



Rugeley Power Station Supplementary Planning Document

Consultation Statement and Summary of Representations

December 2017

Rugeley Power Station SPD Consultation Statement

1. Introduction

This statement is the 'Consultation Statement' for the Rugeley Power Station SPD as required by the Town and Country Planning (Local Planning) (England) Regulations 2012. This statement sets out how the public and other stakeholders were consulted upon the SPD. This statement was issued alongside the draft SPD for consultation in July 2017 and has now been updated to reflect the consultation undertaken and accompany the adopted SPD.

The SPD has been produced jointly with Lichfield District Council and the two Councils ran the consultation process in tandem.

2. Consultation regulations

The SPD is produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The relevant regulations relating to the consultation process are explained below.

Regulation 12: Regulation 12(a) requires the Council to produce a consultation statement before adoption of the SPD, this must set out who was consulted, a summary of the issues raised, and how these issues were incorporated in to the SPD.

Regulation 12(b) requires the Council to publish the documents (including a 'consultation statement') for a minimum 4 week consultation, specify the date when responses should be received, and identify the address to which responses should be sent.

This statement is the 'Consultation Statement' for the SPD as required by Regulation 12(a). The document also sets out information about the consultation as required by Regulation 12(b). Following the consultation period, as the SPD progresses towards adoption, the 'Consultation Statement' will be expanded to recognise involvement by outside bodies and public participation during this consultation period.

Regulation 13: Regulation 13 stipulates that any person may make representations about the SPD and that the representations must be made by the end of the consultation date referred to in Regulation 12. This consultation statement sets out this requirement.

Regulation 35: Regulation 12 states that when seeking representations on an SPD, documents must be made available in accordance with Regulation 35. This requires the Council to make documents available by taking the following steps:

- Make the document available at the principal office and other places within the area that the Council considers appropriate;
- Publish the document on the Council's website.

These measures were undertaken as part of the draft SPD consultation.

3. The Statement of Community Involvement (SCI)

The SCI was adopted in 2014 and reflects the 2012 Regulations, set out above. It also specifies additional measures that the Council will undertake in consulting upon draft SPDs and these have been reflected in the consultation process for the Rugeley Power Station SPD. As per the SCI, the Council has involved key stakeholders in the preparation of this draft SPD for consultation.

4. Rugeley Power Station SPD Consultation Information

Consultation on the SPD has been carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and in compliance with the Council's Statement of Community Involvement (SCI). An informal consultation period was held in July 2017 whereby those residents and business in the vicinity of the power station site in the District were written to given them advance notice of the forthcoming formal consultation and to invite participation as well as providing the opportunity to ask questions. A presentation was also given to Brereton and Ravenhill Parish Council during this period. The SPD and Consultation Statement were formally made available for inspection by the public for a six week period between Monday 24th July 2017 and Monday 4th September 2017. Copies of the SPD, a covering letter and this consultation statement (setting out how comments can be made) were available during normal office hours at the following locations:

- Cannock Chase Council principal offices at the Civic Centre, Beecroft Road, Cannock
- Public libraries at Cannock, Rugeley, Hednesford, Brereton, Norton Canes and Heath Hayes
- Council Area Office at Rugeley

Copies of the draft Rugeley Power Station SPD and consultation statement were available to view on the Council's website at

www.cannockchasedc.gov.uk/planningpolicy. Further information was available by contacting the Planning Policy team by email at planningpolicy@cannockchasedc.gov.uk or by telephoning 01543 462621.

The consultation was undertaken in tandem with with Lichfield District Council although each Council ran its own consultation exercise in line with its own Statement of Community Involvement. Summaries of the representations have been shared between the two Councils to inform any changes necessary before producing the final joint SPD. For Cannock Chase District the following measures

were undertaken to inform persons of the SPD consultation and document availability:

- Notification letters / emails sent to all individuals/ organisations/ bodies that the Council consider will be affected or interested in the SPD, or may be involved in the delivery of the SPD (including Parish Councils, the County Council, key developers, business and local voluntary organisations and all those registered with the Council's Planning Policy database)
- A press release was issued.
- The SPD and details of the consultation were posted on the Council's website and social media feeds.

The consultation statement accompanying the draft SPD set out that any person may make a representation on the SPD and that any such representations were to be received by Monday 4th September 2017. It also set out that the Council would send a copy of the adoption statement to the author of any representation which specifically asks for notification of the adoption of the document. Details of where representations on the SPD were to be sent to were also included (relevant postal and email addresses were provided).

5. Summary of issues raised and how incorporated into the SPD

260 representations on the draft SPD were received to both Councils from external parties, including Parish and Town Councils; Members of Parliament; statutory agencies, such as the Environment Agency, Natural England and Historic England; local residents and businesses; developers; and the owners of the Power Station site. In summary, a range of amendments were suggested from minor to more significant changes and recommendations for further work/additional information to be referenced were put forward.

A full schedule of representations received and the Councils' joint response is set out in Table 1. This also details the amendments to the draft Rugeley Power Station SPD.

The main areas raised through the representations and resulting in change to the consultation draft (in addition to various corrections) are:

- The need for further evidence to be produced to inform the development in several areas including ecology, archaeology, heritage impact, transport assessment, flooding and drainage, various infrastructure requirements;
- The need for infrastructure provision to be considered in more detail as the development progresses: a range of issues have been bolstered / added to the SPD for example education, health, community facilities, public transport links, broadband provision, parking, access, open space, sport and recreation, electric charging points, cycling and walking routes.

- Opportunities from the site to be maximised: the SPD has been strengthened to take account of opportunities from the conservation and heritage assets and their setting, from the landscape and ecological assets on the site including trees and water features, high quality local employment and the opportunity for local people to access jobs and skills / training.
- The need for further matters to be taken into account as development progresses and for which the SPD has been strengthened include ongoing maintenance (eg open spaces, materials from which roads and other access routes are constructed, access for service vehicles including refuse vehicles), air quality, noise, contamination and pollution matters, minerals, parking and access, employment and skills plans, ecological matters (including impacts on the Cannock Chase Special Area of Conservation), visual impacts from the site including those on the Cannock Chase AONB, strengthening linkages between the site and local communities including Rugeley Town centre; sport and recreation and 'Active Design'.
- The need for part of the site to be safeguarded for works related to the second phase of High Speed Two (HS2). As development progresses this will have implications of the form of development and timescales for delivery will need to be considered further as more information becomes available.

Other changes have also been made to correct errors or to address presentational matters (eg the maps).

Rugeley Power Station SPD consultation – Summary of Representations

Consultee / agent	Comment summary	Recipient	Response	SM changes to document
Allen W	2.4 An undeveloped space should remain at the boundary of the two Districts	LDC	Comments noted	No change
Allen W	Figure 2.3 The Borrow pit and immediate surrounds should be retained as a green buffer between the two authorities	LDC	Comments noted	No change
Allen W	2.38 The Borrow pit, with its spring fed clean water, is ideal wildlife sanctuary and supports myriad aquatic life.	LDC	Comments noted	No change
Allen W	2.47 Should be retained as buffer and for amenity/ wildlife value.	LDC	Comments noted	No change
Allen W	2.49 Should also be retained for local amenity value	LDC	Comments noted	No change
Allen W	2.4 An undeveloped space should remain at the boundary of the two Districts	LDC	Comments noted	No change
Allen W	3.8 Borrow pit area should be retained for amenity value. Development might not be straightforward owing to large volume of spring sourced water.	LDC	Comments noted	No change
Allen W	4.35 Situated near the boundary separating the two authorities, the Borrow Pit area will form a natural green break	LDC	Comments noted	No change
Allen W	4.38 Feel strongly that the borrow pit should be retained	LDC	Comments noted	No change
Allen W	4.47 Opportunity should be taken	LDC	Comments noted	No change
AONB unit	Firstly, we welcome the commitment to collaboration shown by the two authorities on aligning policy approaches for this significant site. Alongside the Local Plans, the SPD will become an important element in the suite of CCC & LDC planning documents.	LDC & CCDC	Comments noted	No change
AONB unit	It is noted that the Draft SPD refers to the AONB in Para. 2.53 (Trees & Landscape) and that SAC mitigation is referred to in para 2.39 and in the list of Ecology & Biodiversity measures in para 4.37. We acknowledge that the power station site is some distance from the AONB boundary and that demolition will actually result in it being less of a visible structure from inside the designated area (e.g. at Stile Cop, Castle Ring and Upper	LDC & CCDC	Comments noted In response to suggestions: 1. Wider contextual plan to be added 2. Information will be reviewed to ensure all known	1. Figure 2.2 updated showing SAC & AONB 2. Constraint added to

<p>Longdon). In addition, we appreciate that the SPD has to focus primarily on the site based issues and the more immediate surroundings. However, we consider that a small number of additional references could be made to the relationship between the proposed development, the AONB and the SAC.</p> <p>We refer firstly to the likely scale of new housing that will be built there (a minimum of 800 dwellings) and the need to manage the environmental and recreational implications of the increase in population.</p> <p>Secondly, although the scale of employment development will be dictated by market conditions (see para. 4.11), there is potential for the site to accommodate very large buildings in terms of floor area and height, which could be visible from afar in the AONB. Accordingly, we would suggest the following short additions to the document.</p> <p>1 - A wider contextual plan (alongside Figs. 1 & 2) showing AONB and SAC boundaries and possible references to the same on Fig2.10 (Services and Facilities).</p> <p>2 – Acknowledgement of the need for SAC mitigation as a constraint on page 24.</p> <p>3 – Brief references to the AONB and SAC Policies in the adopted Local Plans and to the AONB Management Plan (2014-2019) in Section 3 (Policy Context).</p> <p>4 – A further reference to SAC mitigation, noting that any potential increase in pressure on the AONB (in terms of adverse impacts on the landscape, scenic beauty and quiet enjoyment) on the designated area should be avoided, in the CIL and Developer</p>		<p>constraints are identified</p> <p>3. Agree</p> <p>4. The need to take account of impacts on SAC and AONB will be noted in the SPD</p> <p>5. LDC & CCDC will give further consideration to design issues</p> <p>6. Further consideration will be given to how the site relates to its surroundings and wider context</p>	<p>para 2.24</p> <p>3. Reference to Management Plan added to para 3.22 under 'other relevant documents'. AONB & SAC policies in Section 3 are cross referenced to the appendices</p> <p>4. Reference to SAC mitigation added in Developer Contributions 3.31. Not added to delivery & implementation as this section is high level but the detail in the guidance is referenced in the appendices</p> <p>5. Reference added to para 4.58</p> <p>6. Reference to connecting to AONB added to para 4.30</p>
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	<p>Contributions section (Para. 3.22 onwards) and under 5, Delivery & Implementation.</p> <p>5 – An additional reference in Para. 4.50 (Development Layout – Design Strategy) for the design of larger employment building, especially for higher level cladding and roofing materials, to take account of longer distance views from higher ground in the AONB.</p> <p>6 - A reference under Access & Movement (paras. 4.18 – 4.25) to the desirability of links to and investment in the wider footpath and cycling network to increase sustainable access options to the AONB and other surrounding countryside.</p>			
Armitage with Handsacre Parish Council	<p>2.13 & 2.14 Like to see all of the recreational facilities including sports & social club, golf course, railway siding, borrow pit being kept for use of local residents. These facilities have provided and in turn created many clubs and societies, which provide valuable recreational activities for the area and beyond.</p> <p>Armitage with Handsacre Parish Council would seriously consider taking on these areas of land for recreation use</p>	LDC	Comments noted - SPD seeks to ensure there is a mix of facilities for residents	Reference to a Management Company being responsible for open space in perpetuity added to para 4.35
Armitage with Handsacre Parish Council	<p>2.49 Armitage with Handsacre Parish Council would seriously consider taking on these areas of land of recreational use.</p>	LDC	Comments noted	Please see above
Bennett E	<p>2.3 Opportunity exists to develop cycle-ways and pedestrian access throughout the open areas of the site, and along the banks of the river; as a social amenity</p>	LDC	Comments noted	No change
Bennett E	<p>2.42 Social Club provided some unusual and valuable resources within the site. Strongly argues the model railway group be consulted as part of the development plan, with a desire to keep the group resident in the site.</p>	LDC	Comments noted	No change
Bennett E	<p>2.43 In a mixed development such as this plan, leisure facilities should be retained where possible, to provide such opportunities</p>	LDC	SPD seeks to achieve a balance of mixed uses	No change

	to new residents and existing local groups. On the current site dedicated space and developed facilities could be easily be embraced within the development plan. Urges LDC to consult with groups		including leisure and recreational facilities.	
Bennett E	Refer to comments in 2.44 and 2.45	LDC	Comments noted	No change
Bennett E	2.47 Ground conditions which led to the abandonment of the pit by the power station because it filled with water, would undoubtedly make filling the pit for use as building land expensive and potentially unsafe	LDC	Comments noted	No change
Bennett E	2.49 Urge adoption of the Borrow Pit as a community resource for leisure and recreation. It adjoins section of the site already adopted as allotments within the development plan. Water supports a great deal of wildlife as an aside to the primary function of such a pool. Borrow Pit is a unique local resource to be treasured.	LDC	Comments noted	No change
Bennett E	2.16 As a energy storage facility of national significance (contributing to grid in times of stress) the security and integrity of this site will be important. How is the facility to be secured in order to prevent it becoming a place of interest to local youth, and potential terrorist risk?	LDC	Security issues will be considered as part of the detail of development. See also Police representation	No change
Bennett E	3.34 The development of Model Railways; Bowling Greens, etc take many years to mature, and should not be lost	LDC	Comments noted	No change
Bennett E	2.48 Building could be integrated into a development plan for the Borrow Pit and immediate environs. Allotment area may be able to have use but my comments regarding the development of the Borrow Pit as a fishing and leisure facility may help define uses of this building. Concerned about the application for the southern access road, which in plan seems to cut directly across the building and parking area for the building adjacent to the Borrow Pit. This will undoubtedly affect the ways in which the pool (and maybe allotments) can be used or accessed.	LDC	Comments noted	No change

Brereton & Ravenhill Heritage Committee	The impact of the southern part of the site on the almost adjoining Trent and Mersey Canal Conservation will require careful consideration. Paragraph 2.18 should be expanded and strengthened to reflect this. Paragraph 2.25 states "...it is not considered that the development of this site will have a significant impact on heritage assets". This is wrong. The Canal Conservation Area with its 18th-century canal and towpath is unquestionably a heritage asset. The draft should be amended to reflect this.	CCDC	Comments noted – Reference to Conservation and Heritage will be strengthened in the SPD	Paragraph 2.19 expanded Paragraphs 2.23 – 2.28 relating to canal conservation area updated and strengthened.
Brereton & Ravenhill Heritage Committee	Figure 2.10 omits various facilities including Brereton Methodist church on Brereton Main Road.	CCDC	Comments noted – Figure 2.10 can be amended	Figure 2.10 to be amended to reference Methodist church
Brereton & Ravenhill Parish Council	Thank you for consulting on this important draft SPD. I support in principle the redevelopment of this site for a mixture of uses, recognising that the alternative is likely to be development of greenfield land. I am however concerned that the full cost of infrastructure is met by section 106 deeds of planning obligation, Community Infrastructure Levy, or both. This includes (but is not limited to) schools, health provision, buses and policing and Brereton and Ravenhill Parish Council's provision of allotments and parish hall. With local primary schools at capacity, a new primary school is needed. I therefore welcome the references to provision of a primary school in paragraph 2.89's fifth indent and in paragraphs 3.32 and 4.16.	CCDC	Comments noted	No change
Brereton & Ravenhill Parish Council	With the proximity of the site to the A51 and the West Coast Mainline (which in this location will in future carry those high-speed trains that serve Stafford), care will be needed to ensure that buildings (residential, employment and other) have good sound insulation.	CCDC	Comments noted	Noise issues added to SPD para 4.56.
Brereton & Ravenhill Parish Council	We need employment provision, not least to facilitate businesses moving from Redbrook Lane and to prevent a repeat of the loss of JCB from the Rugeley and Brereton and Ravenhill area. Efforts should be made to preserve the private rail siding (paragraph	CCDC	Comments noted	No change

	2.11) for use in connection with the proposed employment development. I therefore welcome paragraph 4.27 and the final sentences of paragraphs 4.11 and 4.45.			
Brereton & Ravenhill Parish Council	In order to reduce car dependency, there needs to be the employment provision mentioned above and a network of pedestrian and cycle routes. These should link with the canal towpath, which should be improved, so that it is usable by and attractive to people with pushchairs, disabled people (including those in wheelchairs) and cyclists. The inadequacy of the towpath in these respects and its need for improvement should be recognised, perhaps in paragraph 2.32.	CCDC	Comments noted – references to tow paths will be considered in relation to the wider site context	Reference to potential enhancement of towpaths added to para 4.23. Emphasis on linkages has been bolstered.
Brereton & Ravenhill Parish Council	The absence of any mention of London in paragraph 2.33 is most surprising and suggests that the most up-to-date information may not have been used in preparation of the SPD.	CCDC	Comments noted – SPD will be amended	Amended
Brereton & Ravenhill Parish Council	The impact of the southern part of the site on the almost adjoining Trent and Mersey Canal Conservation will require careful consideration. Paragraph 2.18 should be expanded and strengthened to reflect this. Paragraph 2.25 is wrong. The Canal Conservation Area with its 18th-century canal and towpath is unquestionably a heritage asset. The draft should be amended to reflect this.	CCDC	Comments noted – Reference to Conservation and Heritage will be strengthened in the SPD	Para 2.23 – 2.28 strengthened
Brereton & Ravenhill Parish Council	“Council’s” in paragraph 2.49 should read “Councils”.	CCDC	To be amended	Amended
Brereton & Ravenhill Parish Council	BRPC am concerned that paragraph 2.52 could facilitate too easy a removal of trees. It should make clear that this should only happen if fully justified by appropriate expert evidence.	CCDC	Comments noted – Paragraph 2.52 to be strengthened	Para 2.57 amended
Brereton & Ravenhill Parish	“Rugeley Train Station” in paragraph 2.81 should read “Rugeley Town Station	CCDC	To be amended	Corrected

Council				
Brereton & Ravenhill Parish Council	Figure 2.10 should include the following (which are at present omitted): Brereton and Ravenhill Parish Hall in Ravenhill Park; Newman Grove allotments, Ravenhill; Brereton Methodist church on Brereton Main Road; and the Co-op supermarket in Redbrook Lane.	CCDC	Comments noted – SPD to be updated to take account of these comments	Figure 2.10 to be updated
Brereton & Ravenhill Parish Council	BRPC welcome the references to “Opportunity to create country park/wildlife corridor” in figure 2.14 and the corresponding annotation in figure 4.4. Despite the proximity to the River Trent of the Rugeley and Brereton and Ravenhill built-up area, there is, at present, hardly any opportunity for local people to enjoy the river.	CCDC	Comments noted	No change
Brereton & Ravenhill Parish Council	BRPC am aware of the current CIL rates and hopes that these will be extended to betting shops and other premises where substantial gambling takes place.	CCDC	CIL rates have been set at examination	No change
Canal & River Trust	<p>The Trent & Mersey canal runs to the south of the SPD area, and along its southern boundary at the eastern end. The Trust’s notified area under para (za) of schedule 4 of the DMPO falls within the SPD area in some places, and close to it in others. The canal falls within a Conservation Area where it adjoins the SPD area. The canal network is thus either a designated or non-designated heritage asset which forms part of the context of the SPD area.</p> <p>It is possible that future developments within the SPD area could have an impact on the canal network and therefore we advise that information be required to support development proposals to demonstrate that this has been adequately mitigated.</p> <p>The waterways can be used as tools in place making and place shaping, and contribute to the creation of sustainable communities. We seek for any development to relate appropriately to the waterway, minimise the ecological impacts and optimise the benefits such a location can generate for all</p>	CCDC	Comments noted - SPD will be strengthened to take account of these issues	Para 2.42, 2.93 and 4.23 bolstered

	parts of the community. The canal network provides a multitude of benefits, including the reservation and interpretation of the historic network, sustainable travel routes, recreation and leisure opportunities, biodiversity, improving health and wellbeing, and for educational activities.			
Canal & River Trust	Biodiversity and recreation Linking the wildlife corridor through the SPD site to the existing green infrastructure of the canal network at both eastern and western ends could result in positive benefits including the opportunity for a circular walking/cycling route.	CCDC	Comments noted - SPD will be strengthened to take account of these issues	Bullet point added to 4.44
Canal & River Trust	Heritage The listed viaduct carrying the railway over the canal is in close proximity to the west of the SPD area and any development near to it should include an assessment of its impact on the designated heritage asset. Similarly, any development within the notified area or the designated Conservation Area should include a heritage impact assessment in order to preserve and enhance its character and appearance.	CCDC	Comments noted - SPD will be strengthened to take account of these issues	Heritage added as a development principle with para 4.22-4.23 as supporting text
Canal & River Trust	Considering the canal as a sensitive receptor For developments that fall within our notified area, the canal should be identified as a sensitive receptor when considering any potential harm and appropriate mitigation. This would be in relation to contaminated land, foul and surface water discharge, noise, air quality and water quality, as well as other site specific matters. Suitable surveys and reports should be included to support development proposals in the Development Management process in order that a proper assessment can be made of the impacts on our network.	CCDC	Comments noted - SPD will be strengthened to take account of these issues	No change added – considered this is detailed survey work that will need to be discussed further during pre-app
Canal & River Trust	Inclusion in pre-application discussions The Trust notes the importance placed on pre-application discussions in the draft SPD. Where such schemes have the potential to affect the canal network, we ask that we be included in such discussions, or that the developers be encouraged to seek	CCDC	Comments noted - SPD will be strengthened to take account of these issues	Reference added 2.26

	our advice directly.			
Canal & River Trust	Sustainable use of canal water resources The canal water can be a resource for low carbon methods of heating and cooling buildings, and should be promoted as such for sustainability, especially in relation to commercial developments. Further information can be provided by the Trust to assist. There may also be options for the discharge of treated foul and/or surface water drainage to the canal and this should also be promoted to developers through the SPD.	CCDC	Comments noted - SPD will be strengthened to take account of these issues	Added as an opportunity to para 2.93
Canal & River Trust	Potential increase in use of canal and towpath Where developments are likely to result in an increase in use of the canal network, consideration should be given to any associated improvements that should be required.	CCDC	Comments noted - SPD will be strengthened to take account of these issues	Comments incorporated into para. 4.22
CCGs (Wood, E on behalf of the three CCGs)	The increase in housing provision identified within the Rugeley Power Station site is likely to impact on the health provision within Rugeley. Further dialogue will be required as the scale of the housing provision is quantified and more defined.	CCDC	Comments noted	No change
Clay, M	Before we make specific points, we would like to say we welcome the redevelopment of the site and believe it represents a unique opportunity for the town of Rugeley to shape its future. We are pleased that the present Supplementary Planning Document (SPD) demonstrates an intent to provide a mix of business and residential development, both of which are key to growing the town and local economy.	CCDC	Comments noted	No change
Clay, M	Provision of HGV parking: Here on Towers Business Park, there have been ongoing, chronic issues relating to HGV parking. Owing to a lack of adequate HGV parking within the greater area and also to a lack of foresight, management and enforcement in terms of parking regulations, many access roads on the Towers Business Park are perennially cluttered with HGV and PSV vehicles which have no business, whatsoever, on the Towers Business Park, but rather are simply using the roads for long term parking or, in certain cases, as a de-	CCDC	Depending on the nature of the end users of the site these matters will be considered further.	SPD strengthened para 4.14 to say that depending on the end users and their operational patterns, parking and facilities for drivers will be expected to be delivered and managed on site (eg

	<p>facto operating centre.</p> <p>The issue creates a number of problems:</p> <p>a.) Due to the nature of the parking, it is often long term, with trucks waiting, with their driver(s) for their next load/job, so the parking spaces can be occupied for several days on end. There are absolutely no provisions for toilet facilities.</p> <p>b.) The spaces occupied by these vehicles mean that goods vehicles collecting from or delivering to businesses on the park – those with a legitimate reason to be there in other words – have nowhere to wait for their appointed load/unload time or to take mandatory tachograph breaks.</p> <p>c.) The extent of the parking -especially trucks parked right up to road junctions - can make it very difficult and even dangerous during peak commuting times. It also make it very awkward for large HGVs delivering plant or machinery to businesses on the site.</p> <p>In order to address this issue and ensure any business and industrial developments on the site of the former Rugeley Power Station do not suffer the same fate, the Council needs to consider the provision of HGV parking within the broader area and also how it is going to legislate those who continue to hinder legitimate business within Towers Business Park and any new developments. We have long suggested limiting waiting (and policing this with traffic wardens) to 1 hour during 0700 to 1800 hrs as a simple and pragmatic way of allowing some overnight parking and giving HGVs adequate waiting and break parking during the day, without enabling long-term parking.</p>			<p>where long-distance drivers would be required to take a break). This would be considered further as the details of the scheme emerge.</p>
Clay, M	<p>Provision of small industrial units: Since large deals like the Gazeley unit, now occupied by Amazon, are great for local authority kudos and publicity, and no doubt also good for employment within the area, it is sometimes easy to</p>	CCDC	Comments noted	<p>The need to diversify the local economy is noted and the SPD strengthened paras 4.12, 4.13 and 4.14</p>

	overlook the benefits and need for smaller industrial and commercial units. Provision of as wide a variety of unit sizes – and not overlooking the very smallest – is key to ensuring development of the local SME economy, both in terms of enabling local individuals the opportunity to become self-employed and also giving existing local businesses the space to expand.			to pick up this point and relate it back to the Local Plan policies of the District Councils which support such diversification.
Coal Authority	I have reviewed our data and can confirm that the Rugeley Power Station Site does not contain any surface coal resources or recorded risks from past coal mining activity. On this basis the Coal Authority has no specific comments to make on the Development Brief SPD.	CCDC	Comments noted	No change
Colton Parish Council	Clarify what the infrastructure provisions are to be, in terms of schools and doctors. Concern that the catchment schools are thought to be well oversubscribed already and getting healthcare appointments in Rugeley is dire. Adequate provision needs to be made in terms of infrastructure to support the new development so that it doesn't cause a deterioration in services for existing areas.	LDC	Comments noted – infrastructure requirements will be considered as part of the future development	No change
Craddock M	<p>I really think this site would be an ideal opportunity to bring new companies to Rugeley or even existing Staffordshire businesses. Since moving to Rugeley and becoming a new Mum it is really apparent to me the amount of people who travel a long distance from Rugeley to work due there being very little employment in the area.</p> <p>The ideal use would be a business park with various companies on it. The local MP has been campaigning for more employment opportunities in Rugeley and this is an ideal opportunity. There could be ample car parking on site for employees. Nearby local businesses in the town would prosper from increased footfall of staff during their lunch breaks.</p> <p>There really is very little employment in Rugeley and all those</p>	CCDC	Comments noted – infrastructure requirements will be considered further as the development progresses.	<p>Para 5.6 reflects infrastructure needs and will be considered further as part of application process : for example a school and community facilities will need to be provided to support housing development.</p> <p>In terms of the opportunities from local employment, the document has been strengthened to</p>

	<p>people who worked at the power station have lost their jobs I'm sure they would be pleased to at least see Staffordshire council were trying to help boost employment.</p> <p>I really feel we don't need another housing development in Rugeley the GP surgeries can't cope as it is without an influx of new residents. We also only have one high school in Rugeley that is expected to cope with demand again more young families are bound to move to a new housing development and need high schools eventually.</p>			emphasise the need for strong linkages between the site and the town and for employment uses to provide opportunities for local people.
Davey M	I feel that full cognisance should be taken of the lack of employment in Rugeley and the surrounding district. There should be a maximisation of employment on this site with the maximum of 106 agreements so that infrastructure can be addressed.	CCDC	Comments noted – infrastructure requirements will be considered further as the development progresses	The document has been strengthened para 4.12, 4.13 to emphasise the need for strong linkages between the site and the town and for employment uses to provide opportunities for local people.
Dundas D	1.2 If a boiler is available during decommissioning/demolition and is suitable to power the historic Cornish beam engine located in the Sandfields pumping station on the south side of Lichfield, the Lichfield Waterworks Trust would be very grateful to receive it.	LDC	Comments noted	No change
Dundas D	1.4 Site is located in Trent floodplain, is it sufficiently protected against flooding?	LDC	LDC & CCDC are working with the EA on issues relating to flooding	The SPD has been strengthened paras 4.47 – 4.49 to take account of the issues raised by the Environment Agency
Dundas D	1.5 Will building plots for self build housing be available for local building companies to purchase, build on and re-sell	LDC	The SPD encourages self-build	No change
Dundas D	Figure 2.6 The resolution of the image is not good	LDC	Comments noted	Image will be improved.
Environment	<u>Environmental Permitting</u>	LDC &	Comments noted	No change

Agency	<p>Please be aware the power station site is currently subject to two Pollution Prevention Control (PPC) permits, one for the combustion process and one for the ash lagoons. Both these permits will be revoked when the Environment Agency is satisfied that relevant environmental requirements have been met. It is not possible to outline these, at this time, because the operator has not yet applied to revoke the permits.</p> <p>The following comments are made in this context.</p>	CCDC		
Environment Agency	<p><u>Flood Risk</u> As discussed in paragraph 2.15 of the draft SPD the majority of the site is currently protected from flooding from the River Trent by the railway line embankment crossing the site on the northern side of the former power station and as such is shown as being in low risk Flood Zone 1. This is the sequentially preferable location for development in line with the NPPF approach to managing flood risk. The other side of the railway line is shown to lie within high risk Flood Zone 3, and is likely to be classified as Flood Zone 3b (functional floodplain). As such, in line with the NPPF, development should be limited within this area and we support the proposed retention of this land for use as a golf course / country park. It should be ensured there is no land raising within this area, as any such works would displace flood waters and increase flood risk elsewhere, in line with Cannock's adopted Policy CP16 (1g & 3c) and Lichfield's adopted Policy CP3. Although the majority of the development area is shown outside the floodplain in Flood Zone 1, there are three areas of Flood Zone 2 (medium risk) on the 'landward' side of the railway as well as areas at risk of surface water flooding. This equates to land at 1 in 1000 year level of risk. It is likely that the removal of the embankment would significantly increase flood risk to the site from the River Trent, given the flat topography, which would severely limit the development potential of this land.</p>	LDC & CCDC	Comments noted – the SPD will be expanded to take account of these issues	<p>Flood Risk section bolstered 4.47 – 4.49.</p> <p>No change regarding the railway embankment as this depends on the end user and discussions throughout the applications.</p>

	<p>In light of this it is imperative that a Flood Risk Assessment (FRA) is undertaken at the earliest opportunity to inform the site proposals, through an assessment of the extent to which this structure acts as a flood defence, and whether it needs to be retained and/or improved to allow the safe development of this site.</p> <p>Further to the above observations, flood risk should be acknowledged as a constraint to development in section 2.89 of the plan and a detailed consideration of fluvial (river) flood risk should be added to the Flood Risk & Drainage section (Page 36) which currently largely focusses on surface drainage issues.</p> <p>Aside from the issue of the embankment, there is also potential for flood risk on site to be increased if the levels in the north-west corner of the site adjacent to the A51 and railway line are lowered. Our flood map currently shows the adjacent section of the A51 itself to be in high risk Flood Zone 3 and this could provide a flood flow route into the site. It is therefore questioned whether this area is capable of being reprofiled, and the SPD should flag the potential risks associated with this.</p> <p>It is currently not clear from the consultation document whether the railway embankment will be retained throughout the lifetime of the development. As discussed above, we advise that the SPD specifies that this feature remains, and that as part of this an assessment is carried out in order to establish the level of flood protection it currently provides and whether it is structurally sound and suitable for acting as a flood defence. It may also be necessary to obtain appropriate legal agreement from the owner of the embankment for it to be used for this purpose. The local authorities may wish to consider formally designating the</p>			
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	<p>embankment under Section 30 and Schedule 1 of the Flood and Water Management Act 2010. The purpose of this is to ensure that owners do not inadvertently damage or alter the embankment and increase flood risk. Once designated, anyone wishing to alter, remove or replace the embankment must seek prior consent from the designating authority. The Environment Agency would not look to adopt the structure as an ongoing flood defence, therefore arrangements will need to be put in place for regular inspections and maintenance to ensure the level of flood protection is maintained. If the railway is likely to be used in future, this will also need to be taken into account both in terms of impact on the structure acting as a flood defence and risk of flooding to the railway itself.</p> <p>The SPD should detail how a site-specific FRA will be required to determine the level of flood risk across the whole site from all sources, as well as any potential impacts off-site (both upstream and downstream), and how any risk can be mitigated. The SPD should detail the site-specific issues it should consider, including a requirement that pre-application discussions are undertaken with the Environment Agency, prior to any detailed proposals for the site development to be drawn up. It should be ensured that flood risk to third party land is not increased a result of the development, and that options are assessed as to the viability of the site providing flood alleviation benefits to the wider catchment. The effect of a range of flooding events should be considered, including extreme events on people and property.</p> <p>The FRA should include the following:</p> <ul style="list-style-type: none"> • Hydraulic modelling to include flood outlines with and without the railway embankment. This shall take into account any existing channels, outfalls or other potential flow routes through the railway embankment. 			
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	<ul style="list-style-type: none"> • The latest climate change allowances. • Should the modelling show that the embankment is integral to safe development of the site, an assessment of its structural integrity should be undertaken, and remedial measures identified where necessary, to ensure the development remains safe for its lifetime • The required height of the embankment to provide the necessary level of flood protection for residential development, taking account of climate change. • An assessment of the impact on the site if the embankment is overtopped or breached (residual risk) and how this will be managed. • Potential mitigation measures including sequential site layout, floodplain compensation, raised floor levels etc. for the existing situation and any other scenarios. • Surface water management <p>The Environment Agency will be able to supply existing model and LIDAR survey data to support this work.</p> <p>It must be made clear within the SPD that this assessment must be undertaken for the whole site at the earliest opportunity in order to inform any outline planning application. Subsequent mitigation measures or infrastructure required to make the site safe from flood risk must be completed prior to the commencement of any development. Any mitigation measures or flood risk management infrastructure required to make the site safe will need to be funded by the developer.</p> <p>No development should take place in the area between the railway embankment and the River Trent which is Flood Zone 3 and likely includes functional floodplain. The permanent retention of a continuous unobstructed area is an essential requirement for</p>			
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	<p>future maintenance of the river by the Environment Agency.</p> <p>Opportunities for flood risk reduction through the development of this site are limited, but the possibility of relocating the existing waste facility permitted under Staffordshire County Council reference CH.13/10/725 W at SK0516818289 (Land off Rugeley Eastern Bypass) should be explored to provide wider flood reduction benefits as part of this strategic development scheme.</p>			
Environment Agency	<p><u>Ecology</u> An ecological assessment should be submitted in support of the proposals in order to inform on the opportunities the development provides to improve the water-based habitat along the river Trent and the drains that flow through the site. The inflow and outflow channels to the river Trent within the site should be retained as they are currently functioning as fish refuge backwaters, and this should be protected. To improve the channel itself, gravel should be installed to promote fish spawning.</p> <p>The SPD should make it clear that culverting and building over of culverts on site should be avoided. Opportunities should be sought to open up any existing culverted watercourses on the site to alleviate flood risk, create and improve habitat and develop green corridors. Native riverside tree planting should be promoted.</p> <p>The river banks should be re-profiled in sections to create a sloping bank, and to increase access to the river corridor. The SPD should support connections between the elements of built development and the river in order to provide waterside recreation and a sense of ownership of the river. Consideration of how this could be achieved alongside the use as a golf course, and</p>	LDC & CCDC	Comments noted - the SPD will be expanded to take account of these issues	<p>4.45 references need for Ecological Assessment.</p> <p>Added opportunity opening culverted watercourse to 4.44</p> <p>Comments added in para 4.46</p>

	the physical barrier of the embankment should be addressed.			
Environment Agency	<p><u>Environmental permitting regulations (EPR)</u> This development may require Environmental Permits from the Environment Agency under the terms of the Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations 2016 for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of designated ‘main rivers’. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. An environmental permit is in addition to and a separate process from obtaining planning permission. Further details and guidance are available on the GOV.UK website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</p> <p>The local authorities will need to liaise with Staffordshire Council as lead Local Flood Authority regarding surface water management and watercourses other than main rivers (River Trent, Rising Brook). Given the proximity to the River Trent the water table is likely to be fairly close to ground level so drainage to ground may not be feasible.</p>	LDC & CCDC	Comments noted – reference to Environmental Permits will be incorporated into the SPD	Para 4.49 added
Environment Agency	<p><u>Contaminated Land</u> The following comments relate solely to the protection of ‘Controlled Waters’, matters relating to Human Health should be directed to the relevant department of the local council.</p> <p>The site is located in a sensitive location with respect to ‘Controlled Waters’ receptors being on Principal and Secondary A Aquifers, adjacent to the River Trent and crossed by several watercourses / drains.</p>	LDC & CCDC	Comments noted – the SPD will be expanded to take account of these issues	Original Para 2.73 removed.

	<p>Given the previous use and extent of historic landfills underlying virtually the entire development area, investigation into the presence of contamination is going to be required. There may be areas that haven't been subject to previous significant development (including historic landfills) but these are likely to be few and far between.</p> <p>With reference to paragraph 2.68 it is unclear who agreed that there is no requirement for remediation of the former Coal Stock Yard. It may be that these comments relate only to Human Health receptors and haven't considered 'Controlled Waters'. The Environment Agency would want to see further justification of this approach.</p>			
Fogarty S / Taroni S	<p>Our idea is for a "Boaters island" to be created from the Canal near by Spode with a viaduct over the Armitage road this would create a small canal arm up through the power station site or alongside it ,leading up to a "Boaters island" which would have a cafe on it and shop /boat facilities with short stop mooring so all tourist could use it say on an overnight ticket basis it would allow the boaters to go around it in one direction and exit back out onto the existing canal. Possibility of creating some new jobs and a tourist destination much needed facilities as there are currently about a twelve mile gap from Rugeley East to west of the canal this could be something along the lines of the poncycillte site or birminghams Brindley place in the heart of Cannock chase /Rugeley/Lichfield .</p>	CCDC	Comments noted	Those elements which make reference to the canal have been strengthened to ensure that opportunities are maximised.
French P	<p>I suggest that suitable uses for the power station site would include: more private housing, a school, a community centre, and no more than a convenience store for local inhabitants. All these would blend well with the very pleasant riverside location. There should be more trees to screen the Amazon warehouse from the new development.</p>	CCDC	Comments noted	The site will be developed in line with Local Plan policy which is focused on ensuring that diverse high quality employment is provided. National policy sets clear parameters

	I consider that unsuitable uses for the site would include: more high volume warehousing, an out of town retail park or large super market that would suck more life blood out of our town centre. More industrial units are also unnecessary, there is still ample space for more such units on the site of the old colliery.			considering town centre uses so as not to undermine the vitality of town centres and the SPD has been strengthened para 4.18 to emphasise this: retail should just be restricted to small scale convenience shopping to serve the new community.
Friends of Cannock Chase	Having examined the plans for the Rugeley Power Station site the details were discussed at our meeting this evening. Our main concern is the retention of corridors for the wildlife that exists in the areas especially along the canal and river courses. It is noted that there are water voles, newts, bats, some rare birds and other species there. Many of these species are in decline due to loss of habitat. It is therefore imperative that the developers recognise the importance of retaining habitats. We are alarmed at the removal of trees which affect landscape, habitat and help minimise pollution. Removal should be at a minimum and replacement trees planted. The proximity to historical sites is noted. These must be protected at all times. With 800 dwellings being created it is felt that more schools, doctors etc will be needed. Transport links should also be provided from the site to connect to Rugeley town and railway stations. We would be interested in the results of any further research carried out on the site.	CCDC	Comments noted – infrastructure requirements will be considered further as the development progresses. Any planning application for the site will need to be supported by a range of technical evidence including ecological surveys and a transport assessment.	SPD strengthened to take more account of these issues.
Garfield I	2.43 Maintain the clubhouse and some of the sports facilities would be great. It is a valuable resource for the local community to use.	LDC	Comments noted	No change

Garfield I	2.46 Borrow pit was a successful trout fishery with over 100 active members. I was a member for over 7 years and thoroughly enjoyed the fishing, missing it greatly since it was sadly closed down. Along with the attached lakeside amenities it was a lovely venue for fishing. It would be great to see it opened once more as a trout fishery accessible to members of a club to fish for trout using flies only.	LDC	Comments noted	No change
Garfield I	2.48 This building was an Environmental classroom and resource, I remember the excitement of the children I took there back in the seventies as they took part in activities such as pond dipping and sorting through leaf litter to look for and identify bugs. It would be lovely to see it reused by future generations to gain valuable insights into ecology and the environment	LDC	Comments noted	No change
Garfield I	2.49 I was a member of the RPSC angling section for over 7 years and loved fly fishing there, it was a great venue and it would be great to see it reopened. I and I know many others miss the facility greatly, there are few comparable fisheries nearby.	LDC	Comments noted	No change
Garner D&G	I support there being development in this particular area as it is a 'Brownfield Site' - were it a 'Greenfield Site' then I would be opposed to the proposed development/s. The definition of Rugeley Town Centre being close to the proposed development site can be considered in many different ways. As Rugeley Town Centre is suffering from a lack of interest and appropriate investments by all the Local Authorities and thus the results are a shortage of businesses and jobs, etc. The directions to it should be displayed at as many points as possible including a 'Bus Route' and provision of a 'Taxi Rank', etc. etc. within the development not nearby. The present 'Social Club' and 'Leisure Facilities' and 'Allotments' should be adapted to meet the needs of the community created by the development BUT WITHOUT TAKING AWAY/REDUCING THE USE OF THE RUGELEY LEISURE CENTRE AND OTHER EXISTING PROVIDERS WITHIN THE LOCAL AREA, ETC.	CCDC	Comments noted: specific infrastructure needs will be considered further as details of the scheme are worked up.	No change

	<p>Trees should be planted and the appropriate landscapes created as part of the development to enhance the former industrial area, etc.</p> <p>The proposal for more 'Education Facilities' as part of the development are not required as the present/existing 'Education Facilities' within Rugeley - Brereton - Armitage are sufficient and if the need for more places at those are proved to be necessary then - those present Schools and Academies - should be enlarged and the present provision of transport to them enhanced.</p> <p>As far as the proposed 'Housing Development' is concerned I see 'no problems' with that as long as access to - and the use of - Rugeley Town Centre is improved/increased resulting in it becoming a more enhanced and used place, etc., etc.</p>			
Highways England	<p>Rugeley is well served by public transport linking it to the rest of Staffordshire, the wider region and beyond. The town is host to a large bus interchange with services to Stafford, Lichfield, Uttoxeter, Cannock, Walsall and Wolverhampton, as well as two railway stations on two major mainline railways; the West Coast Mainline between London Euston, Manchester, Liverpool, Preston and Glasgow, and the Cannock Chase Line which heads south to Walsall and eventually Birmingham New Street.</p> <p>Public transport for both modes is relatively frequent, with bus services operating regularly to key destinations, an hourly rail service towards London and a half-hourly service towards Birmingham via Walsall. Electrification of the Rugeley to Cannock rail- line by 2018 will reduce journey times to Walsall and Birmingham.</p> <p>The former power station entrance is to be repurposed as the main access point for the development, which is within reasonable distance and walking time of the following public transport connections:</p> <p>Rugeley Trent Valley station: 1 mile – 20mins; Rugeley Town station: 0.5 miles – 12mins ; Rugeley Bus Station: 0.8 miles –</p>	LDC & CCDC	Comments noted – the requirement for a Transport Assessment will be included within the SPD	Requirement for Transport Assessment added para 4.24

	<p>15mins</p> <p>Rugeley Town station and the Bus Station fall within 15 minutes walking distance, providing public transport connections to the development.</p> <p>The objectives outlined in the Draft SPD support further possible regeneration within the Rugeley area in response to the creation of the new site. With the construction of more than 10,000 homes immediately to the east of the town centre, large amounts of infrastructure and services will have to be upgraded to accommodate this new population. Highways England supports the regeneration of district centres as a sustainable manner of bringing development forward, potentially reducing the need to travel to access services and employment opportunities for local citizens.</p> <p>Further to supporting the regeneration and development of the Rugeley area, the Draft SPD also outlines sustainable travel and development practices in order to maintain its environmental awareness. The objectives are welcomed as part of a sustainable approach to mobility, reducing the need to travel and promoting the use of alternative modes.</p> <p>The closest parts of the SRN include M6 Junction 13 (11.6 miles), M6 Toll Junction 7 (9.1 miles), the A5 (9.1 miles), the A38 (8.7 miles) and the A50 (14 miles). In average traffic conditions, each of these can be reached within 20 to 25 minutes.</p> <p>Despite the relative distance of the SRN from the development site, Highways England considers that due to the scale of development being proposed, there could be some impacts on the operation of the network. Therefore we would expect that a Transport Assessment will be carried out in order to better understand the impacts and we would wish to be engaged in its review.</p> <p>Conclusion</p>			
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	Rugeley is not located near to any part of the SRN, however due to the scale of development being proposed, there could be some impacts which should be better understood through the undertaking of a Transport Assessment.			
Homes & Communities Agency	<p>The HCA supports the approach taken within the SPD to the redevelopment of the site, and the positive approach to joint working demonstrated by CCDC and LDC.</p> <p>The recognition of the site’s capability to accommodate a significant amount of much needed new housing is welcomed. In particular, the confirmation that the predominant use of the site will be residential with employment, commercial, retail, leisure and community uses is also encouraged. The HCA consider the identified ‘blend’ on uses to be entirely appropriate for the delivery of a sustainable urban extension to Rugeley, which maximises the re-use of brownfield land.</p>	LDC & CCDC	Comments noted	No change
Homes & Communities Agency	The HCA consider setting a minimum limit for housing is entirely appropriate and recommend that further clarification is provided regarding the minimum level of provision. Specifically, the SPD should make clear that the minimum of 800 new homes is in addition to the extant planning permissions and site allocations on the site. Furthermore, the SPD should clarify that some residential development on the site is likely to be delivered beyond the current Plan Period to 2029 and that this housing would be in addition to the minimum threshold set. In doing so it is important for the SPD to provide guidance for development beyond the current plan period.	LDC & CCDC	Due to the level of information available to date, the provision of a minimum of 800 dwelling relates to development within Lichfield District Council only.	No change
Homes & Communities Agency	The HCA recognises the site has significant constraints, as well as opportunities and welcomes the encouragement contained within the SPD for the retention of key elements of the site as part of its future redevelopment. In order to ensure the SPD does not unduly	LDC & CCDC	The rail connection is an opportunity which will be subject of further discussions as the development	No change

	delay the delivery of this key site and to make the policy more precise, the HCA recommend that further clarification is provided regarding the level of information required and methodology for considering the future potential of the existing rail freight connection.		progresses.	
Homes & Communities Agency	The HCA supports the approach taken to the delivery of Affordable Housing, and the recognition that whilst both LDC and CCDC have differing Affordable Housing Policy Requirements (subject to viability), the provision of affordable housing across the site will be subject to further negotiation with the Local Authorities.	LDC & CCDC	Comments noted	No change
Homes & Communities Agency	The HCA recommend that the SPD provides clarity on how Vacant Building Credit could be applied to the redevelopment of the site. This should be provided alongside the guidance on Community Infrastructure Levy (CIL) and developer contributions.	LDC & CCDC	Vacant Building Credit will be applied in line with legal requirements	No change
Johnson, R	As a former City Planner from Santa Barbara, California (current resident of Hednesford) I strongly support the proposal to bring a high-tech development into the former Rugeley power station site. Tech talent would be very attracted to this area for its outstanding recreation in Cannock Chase forest, quick public transit to Birmingham for city amenities, and diverse & affordable local housing stock. Our area deserves this chance to become something bigger and greater.	CCDC	Comments noted	No change
Jones B	Figure 2.3 As a former member of the RPS fishing club I believe that the Borrow Pit and its surrounds should be designated an area of outstanding natural beauty. Its varied fauna & flora should be nurtured and protected for future generations that may live in the vicinity. It would be a great shame if the Borrow Pit were lost as the area is sadly lacking in this type of facility.	LDC	Comments noted	No change
Jones B	Figure 2.3 As a former member of the RPS fishing club I believe that the Borrow Pit and its surrounding area should be designated an area of outstanding natural beauty. The wide variety of flora &	LDC	Comments noted	No change

	flora to be found there should be nurtured and protected for future generation that may come to live in the vicinity. If the Borrow pit were lost or drastically changed it would be a great loss as this type of facility are in short supply in this area.			
Jones, G	Please ensure facilities that include a school and a Doctor' surgery.	CCDC	Comments noted – infrastructure requirements will be considered further as the development progresses	No change
Jones T	Thank you for consulting on this important draft SPD. I support in principle the redevelopment of this site for a mixture of uses, recognising that the alternative is likely to be development of greenfield land. I am however concerned that the full cost of infrastructure is met by section 106 deeds of planning obligation, Community Infrastructure Levy, or both. This includes (but is not limited to) schools, health provision, buses and policing and Brereton and Ravenhill Parish Council's provision of allotments and parish hall. With local primary schools at capacity, a new primary school is needed. I therefore welcome the references to provision of a primary school in paragraph 2.89's fifth indent and in paragraphs 3.32 and 4.16.	CCDC	Comments noted	No change
Jones T	With the proximity of the site to the A51 and the West Coast Mainline (which in this location will in future carry those high-speed trains that serve Stafford), care will be needed to ensure that buildings (residential, employment and other) have good sound insulation.	CCDC	Comments noted	Noise considerations added in para 4.56
Jones T	We need employment provision, not least to facilitate businesses moving from Redbrook Lane and to prevent a repeat of the loss of JCB from the Rugeley and Brereton and Ravenhill area. Efforts should be made to preserve the private rail siding (paragraph 2.11) for use in connection with the proposed employment development. I therefore welcome paragraph 4.27 and the final sentences of paragraphs 4.11 and 4.45.	CCDC	Comments noted	No change
Jones T	In order to reduce car dependency, there needs to be the	CCDC	Comments noted –	Reference to potential

	employment provision mentioned above and a network of pedestrian and cycle routes. These should link with the canal towpath, which should be improved, so that it is usable by and attractive to people with pushchairs, disabled people (including those in wheelchairs) and cyclists. The inadequacy of the towpath in these respects and its need for improvement should be recognised, perhaps in paragraph 2.32.		references to tow paths will be considered in relation to the wider site context	enhancement of towpaths added to para 4.23, 4.30. Emphasis on linkages has been bolstered.
Jones T	The absence of any mention of London in paragraph 2.33 is most surprising and suggests that the most up-to-date information may not have been used in preparation of the SPD.	CCDC	Comments noted – SPD will be amended	Para 2.36 amended to reference London
Jones T	The impact of the southern part of the site on the almost adjoining Trent and Mersey Canal Conservation will require careful consideration. Paragraph 2.18 should be expanded and strengthened to reflect this. Paragraph 2.25 is wrong. The Canal Conservation Area with its 18th-century canal and towpath is unquestionably a heritage asset. The draft should be amended to reflect this.	CCDC	Comments noted – Reference to Conservation and Heritage will be strengthened in the SPD	Historic Environment bolstered paras 2.23-2.28
Jones T	“Council’s” in paragraph 2.49 should read “Councils”.	CCDC	To be amended	Amended
Jones T	I am concerned that paragraph 2.52 could facilitate too easy a removal of trees. It should make clear that this should only happen if fully justified by appropriate expert evidence.	CCDC	Comments noted – Paragraph to be strengthened	New Para 2.57 strengthened
Jones T	“Rugeley Train Station” in paragraph 2.81 should read “Rugeley Town Station	CCDC	To be amended	Amended
Jones T	Figure 2.10 should include the following (which are at present omitted): Brereton and Ravenhill Parish Hall in Ravenhill Park; Newman Grove allotments, Ravenhill; Brereton Methodist church on Brereton Main Road; and the Co-op supermarket in Redbrook Lane.	CCDC	Comments noted – SPD to be updated to take account of these comments	Figure 2.10 updated to include Newman Grove allotments, Co-op supermarket
Jones T	I welcome the references to “Opportunity to create country park/wildlife corridor” in figure 2.14 and the corresponding annotation in figure 4.4. Despite the proximity to the River Trent of the Rugeley and Brereton and Ravenhill built-up area, there is, at present, hardly any opportunity for local people to enjoy the	CCDC	Comments noted	No change

	river.			
Jones T	I am aware of the current CIL rates and hopes that these will be extended to betting shops and other premises where substantial gambling takes place.	CCDC	CIL rates have been set at examination	No change
Julie & Gary	The development of the Power Station is a golden opportunity to enhance the area and add to the beauty of the surrounding areas. Accepts there should be some housing on the site but urbanisation of the town should be minimised and the site's recreational facilities retained. A country park would be ideal. This is a unique opportunity so think of the future of the town not just meeting current targets.	LDC	Comments noted	No change
Kettle, M	I fully support the development of this site. I believe the proposals are for a mixed use of housing, employment land, open space and recreation facility (Page 3 paragraph 1.5). Roughly 1/3 of the proposed area falls within Cannock Chase District Council and is proposed as employment land/provision. The remaining 2/3 of the proposed area within Lichfield District Council for housing. However I would like to see more of the employment land/ provision available within the given area. Recently, Rugeley was unable to provide a larger suitable site for one of the major employers in the town, JCB. This has led regrettably to JCB making a decision to close their operations in Rugeley and to move their employees and the work out of the area. We do need employment opportunities locally however a mix of small and larger businesses.	CCDC	Comments noted	The need to diversify the local economy is noted and the SPD strengthened paras 4.12 to 4.13 to pick up this point and relate it back to the Local Plan policies of the District Councils which support such diversification
Kettle, M	The site needs to have a balance between housing and employment so that people do not have to travel too far out of the area to work. P33 paragraph 4.18 'to create a sustainable development which reduces car dependency..'	CCDC	Comments noted	No change

Kettle, M	Page 3 paragraph 1.5 If residential development is proposed we need accommodation of mixed type houses, bungalows, sheltered accommodation. The occupants of the new houses will need services. The existing schools in the area could not accommodate the additional school places that are needed so there would be a need for a new school to be built. It maybe that additional doctors, health centres are needed as the existing provision within the area is already strained.	CCDC	Comments noted: infrastructure issues will be addressed as details of the site are developed.	No change – para 5.6-5.7 make reference to infrastructure requirements being considered further as an application progresses
Kettle, M	Pages 11, 12 (paragraphs 2.27 – 2.34) The site will need improved transport and access routes. Roads, bus routes, pedestrian and cycle routes and access routes to the railway stations of Rugeley Town station and Trent Valley station. The employees of the large Amazon site that commute via bus and train often have to walk from the station some distance to reach the warehouse, many use the canal towpath to cut across to Amazon warehouse. This provides a pleasant route to the warehouse but the towpaths do require regular maintenance.	CCDC	Comments noted – infrastructure requirements will be considered further as the development progresses	No change – para 5.6-5.7 make reference to infrastructure requirements being considered further as an application progresses
Kettle, M	Page 10 paragraph 2.21 The retention of sub stations in situ, rights of way to substations and adjoining land need to be carefully considered as this may affect the suitability of the use of the land.	CCDC	Comments noted	No change
Kettle, M	The proposals mention that no conservation area is affected however if housing is proposed this may run adjacent to the Trent and Mersey canal, which is within a conservation area. (page 9 paragraph 2.18) (Page 11 paragraph 2.24) Carefully consideration to this area was given with the development of the Pippins housing development. The links below shows maps of the area during the period 1885 – 1952 prior to the development of the site as a Power Station. http://maps.nls.uk/view/102347345 1924 map http://maps.nls.uk/view/101596823 1885 map http://maps.nls.uk/view/101596820 1902 map http://maps.nls.uk/view/101596814 1948 map	CCDC	Comments noted – Reference to Conservation and Heritage will be strengthened in the SPD	Para 2.23 – 2.28 strengthened

	http://maps.nls.uk/view/91792632 1952 map			
KGL Estates (Agent: Heminsley, J)	<p>1. Context in relation to Local Plan Part 2</p> <p>1.1 Representations have been made on behalf of KGL Estates in relation to the potential of land south of the A5190 Cannock Road Heath Hayes to meet part of the District’s housing land requirements in the context of the contribution required to meet Birmingham’s needs during the current plan period and to safeguard land for future housing development post 2028.</p> <p>1.2 The future contribution to housing land requirements which could be made at Rugeley Power Station were referred to in the consultation on Local Plan Part 2, which took place earlier in the year. The contents of the report to Cabinet on 24/07/2017 concerning the outcomes of the consultation and the proposed next steps are noted.</p> <p>1.3 The comments below are made in the context of these previous representations.</p> <p>2. Representations on the Draft Development Brief</p> <p>2.1 It is noted that the area covered by the brief includes land in both Cannock Chase District (CCC) and Lichfield District (LDC).</p> <p>2.2 The overall proposals for a mixed use development comprising housing, employment, education, open space and recreation uses are supported as providing an appropriate approach to future development of the site, potentially enabling Rugeley to continue to function as a sustainable settlement which includes a range of employment opportunities for its residents.</p> <p>2.3 The practicalities of the need to retain some existing electricity and rail infrastructure on the site and the relationship with existing housing developments adjoining the site and open space uses on the site has led the proposed distribution of future land uses to focus on employment provision on the CCC land. This</p>	CCDC	<p>Comments noted – these comments will be the subject of further discussions between LDC and CCDC.</p> <p>Please see response to the representations to Cannock Chase Local Plan Part 2 consultation (Issues and options) on matters relating to Birmingham shortfall</p>	No change

	<p>approach is supported. However the consequence of this is that the site will not make a contribution towards meeting Rugeley's future housing needs unless a further agreement is reached between the two Councils.</p> <p>2.4 The current adopted Local Plan Policies across the two Councils is understood to be as follows –</p> <ul style="list-style-type: none"> • The adopted CCC Plan requires delivery of 5800 dwellings to 2028 of which 500 are to be provided on land in LDC east of Brereton in order to meet Rugeley/Brereton's needs. • The adopted LDC Plan proposed 10,030 dwellings up to 2029 including the 500 for Rugeley as part of a strategic allocation of 1,125 dwellings east of Brereton. <p>2.5 LDC's Site Allocations Plan indicates that a minimum of 800 dwellings to be completed east of Brereton by 2029. The overall capacity of sites currently with permission is around 650 and these are either built or under construction. The LDC allocation in the adopted Local Plan assumes that 450 units will be built on the site of the former borrow pit, east of the current housing development site. It is noted that the Draft Development Brief now proposes to retain this water body as a nature conservation/recreation site. As the housing proposals in the Brief indicate a capacity of 800 units entirely within LDC, this means that the net increase in capacity achievable, if the proposals in the brief are followed, would only be 350 units.</p> <p>2.6 It is noted that CCC is not attributing any housing numbers to be delivered on land within the District. LDC expect all the proposed 800 to be completed by 2029. This latter conclusion is questionable, because the land identified for housing development in the Brief mostly comprises existing or partially reclaimed ash lagoons and it is acknowledged that further information is needed on remediation requirements before development can commence on this land. The initial demolition programme is not expected to be completed until 2020. So this</p>			
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	<p>fact, together with the uncertain extent of remediation required to deliver housing on the site, makes it very unlikely that more than 500 completions could be achieved by 2029. Construction of 50 units per year, the normal development rate on major housing sites, would only realise 450 units if development actually commenced in 2020. The net increase in units during the current LDC plan period, taking account of the loss of the borrow pit site, would therefore only likely to be 100 to 150 units.</p> <p>2.7 Clearly a further agreement between the two Councils would be required if any of the proposed dwellings are to be counted as contributing to housing requirements within Cannock Chase District.</p> <p>3. Conclusions</p> <p>3.1 Rugeley Power Station provides a major brownfield development opportunity and the focus on mixed uses is considered to be the right one in the interests of the sustainability of Rugeley/Brereton as a whole.</p> <p>3.2 The proposal to retain the former borrow pit as a nature conservation/recreation resource is appropriate, but the consequence of this is that the net increase in housing which the site can deliver is limited. It is inevitable that some of the housing delivery will take place beyond the current CCC plan period ending 2028 and the LDC plan period ending 2029. If any of these limited numbers, over and above the 500 already counted in the adopted Local Plans, are to support local housing need in Rugeley, a further agreement between the two Councils will be required.</p> <p>3.3 Both Cannock Chase Council and Lichfield District Council are expected to contribute to meeting Birmingham’s housing requirements as well as their own locally generated need. The redevelopment of Rugeley Power Station can only make a very minor contribution to future local or regional housing needs and therefore the validity of the arguments for release of the land</p>			
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	<p>south of Cannock Road put forward in connection with the consultation on Cannock Chase Local Plan Part 2 Issues and Options document remain unaltered.</p>			
Lawrence R	<p>I have read, with interest, the many articles over the last few months regarding the closure and proposed redevelopment of Rugeley Power Station. Recently there have been a few articles in the press quoting a 'third party developer' and those comments by Amanda Milling MP.</p> <p>The development of this site is a once in a lifetime opportunity, proper redevelopment will put Cannock and Rugeley on a solid footing, developing into the future, poor redevelopment will simply destroy the area.</p> <p>In my view, the site is vital to the local, regional and national infrastructure and needs to have the right approach, the development needs to include:</p> <ul style="list-style-type: none"> High tech Industry Housing designed and developed to create a community The integration of the site into Rugeley and Cannock, offering facilities unavailable elsewhere A school (given the size of the proposed development) Entertainment and leisure facilities The proper landscaping and ecological development of the site Enhancing the road, walkways and cycle paths for the region A certain level of power generation on site Developing with a view to the future, e.g. the 2040 ban on non-electric vehicles Taking this route would create a shining jewel for the region, would enhance the reputation of the Councils and provide high paid jobs with prospects (replacing the loss of business rates from the Power Station, many fold) The alternate (as is intimated in the Supplementary planning Document), looks like a massive, cookie cutter approach to housing, with no attempt at developing a community (as per the 	CCDC	<p>Comments noted – the SPD aims to create a balanced and sustainable community. The SPD is flexible to enable development to come forward and will be the subject of further discussion as more information becomes available.</p>	No change

	<p>current Persimmons development next to the site), and a distribution centre, offering zero hour, minimum pay jobs. This approach would destroy the local economy and, to be honest, I can't think of an approach that would actually do more damage (even leaving the site undeveloped would be better).</p> <p>From what I can extrapolate from the recent articles in the press, the 'third party developer' approach seems to be one that offers a visionary, somewhat radical approach, one that proposes the best for the site and for the community as a whole.</p>			
Lefroy J (MP)	<p>For a significant number of residents of Stafford Borough and my constituency (for instance in Hixon, the Haywoods, Colwich and Wolseley Bridge), Rugeley is an important destination whether for leisure or work.</p> <p>I support entirely the contribution of Amanda Milling MP (Cannock Chase). I wish to add the following points.</p> <p>1) Stafford is growing into a regional centre for digital companies with several new businesses now established on the Technology Park on Beaconside and in the Town Centre.</p> <p>2) The presence of 3 Signal regiments with more than 1,600 service personnel provides a strong digital skills base as they retire typically after 15-22 years' service and settle in the area.</p> <p>3) The new Beacon University Centre (being established on the former Staffordshire University campus by Chinese investors) is likely to attract forward-thinking Chinese businesses to the area. It is currently the only Chinese investment in higher education</p>	CCDC	Please refer to response to Amanda Milling MP representation. Additional comments in relation to Stafford are noted.	Please refer to response to Amanda Milling MP representation.

	<p>in the UK.</p> <p>4) HS2 will is likely to bring increased investment into the Stafford/Rugeley area as new high speed trains will stop at Stafford.</p> <p>5) The recent major investments by General Electric in Redhill, Stafford, raises the possibility of seeing the further growth of the energy cluster in the Stafford/Rugeley area.</p> <p>As Amanda Milling MP writes, “we should be setting out a plan which will attract high-tech, digital and advanced manufacturing businesses”. We already have a strong base for this in Stafford, Cannock and Rugeley. The three towns and surrounding communities can form a ‘golden triangle’ of technology-based businesses with the beautiful natural surroundings of the Chase at their heart. The power station site is key to that.</p>			
Lever D	<p>1.5 My connection with the Rugeley Power Station (RPS) Site goes back to 1965 when I took up appointment as a teacher at the Pear Tree Primary School, Rugeley and bought property first in Armitage and then in Brereton. I visited the Station many times as well as the adjacent Colliery and the Staffs CC Environmental Centre. There has always been a strong connection between RPS and both its environment and local community - the many and various facilities have benefitted 1000's of people over the years. I have played football and cricket and, latterly, for many years fished the pool known as Borrowpit Lake. It is good to note that the decommissioning of RPS will enhance the the area, in terms of accommodation and leisure - the two go together. Demise anticipates rise. It would be a tragedy if the Borrowpit Lake was lost - it is a beautiful, well maintained and accessible feature and surely will contribute to the lives of those who live in the new housing but also further afield - as it always has. It might seem</p>	LDC	Comments noted	No change

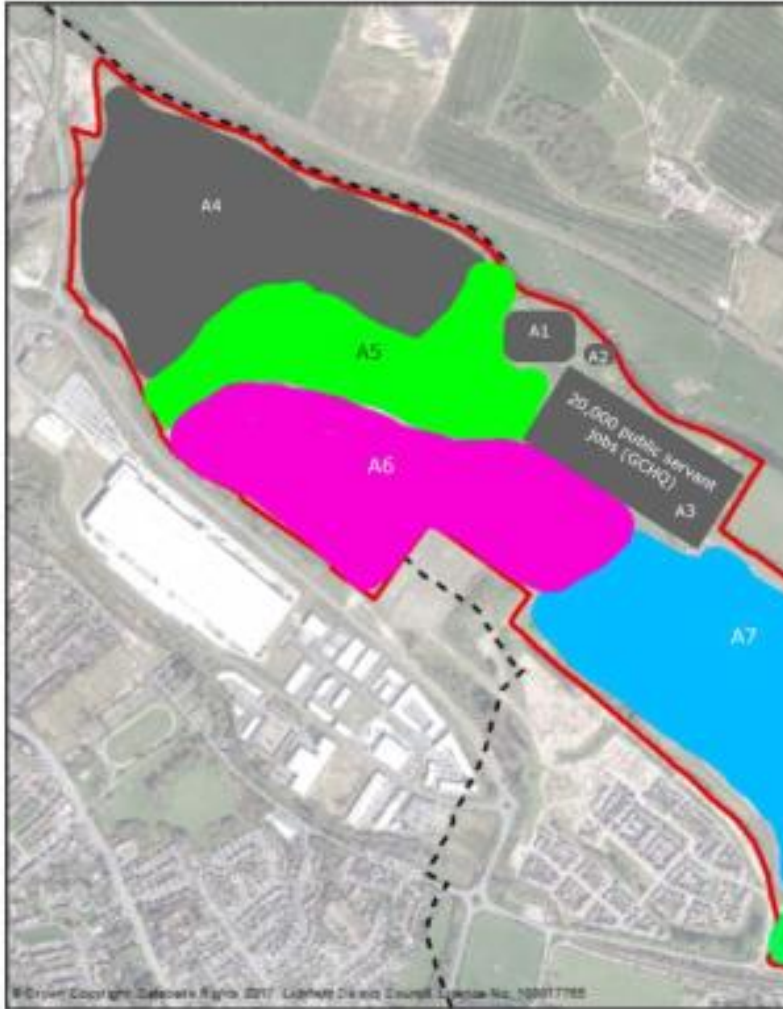
	<p>that I comment for selfish reasons and it is true that I would hope to continue fly fishing. However, my comments are made for several reasons that can hardly be deemed selfish: maintaining and enjoying a beauty spot; retaining an environment for a range of creatures and plants that live above, on, beside and beneath the lake's surface; striking a balance between work and leisure and so much more. Those of us who have enjoyed and voluntarily maintained the lake and its environs would continue to do this, and welcome others to share the joy and pleasure we have garnered over time. Our membership of a fishing association continues and, hopefully, we will continue to look beyond the lake - to the beauty, the wellbeing of people and the future generally. Families need homes but they need space and places to enjoy all that nature can bestow. Once this lake is gone, it is gone. It cannot be re-established. Change can be profitable but it can also, as I believe in this case, be counterproductive and damaging. I humbly beg the decision-makers to vote to keep what is as part of the mixed use development referred to in this document as "the overall aim."</p>			
Machin J	<p>2.18 TPO should be protected, it provides a barrier and environmental corridor between the site and the A513</p>	LDC	Comments noted	Reference for the need for a Green Infrastructure Strategy included at para 4.60
Machin J	<p>2.28 The application for a secondary access point off A513 to facilitate demolition works (Application Reference: 17/00453/FUL), cuts directly through the Environmental Centre car park and isolates the Classroom and Educational facility from access to the Borrow pit. This would hinder the development of Recreational Facilities and the reinstatement of the Educational facilities for the redeveloped site.</p>	LDC	Comments noted	Para 2.31 – 2.32 discuss access arrangements following planning approval for the second access
Machin J	<p>2.35 Support the Councils desire to maintain ecological aspect of the South and Eastern area of the site</p>	LDC	Comments noted	No change

Machin J	2.37 Borrow Pit provides ideal habitat for wildlife species	LDC	Comments noted	No change
Machin J	2.41 Important to retain Landscape and Community features as once lost only a token gesture will be paid toward their requirements by any future developer	LDC	Comments noted	No change
Machin J	2.46 The pit and its immediate surroundings have become an amenity and ecological asset and provided fishing for the sports and social club. This comment should be emphasised and form a strong foundation for providing ecological and recreational facilities within the re development.	LDC	Comments noted - further ecological assessments will be undertaken	Reference to ecological assessments included in para 2.42
Machin J	2.47 There should be no consideration for future planning application which seek to fill the Borrow Pit	LDC	The SPD seeks to retain the Borrow Pit	No change
Machin J	2.48 The building used as an educational facility should be retained so it can be developed to be utilised as a commual hub	LDC	Retention of amenity facilities needs to be considered in the context of what comes forward for development	No change
Machin J	2.49 Welcomes the opportunity to play a key role in retaining the Borrow Pit as an amenity and hence strongly support the councils support to retain this aspect of the document	LDC	Comments noted	No change
Machin J	Figure 2.11 No permission on the Borrow Pit is encouraging as regards to its retention as an Ecological, Environmental and recreational asset.	LDC	Comments noted	No change
Machin J	2.28 Supports the comments to retain natural assets and existing sports facilities where possible and retain the borrow pit as a landscape/ water feature/ recreational feature and to investigate potential to link school and community facilities on site.	LDC	Comments noted	No change
Machin J	Figure 2.14 Support the Country Park and Borrow Pit and restrict	LDC	Comments noted	No change

	the development to the Ash Lagoon site. Also support the Community Hub as well as a prospective Education Centre where the existing Building is sited on the Borrow Pit Car Park.			
Machin J	Figure 2.15 Supplementary access is superfluous to requirements as an existing access has been used satisfactorily for many years	LDC	An application is being considered for a secondary access to facilitate demolition	No change
Machin J	3.1 Supports the comments to ensure the protection and enhancement of ecological interests including the management and future maintenance of landscape and important recreation features	LDC	Comments noted	No change
Machin J	3.21 Armitage with Handsacre Neighbourhood plan specifically seeks to retain the Borrow Pit as a an Environmental Asset to the Community	LDC	Comments noted	No change
Machin J	3.34 Borrow Pit fits within this scope and should be retained	LDC	Comments noted	No change
Machin J	4.29 Support the Councils intention to retain and protect existing facilities	LDC	Comments noted	No change
Machin J	4.34 Support the inclusion of this clause and would seek to assist the existing users of the facility in their proposals to retain the Borrow Pit in the redevelopment plans	LDC	Comments noted	No change
Machin J	4.37 Supports the Councils desire to include this in the planning document 'the retention of the Borrow Pit and the adjacent landscape features'	LDC	Comments noted	No change
Machin J	4.46 Fully support the retention of this clause	LDC	Comments noted	No change
Machin J	4.5 Fully support the provision to retain natural assets and sports facilities	LDC	Comments noted	No change
Machin J	Figure 4.4 Support the plan but would encourage the buffer to be extended to the perimeter of the site at the southern end where the A513 abuts to the existing perimeter security fence.	LDC	Comments noted	No change
Machin J	Table A.1 Encouraged to see Policy CP10 through to NR4 are included and supports this	LDC	Comments noted	No change
Malone P	2.12 Supports the retention of the Borrow Pit	LDC	Comments noted	No change

Malone P	2.13 Supports the retention of the Borrow Pit	LDC	Comments noted	No change
Malone P	2.35 Supports the retention of the Borrow Pit	LDC	Comments noted	No change
Malone P	2.46 Supports the retention of the Borrow Pit	LDC	Comments noted	No change
Malone P	2.48 This action if ever it were to take place, would be a tragic event for the environment, the wildlife, the ecology. It takes decades to establish a mature pool such as borrow pit. It is one of the most diverse and natural water features that I have ever seen.	LDC	Comments noted	No change
Malone P	2.49 Supports the retention of the Borrow Pit	LDC	Comments noted	No change
Marston J & S	<p>1. Given that most developments in our area have been at the luxurious end of the market we believe that any application should ensure that there is a fair amount of affordable housing, this would enable residents families could purchase there own properties.</p> <p>2. Given the bad press and Government concerns relating to the abuse of Leasehold properties, we believe any application should only contain Freehold properties.</p> <p>3. Would it be possible to insist that some of the lost Leisure facilities including fishing, golf etc, could be reinstated within the site.</p> <p>4. Given that we live in an area of Outstanding Natural beauty, would it be possible to insist that wooded type areas around the site, to blend in with the local landscape.</p> <p>5. Given that this site already has access for rail freight, we believe that this could be turned into a public right of way, with pedestrian access to Trent Valley Station or Rugeley town station or both.</p>	CCDC	Comments noted – these issues will be considered further as the details of the development emerge and where they are within the scope of the planning system.	No change
Mayo M	<p>It is my view that the land that is due for redevelopment at the former Rugeley B power station site could be better utilised in several ways which will not only serve the local area but would help the nation as a whole.</p> <p>It is my proposal that the site is the ideal location for a new data communications GCHQ subsidiary facility specifically due to the</p>	CCDC	Comments noted – the nature of any employment uses will be considered further as the development progresses.	No change

	<p>location of the Rugeley power station B site being in direct line-of-site view to the nations concrete tower military microwave communications network (codenamed: backbone). A new concrete microwave tower located on the map at A2 would link directly into the backbone network connecting all military bases around the UK. A new small satellite field located at A1 on the attached image would also help to serve this location.</p> <p>The building at A3 would rival the current building occupied by Amazon in rugeley, this building would employ up to 20,000 highly skilled civil servants linked to british intelligence/GCHQ/British Army. Staffordshire is at the heart of the British military forces, it has a long established role, Rugeley is a Centralised area of Staffordshire, it is the ideal location to build such a facility.</p> <p>The facility would be supplied with a highly skilled workforce. The main bulk of public servants who come from Staffordshire but travel long distances to other British intelligence linked facilities in areas such as Portsmouth, Cardiff, Cheltenham, Gloucester, London to name a few, would be able to board private civil service worker trains from along the north/south west coast mainline (Stafford, stone, Stoke-on-trent/Lichfield, tamworth, atherstone, nuneton, rugby) and from along the chase line (hednesford, Cannock, Walsall, Birmingham), with the use of the existing rail-line connecting the chase-line to rugeley power station B site being utilised by the new facility, the rail-line could also be used by another proposed part of the site proposed use by pentalver at location A4 on the attached image.</p>			
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The site at A4 would be ideal to connect Amazon Swansea to Amazon Rugeley, via a direct access rail link. If pentalver were to

	<p>build at that location with direct connection to the chase-line then we would see more jobs coming to Rugeley. This would add more jobs along the chase-line in the long term, possibly leading to the development of an actual Cannock Chase railway station being developed right at the heart of the chase around the area of the rail crossing located on the bottom of Marquis Drive/Hednesford Road, which would serve the chase area.</p> <p>I hope you see the full potential of these proposals listed below.</p> <p>A1 - proposed satellite field. A2 – New Microwave Tower – direct line of site link to Pye Green military/BT tower (backbone military communications network). A3 – New building to house 20,000 public servants who specialise in CyberSecurity, Cryptography, GCHQ. A4 – Pentaver rail freight forwarder. A5 – New recreational facility with large park, ice rink, skate park etc. A6 – Large Retail park with underground parking. A7 – Large housing estate complete with own recreational Lake & park A8/A9</p>			
Milling A (MP)	<p>Since the closure of the power station I have consistently called for an ambitious, bold and visionary plan for the redevelopment of the site. This is a large strategic site both to the district as well as the West Midlands region with excellent connectivity to the National Grid, rail infrastructure and fibre optic broadband. The redevelopment has the potential to add significant economic value to the Rugeley area, Staffordshire and the West Midlands. The redevelopment provides an opportunity to take account of the growth in new industries and sectors of growth, especially given the infrastructure that already exists. It is essential that the redevelopment attracts innovative, high tech and advanced manufacturing businesses that create high skilled and highly paid</p>	CCDC	Comments noted	See responses below to show where the SPD has been strengthened.

	<p>jobs for residents. Indeed the development is a once in a generation opportunity to create a prosperous future for Rugeley and the Cannock Chase district as well as the springboard for the regeneration of Rugeley Town Centre.</p> <p>There are various sites across the West Midlands which provide examples of what could be achieved in terms of attracting businesses of this nature, for instance the i54 site in South Staffordshire home to Jaguar Land Rover; the Longbridge Technology Park, which was known as the birthplace of the Mini, and is now undergoing a major regeneration scheme which will see thousands of new jobs and will be a leading centre for technology and innovation.</p>			
Milling A (MP)	<p>Mixed use Development</p> <p>Support in principle the aim that the site should be used for a ‘<i>well designed</i>’ mixed use development which includes provision for education, open space, recreational facilities, housing and employment. The Longbridge site is a good example of a fully mixed model, with the Technology park, new homes, a leisure and retail offer, conference facilities and hotel accommodation.</p>	CCDC	Comments noted: both councils have adopted Design SPDs which will be used to guide the detailed development of the site. This SPD cross references to them.	No change
Milling A (MP)	<p>Housing</p> <p>In principle, support the concept that some of the site should be allocated to housing provision although it will be essential that there is sufficient provision of the infrastructure, local services and amenities such as local transport, schools, GPs and shops to support the increase in new residents to Rugeley. A housing development of this scale could put further strain on already stretched services so it is imperative that the plans build in the additional infrastructure, public services and local amenities to support the population increase.</p> <p>Figure 22 outlines the design parameters and I support the proposed situation of the residential land. I note that this land falls under Lichfield District Council but I am of the firm view that it should be Brereton and Ravenhill and Rugeley’s infrastructure,</p>	CCDC	Comments noted – infrastructure requirements will be considered further as the development progresses. Services and facilities assessment work is underway.	No change

	public service provision and amenities that should be bolstered to support the development.			
Milling A (MP)	<p>Leisure and Recreational Facilities</p> <p>The Power Station site has, historically, been home to a Social Club and numerous sports and leisure facilities and groups. The closure of the Power Station and the resulting closure of the Club and these facilities has had a significant impact on the town, its residents and the available sports and leisure provision. Re-homing the various clubs and community groups has been one of the biggest challenges over the last 12 months. As such, it is essential that the site's redevelopment sees this leisure and recreational provision replaced in full. Given the additional housing being proposed, this provision should actually be enhanced. As such, I support the inclusion of Community Hub, Recreational Facilities and open Space as outlined in the plans and agree to where they would be situated as outlined in Figure 22, The Design Parameters.</p>	CCDC	Support noted	No change
Milling A (MP)	<p>Employment</p> <p>As set out in the introduction, this is, in my view the most critical aspect of the policy plans. A strategic plan should be set out which will ensure the employment provision attracts business that will bring highly skilled and paid jobs to Rugeley, Cannock Chase District, Staffordshire and the West Midlands region.</p> <p>I currently do not believe that the current policy goes far enough in terms of realising the employment potential for the site. As I have set out, I believe we should be setting out a plan which will attract high tech, digital and advanced manufacturing businesses. Currently, the policy document omits the connectivity to the fibre optic broadband network. Indeed the site is located adjacent to two of the main lines which form part of the UKs fibre optic backbone. These lines run alongside the canal network and along the west Coast Main Line. I strongly believe that there is a role for the sites development to leverage the proximity to this</p>	CCDC	<p>Comments noted – the SPD will be strengthened in the context of these issues.</p> <p>With regards to transport concerns, a Transport Assessment will be required as part of a planning application to take account of these issues.</p> <p>The Councils will be encouraging high quality end uses. The SPD will be adopted in accordance with Cannock Chase LLP1 Policy CP9 which</p>	<p>4.24 references need for a Transport Assessment</p> <p>In terms of the opportunities from local employment, the document has been strengthened 4.12 / 4.13 to emphasise the need for strong linkages between the site and the town and for employment uses to provide opportunities for local people.</p> <p>The need to diversify the</p>

	<p>infrastructure. Indeed I believe this site would be ideally placed to home a Science / Technology Park given the infrastructure – National Grid, fibre optic broadband and rail network with access to both the Chase Line (to and from Birmingham City centre) and the West Coast Mainline (to and from London and the North). In contrast I feel that the policy document overstates the road network connectivity. The road network to the site is not within the direct vicinity of a motorway. It should be noted that Rugeley is some distance from the motorway network in contrast to the Kingswood Lakeside Business Park in Cannock which is in very close proximity to both the M6 and the M6 Toll Road. In fact, from the Rugeley Power Station site the motorway network can only be accessed via single carriageway A roads through towns and cities including Rugeley itself, Cannock, Stafford and Lichfield. These roads already incur extensive HGV traffic by virtue of other businesses in the area. Further to this, Rugeley is suffering from a shortage of HGV parking facilities which has seen local residents and businesses suffering from HGV fly-parking on streets and business parks. The town is ill equipped to cope with additional HGV traffic both in terms of the road network and the facilities for HGVs. Serious care and consideration needs to be given to the redevelopment of the site, as it is the town and local infrastructure could not support more warehouses and distribution centres.</p> <p>I feel that the planning policy document in its current form is in danger of homing businesses that offer low skilled employment, such as warehouses and ‘standard’ businesses units which are already in plentiful supply. Not only is there the danger that more warehouses and distribution centres will simply create low skilled jobs but also exacerbate the issue of HGV traffic and HGV fly-parking in and around Rugeley.</p> <p>In summary, the site offers the opportunity to build a strong local economy and sustainable economic growth(in line with the NPPF)</p>		<p>encourages high quality employment uses.</p>	<p>local economy is noted and the SPD strengthened (4.12 / 4.13) to pick up this point and relate it back to the Local Plan policies of the District Councils which support such diversification. Also in this context, SPD strengthened (para 4.14) to say that depending on the end users and their operational patterns, parking and facilities for drivers will be expected to be delivered and managed on site (eg where long-distance drivers would be required to take a break). This would be considered further as the details of the scheme emerge.</p>
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	attracting significant investment and create an employment footprint leading to high skilled and high paid jobs. Anything less would be selling short the future of Rugeley and the wider area.			
Milling A (MP)	<p>Mixed use land</p> <p>Rugeley is currently lacking in significant leisure / entertainment provision (eg cinema, bowling alley, ice skating etc) and has limited hotel accommodation, restaurants etc. I believe that provision of this nature should be considered.</p>	CCDC	Comments noted although these will be considered in the context of Rugeley Town Centre as this site must not undermine the vitality of Rugeley Town Centre in line with Rugeley Area Action Plan and as set out in national policy which sets out the detail of such 'Town Centre uses'.	No change
Milling A (MP)	<p>Other considerations</p> <p>Strategic Development Plan for Rugeley</p> <p>The planning policy document fails to take into account any other development land which will be available as a result of the flood defence work which is being undertaken in Rugeley and the relocation of JCB cab systems (opposite the power station on Power Station Road). These additional sites should be factored into the development plan as they provide an opportunity or strategic redevelopment plan for Rugeley. The sites should be mentioned in the document and then taken into account as part of the planning policy document. These other sites increase the redevelopment footprint.</p>	CCDC	SPD focuses specifically on Rugeley Power Station Site. Other issues will be considered through Cannock Chase Local Plan.	No change
Milling A (MP)	<p>Developer contributions</p> <p>I believe there needs to be a robust policy in place for the contributions by developers. I would urge the Council to ensure developer contributions are focused on improving the facilities in Brereton & Ravenhill and Rugeley. Once the flood defence scheme has been completed in Rugeley there will be the opportunity to</p>	CCDC	The SPD compliments the adopted Local Plan Part 1 and Rugeley Area Action Plan (CCDC) and Local Plan Strategy (LDC) which are both supported by an	Document strengthened at 4.12 – 4.13 to emphasise the need for strong linkages with Rugeley and at para 4.18 to make clearer the need

	<p>regenerate Rugeley Town Centre. A town centre investment strategy should be established with a greater focus on the redevelopment of the Power Station site releasing funding from developer contributions for wider town centre investment and to increase the leisure and entertainment facilities on offer. The possibility of retail development on the power station site should, I believe, be limited to convenience services. The use of the existing town centre should be promoted as a main shopping destination for the residents of the new housing development on the site, thus increasing the town centre economy.</p> <p>Cannock Chase District Council and Lichfield District Council should have a formal agreement between themselves to ensure any developer contributions that would be received by Lichfield District Council are either passed to Cannock Chase District Council or Cannock Chase District Council are empowered to decide on how these contributions are spent. Contributions received by Lichfield District Council should not be spent on schemes that are outside the immediate Rugeley area.</p>		<p>Infrastructure Delivery Plan. This is being updated as part of the ongoing work in relation to this SPD and Local Plan Part 2 (CCDC) and Local Plan Allocations (LDC). It is agreed retail development should be limited to local service centre so as not to undermine the vitality of Rugeley town centre.</p> <p>Any development contributions towards infrastructure delivery will be the subject of further discussions between two Councils.</p>	<p>to limit retail to local convenience shopping to serve the development and not undermine the town centre.</p>
Molineux S	<p>I think no more houses are needed at this time in Rugeley as the growth is good at the moment but what's needed is jobs and more things for family's and younger people to do i.e. Shopping and amusements maybe you should try and make Rugeley better rather than filling it with houses and drowning the town with people and not giving what is needed more doctors schools shops and JOBS hope this actually gets read thank you</p>	CCDC	<p>Comments noted – infrastructure issues will be considered to align with the development on the site</p>	No change
Moulton S	<p>I think it is good that the land is being used for more than just housing. HOWEVER, I you cannot build another 800 houses unless you have built another health centre / doctors. Sandy Lane Doctors is already over used as well as most in the area, so there is a real need for another health centre in the area if these houses are being built.</p>	CCDC	<p>Comments noted - infrastructure requirements will be considered further as the development progresses.</p>	No change
National	<p>Figure 2.15 The constraints map should include HS2 Phase 2a land</p>	LDC	<p>Comments noted -</p>	HS2 added to para 2.38

Grid	requirements as NG 400kV substation is identified as a point of connection to electrify the new railway. This would include an extension to the substation, access arrangements, laydown and underground cables to the proposed railway.		Reference to HS2 will be included in SPD	
National Grid	4.4 HS2 Phase 2a hybrid bill identifies National Grid's 400kV substation as a point of connection to electrify the new railway. To facilitate this connection it is likely that the 400kV substation would need to be extended and there would be a cable / overhead line corridor connecting to the proposed railway to the north.	LDC	Comments noted	No change
Natural England	Natural England welcomes this Supplementary Planning Document (SPD). In view of the former power station site's scale and location this shared local planning authority SPD offers a valuable opportunity to guide development in such a way that the scheme's design achieves optimum, positive social, economic and environmental outcomes. In particular we would emphasise the synergies offered by the site's redevelopment in terms of landscape, biodiversity, surface water drainage, open/greenspace and access. The SPD covers the following themes and issues of particular relevance to Natural England's remit	CCDC	Comments noted	No change
Natural England	Biodiversity We welcome the SPD's reference to the biodiversity resources on and adjoining the site. The Cannock Chase SAC strategic project and associated mitigation measures provide an opportunity as part of the Habitats Regulations Assessment process to consider and incorporate the recreation needs of new residents as part of the scheme's design.	CCDC	Comments noted - appropriate mitigation to be discussed with Natural England. SAC mitigation is considered by each Council	No change
Natural England	Landscape We note the SPD's reference to the condition assessment of 'very poor' for the relevant landscape character parcel (LCP). In devising a suitable scheme design the following sources of information may be helpful:	CCDC	Comments noted	No change

	<p>The site lies close to the boundary of two adjoining National character Areas (NCAs):</p> <ul style="list-style-type: none"> - Cannock Chase to Cank Wood1 - Needwood and South Derbyshire Claylands2 <p>Each NCA profile provides a wealth of landscape related information including high level 'Statements of Environmental Opportunity' that help to highlight broad themes of key interest.</p>			
Natural England	<p>Green infrastructure</p> <p>Natural England notes and welcomes the SPD's inclusion of green infrastructure (GI) networks as a key element in the design of the site. Multifunctional GI provides a framework for landscape, biodiversity, access /recreation and surface water drainage provision.</p>	CCDC	Comments noted	No change
Natural England	<p>Surface water drainage</p> <p>We note the stated intention to retain the existing 'borrow pit' on site as a landscape and amenity/recreation resource.</p>	CCDC	Comments noted	No change
Natural England	<p>Concept statement and design objectives</p> <p>Given the site's appreciable size (139Ha) we welcome reference to the use of a Concept Plan to guide development, together with the design objectives listed at paragraph 4.50.</p>	CCDC	Comments noted	No change
Nightingale	<p>2.46 Borrow Pit was transformed into a nature reserve with the inclusion of a purpose built environmental centre. It makes a great asset to the local community and would be a great loss should it be lost.</p>	LDC	Comments noted	No change
Northway L	<p>The redevelopment of the power station site is a golden opportunity for Rugeley and the whole Cannock chase district. As there is plenty of new housing stock being built here in Brereton and Rugeley I believe that the site should be ring fenced for business purposes only to provide jobs and security for the future of our district.</p> <p>The power station was built to provide energy to the National Grid from the Lea Hall and Littletons Collieries coal. Our district get</p>	CCDC	Comments noted however there is also a significant need to provide housing and a balance of uses.	In terms of the opportunities from local employment, the document has been strengthened at 4.12 / 4.13 to emphasise the need for strong linkages between the site and the town and for employment

	<p>very little attention and praise for the massive contribution that the power station and collieries of this area have made to the country as a whole over the decades of the 60s, 70s and 80s.</p> <p>We have one of the largest warehouses in the county currently run by the giant that is Amazon if Amazon can be attracted into our area I am sure that the power station site will be able to bring in major employers from the private and public sector. Employers which will pay good wages, help our local education sector, pay good levels of tax into our council and generally improve the life in the district as a whole.</p> <p>There are still plenty of units for smaller businesses on the developments at the Towers Business Park and its counterpart in Cannock. I believe The council should do everything in its power to ensure that high-tech businesses of all shapes and sizes who have a stable, sustainable future are given every encouragement to invest in the site. More warehouses, small business units et cetera will not replace the taxes that we stand to lose or have already lost due to the closure and run down of the Rugeley Power Station.</p> <p>Cannock chase district maybe a small part of the map politically but back in the 1950s and 60s the government put the money in and ensured the towns and districts of Cannock Chase up until the early 90s prospered. We are here again at the same starting point we were at in the 1950s it is time to grab opportunity with both hands and start to rebuild the infrastructure and industry that over many decades helped our district. The power station site along with all the developments that have already happened in our district can ensure this but more residential developments will not do that.</p>			<p>uses to provide opportunities for local people.</p> <p>The need to diversify the local economy is noted and the SPD strengthened to pick up this point and relate it back to the Local Plan policies of the District Councils which support such diversification.</p>
Palmer D	I really disagree on adding more homes to the area, Rugeley's	CCDC	Comments noted -	No change

	<p>roads are already becoming congested and our local services are at breaking point. Those who put this idea up must have not tried to get an appointment at the sandy lane GP. Rugeley is becoming over populated and the services are not being improved the accommodate this.</p> <p>My suggestion for the area would be to provide a business park that would allow stores like B&Q, Matalan etc to bring business and jobs to the town, id also suggest an entertainment centre such as a cinebowl, it's been far too long since Rugeley had a local cinema.</p>		<p>infrastructure requirements will be considered further as the development progresses.</p> <p>Appropriate uses on site will be considered so not to undermine the vitality of Rugeley Town Centre in line with the Rugeley Area Action Plan</p>	
Payne, R, & Ricketts B	<ol style="list-style-type: none"> 1. Can it be assured that the size and number of heavy duty lorries and work vehicles be prohibited from using the roads near to and accessing Cannock Chase. i.e. Penkridge Bank Road, Bower Lane, Slitting Mill Road. 2. That traffic in and around Rugeley Town centre is restricted to local traffic only and any increased trade/industrial traffic from the proposed development is also restricted from using the local roads. 	CCDC	Comments noted	A Transport Assessment will be required and this is picked up in the document at para 4.24.
Pegasus Group	<p>These representations are framed in the context of the requirements of Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for producing Supplementary Planning Documents (SPDs). In preparing the SPD Councils are is obliged to consider national policies and guidance and comply with legal requirements. The National Planning Policy Framework advises at paragraph 153 that any additional development plan documents, to a Local Plan, should only be used where clearly justified and that SPDs should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development. The Planning Practice guidance reiterates this advice and states that SPDs should build and provide more detailed advice or</p>	LDC & CCDC	Comments noted	No change

	guidance on the policies in the Local Plan.			
Pegasus Group	<p>Lichfield District Development Plan</p> <p>Lichfield District Council commenced a review of its Local Plan in 2006 following the withdrawal of a Core Strategy DPD, Allocations DPD and Development Control Policies DPD which were deemed 'unsound' at EiP in 2004.</p> <p>The Local Plan Strategy reflected the extant permissions at Rugeley 'A' Power Station and proposed a Strategic Development Allocation to encompass the Rugeley 'A' Power Station and the former British Waterways Board (BWB) site – East of Rugeley SDA. The SDA also included further land to the east encompassing the Borrow Pit which the Council assumed had capacity to deliver a further 450 dwellings. The original intention was to fill the Borrow Pit with Pulverised Fuel Ash, however, the installation of the Flue Gas Sulpherization plant removed this opportunity.</p> <p>The East of Rugeley SDA (Core Policy 6 and Policy East of Rugeley) was allocated in February 2017 following the adoption of the Lichfield District Local Plan Strategy.</p> <p>A Concept Statement is set out at Appendix G to the Local Plan Strategy which establishes key design principles and infrastructure requirements.</p> <p>Through cross-boundary discussions with Cannock Chase DC to discharge the Councils Duty to Cooperate, it was agreed that 500 homes within the SDA would meet needs arising within Rugeley.</p> <p>The adopted development plan for Lichfield District, relating to Rugeley Power Station, comprises: Lichfield District Local Plan Strategy (Adopted February 2017); and 'Saved' policies of the Lichfield District Local Plan (Adopted June 1998).</p>	LDC & CCDC	Comments noted	No change

	<p>The Council is currently in the process of progressing a Local Plan Allocations document that is intended to replace the remaining 'saved' policies contained within the 1998 Local Plan. This document is intended to be submitted to the Secretary of State for examination towards the end of 2017.</p> <p>The Lichfield District Local Plan Strategy commits the Council to undertaking an early review or partial review of the Local Plan if cross boundary work being undertaken with the constituent LPAs within the wider Greater Birmingham Housing Market Area determines further development provision is required within Lichfield District. Armitage with Handsacre Parish Council is currently in the process of preparing a Neighbourhood Plan following the designation of the Parish as a Neighbourhood Area on 9th July 2013. This emerging Neighbourhood Plan is at an early stage in its formulation, with a pre-submission (Regulation 14) consultation undertaken in May/June 2017. If and when this document is 'made' it will form part of the development plan relevant to the area of Rugeley Power Station within Lichfield District.</p> <p>Full rep then summarises the policies of the Local plan strategy and emerging Allocations document.</p>			
Pegasus Group	<p>Cannock Chase District Development Plan The development plan for Cannock Chase District, relating to Rugeley Power Station, comprises:</p> <ul style="list-style-type: none"> • Cannock Chase Local Plan Part 1 (Adopted 2014) <p>The Council is currently in the process of progressing a Local Plan</p>	LDC & CCDC	Comments noted	No change

	<p>Part 2 document that is intended to establish a number of allocations and development standards, and a Cannock Town Centre Area Action Plan. The Local Plan Part 2 is currently at an early stage in its preparation, with publication of a draft Plan expected towards the end of this year.</p> <p>The Cannock Chase Local Plan Part 1 considers the future of Rugeley 'B' Power Station and commits to reviewing the need for a site-specific policy to be considered within the Local Plan Part 2. In addition, the Local Plan Part 1 commits the Council to working with the other constituent authorities within the wider Greater Birmingham Housing Market Area to consider housing shortfalls and commits the Council to considering this issue through the Local Plan Part 2 if it is determined that further development provision is required within Cannock Chase District.</p> <p>Brereton and Ravenhill Parish Council is currently in the process of preparing a Neighbourhood Plan following the designation of the Parish as a Neighbourhood Area on 17th January 2013. This emerging Neighbourhood Plan is at a very early stage in its formulation, with no pre-submission (Regulation 14) consultation undertaken to date. If and when this document is 'made' it will form part of the development plan relevant to the area of Rugeley Power Station within Cannock Chase District.</p> <p>Full rep then summarises the policies of Local Plan part 1 and the emerging Part 2.</p>			
Pegasus Group	<p>Timescales</p> <p>Pegasus Group is generally supportive of the principle of producing an SPD to provide guidance to inform the re-development of the Rugeley 'B' Power Station site. However, as noted above, Lichfield District Council's Local Plan Allocations</p>	LDC & CCDC	Page 3 of the Introduction sets out the purpose and scope of the SPD. The SPD provides the framework for development accepting that further	No change

	<p>publication document was published in May 2017, and is scheduled for submission to the Secretary of State later this year. This document identifies additional allocations and site specific policies to support the delivery of the Local Plan Strategy, and includes a further housing allocation at the Rugeley 'B' Power Station site; allocated through Policy R1: East of Rugeley Housing Land Allocations.</p> <p>The Lichfield District Local Plan Allocations document has yet to be subject to an examination by an Inspector appointed by the Secretary of State and is thus some way off adoption. Similarly, the Cannock Chase Local Plan Part 2 is at an early stage in the preparation process; an Issues and Options consultation, having been undertaken earlier this year. It is the case that an SPD should only become supplementary to the development plan upon allocation of the site through a Local Plan document; in this case both the Lichfield District Allocations document and the Cannock Chase Local Plan Part 2.</p> <p>However, it is noted that Section 4 of the Rugeley Power Station SPD includes detailed guidance on the appropriate scale, form, density and character of development in different parts of the site, under the heading 'Development Layout' and includes 'Design Parameters' in diagrammatic form. Furthermore, earlier in the document (under Section 2 Site Analysis) there are several instances where further survey and technical work is highlighted as being necessary; these being in relation to ground conditions, ecology and flood risk. This therefore brings into question the timescales for preparing this SPD, in advance of the adoption of key policies allocating the site within a Local Plan, as well as the prematurity of establishing design parameters prior to completion of technical evidence and the selection of a developer.</p>		<p>information is emerging for the site. The SPD is intended to be flexible to respond to emerging issues whilst still delivering a development that complements the existing local plan for both areas.</p>	
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	<p>It is the view of Pegasus Group, that the progression of a Development Brief should be delayed to allow for all necessary technical work to be completed and to allow further dialogue with the identified developer of the site. A delay in the adoption of an SPD will have no implications for the timescales in bringing the site forward; instead, it would allow for greater certainty in respect of land uses, quantum and balance of land uses that can be achieved and scheme viability.</p>			
Pegasus Group	<p>Identification of the site as a Strategic Development Allocation (SDA)</p> <p>It is noted that the Rugeley Power Station Development Brief SPD does not consider this site as an extension to the existing East of Rugeley SDA as part of the plan-making process. This is particularly anomalous given that the allocation for Site R1 (East of Rugeley 1): Former Rugeley Power Station within the Lichfield District Local Plan Allocations submission document lists as a key development consideration that development proposals should have consideration to the Rugeley Power Station Concept Statement, Appendix E, of the adopted Lichfield District Local Plan Strategy, which relates to the East of Rugeley SDA.</p> <p>As noted within the SPD the site is capable of delivering a significant amount of housing and commercial development and it is the case that the identification of the site as an SDA would underline the importance of this site in delivering the spatial strategy for both Lichfield District and Cannock Chase District.</p> <p>Significant infrastructure investment would be necessary to bring forward this strategic site and identification as a SDA would recognise this, and provide parity with the other SDAs identified</p>	LDC & CCDC	SDAs were identified within the Local Plan Strategy (LDC). This is considered to be an opportunity brownfield site.	No change

	<p>within Lichfield District though the provision of a lower CIL rate on land contained within Lichfield District (£14 per sqm vs. £25 per sqm). This lower CIL rate recognised the significant infrastructure investment required within the SDAs compared to non-strategic sites elsewhere within the District. The Rugeley 'B' Power Station site is of a strategic scale with significant costs expected in respect of redevelopment and should not be expected to shoulder a higher CIL Levy that the other SDAs within Lichfield District, of which the majority require no significant remediation.</p>			
Pegasus Group	<p>Housing Provision Within the wider Housing Market Area (HMA) across southern Staffordshire there is an identified shortfall of housing land. The housing requirements established within the Lichfield District Local Plan Strategy and the Cannock Chase Local Plan Part 1 have been informed by the Southern Staffordshire Districts Housing Needs Study and Strategic Housing Market Assessment; a joint SHMA commissioned by LDC, CCDC and Tamworth Borough Council, in part to inform cross boundary housing discussions between these LPAs.</p> <p>The SHMA identified a housing requirement of between 900 and 995 dpa across Southern Staffordshire and, specifically to Lichfield and Cannock Chase Districts, the following requirement:</p> <ul style="list-style-type: none"> • Lichfield District: OAN of 410-450 dwellings per annum between 2006 and 2028. The need within the Lichfield District North sub-housing market area, in which Rugeley 'B' Power Station is location, was identified as 143-157 dpa (35% of the District's need as a whole). An affordable housing need of 377 dpa was identified for the District as a whole (65% social rented/15% affordable rent/20% intermediate). • Cannock Chase District: OAN of 250-280 dwellings per annum 	LDC & CCDC	<p>Comments – the SPD identifies the site for a minimum of 800 homes. Work on the HMA shortfall is on-going and this is being addressed via the approach towards the respective Local Plan Part 2 (CCDC), Local Plan Allocations (LDC) and Local Plan Review.</p>	No change

	<p>between 2006 and 2028. The need within the Rugeley sub-housing market area, in which Rugeley 'B' Power Station is location, was identified as 62-70 dpa (25% of the District's need as a whole). An affordable housing need of 197 dpa was identified for the District as a whole (80% social rented/10% affordable rent/10% intermediate).</p> <p>It should be noted the SHMA, published in May 2012, utilised the 2008 Sub-National Population Projections to inform the Objectively Assessed Need (OAN) for Southern Staffordshire. These projections are now significantly out of date.</p> <p>Whilst the Household Projections only provide a very initial indication of the likely future housing needs, they provide a useful starting point in considering the direction of travel in determining appropriate housing requirements.</p> <p>Any appropriate housing requirement should however be seen in the context of the needs of the wider Housing Market Area. Both Lichfield District and Cannock Chase District lie within the Greater Birmingham Housing Market Area (GBHMA). Work undertaken to date by the 14 constituent Local Planning Authorities that make up this HMA has demonstrated that there is a significant housing shortfall when the level of need is considered against the planned supply. The Stage 3 PBA Report considered the shortfall to be in the region of 37,900 in the period 2011 to 2031. The recent Black Country and South Staffordshire SHMA suggests that the shortfall could be in the region of 60,000 with an additional shortfall of 22,000 homes against supply within the Black Country.</p> <p>Cannock Chase District Council has committed to testing the delivery of 1,000 additional homes to meet the GBHMA shortfall within the emerging Local Plan Part 2.</p>			
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	<p>It is noted that Lichfield District Council is not proposing to deal with the GBHMA shortfall within the emerging Local Plan Strategy; instead committing to dealing with this issue through an early review of the Local Plan once further evidence is available.</p> <p>It is noted that the 14 constituent LPAs within the GBHMA have commissioned further work to re-consider housing need and to consider the spatial distribution options for meeting this shortfall. This work, which includes a strategic Green Belt Review, is scheduled for publication in September/October this year.</p> <p>Thus, both Lichfield District and Cannock Chase District Councils are facing increasing pressures to assist in meeting the housing shortfall identified within the wider HMA. Both authorities are considered to be constrained by virtue of Green Belt and environmental designations.</p> <p>Rugeley 'B' Power Station represents a 'windfall' not identified to date within the existing adopted strategic Local Plans. The reference to residential development being an appropriate use as part of the redevelopment of the site is therefore supported by Pegasus Group.</p> <p>However, in the light of the housing shortfall within the wider HMA, as noted above, the site offers an opportunity to increase housing numbers significantly above the approximate yield of 800 set out within the emerging SPD to help satisfy increasing housing pressures. For Lichfield District increasing housing numbers on the site would assist in addressing the loss of the assumed 450 dwellings that was set to come forward on the former Borrow Pit site as allocated within the Local Plan Core Strategy. This is area of the Power Station site is now proposed to be retained as a</p>			
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	<p>landscape/water feature and thus the 450 removed from the housing supply. For Cannock Chase District the site would provide an easy solution for delivering a significant proportion of the additional 1,000 homes currently being tested as a contribution towards meeting the wider HMA shortfall within the Local Plan Part 2.</p> <p>Agreement to deliver additional housing numbers to meet cross boundary needs is only likely to exacerbate the supply position within both authority areas.</p> <p>In respect of the Rugeley 'A' site, house building commenced in late 2010 and completed in 2017. The site has delivered 568 homes in 6.5 years through two sales outlets (Persimmon Homes and Barratt Homes). Demand for homes in this location has been strong, despite the site being overshadowed by the cooling towers associated with Rugeley 'B' Power Station. Annual completions on site have fluctuated between 42 and 175 dwellings.</p> <p>Pegasus Group consider the site is capable of supporting up to 2,000 houses as part of a comprehensive mixed use scheme across both LPA areas. An increase in housing provision supported within the site would assist in meeting the increased housing pressures in light of the significant shortfalls evidenced across the wider Greater Birmingham Housing Market Area. The recent completion of the housing element of the Rugeley 'A' Power Station site demonstrates that housing in this location is deliverable and would assist in supporting the housing land supply position for both Lichfield District and Cannock Chase District.</p>			
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<p>Pegasus Group</p>	<p>Employment Provision</p> <p>The Cannock Chase Local Plan Part 1, within Policy CP8 (Employment Land), establishes an employment land requirement of at least 88ha of new and redeveloped employment land (primarily for non-town centre B class uses but with flexibility for other uses, particularly where in accordance with CP11) across the plan period from 2006 to 2028. Policy CP8 identifies sites that equate to 91ha of land.</p> <p>The emerging Cannock Chase Local Plan Part 2 is currently at an early stage in its formulation, however the Issues and Options consultation document explores the options for allocating further employment sites.</p> <p>The Lichfield District Local Plan Strategy, within Core Policy 7 (Employment & Economic Development), seeks the creation of between 7,310 and 9,000 additional jobs over the plan period 2008-2029, requiring the allocation of 79.1ha of employment land and the identification of a further 10ha of employment land to provide flexibility within the employment land portfolio. The Plan recognises that considerable proportion of this requirement already has planning permission, but allocates approximately 12 hectares of additional employment land within the Cricket Lane SDA in Lichfield City.</p> <p>The emerging Local Plan Allocations document identifies the following proposed employment allocations to ensure the employment land requirements set out in the Local Plan Strategy and makes a further 6.5ha of provision to meet needs arising within Tamworth Borough:</p> <ul style="list-style-type: none"> • Land South of Fradley Park (18.2ha) 	<p>LDC & CCDC</p>	<p>The issue over the shortfall is being addressed by Cannock Chase Local Plan Part 2 / Review and given the site is already an employment use, some employment use for the future is considered appropriate as a future use as part of some mixed use development.</p>	<p>No change</p>
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- Land east of A38 (5.1ha)
- Land at Main Street, Alrewas (0.4ha)

The Cannock Chase Local Plan Part 2 Issues and Options consultation document highlights a shortfall in employment land provision against the requirement of 88ha established through the Local Plan Part 1. The shortfall is attributable to the loss of the Mill Green employment site from the committed supply following the issue of planning consent for a designer retail outlet village.

The employment land supply as at March 2016 is identified as follows:

	All Sites (ha)	New Sites (ha)	Redevelopments (ha)
Completions 2006-2016	45.92	36.76	9.16
Available Supply (under construction)	46.81 (2.05)	35.24	11.57
Total Supply 2006 -2028	92.73	35.24	11.57
Less Local Plan Part 1 Target	88	-	-
Balance	+4.73	-	-
Balance minus Mill Green	-2.87	-	-

Whilst a deficit in supply is identified, the Issues and Options document highlights that the above figures do not make any allowance for provision within the Rugeley 'B' Power Station site, on the basis that proposals are still emerging.

The latest employment land position in respect of Lichfield District is set out in the Employment Land Availability Assessment (ELAA) 2016. This document identifies the following supply position within the District:

	Uses	Ha	Floorspace
Completions 2008-2016	B1/B2/B8	29.89	74,312
Sites currently under construction	B1/B2/B8	2.54	6,669
Sites with planning permission	B1/B2/B8	65.34	208,044
Available sites	B1/B2/B8	45.72	158,573
Total 'Available' Supply	B1/B2/B8	113.6	373,286

The position demonstrates a supply of general employment land exists that significantly exceeds the employment land requirement of 79.1ha (+ additional 10ha for flexibility) set out in the Local Plan Strategy. Identification of a further 23.7ha within the emerging Local Plan Allocations further strengthens this position even having regard to the 6.5ha identified for meeting needs arising within Tamworth Borough.

Within Cannock Chase District, the emerging Local Plan Part 2 and the current evidence base does not support the need to identify significant levels of additional employment land within the Rugeley 'B' Power Station site. The shortfall, as evidenced by the

	<p>Council, stands at 3ha. This compares to approximately 30ha identified within the emerging Rugeley Power Station Development Brief SPD.</p> <p>Whilst the 88ha requirement is set out as a minimum requirement within the Local Plan Part 1, a significant oversupply could be argued to result in an imbalance between jobs creation and housing delivery.</p> <p>Within Lichfield District, the existing employment land portfolio is strong with a significant committed supply. The emerging Local Plan Allocations seeks to strengthen this provision through the identification of additional allocations to provide flexibility. Therefore, justification for requiring the delivery of employment land within the Rugeley 'B' Power Station site within Lichfield District does not exist.</p> <p>The published evidence base and latest employment land supply information published justify a limited need for further employment land to be secured within the Rugeley Power Station site than that inferred within the Development Brief. This is coupled with market concerns that the delivery of significant employment in this location would be difficult to achieve in the current plan period. It is noted that there is vacant land within the adjacent Towers Business Park and that the take up rate to date within the business park has been slow to date.</p> <p>Whilst Pegasus Group welcomes the identification of employment land as an appropriate use as part of a comprehensive mixed use scheme across both LPA areas, it considers the Design Parameters Plan places far too much emphasis on the level of employment land that should be incorporated within the scheme. The level of employment provision indicated appears at odds with the Council's published evidence base.</p>			
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	As the portfolio of employment land within Lichfield District is strong and only a marginal shortfall in supply is identified in Cannock, the Development Brief should support a reduction in the indicative starting point for employment provision set out in the Design Parameters plan accordingly.			
Pegasus Group	<p>HS2 Subsequent to the preparation of the Rugeley Power Station Development Brief, HS2 has identified a number of safeguarded land areas related to the second phase of the high-speed rail project. This identifies an area of proposed safeguarded land within the Rugeley 'B' Power Station site, including the current main access to the Power Station. This relates to the upgrade of voltage to the West Coast Mainline to allow HS2 trains to utilise the WCML if necessary. A plan of the proposed safeguarded land is attached at Appendix 1.</p> <p>At present, it is not understood what implications this proposed safeguarding will pose for the phasing and delivery of development within the Power Station site. It is recommended that further dialogue is undertaken with HS2 to explore the extent of the safeguarded land required to support the delivery of HS2 and to understand the timescales and operational restrictions that may be imposed on any developer or occupier of the site in the short, medium and long term. This further dialogue will need to inform the Development Brief and any guidance provided in respect of phasing and delivery. In addition, the constraints plan within the Development Brief should be updated to include the identification of the safeguarded land.</p>	LDC & CCDC	Comments noted – HS2 will need to be addressed within the SPD.	HS2 section added to para 2.38
Pegasus Group	Viability	LDC & CCDC	Comments noted and will be the subject of further	No change

	<p>The Development Brief acknowledges at paragraph 2.67 that the majority of the land will require remediation and work is ongoing to understand the extent of the remediation works required. The Development Brief also recognises that demolition is anticipated to commence in 2018 and take two years to complete. Until demolition is underway, the level of remediation necessary, particularly in those areas currently comprising heavy infrastructure, is unlikely to be fully quantifiable.</p> <p>It should be recognised that site will require significant investment at the outset to allow development to come forward. The cost of the remediation works is unknown at present and therefore it is necessary to ensure maximum flexibility for determining an appropriate balance of uses within the Development Brief. Such flexibility should include the balance between employment and residential development, quantum of development and phasing and funding of necessary infrastructure.</p> <p>As set out above, Pegasus Group consider the site is capable of accommodating up to 2,000 dwellings as part of a comprehensive mixed-use scheme. An increase in the level of residential floorspace within the site would increase the viability of any final scheme and would not undermine the ability to deliver new jobs and employment uses within the site.</p>		discussion as the scheme progresses	
Pegasus Group	<p>CONCLUSIONS</p> <p>Whilst Pegasus Group welcomes the preparation of a Development Brief to assist in bring forward redevelopment of the former Rugeley 'B' Power Station site, it is considered necessary to delay the progression of a such guidance to allow for all necessary technical work to be completed and to provide opportunity for further dialogue with selected purchaser of the site in due course.</p>	LDC & CCDC	The SPD provides a framework for future development. The SPD is flexible to respond to further evidence coming forward.	No change

	<p>At this point in time a Development Brief cannot achieve the intended purpose of providing ‘guidance to the landowners, developers and the local community about expectations with regards to layout, form and quality of development on the site.’ This is due to the following uncertainties:</p> <ul style="list-style-type: none"> • Further work is ongoing in respect of ground conditions to understand the extent of remediation works required; • Secondary access is currently subject to a live planning application and pending consideration; and • Implications related to the proposed safeguarding of land in respect of HS2. <p>A delay in the adoption of an SPD to allow for the completion of further technical work will have no implications for the timescales in bringing the site forward; instead, it would allow for greater certainty to be provided to landowners, developers and the local community in respect of land uses (including infrastructure provision) and the quantum and balance of such land uses that can be achieved to ensure scheme viability.</p> <p>In light of outstanding technical work referred to above and evidence published to date relating to housing and employment provision, there is a need to provide far greater flexibility within the Development Brief between the balance of housing and employment land supported as part of a comprehensive mixed use development.</p> <p>The published evidence base supporting the plan making process highlights the significant housing shortfall within the Greater Birmingham Housing Market Area and the increased pressures</p>			
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	<p>being placed upon both Cannock Chase and Lichfield District in identifying additional housing sites. In addition, as the portfolio of employment land within Lichfield District is strong and only a marginal shortfall in supply is identified in Cannock, the need to identify additional employment land in this location is low.</p> <p>Therefore, the Development Brief should reflect a reduction in the indicative starting point for employment provision sought and provide no limit on the levels of residential provision at this stage.</p> <p>Pegasus Group consider the site is capable of accommodating up to 2,000 dwellings as part of a comprehensive scheme. An increase in the level of residential floorspace within the site would increase the viability of any final scheme and would not undermine the ability to deliver new jobs and employment uses within the site.</p> <p>If the Development Brief is to proceed to adoption, it will be necessary to remove Figure 4.4 from the document to ensure the necessary flexibility is provided.</p>			
Prozak R	<p>Rugeley needs a social hub for people to go, with a cinema, shopping complex eateries and things for the evening. The river trent would attract café bars, eateries, leisure and tourism. The river would open up a whole new avenue of possibilities. If the site becomes housing people will just use the town as a base and go elsewhere.</p>	LDC	<p>Site will be developed in line with adopted local plans and needs to protect vitality of Rugeley Town Centre. It is agreed the River Trent is an asset</p>	No change
Rugeley Power Station Society of Model Engineers	<p>Paragraph 2.43 omits to include miniature steam railway in the list of existing facilities within the recreation area.</p> <p>Request the in the SPD the miniature steam railway be included in the schedule of leisure facilities within the recreational area of the power station.</p> <p>Ask to be included in plans to establish a 'Community Hub' and secure a future for the railway and workshops free from the</p>	LDC	<p>Comments - will be amended to reference railway</p>	<p>Reference to railway added para 2.48</p>

	constraints of operating within a secure area. Along with providing steam train rides on a non-commercial basis, expect to be able to attract younger members to the facility.			
Rugeley Town Council	Further to your presentation on 30 th August 2017, Rugeley Town Council considered their responses and have asked me to make the following points which refer directly to the above Supplementary Planning Document. Rugeley Town Council understands that the demolition and clearance of the site will take between 3 – 4 years. In addition to this will be the need for remediation of the site to clear it of contaminants and pollutants. This remediation could be undertaken in a piecemeal fashion depending on the development phasing of the site. However, no work can take place until the current owners sell their business to a new owner willing to undertake the work.	CCDC	Noted: further details are awaited in terms of remediation and phasing.	No change
Rugeley Town Council	Cannock Chase Local Plan is ending in 2028 and Lichfield Local Plan ends in 2029. Given the timescale before any building work can take place, it is likely that the development will take place in the new local plan term rather than the current plan life. Rugeley Town Council are concerned that proposed regeneration, (redevelopment of Rugeley bus station and markets), due to take place in the current local plan life time may be delayed. Rugeley Town Council is seeking assurances that the regeneration of the town centre will continue without delay. It is also important that any planning document consider the future size and needs of the town post development of the power station in order to make meaningful comments on the redevelopment of the market hall and bus station.	CCDC	The regeneration of the town centre as set out in the Area Action Plan is separate to the power station issue and would not be delayed by this. The comments about future growth are noted and would be taken account of in any local plan review – at present the exact scale and nature of the redevelopment is not yet detailed beyond the minimum 800 homes specified.	No change
Rugeley Town Council	There has been much focus on the Community Infrastructure Levy and ongoing Council Tax that will stem from the new development. The beneficiaries of this funding will be the	CCDC	Noted although the collection and distribution of CIL is governed by legislation. The	No change

	Brereton and Ravenhill PC, Armitage and Handsacre PC, Cannock Chase DC and Lichfield DC. It is clear that Rugeley Town, which will be the economic focus for the housing developments, will not benefit from this income. This is a great concern for Rugeley Town Council. It may be that this funding is the only opportunity Rugeley Town Council has to secure funding to assist with infrastructure links between the new development and town.		Infrastructure Delivery Plans and associated Regulation123 lists determine the infrastructure priorities for each district and are reviewed as necessary.	
Rugeley Town Council	During the presentation the district councils expressed their disappointment that the leisure facilities on the current site are already closed in preparation of possible sale and redevelopment of the site despite this being some time away. The SPD identifies the desire to have replacement leisure facilities on the site. Councillors wish to bring to the district councils attention that whilst some local development of leisure / open space would be appropriate, there is an existing leisure centre and swimming pool which may benefit from improvements / expansion which is more centrally placed and serves the whole town rather than just the new housing.	CCDC	Comments noted - infrastructure requirements will be considered further as the development progresses.	No change
Rugeley Town Council	The development of green space is an important part of new development. The Town Council currently support and promote the idea of an Urban Orchard and Councillors are looking to ensure that future planning briefs / guidance consider stressing that new tree planting include an element of fruit trees throughout the site	CCDC	Comments noted: Green Infrastructure is already a feature of the SPD	Reference to fruit trees added to para 4.41
Rugeley Town Council	Rugeley has a tight political boundary around it which prevents large areas of new housing being added. The Town Council are seeking reassurance that the housing allocation for Rugeley town is absorbed within the power station development housing development.	CCDC	The respective Local Plan Allocations / Local Plan Part 2 documents for each district will determine which sites are suitable for allocation in delivering the requirements set out in the Local Plan	No change

			Strategy / Local Plan Part 1 and the plan periods to which these relate.	
Rugeley Town Council	There is little guidance for economic development on the site – be it commercial/retail or business. Councillors are seeking assurances that the development not detract from town centre development. It is important to the vitality of Rugeley Town Centre that the key retail development remains in the town centre rather than being dispersed through the new housing area.	CCDC	Noted and agreed that the uses on the site must not undermine the vitality and viability of the town centre. The wording in the SPD will be strengthened.	<p>In terms of the opportunities from local employment, the document has been strengthened at paras 4.12 /4.13 to emphasise the need for strong linkages between the site and the town and for employment uses to provide opportunities for local people.</p> <p>The need to diversify the local economy is noted and the SPD strengthened to pick up this point and relate it back to the Local Plan policies of the District Councils which support such diversification.</p> <p>National policy sets clear parameters considering town centre uses so as not to undermine the vitality of town centres and the SPD has been strengthened para 4.18</p>

				to emphasise this: retail should just be restricted to small scale convenience shopping to serve the new community.
Rugeley Town Council	The access routes for pedestrians / cycles to and from the new housing to the town centre need to be carefully considered to promote use. Desire lines of pedestrian traffic should be considered and pathways created to be open and inviting to encourage use. Equally when car journeys are made to the town centre, parking availability and additional opportunities from the redevelopment of Market Hall and the bus station should be considered. With housing close to the river and canal, this brings an additional opportunity for tourism promotion	CCDC	Comments noted	Reference to linkages, and to opportunities from the canal and river have been strengthened at para 2.93, 4.30, 4.64
Rugeley Town Council	At present, tourism is very much on the back foot in Rugeley. The proximity of the town to the canal and the river provides a great opportunity for boaters / walkers / cyclists to stop off in the town. The Town Council is keen to see the SPD consider physical links from the waterways into the town centre with financial support for way marking / information signage / tourism promotion.	CCDC	Comments noted	Reference to linkages, and to opportunities from the canal and river have been strengthened paras 2.93, 4.30, 4.64
Rugeley Town Council	There is concern that the new housing development essentially may create a 'dormitory suburb' of Rugeley rather than a vibrant expansion of the town. It is important that the new development looks to Rugeley for its economic / business / employment and educational needs rather than to more distant urban areas.	CCDC	Comments noted	Reference to linkages have been strengthened 4.12 / 4.13.
Rugeley Town Council	The SPD identifies the need for a new primary school on the site to support the new development. The new development will bring people of all ages though and this will have an effect on the local secondary school (The Hart School) which will be fed by the primary school. There are concerns that the school may not be of a sufficient size in its existing form to house additional classes in	CCDC	Noted and discussions are underway to ensure the right level of education provision	Reference to secondary education provision added to para 4.20

	each year group through the school. Consideration should be given to development of the Hart School			
Rugeley Town Council	There are already on going issues with the lack of driver facilities and lorry parking for the Amazon warehouse. It may be suggested that purpose built hard standing be created to service this need.	CCDC	Comments noted	SPD strengthened at 4.14 to say that depending on the end users and their operational patterns, parking and facilities for drivers will be expected to be delivered and managed on site (eg where long-distance drivers would be required to take a break). This would be considered further as the details of the scheme emerge.
Rugeley Town Council	Concerns have been voiced about the overall development on a flood plain with a high water table level. Assurances are sought that development on the site would not be affected by flooding of the river and the raised water table. The flood relief works at Hagley Fields are protection from the west rather than the east.	CCDC	Comments noted and will be addressed with the Environment Agency	The SPD has been amended 4.47 – 4.49 to take account of feedback from the Environment Agency
Rugeley Town Council	Since the redevelopment of the Horse Fair road system, congestion is a key issue through the town. Assurances would need to be given that traffic analysis was undertaken to prepare the arterial roads for the increase in traffic – not just from the housing but to accommodate all the site clearance and development traffic ahead of residents moving in.	CCDC	Noted: transport assessment will be required for the development.	Reference to Transport Assessment added at 4.24
Rugeley Town Council	Since writing the above, the Town Council have learnt of the possible use of the power station site as a storage compound up to 2029. This is of great concern to the Town Council and the people of Rugeley. Over the past 12 – 18 months, there has been	CCDC	Comments noted	The document has been strengthened at 4.12 / 4.13 to emphasise the need for strong linkages

	<p>a steady increase in anti-social behaviour and criminal activity in and around Rugeley and Brereton. The town centre in Rugeley is seeing a decline in footfall as more shop units are closing. The economic and learning opportunities available for post 16 year olds in Rugeley are also limited. There are no seats of higher or further education (except for Sixth Form at Hart School). The young adults are required to attend Stafford, Cannock or Lichfield. Support for young adults to readily access academic opportunities and employment opportunities could be further developed.</p>			<p>between the site and the town and for employment uses to provide opportunities for local people, which will include developing the skills of young people.</p>
<p>Savills (Rugeley Power Ltd)</p>	<p>We are instructed by Rugeley Power Limited (RPL), owners of Rugeley Power Station, to submit representations in respect of the current consultation on the Rugeley Power Station Development Brief draft supplementary planning document. These comments are put forward in furtherance of the ongoing constructive dialogue between both Cannock Chase District Council and Lichfield District Council with RPL. The comments seek amendment to the Development Brief to ensure that it is consistent with the adopted development plan and therefore capable of adoption as a SPD for which it needs to be in conformity with and supplementary to development plan policy. Our comments also set out the possible implications of the High Speed Rail Phase 2a (West Midlands to Crewe) hybrid Bill which was laid before Parliament on 17 July 2017. Further comments provide clarification and thoughts on practical matters to ensure the Development Brief promotes a deliverable and viable form of development. Comments are set out with reference to the paragraph numbers of the draft Development Brief.</p>	<p>LDC & CCDC</p>	<p>Comments noted</p>	<p>See responses below to individual matters.</p>
<p>Savills (Rugeley Power Ltd)</p>	<p>1.5 and 4.4 The Brief states that development proposals “should comprise a range of housing including self-build housing”. This is not in conformity with or supplementary to either Council’s development plan, nor is it realistic or appropriate to the circumstances of the site.</p>	<p>LDC & CCDC</p>	<p>The SPD encourages self-build however it is not a requirement</p>	<p>Added ‘where appropriate self build housing will be encouraged’ to para 4.4</p>

	<p>There is no policy requirement in the housing policies of either the CCDC or LDC development plans for housing development either on allocated or windfall sites to include an element of self-build housing.</p> <p>Self-build housing will by definition be brought forward as individual plots by persons that are not developers. Such a form of development is better suited to windfall sites and small allocations of a few plots where there is existing infrastructure where private buyers will be able to deliver a house into an existing built context.</p> <p>The property market is naturally geared towards the sale of individual plots or small sites in such situations to private buyers. Mainstream housebuilders and developers are not attracted to buy such sites. By contrast, the Power Station site is being planned comprehensively as the draft Development Brief attests. The site is complex and requires a comprehensive approach to ground remediation and infrastructure provision and is proposed for a minimum of 800 houses plus mixed uses. In these circumstances it is not practicable to dispose of individual plots to private individuals.</p> <p>The Brief should therefore be amended to delete a requirement for the development to include self-build housing.</p>			
Savills (Rugeley Power Ltd)	<p>1.13 By way of clarification, it would be helpful to note that RPL has been a member of the Task Force and has engaged cooperatively with it throughout.</p>	LDC & CCDC	Comments noted – Paragraph 1.13 will be amended	Para 1.13 amended
Savills (Rugeley Power Ltd)	<p>2.13 point 3 and 2.42 Insert the word “former” in front of Sports and Social Club to be accurate and consistent with the remainder of the Brief.</p>	LDC & CCDC	Comments noted - Guidance of Sport England will be followed on this matter	No change
Savills (Rugeley Power Ltd)	<p>2.22 The draft Brief states that “it is understood that Historic England decided against listing the cooling towers following a recent assessment”. The assessment by Historic England is a matter of</p>	LDC & CCDC	Comments noted – Paragraph 2.22 will be clarified	Para 2.23 updated regarding Certificate of Immunity

	<p>public record which the Brief can report affirmatively. Historic England assessed the whole of the Rugeley B Power Station site not just the cooling towers, and in January 2017 concluded that none of the buildings on the Power Station meets the criteria for listing. The recommendation that Historic England made was therefore to reject the listing of any of the site.</p> <p>The Brief should be amended to accurately report the Historic England assessment.</p>			
Savills (Rugeley Power Ltd)	<p>2.23</p> <p>If the Council considers that the significance of any of the heritage assets identified will be affected by redevelopment of the power station it would be helpful to identify which assets and how, in order that those matters can be specifically considered in any subsequent proposals. If however, it is not possible to determine at this stage whether the significance of any assets will be affected by development, it would be helpful to state that and outline what information the Council will require to consider this in due course.</p>	LDC & CCDC	Comments noted – Reference to Conservation and Heritage will be strengthened in the SPD	Para 2.23 – 2.28 strengthened
Savills (Rugeley Power Ltd)	<p>2.28 and 4.20</p> <p>Reference is made to the current application for a “secondary” access point from the A513 to facilitate demolition works. Amendment is needed to clarify the current application, what it is for and why, and how that has now acquired increased importance as a result of the High Speed Rail (HS2) Phase 2a Bill. The current application is not for a secondary access, but is for an additional access point to serve the existing requirements of the power station. There are a number of specific reasons for needing that access which are set out in the application submission. These are not secondary matters but matters of the utmost importance to the operation and preparation of the site for redevelopment, and the continued operation of the National Grid 400kv substation, the Western Power Distribution 132kv sub station and the Network Rail substation serving the west coast mainline.</p>	LDC & CCDC	Comments noted - Engagement with Staffordshire County Council will be on-going regarding access.	Updated para 2.31 and 4.27 now permission has been granted and stated further dialogue required to establish whether additional access points will be required.

	<p>The draft Brief states at 4.20 that the existing access from the A51 should be the primary access serving the redeveloped site, with any other access being secondary. If the HS2 Phase 2a Bill receives Royal Assent this aspiration of the draft Brief will not be achievable. The HS2 Bill proposals include the legal instruments to acquire by compulsory means various parcels of land within the Rugeley Power Station site. This will split the site into two separate parts with a strip owned by HS2 between them. It will not be possible for a developer or either Council to lay a road connecting the two parts of the Power Station site. Neither will a developer progress redevelopment proposals assuming a combined site whilst the HS2 Bill remains live, as this is an unacceptable threat to such a form of development. Accordingly each of the two halves of the Power Station site will require its own access. It may be beneficial for there to be more than one point of access to each part of the site, and the status of primary or secondary access may become even less relevant.</p> <p>Assessment of access requirements undertaken ahead of the current access planning application identified the need for at least one additional access for the development potential of the Power Station site to be realised. It can be expected therefore that future development as envisaged by the Brief will require one or more additional accesses to be developed. It is acknowledged that a further planning approval will be required for an access to serve the redevelopment and that is not the purpose of the current access application. However, the Brief should acknowledge that a new primary access will be required to serve the eastern part of the site.</p> <p>The current proposed additional access is expected to be granted planning permission imminently. All matters raised during consultation have now been resolved to the satisfaction of all officers and statutory consultees concerned. The Brief should be brought up to date when that permission is granted.</p>			
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Savills (Rugeley Power Ltd)	<p>2.41 and 4.34</p> <p>The Brief seeks to retain, where possible, the key landscape features highlighted in the figure (note error in reference). The landscape features identified in Figure 2.6 includes tree planting within pulverised fuel ash (pfa) bunds, and an amenity lake and recreation areas laid out on elevated pfa deposits.</p> <p>The ground reclamation strategy is still being considered, taking account of engineering factors and requirements flowing from the environmental permits related to the former power station use which extend across the site. It is possible that it may be necessary to remove the pfa which will necessitate the removal of the ground features and the vegetation growing from it. Given the potential for this outcome, it would be helpful for the Brief to acknowledge this.</p> <p>In the same terms, the Brief also identifies a preference for the Borrow Pit to be retained if possible. This is at odds with the LDC Local Plan Strategy (2015) which allocates the entirety of the Borrow Pit for development as part of the East of Rugeley Strategic Allocation. The Brief cannot re-write or usurp the development plan to which it is supplementary. The Brief should therefore support the development of the Borrow Pit in accordance with the Local Plan Strategy. It may however, also be possible for the Brief to confirm support for an alternative form of development whereby the housing allocated for the Borrow Pit is located elsewhere on the site.</p> <p>It is acknowledged that Brief paragraph 2.41 does state “where possible retaining” but given the significance of the areas of strategic landscape identified on figure 2.6 which may potentially have to be cleared, and the need for the Brief to be consistent with the Local Plan, the retention of these landscape features should be expressed as more of an aspiration and less of a requirement.</p>	LDC & CCDC	The retention of the Borrow Pit should be seen in context of redeveloping the site.	No change
Savills	2.45	LDC &	Comments noted	No change

(Rugeley Power Ltd)	By way of clarification: The main Power Station sports and social club lease and use of the sports facilities on site finished at the end of March 2017.	CCDC		
Savills (Rugeley Power Ltd)	2.49 The comments made in respect of the Borrow Pit under 2.41 apply. The support for retention of the Borrow Pit should also acknowledge support for the redevelopment of the Borrow Pit in accordance with the Local Plan allocation.	LDC & CCDC	The retention of the Borrow Pit should be seen in context of redeveloping the site.	No change
Savills (Rugeley Power Ltd)	2.50 It should be noted that RPL have been able to agree to continued use the allotments whilst redevelopment of the site is considered. The Brief should simply state support for the retention of the allotments.	LDC & CCDC	No change proposed – it is considered that the Brief is clear	No change
Savills (Rugeley Power Ltd)	2.73 It appears the words “be brought” are missing.	LDC & CCDC	Comments noted –will be amended	Amended
Savills (Rugeley Power Ltd)	2.74 The Brief refers to the County Minerals Local Plan and the minerals safeguarding area which covers much of both local authority areas including the Power Station site. Appendix 6 of that plan gives exemption from the safeguarding policy for sites within the urban area and for allocated sites where the assessment of site ptions took account of minerals safeguarding. With the exception of the golf course, none of the Power Station site is located within the countryside, the area of the Power Station expected to be redeveloped is wholly within the urban area. Additionally, the Borrow Pit is allocated for development. It follows therefore that the minerals safeguarding policy should not apply to the majority of the site. The Brief should be amended to provide a clear statement of the District Councils’ interpretation of the minerals policy in this regard.	LDC & CCDC	Comments noted - the advice of SSC Minerals will be sought on this matter	No change - Considered 2.77 is clear
Savills (Rugeley)	2.83 and 3.7 Other than by reference to Figure 2.11 (para 2.83) and Figure 3.1	LDC & CCDC	No change proposed – it is considered that the Brief is	No change

Power Ltd)	(para 3.7) there is no mention that the Borrow Pit forms a significant part of the East of Rugeley Strategic Development Area, nor is there reference to the residual quantum of development which the allocation relies upon from the Borrow Pit. It would aid completeness for the Brief to be clear in this regard.		clear	
Savills (Rugeley Power Ltd)	<p>2.89 and Figure 2.14</p> <p>It is acknowledged that this is a section on opportunities and not prescriptive policy, however it has the potential to confuse and be at odds with the LDC Local Plan Strategy. The key and the text state the Borrow Pit to be retained as a landscape / water / recreation feature. As noted with reference to 2.41 and 2.49, the Brief cannot ignore the fact that the Borrow Pit is allocated for development.</p> <p>The potential secondary access points indicated on the figure are unlikely to be deliverable without compulsory acquisition of third party land interests as the Councils are well aware. The most likely location for an additional access (which will be the primary access to the eastern part of the site as a result of the HS2 proposals) is from the A513 around the location of the current application for an additional access to the site. The location of the current application is consistent with Map G.2 East Rugeley Concept Diagram in the Local Plan Strategy. The Brief should therefore not promote access locations which cannot be delivered unless the Councils are prepared to use compulsory purchase powers. The location of a deliverable additional access should be identified consistent with that shown in the Local Plan Strategy.</p>	LDC & CCDC	<p>The retention of the Borrow Pit should be seen in context of redeveloping the site.</p> <p>Further discussions on the access will take place as more information becomes available on the site.</p>	No change
Savills (Rugeley Power Ltd)	<p>3.9 and 3.10</p> <p>The Brief refers to the Concept Statement (Appendix E) of the draft Local Plan Allocations document.</p> <p>Aspects of the Concept Brief are repeated in the Brief. RPL submitted representations to the LDC Local Plan Allocations</p>	LDC & CCDC	Comments noted – these matters are taken account of in the SPD and subject to discussions as further information becomes	No change

	<p>document including specifically in respect of the Appendix E Concept Statement. Those representations are copied below for ease of reference. These same comments are relevant and should be taken into account within the Brief.</p> <p>The matters set out at Appendix E are a 'Key Development Consideration' as referenced in Policy R1, with which development should comply. Appendix E contains a number of requirements which are unreasonable and in appropriate.</p> <p>E2 states that the development should ensure that it makes best use of the land. This is supported.</p> <p>E3(1) states a minimum of 800 homes. This is supported.</p> <p>E3(2) The objective for enhancement of ecological interests in addition to protection of ecological interests goes beyond NPPF requirements for planning policy in Local Plans as set out at 109 – 117 of the NPPF. Where the NPPF does seek enhancement of biodiversity it is with regard to the specific circumstances set out in 118. The LPA policy should not seek to place an undue burden on development which makes the use of previously developed land inefficient.</p> <p>E4(2) requires a net gain to biodiversity which as noted above goes beyond what is required by the NPPF and could run counter to the efficient use of previously developed land. The paragraph also states that existing mature trees and hedgerows will be retained. Council officers are aware that large areas of the R1 allocation site are overlain with pulverised fuel ash (PFA) which is a recognised grade of by product from the power station combustion process. The entirety of the R1 allocation site is within the area of Environmental Permits relating to the operation of Rugeley B Power Station. The operation of those permits may require the removal of the PFA from the site, or the relocation and stabilisation of the PFA within the site. In either event, the vegetation and mature trees currently rooted in the PFA will necessarily be removed. Such action is independent of the</p>		available.	
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	<p>planning process for the redevelopment of the site, and cannot therefore be controlled through development plan policy.</p> <p>E4(3) The paragraph relates to natural assets, but seeks to retain the existing sports facilities within the Power Station site. Those sports facilities are not natural assets and are constructed on a raised area of PFA on what was historically a PFA settlement lagoon. For the same reasons as set out above in relation to the retention of trees and hedgerows, it may be an environmental requirement that the PFA and hence the sports facilities are removed. Rugeley Power Ltd is working with its technical team to determine what works are required to comply with the Environmental Permits.</p> <p>E4(3) The preference expressed for the retention of the Borrow Pit as a water feature is contrary to adopted LPS policy CP6. As set out in objections to Table 4.1 and policy R1, the LPA cannot change adopted LPS policy, to do so requires a formal review of the LPS.</p> <p>E4(6) The R1 allocation site can be connected with the Borrow Pit component of the East of Rugeley SDA which is within the control of the same landowner. LDC Officers are aware that the ability to connect the R1 site to other elements of the East of Rugeley SDA is constrained by third party land holdings over which Rugeley Power Limited has no control. If those third parties are unwilling to cooperate, achievement of linkages between the R1 site and those parts of the East of Rugeley SDA is a matter that only public authorities can achieve through the use of their compulsory purchase powers.</p> <p>E4(7) LDC officers are aware that third party landholdings also constrain where access can be taken into the R1 site. Whilst it may be desirable to take access from neighbouring development, the LPA must recognise that achievement of this is unrealistic and not within the control of Rugeley Power Limited or the development of the R1 site.</p>			
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	<p>E4(14) Public art may be appropriate as part of the development, but it should not be a specific requirement. LPS policy CP12 supports public art, but does not require it.</p> <p>E4(15) The existing allotments at Rugeley B Power Station are not within the R1 allocation site as currently defined on the Proposals Map. As such policy R1 should not seek to control what happens to that land. The allotments are within the area of the adopted East Of Rugeley SDA.</p> <p>E5 Summary:</p> <p>The summary introduces new requirements which have not been considered elsewhere. This includes a requirement for a community hub to incorporate a community sports building and small scale convenience retail provision, and provision of a new primary school. No justification is provided for any of these requirements. In all cases, the provision of sports and community facilities and school places should only be what is necessary in accordance with policy in the adopted LPS to make the development acceptable. It is desirable that there is flexibility for convenience retail provision to come forward as part of the development, but this should not be a fixed requirement in the absence of demonstrated retail need.</p> <p>The retention (or replacement) of existing sports pitches and facilities should be regarded as contributing towards the provision necessary to support the new housing development, not in addition to it. This stands to reason as if full provision of sports facilities is made additionally, it would render the existing facilities surplus. The requirement to make new provision and retain the existing should therefore be changed to make appropriate provision from either new or existing facilities or a combination of the two.</p> <p>As noted above the retention of trees and hedgerows may be unachievable given the likely need to remove PFA, from which many trees and hedgerows are growing.</p>			
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	The requirement for all development to be within 350m of a bus stop is overly onerous. The Government and urban design best practice guidance sets a more realistic requirement for 400m.			
Savills (Rugeley Power Ltd)	3.22 When referring to developer contributions it is unclear whether the Brief is referring to CIL or S106 or both. CIL is adopted and payable as stated. Contributions through S106 may only be sought where they are necessary in planning terms, directly related to the development and fair and reasonable. The Brief should be clear in this regard.	LDC & CCDC	Comment noted – S106 contributions will only be sought where appropriate.	No change
Savills (Rugeley Power Ltd)	3.26 The desire expressed by the draft Brief for the Borrow Pit to be retained as a landscape / recreation facility, would require the Local Plan allocation for approximately 450 dwellings on the Borrow Pit (as part of the East of Rugeley SDA) to be re-provided elsewhere on the Power Station site. The Local Plan Allocations document identifies the site as an extension to the East of Rugeley SDA, and so the relocation of that housing provision could be considered to remain with the SDA. The CIL rate chargeable to those approximately 450 dwellings relocated from the Borrow Pit within the Power Station site should therefore, be eligible for the CIL rate applicable to the SDA. It would be helpful for the Brief to confirm this if possible. As an extension of the SDA, it would also be helpful to consider whether the reduced CIL rate which was deemed appropriate for the SDA could also be applied to the whole Power Station site as an extended SDA.	LDC & CCDC	SDA's were identified within the Local Plan Strategy. This is considered to be an opportunity brownfield site. CIL rates are set by the respective Councils and are already adopted	No change
Savills (Rugeley Power Ltd)	3.33, 4.14 and 4.48 The requirement for a community hub and its composition, should be considered alongside the overall quantum and mix of uses across the site. Once the role and function of the hub is known, the most appropriate location for it within the site can be determined, taking account of all relevant factors, including the	LDC & CCDC	Comments noted	No change

	<p>need for commercial viability. The HS2 Bill proposals which sever the site in two will also influence the most appropriate location. The preference for a location at the centre of the site should not therefore be predetermined by the Brief.</p>			
<p>Savills (Rugeley Power Ltd)</p>	<p>4.51 and Figure 4.4 For the reasons set out above it is not considered that the Design Parameters illustrated at Figure 4.4 “should be the starting point for any proposals”.</p> <p>Retention of the Borrow Pit as a landscape / recreation feature may be desirable in the context of the wider site, but is not strictly in conformity with the Local Plan.</p> <p>The location of the additional accesses are unrealistic and inconsistent with the Local Plan Strategy.</p> <p>The location of the community hub may not be appropriate for its purpose or commercial viability depending upon the development mix.</p> <p>The area of recreation and open space may have to be cleared, and there are many locations within the site that are suitable for the provision of the necessary sports pitches.</p> <p>The existing high bund along the southern boundary of the Power Station site along the north of the Persimmon development, may have to be removed for engineering reasons depending upon the requirements for remediation to the ash lagoons. The vegetation in this area may therefore have to be cleared in order to prepare the ground for redevelopment. If as proposed by the Brief the ash lagoon area is re-developed for residential, then there should be no need for a buffer between uses.</p> <p>Whilst Figure 4.4 may illustrate the Council’s preferred layout based upon its current understanding, the Brief should not close off the opportunity for alternative layouts as and when further information is known.</p>	<p>LDC & CCDC</p>	<p>The SPD provides the framework for development accepting that further information is emerging for the site. The SPD is intended to be flexible to respond to emerging issues whilst still delivering a development that compliments the existing local plan for both areas.</p>	<p>No change</p>

Savills (Rugeley Power Ltd)	5.2 It is stated that an Environmental Statement will be required due to the scale of development. Can the Brief provide more detail on what significant environmental effects are considered to be likely?	LDC & CCDC	Comments noted – Paragraph 5.2 to be amended to refer to EIA screening request	Para 5.2 amended
Slater, Z	Rugeley is growing at an alarming rate with houses been built on any available land but we are greatly lacking in shopping and leisure facilities especially for young people. I would love to see facilities being added to on the site as I now live on the hawkyard estate and there is nothing but a small park for children and no facilities for teenagers.	CCDC	Comments noted- infrastructure requirements will be considered further as development progresses	No change
Smith A	Agree Rugeley Power Station should be used to build 800 homes, 400 private homes and 400 rented homes to include a school, shop, pharmacy, doctors surgery. With access to public transport to Rugeley Trent Valley Train Station and Rugeley Town.	LDC	Site will seek to achieve a balanced housing market	No change
Smith P	Supports retention of the Borrow Pit for its environmental qualities and the preservation of the varied wildlife.	LDC	Comments noted	No change
Sport England	The overall drivers for the project are shaped around the national policy context in Section 3. I wonder if there are any local drivers that could be drawn out which make this location different. Are there any local challenges that this project could help deliver/address if clearly incorporated in the SPD?	CCDC	The local drivers are those set out in the adopted policy as part of the Local Plan Strategy and Local Plan Part 1	No change
Sport England	Given the national emphasis on planning and health and initiatives such as ‘Healthy Towns’ I wonder, with Rugeley being a relatively deprived community, whether this might merit an bit more emphasis (appreciating it is listed as one of the criteria in section 3)? There are a number of bodies engaged in promoting healthy active communities, including the NHS, Public Health England and ourselves, and we’ve updated and refreshed our guidance on ‘Active Design’ (along with Public Health England) which is referenced in both Local Plans (Cannock LP: Par 4.9, Policy CP3 – Chase Shaping – Design, and Lichfield LP: CP 10 – Healthy & Safe Lifestyles) but not highlighted in the body of the SPD. The youtube video below gives a short visual summary of the guidance	LDC & CCDC	Comments noted – the SPD will be amended to make reference to ‘Active Design’ guidance and this will be encouraged as development is progressed	Active Design Guide is encouraged in para 3.23 under other relevant documents.

	<p>and the link below that provides access to the background information and a copy of the guidance itself.</p> <p>https://www.youtube.com/watch?v=mDaVBh1Bs7Y</p> <p>https://www.sportengland.org/facilities-planning/active-design/</p> <p>We would like to see the SPD encourage any developer to embed the philosophy of healthy and active communities and for a developer to be required to utilise our 'Active Design' guidance as part of the quality design process, and if you are in agreement to perhaps use the development as a new case study for Active Design?</p>			
Sport England	<p>In terms of sports provision in general there are two separate elements which I don't think the SPD really draws out clearly enough. These are:</p> <ul style="list-style-type: none"> • The protection of the EXISTING sports club facilities, which meet <u>current</u> demand • The provision of new sports facilities, to meet <u>new</u> demand arising from planned housing growth <p>Whilst the solution may be provided via one community hub the way a masterplan addresses sport and recreation really needs to ensure it addresses both:</p> <ul style="list-style-type: none"> • Protection - NPPF Par 74 and Sport England policy to protect playing fields in the context of the existing sports facilities (https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/playing-field-land/) • Provision - NPPF Par 73, any robust and up to date evidence base for sport and NPPF Pars 17, 58, 70 and 171 https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/major-developments/ 	LDC & CCDC	Discussions are ongoing with Sport England and other relevant parties in relation to this issue	The SPD has been worded flexibly to enable the outcomes of ongoing discussions to be incorporated.

Sport England	Par 1.5 – in several instances reference is made to ‘open space and recreational facilities’. Can I recommend, to be consistent with NPPF Par 74, that this reads ‘open space, sport and recreation’. This will avoid lack of clarity between informal physical activity (such as play, walking etc. that is generally regarded as informal recreation) and sport which is generally regarded as formal activity. Also applies to Par’s 2.13 bullet 3, 3.22, 4.14, 4.28, 4.29, 4.44	LDC & CCDC	Comments noted – references will be amended	Amended
Sport England	Par 2.7 – it might be helpful to show the green belt on one of the maps?	LDC & CCDC	Comments noted – a contextual background plan will be provided	Figure 2.2 to show green belt boundaries
Sport England	Par 2.9 – the site may be well located but is there sufficient capacity in existing services and facilities to meet the additional demand? The snapshots below [see full rep] for example provide 2017 data for the usage of Rugeley Leisure Centre (the only community LC in Rugeley) which illustrates that the swimming pool (top table, yellow highlights) is 86% full at peak time (Sport England recommend 70% utilised capacity at peak times otherwise there is insufficient space to swim) and the sports hall 100% full (second table) at peak times (Sport England recommends 80%). This indicates for example in terms of built sports facilities that there is unlikely to be sufficient capacity at Rugeley Leisure centre to absorb new demand from housing growth, even if it is well located. If housing growth is the figure given in Par 1.7 (10,050 dwellings) this is equivalent to an additional 24,072 local residents. Using our Sports Facility Calculator this scale of housing growth would generate demand for a 7 court sports hall, a 5 lane 25m swimming pool and 1 AGP (this can be re-run depending on final housing numbers associated with this specific proposal but it give a feel for the scale of additional built sports facilities required to meet new demand). https://www.sportengland.org/facilities-	LDC & CCDC	Discussions are ongoing with Sport England and other relevant parties in relation to this issue. Evidence base is being updated.	No change but SPD flexibly worded to allow for the detail of further discussions and updated evidence.

	<p>planning/planning-for-sport/planning-tools-and-guidance/sports-facility-calculator/</p> <p>My point is that existing formal built sports provision in Rugeley appears to already be over used at peak times and additional growth will increase that demand. Measures need to be put in place to meet that new demand and planning contributions/CIL/land etc. secured to ensure delivery. It might be helpful to ref. use of Sport England’s Sports Facility Calculator (which can be used by Councils or developers via the Active Places Database) in the SPD to work out what level of new provision is required, which meets the CIL tests, and how it is to be delivered.</p>			
Sport England	Par 2.12 – describing the club as ‘former’ is a bit misleading as it has only had to close due to the decommissioning and demolition of the power station. I suggest this is clarified.	LDC & CCDC	Comments noted (although this reflects the situation relating to the building itself) as it is now	No change
Sport England	Par 2.43 – the list of sports facilities is not comprehensive. The ‘cricket oval’ should really be referred to as a ‘cricket pitch’, the ‘lawn bowls’ should be referred to as ‘a crown bowling green’ and there is also an 18 hole golf course and an angling/course fishing lake/pond (although this is mentioned in 2.46 it ought to be recognised as a sport taking place on the site).	LDC & CCDC	Comments noted – Paragraph 2.43 will be amended	Para 2.48 amended – not referenced golf course as its noted within para 2.47, nor angling as it is not centrally located. Reference to angling added to para 2.51
Sport England	Par 2.45 – my understanding from the task force agreement is that there would be a transitional plan put in place to relocate the users during decommissioning/demolition with the potential to re-open the sports club once the site was safe to access. This par. assume closure is permanent and rather undermines the policy position reinforced via NPPF 74 and SE policy to protect playing fields.	LDC & CCDC	It is the expectation set out in the SPD that sufficient provision of sport and recreational facilities will be made available on this site to the satisfaction of Sport England.	No change
Sport England	Site Analysis Map – general point that the plans are difficult to read, especially the key with is too small and blurry.	LDC & CCDC	Comments noted	Update plans

Sport England	Par 2.89 includes the opportunity to accommodate a local centre to include a sports building. I think this, and other references, don't really make it clear that outdoor space would need to be provided as part of this 'hub' which meets the protection/provision requirements for sport set out in point 3 above (e.g. pitches, changing rooms, perhaps an AGP/MUGA etc.). I would also suggest that bullet 6, and ref to pedestrian and cycling links should not only connect to local services/facilities but also act as part of a wider recreational walking/cycling/running routes to help improve opportunities for active lifestyles – maximising the value of the canal and other green infrastructure for example?	LDC & CCDC	Comments noted – Bullet point will be amended	Bullet point amended para 2.93
Sport England	Section 3, National Planning Policy Context. I expect you don't want to go into too much detail here but given there is existing sports facilities on site which are protected under NPPF 74 and policy to protect playing fields - would it help to ref. that in this section?	LDC & CCDC	No change proposed	No change – National Policy section is high level and therefore no reference to P.74 added into this section. Sports provision is covered under site analysis and development principles
Sport England	Section 3, Local Planning Policy refers only to LPs, SPDs etc. but not to key items of evidence base. I would perhaps ref. the local PPSs (as updated through the process) to ensure these were seen as a source of information to resolve the protect/provide issue around sports facilities?	LDC & CCDC	No change proposed as this specifically relates to policy	No change

Sport England	Par 3.22-28 – CIL 123 lists include some sports infrastructure. Further clarity might be required to ensure delivery of onsite and offsite sports infrastructure is actually delivered as part of the development project. There is a risk that generic statements on CIL 123 lists (as opposed to specific project definition) could mean all sports provision might be mopped up via CIL contributions which may mean specific mitigation and provision cannot be secured via S106 agreements. It may be for example that CIL is used to help fund the big ticket items (such as a new leisure centre) whilst S106 is used for on/off site outdoor sports facilities.	LDC & CCDC	Comments noted – infrastructure requirements will be considered in detail as the development progresses	No change
Sport England	Par 3.33 – cross reference to NPPF Par 73 Evidence Base (e.g. Playing Pitch Strategies) will be useful here and reference needs to be made to provision of outdoor sports space as well as the sports building.	LDC & CCDC	Comments noted – Paragraph 3.33 will be amended	Added reference to provision of outdoor sports space to para 3.36
Sport England	<p>Par 3.34 –</p> <ul style="list-style-type: none"> • The first sentence could read ‘to support sustainable development and healthy active lifestyles’. • The second sentence could read, ‘the proposals will be required to incorporate <u>provision</u> for open space, sports and recreation facilities in line with local policy and evidence base, incorporating playing pitches, outdoor sports such as tennis courts, bowling greens and/or tennis courts, equipped play, allotments to meet new demand generated by new population within the development and where possible the retention of any existing temporarily disused sports and recreation facilities that are required to meet existing needs. not justified to be unless it is 	LDC & CCDC	Comments noted – Paragraph will be amended	New Para 3.37 amended

	robustly demonstrated as being surplus to requirements’.			
Sport England	Par 4.15 – just a bit concerned that, apart from on the plans, this hub is not termed as being physically connected with the outdoor sports provision that it is designed to support.	LDC & CCDC	Comments noted - Link between hub and outdoor sports provision can be strengthened	4.17 – added in close proximity to outdoor sport provision
Sport England	Par 4.24-25 – added to this it is really helpful for walking/cycling/running routes to have clear signage/environmental legibility (e.g. 2 miles to town centre taking 30 mins walk, 10 mins cycle etc. giving users an idea of how far/how long it will take) with cycle and locker storage and showers at key nodes and locations such as schools/employment sites etc. (see active design).	LDC & CCDC	Comments noted	Reference to signage added to para 4.30
Sport England	Par 4.29 – similar wording to 3.34 above. If existing sports facilities (even if they are temporarily disused) are to be lost there needs to be a clear evidence base, informed by the an up to date PPS/Sports assessment to demonstrate they are surplus to requirements to accord with NPPF Par 74/SE policy to protect playing fields.	LDC & CCDC	Comments noted: CCDC is updating its evidence base	SPD flexibly worded so requirements of updated evidence can be accounted for as development progresses.
Sport England	Par. 4.47 – again the loss of a golf course to a country park may be interpreted as being supported here. The loss of the golf course would have to be demonstrated as surplus re. NPPF Par 74. Wording here should be more cautious. Figure 4.4 appears to assume the provision of a country park instead of the golf course – this should be corrected.	LDC & CCDC	Discussions are ongoing with Sport England and other relevant parties in relation to this issue	No change
Sport England	Development Layout – reinforce ‘Active Design’ implementation would be useful here.	LDC & CCDC	Comments noted	Reference added to para 4.64
Sport England	Par 5.2 – whilst we support the appropriateness of an outline application, because NPPF Par 74 is a <u>restrictive policy</u> it will be important to demonstrate at outline stage that the whole sports club site, golf course etc. is either to be retained and restored OR detailed evidence provided to prove some or part of the existing sports facilities are surplus to requirements (based on robust	LDC & CCDC	Comments noted - It is important that sport and recreation provision will need to be demonstrated at the earliest stage of a planning application.	No change

	evidence base) AND clear provision is to be made in terms of area/capacity/type (but not necessarily detailed layout) for new sports provision to meet the additional needs. If this is not clearly demonstrated we would have no choice but to object.			
Stafford Borough Council	Stafford Borough is a neighbouring authority to Cannock Chase District and Lichfield District with Rugeley being in close proximity to a number of settlements within the Borough. Whilst it is noted that this scale of development will further increase the substantial employment areas of Rugeley it is considered that this complements the overall economy of Staffordshire, although there may be a limited outflow of economically active people from Stafford Borough to these new developments. Furthermore the level of traffic movements will inevitably increase due to the new housing and employment areas with further pressure on the existing road network through Rugeley, particularly from the Cannock Chase area.	CCDC	Comments noted	Need for a Transport Assessment specified.
Stafford Borough Council	The Borough Council is generally supportive of the development principles, layout and design parameters in terms of re-using this significant brownfield site for new employment, housing and community facilities together with a new country park and significant areas of open space. However the vision could be further strengthened to explain the quality and type of place to be created. It is important to ensure that the overall aims of the project are supported, such as self-build which is an objective but does not appear to be re-enforced in terms of actual delivery. In addition the 'Development Principles' should provide more reference to high quality design and explain how this will be delivered by the development.	CCDC	Comments noted	Cross referencing to design guide SPDs added.

Stafford Borough Council	Turning to the 'design parameters' the current proposals show a Primary Access point along with potential secondary access points which must be delivered to ensure the development connects with surrounding areas rather than being a cul-de-sac. In addition the landscape buffer along the southern boundary of the site may lead to isolation of the development from the rest of the town rather than integrating with the existing settlement. Whilst some landscaping would be required it is important to provide strong linkages to the town centre and other areas.	CCDC	Comments noted	Cross referencing to design guide SPDs added.
Stafford Borough Council	The Borough Council welcomes acknowledgement in the consultation document of the Cannock Chase Special Area of Conservation and the need to contribute to mitigation measures whilst also providing a Country Park and areas of open space.	CCDC	Comments noted	No change
Stafford Borough Council	Finally it is worth noting that proposals for High Speed 2, published in July 2017 within the 'High Speed Rail (West Midlands – Crewe) Plans & Sections Volume 1: Plans' would appear to be using part of the Rugeley Power Station site for power generation, facilitated by access routes for construction and maintenance, which may have an impact on the delivery timescales of the development proposals.	CCDC	Comments noted	Reference to HS2 added 2.38
Stafford Borough Council	The Borough Council would welcome acknowledgement of this consultation response and a continuing updates on the progress of the Rugeley Power Station development approach in order to meet Duty to Co-operate requirements.	CCDC	Comments noted: dialogue will be ongoing under the Duty to Co-operate.	No change
Staffordshire County Council	Ecology 2.35 – 2.39 refer to ecology but fail to make it clear to potential developers what survey and assessment is required. Habitat survey and preliminary ecological assessment should be required for the full site, rather than making assumptions that only the "green" areas support biodiversity interest. For example land along the southern edge of the site along the A51 support species-rich grassland with a large colony of bee orchids (rare in Staffordshire). Assessment of impacts on ecology need to	LDC & CCDC	Comments noted - SPD will be strengthened to take account of these issues	Paragraph 2.42 bolstered

	<p>consider off-site impacts – for example to a large off-site bat maternity roost thought to use power station habitats at the Borrow Pit for foraging, and species using the River Trent.</p> <p>There is a substantial opportunity to deliver biodiversity enhancement through re-development of this site that contributes to the UK Biodiversity Strategy, the Staffordshire Biodiversity Action Plan and Cannock Chase and Lichfield District Biodiversity Opportunity Maps. It is therefore disappointing that s.2.89 refers only to retention “where possible” of natural features. A more ambitious and sustainable approach to biodiversity would be welcomed and would be more in accordance with the NPPF . It is noted that the Lichfield Local Plan Concept statement referred to in s.3.10 indicates that enhancement for biodiversity would be required. In regard of the Design Principles it might be helpful if the sections on Open Space & Green Infrastructure and Ecology & Biodiversity were better integrated to specify creation of a green infrastructure framework that incorporates and links existing features and provides enhancements for biodiversity. Reference to habitat creation as well as tree planting and measures for species would indicate more clearly the potential for substantial biodiversity enhancement on this site situated within the key landscape corridor of the River Trent.</p> <p>The Development Layout section fails to give clarity regarding delivery of green infrastructure. A green infrastructure strategy for the site may be a means of ensuring delivery of good quality multi-functional greenspace that incorporates ecological connectivity and biodiversity enhancement. The limited ambition in s.4.50 that a design strategy is required that “Seeks to retain natural assets...” is unlikely to deliver good quality greenspace or biodiversity protection let alone enhancement. The Figure 4.4</p>			<p>Reference added to Para 2.43.</p> <p>Added reference to green infrastructure strategy para 4.61</p> <p>Reference to biodiversity enhancement para 4.60</p>
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	<p>concept of a Country Park in the current golf course location is welcomed and provides potential for substantial biodiversity enhancement but this is not reflected in SPD text. Section 5.0 requirement for a green infrastructure strategy (linked to the phasing information required by s.5.8) as part of an outline planning application would be helpful in ensuring that piecemeal development does not result in erosion of landscape and biodiversity interest but delivers the enhancements that this site has potential for and is in accordance with Lichfield Local Plan policy NR6</p>			
Staffordshire County Council	<p>Historic Environment: Archaeology and Historic Landscape Character</p> <p>2.22. The Staffordshire Historic Environment Record (SHER) has yet to receive a copy of the Archaeological Desk Based Assessment referenced in this section. It is requested that a hard copy and a CD Rom version be submitted for inclusion on the SHER at the earliest opportunity.</p> <p>2.22. The Staffordshire County Council Historic Environment Team have briefly discussed the extant buildings of the Rugeley Power Station complex with colleagues from Historic England and are aware of their advice regarding the significance of the cooling towers; the need for the developer to record the site ‘in line with best practice and in accordance with NPPF’ is acknowledged. Bearing in mind that the site contains no designated heritage assets, advice regarding historic environment mitigation falls within the remit of the Local Planning Authority (LPA) and their historic environment advisors as part of the NPPF process. In this instance this will be the LPA Conservation Officer and the Staffordshire County Council Historic Environment Team (as archaeological advisors to the LPA). These specialists and not Historic England will advise regarding the nature, scope and scale</p>	LDC & CCDC	Comments noted - SPD will be strengthened to take account of these issues	<p>Para 2.23 – 2.28 relating to heritage assets amended and bolstered</p> <p>Para 2.25 added reference to below ground archaeological remains</p>

	<p>of archaeological and historic building surveys across the site as part of the planning process at either a pre-application stage or following the submission of planning permissions for the site.</p> <p>2.22. As the consultation document does not include links to the archaeological Desk-Based Assessment it is not clear how archaeological potential has been addressed across the site. It should be noted however that (in spite of likely substantial below ground impacts from the construction of the power station) there does remain the potential for below archaeological remains to be present across the site; this would include the potential for palaeoenvironmental remains associated with the nearby River Trent. Bearing in mind the scale of the proposed scheme there should be the recognition here that staged archaeological evaluations to better understand the significance of any below ground archaeological remains present and to inform discussions regarding ‘next steps’ may be required by the LPA.</p> <p>2.24. It is understandable that the document details the designated heritage assets in the general area of the site. However, there are also undesignated heritage assets across the site as recorded on the HER or consider the broad archaeological or historic character of the site and its environs, which are not covered; instead it references ‘low-moderate’ heritage asset significance as identified in the Rugeley HECZ (10). A number of historic farmsteads (PRNs 50123 & 50125) are recorded within the boundary of the site as well as an area of post medieval (and potentially medieval) squatter settlement (PRN 50124) at Langley Common (within the site boundary). Finally, on the opposite bank of the River Trent the HER records the presence of a pair of possible ring ditches (PRNs 05216 & 05258), these may be evidence for late Neolithic or Bronze Age burial activity and may indicate the potential for further similar archaeological sites</p>			
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	<p>to the south of the Trent.</p> <p>2.25. Future dialogue with the applicants' historic environment advisors is to be welcomed. It is advised that this be undertaken at the earliest opportunity to discuss likely next steps to better understand the scope and significance of heritage assets (both below ground and upstanding) across the site.</p> <p>Figure 2.14. This figure identifies the potential for the creation of 'Country Park/Wildlife Corridor' flanking the River Trent in the northern portion of the site. While this is to be welcomed and its introduction could potentially preserve archaeological remains in situ, an area of a post-medieval water meadow system (PRN 54830) does occupy most if not all of this corridor. While not statutorily protected it is recognised as a heritage asset and would therefore be considered as part of any future application for the site. Any proposals for this area would need to consider the potential for the presence of water meadow features such as structures (culverts, bridges) and features (banks/panes and leats) to survive. There are however also opportunities for this areas historic character to inform the 'development' of this area of a Country Park or Wildlife Corridor as well as opportunities for the interpretation of the historic environment as part of a broader public engagement strategy for the whole site.</p>			
Staffordshire County Council	<p>Minerals and Waste</p> <p>It is noted that Paragraph 2.47 refers to the planning permission L.07/08/856 W for infilling the borrow pit, which was first granted in December 2007. This permission was subsequently extended in October 2010 for a further 3 years (L.10/10/856 W), but has now expired. This was confirmed in our response to an application to discharge conditions (L.10/10/856 W D1) in October 2013.</p>	LDC & CCDC	Comments noted	Para 2.78 strengthened to reference need for an assessment to be undertaken

	<p>Our records also show that a small area of the site, in the vicinity of the cooling towers, also benefits from planning permission for the Materials Recycling Facility (CH.06/03/736 W), which was permitted in June 2006. The site processes ash from the power station to manufacture concrete blocks and other construction materials. Whilst the operation would appear to be dependent on the power station for its raw materials, future of this permission should be addressed within the SPD, especially as substantial stockpiles of ash may remain on site.</p> <p>Paragraph 2.74 correctly states that the site falls within a Mineral Safeguarding Area for Superficial Sand and Gravel. Paragraph 144, of the National Planning Policy Framework (NPPF) and Policy 3 of the Minerals Local Plan for Staffordshire (2015 – 2030), aim to protect mineral resources from sterilisation by other forms of development. However, the document suggests that the proposed redevelopment may be exempt under the details of Policy 3.2. This refers to a series of exemptions listed in Table 6, Appendix 6, of the Plan. While it is clear that the adjacent housing development, and the borrow pit area, are identified in the Lichfield District Local Plan as a Strategic Development Allocation, and would fall under Exemption 3 (Applications that are in accordance with the development plan where the assessment of site options took account of potential mineral sterilisation), the main area under consideration in this SPD would not have the same benefit.</p> <p>It is recommended that, as part of the development of the Rugeley Power Station Development Brief, an assessment is carried out to determine the existence, the quantity, the quality and the value of the underlying or adjacent mineral resource. It is likely that this can be prepared on the basis of drilling and other site investigations that have already been carried out.</p>			
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	<p>Finally, the site clearance and remediation will inevitable give rise to substantial quantities of waste materials. We would encourage every effort to maximise the beneficial use of this material, ideally through recycling as a secondary aggregate which can reduce the demand for newly extracted sand and gravel. Where this is not possible, the material would be valuable for use in the restoration of mineral workings in the area.</p>			
Staffordshire Police	<p>Re: Rugeley Power Station Consultation (Regulations 12 and 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012)</p> <p>Thank you for the above consultation document, I ask that Cannock Chase District Council consider my comments, which are made in accordance with;</p> <p>Section 17 of the ‘Crime and Disorder Act 1998’:</p> <ul style="list-style-type: none"> • <i>places a duty on each local authority (Parish, District & County Council): ‘to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area to include anti-social behaviour, substance misuse and behaviour which adversely affects the environment’.</i> <p>National Planning Policy Framework:</p> <ul style="list-style-type: none"> • <i>Paragraph 58</i> <i>‘Planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.’</i> • Paragraph 69. <i>This paragraph looks towards healthy and inclusive communities.</i> 	LDC & CCDC	Comments noted	No change

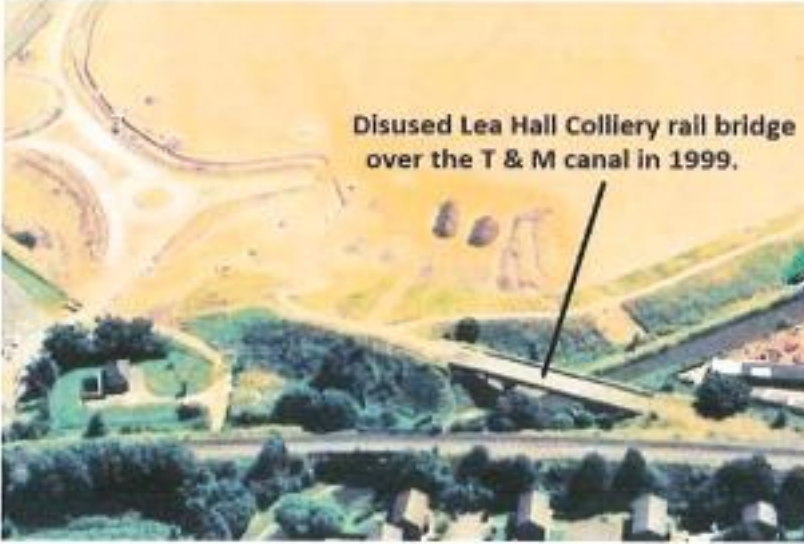
	<p><i>The paragraph includes:- “Planning policies and decisions, in turn, should aim to achieve places which promote: Safe and accessible developments where crime and disorder, and the fear of crime, do not undermine quality of life and community cohesion”</i></p> <p>Cannock Chase District Council Local Plan Part 1 & Design SPD Designing Out Crime Policy Local Plan (Part 1) Policy CP3</p> <ul style="list-style-type: none"> • <i>Policy CP3 includes key design principles that includes;- “The recent updates to housing standards brought in via the updated PPG and Building Regulations do now incorporate the dwelling-scale requirements of Secured by Design into mandatory Building Regulation requirements. As a result, the guidance for individual dwellings is no longer applicable”. “Good design will give careful thought to how appropriate safety and security measures can be accommodated in a way sympathetic to the amenity of the local area.” “The need to enhance crime prevention as part of new developments including building security and attractive design of surroundings (car parking etc.) to deter crime”</i> <p>The Human Rights Act Article & Protocol 1, Safer Places: The Planning System and Crime Prevention and PINS 953.</p> <p>Staffordshire Police request that in order to prevent crime and reduce the fear of crime that this re-development attains Police Secured by Design (SBD) accreditation and that any public car-parks attain the British Parking Associations’ “Parkmark” standard award. There is no charge for my advice or for the Secured by Design award, and once awarded the Police SBD logo can be used on advertising material.</p>			
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	<p>Research shows that adopting SBD can reduce burglary by 50%, car crime and criminal damage by 25%, therefore the carbon costs of replacing door-sets and windows on SBD accredited developments as a result of criminal activity is more than 50% less than on non SBD developments, <i>installing SBD approved products cost 0.2% of the total build cost.</i></p> <p>Secured by Design will support the consultation documents aim in;</p> <p>Delivering a wide choice of high quality homes – where residential development is involved, a range of homes should be delivered which incorporate a mix of housing to meet local needs including the provision of affordable homes;</p> <p>Requiring good design – achieving high quality and innovative design, stressing the importance of local distinctiveness and sustainability;</p> <p>Further information on Secured by Design and accredited security products can be found at www.securedbydesign.com, further information relating to “Parkmark” can be found at www.parkmark.co.uk</p> <p>I trust the constructive observations I have made will be useful to the Planning Committee in considering the application.</p>			
Stockton P	2.5 The current application for second access point to facilitate demolition work from A513 is not required and would damage the Educational facilities by cutting off Borrow Pit from the main environmental building. There is already access as mentioned in paragraph 2.27	LDC	Application has been submitted and is being considered to facilitate demolition	No change
Stockton P	2.29 This area should be protected as part of the environmental	LDC	Comments noted	No change

	resource that is mentioned later in the document, and any planning applications should be mindful of this resource. It provides a barrier and environmental corridor between the site and the A513.			
Stockton P	2.18 The Ecology of the site should be seen as an on going ecological asset, and I support the Councils desire to maintain this aspect of the South and Eastern area of the site.	LDC	Comments noted	No change
Stockton P	2.36 The Borrow Pit and land surrounding it provides the ideal habitat for wildlife species, and a corridor to the Trent System for Otters as well as vital habitat for all the other species mentioned.	LDC	Comments noted	No change
Stockton P	2.38 The Landscape and Community features should be kept as once lost, only a token gesture will be paid toward their requirements by any future developers who will seek to develop even further.	LDC	Comments noted	No change
Stockton P	3.21 I fully support The Armitage with Handsacre Neighbourhood plan which specifically seeks to retain the Borrow Pit as an Environmental Asset to the Community.	LDC	Comments noted	No change
Stockton P	3.21 I fully support The Armitage with Handsacre Neighbourhood plan which specifically seeks to retain the Borrow Pit as an Environmental Asset to the Community.	LDC	Comments noted	No change
Stockton P	4.29 I fully support the Councils intention to retain and protect existing facilities	LDC	Comments noted	No change
Stockton P	4.34 I fully support the inclusion of this clause, and would seek to assist the existing users of the facility in their proposals to retain the Borrow Pit in the redevelopment plans.	LDC	Comments noted	No change
Stockton P	4.37 I fully support the Councils desire to include this in the Planning Document. "The retention of the Borrow Pit and the adjacent landscape features"	LDC	Comments noted	No change
Stockton P	4.46 I fully support the retention of this clause	LDC	Comments noted	No change
Stokes T (Lakeside FC)	Following the closure of Rugeley Power station leisure facilities and the difficulties encountered by Lakeside FC in finding suitable pitches for training and matches, I contacted Amanda Milling MP	CCDC	Noted – these matters are under discussion with the relevant parties. CCDC is	No change

	<p>for assistance. The early discussions between the Power Station, CCDC and Sports England did not include any representative of Lakeside FC. (Power Station Sports & Leisure club have never managed Lakeside FC).</p> <p>I was informed by Ms Milling of the Rugeley Power Station Development Brief - Supplementary Planning Document, a Cannock Chase District Council & Lichfield District Council joint review which includes leisure facilities which ends on 4th September 2017 so I submit the following for your consideration. I know the council need to provide leisure facilities for all the population but my concern is the lack of suitable, secure pitches of a standard acceptable to governing bodies (i.e. Football Association) especially when teams achieve a higher level of ability (between 2013 and 2016 Lakeside had 2 teams in the Midland Junior Premier league) and also meet the requirements for the 6 different size pitches for different age groups.</p> <p>The council already run two standards of pitch.</p> <ol style="list-style-type: none"> 1 Leisure centres like Cannock and Rugeley, which have associated facilities such as artificial turf and the Bradbury Lane site, Hednesford, although these are predominately used as training facilities. When completed the new stadium in West Chads Moor will increase the number of 'match' pitches. 2 Numerous pitches, open to the public at all times except when in use by teams which have hired them. Some may have changing rooms, like Green Lane in Rugeley and Heath Hayes Park but the grounds are totally unsecured and open to misuse and fouling by dogs. <p>I propose an intermediate standard which can be hired by a limited number of clubs on a time shared basis. These would require security fencing and include changing rooms with showers</p>		<p>currently updating its Playing Field Strategy and this will be used as details of the development are worked up.</p>	
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	<p>and CCTV. Larger clubs, like Lakeside could be approached, together with any other club using the same facility to form a joint 'caretaking' committee to cover opening, cleaning & general maintenance of the facilities, with the hire costs representing the percentage of use and the level of contribution to its upkeep, which will in turn help to reduce council revenue costs.</p> <p>Each club could then provide suitable storage containers for their own equipment.</p> <p>With the assistance of the clubs it may be possible to attract funding from the Football Foundation and Sport England for the initial build and the clubs can also apply for ongoing support, including from Staffordshire FA. The number and location of these pitches will depend on the location and size of suitable clubs, all of which can be part of the council's plan to "refresh its Indoor and Outside Facilities assessment" over the next 12 months.</p>			
Thornton H	<p>P32 Para 4.6. The proposed residential development should include suitable housing / bungalows / sheltered accommodation close to a bus route to meet an already known local need for the elderly including those who may wish to downsize and free up larger dwellings. The huge numbers of new dwellings already built, or about to be built up to 2028 in the Rugeley area will eventually result in a much greater need for such accommodation.</p>	CCDC	<p>Achieving a balanced housing mix will be a requirement of the development in line with the adopted plans of both authorities.</p>	No change
Thornton H	<p>P32 Para 4.11 & P34 Para 4.27. It would be extremely unwise to retain the exiting railway to the Power station as it is unlikely to be needed for the type of employment envisaged and if it remains and is unused it would take up valuable employment land, and the railway with its embankment and bridge over the Rugeley bypass would become a liability for future maintenance. It is therefore vital that everything connected with the railway should be removed at an early stage as part of the Power station decommissioning and land reclamation. It is worth mentioning that a short length of the railway to the nearby lea Hall colliery</p>	CCDC	<p>Comments noted - this matter is being explored</p>	No change

	<p>was similarly retained, including a bridge, with embankments, over the T&M canal, the bridge is now completely useless and deteriorating with no funding available for maintenance or to meet whatever will be the increasing cost of having it removed see aerial photograph</p>  <p>Disused Lea Hall Colliery rail bridge over the T & M canal in 1999.</p>			
Thornton H	<p>P34, Para 4.29 & P36 Para 4.47. The golf course could justifiably be retained as no equivalent facility is now within the Rugeley area – St Thomas’s golf course at Hawkesyard (Page 6 Para 2.7) closed last December and its future is very uncertain. The last 13 holes of the part of the golf course on the flood planning should be fully integrated with the first 5 holes, at a higher level, after removal of the intervening railway lines.</p>	CCDC	<p>Discussions are ongoing between the relevant parties (including Sport England) and with the Environment Agency regarding the role of the land.</p>	<p>No change to the SPD as it has been flexibly worded to enable detailed consideration of issues as they emerge.</p>
Thornton H	<p>P37 Para 4.50. My strong opinion is that the design strategy should ensure that in the Rugeley area the delivery of more dwellings should not be allowed to run ahead of the provision of suitable local employment land, as is the case at present – almost</p>	CCDC	<p>The phasing of the site and delivery of the site will depend on evidence as it emerges</p>	<p>No change</p>

	no local employment land has become available since the Towers site was almost filled to capacity some 4 years ago. This is important as already the occupants of the hundreds of dwellings now being built locally are mostly having to commute to other areas for suitable work, and it appears that most employment land on the Power Station site is unlikely to become available for at least another 3 years. In addition, P33, Para 4.18 reads: 'A key principle of the development is to create a sustainable development which reduces car dependency....'			
Thornton H	P37 Para 4.51 Figure 4.4. The grey area described for 'Mixed use' is somewhat vague, may I suggest it is described as 'Predominantly for Employment' as it contains the 132KV indoor substation along its SW side and will be dominated by the 132/400KV outdoor substation on the whole of its NW side.	CCDC	No change proposed – the SPD is intended to be flexible in its approach.	No change
Thornton H	The large flooded borrow pit could almost immediately be made available, possibly as a commercial enterprise for its present / recent uses of fishing and sailing, particularly as a published power station leaflet of June 2008 estimated that, (because of its depth) '160,000 lorry journeys' would be required to fill it for other uses. It is worth mentioning that when the borrow pit was created circa 1960 it completely destroyed what remained of the 14 th century moated Hawkesyard Hall, an ancient monument, which was abandoned in 1760 when replaced by the present Hawkesyard Hall (Spode House). The exact location of the medieval hall can be found on the 1:2,500 scale 1923 edition of OS map XLV1.9. The ancient tree-lined hollow Hawkesyard lane along the east side of the borrow pit was the means of access to the medieval hall and may contain archaeological remains.	CCDC	The SPD seeks to retain the borrow pit as a key water / landscape feature	No change
Till P	This site is an industrial site and should be kept as such. Option one =Keep the Power Station running on gas, and run by the private sector. Option two = Its reutilisation should be for manufacturing and industrial purposes only. I feel it is important to bring back and	CCDC	Comments noted: employment uses are being encouraged on the site	No change

	<p>encourage this aspect to give the future generation a chance to get them off the dole and the opportunity of a career. This is an import decision and the right one must be taken to improve and put Rugeley on the map for the right reasons.</p>			
Weightman R	<p>A lot of focus is given to the younger generation when it comes to new redevelopments. I understand the need for housing and that the youngsters are the future of the area but we must not forget the older generation. Within the new housing structure could we not see much needed properties to house the older generation. For example: bungalows. People could purchase / rent a smaller property especially a nice little bungalow in a safe area therefore freeing up much needed houses of which could house a family. We also have the need for Residential and Specialist care homes. Could there be a nice garden area so that people could go and sit and feel safe. I know there are parks but sometimes the elderly feel intimidated walking or sitting in a play area. There are some lovely water features on the Power Station site. Please remember the older generation, they are as entitled to consideration as most.</p>	CCDC	Comments noted – the SPD seeks to encourage a balanced housing mix to provide for all needs in line with adopted plans.	No change
Whittaker G	<p>2.47 I would like to say that not only is fishing an enjoyable pastime for young and old it's also a meeting place a sort of talking place to meet up with people a lot of the fishermen are widowed and what a place to meet friends and watch the wildlife of which there's plenty of bird life as is stated badgers/bats /squirrels ect So please give some thought to the people and wildlife in making your decision I hope that you make the right one .</p>	LDC	Comments noted	No change
Whittaker G	<p>4.3 I would like to say that not only is the fishing a really good pastime for both young and old/disabled everyone is welcome they would find a lot of people who are there to help or just chat a</p>	LDC	Comments noted	No change

	lot of the fishermen are retired and look to this as a meeting place as well as a pastime a lot of these elderly men live alone so enjoy the company it is also a place to just sit and watch the wildlife that's there it is truly a haven for the wildlife So please make the right decision when it comes to voting for the sake of the community and the wildlife			
Wilson B	2.5 Allotments have been given a three year reprieve, this should be extended if Cllrs are firm in their belief that Allotments will be retained	LDC	The SPD seeks to retain allotments	No change
Wilson B	2.52 Agree that many of the existing trees should be retained at all costs	LDC	Comments noted	No change
Wilson B	2.3 Clarifies he was a Senior Engineer at RPS for 25 years	LDC	Comments noted	No change
Wilson B	Figure 2.3 There are many mature trees bordering the present open space of the former football pitches etc, to cut these down would be an act of sacrilege.	LDC	Comments noted	No change
Wilson B	2.42 Only the Model Engineers have found it practically impossible to easily move house due to the fixed nature of their assets.	LDC	Comments noted	No change
Wilson B	2.43 The four activities grossly misrepresent the club activities - bar activities, snooker, table tennis, meetings, dancing and variety acts. Outside were model boating, coarse and fly fishing, miniature railway and many more activities.	LDC	Comments noted	No change
Wilson B	2.45 The Model Engineers through their own efforts to date have managed to retain a toe hold on site in the hope that Councillors support these interests.	LDC	Comments noted	No change
Wilson B	Model Engineers negotiated 6 month extension to remain on site in the form of license agreement. It became obvious the railway could not be up routed in 6 months so it was agreed the railway would not be removed just personal and ancillary equipment. Requested an extension to the license primarily to continue looking after the grounds on which it sits as consider they the railway is an asset too good to let go. Keen to maintain a presence on site and perhaps operate the railway on a non-commercial basis for the benefit of the people	LDC	Comments noted	No change

	either already in situ on the 'Pippins' housing development or will be in the future.			
Comments received from officers within Cannock Chase and Lichfield District Councils	Conservation and historic environment : Need to strengthen linkages and opportunities relating to the conservation area, heritage assets and setting, maximise linkages (towpath) for walking and cycling, to strengthen links with the design SPDs, the opportunity to create a landmark, the need for a heritage impact assessment.	CCDC / LDC	Comments noted	SPD strengthened paras 2.23 – 2.28, 2.93, 4.22, 4.23 to take account of these issues: also improved cross referencing to the design SPDs.
Comments received from officers within Cannock Chase and Lichfield District Councils	Land contamination: environmental protection teams will need to be consulted and engaged throughout the process of site development. Allotments need low levels of site contamination so location (if needed) needs to be in clean areas.	CCDC / LDC	Comments noted	SPD strengthened para 2.77 to take account of these issues.
Comments received from officers within Cannock Chase and Lichfield District Councils	Air quality: Traffic associated emissions to be assessed and developer contributions to be sought for mitigation based on DEFRA's damage cost approach.	CCDC / LDC	Comments noted	SPD strengthened para 4.55 to take account of these issues.
Comments received from officers within	Noise: acoustic design statement as described in ProPG document will be needed. Good design and layout needed	CCDC / LDC	Comments noted	SPD strengthened para 4.56 to take account of these issues: also improved cross

Cannock Chase and Lichfield District Councils				referencing to the design SPDs.
Comments received from officers within Cannock Chase and Lichfield District Councils	Existing Environmental permit regulated by the Environment Agency, will be effective until the site is returned to the state it was in prior to use as a power station. This will control the environmental impact of decommissioning and demolition works, such as dust generation. It should also ensure that any significant land contamination caused by use as a power station is addressed but not impacts pre-dating that use.	CCDC / LDC	Comments noted – to be considered further as the detail of the development progresses.	No change
Comments received from officers within Cannock Chase and Lichfield District Councils	Flooding and flood risk / mitigation needs more detail.	CCDC / LDC	Comments noted – Environment Agency comments provide the detail needed.	Flood Risk section strengthened paras 4.47 – 4.49
Comments received from officers within Cannock Chase and Lichfield District Councils	Ecology and biodiversity section needs strengthening and further assessment work is needed including any mitigation and compensatory measures, and this should all be considered as part of a comprehensive landscaping scheme.	CCDC / LDC	Comments noted – to be considered further as the detail of the development progresses.	SPD strengthened including amendments to para 2.42 and 2.43, 2.46

Comments received from officers within Cannock Chase and Lichfield District Councils	Transport references, opportunities and requirements to be strengthened including bus routes.	CCDC / LDC	Comments noted	SPD strengthened Para 2.37, 2.93 to take account of these issues.
Comments received from officers within Cannock Chase and Lichfield District Councils	SPD needs strengthening in terms of parking, management and maintenance (eg roads and open spaces)	CCDC / LDC	Comments noted – to be considered further as the detail of the development progresses.	SPD strengthened, paras 4.14, 4.33, 4.35, 4.64 to take account of these issues.
Comments received from officers within Cannock Chase and Lichfield District Councils	SPD needs strengthening in terms of connectivity, employment and local economy (including employment and skills plans) and supporting infrastructure (high speed broadband – also in relation to homes)	CCDC / LDC	Comments noted – to be considered further as the detail of the development progresses.	SPD strengthened to take account of these issues, paras 4.12 – 4.14, 4.21, 4.59