

Report of:	Head of Economic Prosperity
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Key Decision:	No
Report Track:	Cabinet: 16/12/21

Cabinet
16 December 2021
Local Plan Preferred Options Consultation Feedback and Next Steps

1 Purpose of Report

- 1.1 To provide feedback on the Cannock Chase Local Plan Review Preferred Options consultation and set out the next steps in the Local Plan Review.

2 Recommendation(s)

- 2.1 That Cabinet notes the feedback received on the Cannock Chase Local Plan review preferred Options consultation.
- 2.2 That Cabinet notes the next steps in progressing the Local Plan Review.

3 Key Issues and Reasons for Recommendations

Key Issues

- 3.1 The Cannock Chase Local Plan review Preferred Options consultation was undertaken between 19th March and 30th April 2021. The consultation included a number of supporting documents that were published at the same time. These documents included the non-technical summary, Sustainability Appraisal and Habitat Regulations Assessment Report which included the Health Impact Assessment and Equalities Impact Assessment, alongside 9 additional pieces of evidence. The consultation was approved by Cabinet on 4th March 2021.
- 3.2 Consultation is a vital part of the preparation of the Local Plan and the Council needs to show how it has considered the representations. The consultation was on the third iteration of the review of the Local Plan and was the first to contain site specific allocations for housing and employment. The consultation responses summarised at Appendix A will be considered in the preparation and refinement of Local plan policies and allocations for the next version of the Local plan prior to the Submission of the Local Plan in summer 2022. The Local Plan will also

establish the Council's position regarding cross boundary strategic matters and guide the Council's input into others plans.

3.3 The consultation was undertaken in accordance with the SCI Addendum December 2020 and in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) in particular by the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020. The consultation was prepared following advice from the Communications and Risk Management teams .

3.4 The consultation responses are summarised at Appendix A to this report. Representations were received from residents, developers and landowners, planning agents/consultants, community or other organisations, public agencies and statutory consultees, local authorities, charities and Councillors. Four representations were received regarding the duty to cooperate. In total 99 representations were received, which when broken down into the corresponding questions posed within the Preferred options document provided 518 individual responses plus a further 8 responses to the Sustainability appraisal and 4 responses relating to the other evidence published at the time. Further detail is included within the report detail section of this report, the main issues raised by the representations are listed below:

- Quantum of development
- Lack of sites for Gypsy, Traveller and Travelling Showpeople, employment and housing.
- Loss of Green belt and greenspace
- Impact upon viability due to enhanced Building Standards and housing mix
- Local infrastructure capacity and provision
- Lack of open space standards and a request to include parking standards
- Importance of heritage should be reflected throughout the document and Grove Colliery should be designated a conservation area.
- Comments on individual site allocations
- Effectiveness of the consultation
- General comments

Duty to cooperate

- Strategic matters relating to the Duty to Cooperate

Next Steps

3.5 Further evidence will be completed to support the preparation of the next stage of the Local Plan and discussions continued with our duty to cooperate partners to meet our legal obligations. A viability assessment will be prepared to ensure the balance between the policy requirements in the Local Plan will be effective, are justified, positively prepared and enable the delivery of sustainable development.

Reasons for Recommendations

3.6 Consultation is a vital part of the preparation of the Local Plan. The Council needs to show how it has considered the representations and that the consultation was in conformity with its Statement of Community Involvement.

- 3.7 Consultation provides local involvement and input to reflect local circumstances and ambitions for our district and this is taken further through collaboration with our partners and statutory undertakers. In this way the number of representations to the Local Plan are reduced and the Local Plan should be more robust and justified. In turn, this will help focus a Local Plan examination and potentially reduce the number of hearing sessions and consequently reduce the time and cost of the examination in public.

4 Relationship to Corporate Priorities

- 4.1 This report supports the Council's Corporate Priorities as follows:
- (i) **Supporting Economic Recovery** – Ensuring sufficient supply of employment land and workspaces for small business; regeneration and reshaping of Cannock and Rugeley Town Centres; increasing affordable housing and well-designed communities are key aspects of the emerging Local Plan.
 - (ii) **Supporting Health and Wellbeing** – The Local Plan will identify opportunities for funding to invest in local facilities and contribute to the Council's Health, Wellbeing and Physical Activity Strategy. It will support vulnerable groups, older people and those living with disabilities to live healthier and more independent lives and help to reduce the impact of climate change, and provide improvements to parks, green spaces and countryside along with protecting and enhancing the natural environments.

5 Report Detail

- 5.1 The Cannock Chase Local Plan Review Preferred Options consultation was undertaken between 19th March and 30th April 2021. The consultation included a number of supporting documents that were published at the same time. These documents included the non-technical summary, Sustainability Appraisal and Habitat Regulations Assessment Report which included the Health Impact Assessment and Equalities Impact Assessment, alongside the Economic Development Needs Assessment update, Retail and Town Centre Uses Study, Climate Change Adaption and Mitigation Baseline Report and Final report, Heritage Impact Assessment, Development Capacity Study, Employment Land Availability Assessment, Housing Land Availability Assessment and Green Belt part 2 Study. The consultation was approved by Cabinet on 4th March 2021.
- 5.2 Consultation is a vital part of the preparation of the Local Plan and the Council needs to show how it has considered the representations. The consultation was on the third iteration of the review of the Local Plan and was the first to contain site specific allocations for housing and employment. The first iteration was the Issues and Scope consultation in summer 2018 the outcome of which was reported to Cabinet on 8th November 2018 and the Issues and Options document which was consulted upon in May 2019 and the results of which were reported in October 2019. The consultation responses to this consultation are summarised at Appendix A and will be considered in the preparation and refinement of Local plan policies and allocations for the next version of the Local Plan prior to the Submission stage of the Local Plan in summer 2022. The Local Plan will also

establish the Council's position regarding cross boundary strategic matters and guide the Council's input into others plans.

- 5.3 The consultation was undertaken in accordance with the SCI Addendum December 2020 and in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) in particular by the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020. The consultation was prepared following advice from the Communications and Health and Safety representatives. The consultation comprised publishing the documents on the website and advertising them on the front page of the website; sending over 780 emails and approximately 650 letters to those registered on the local plan consultation database; using the Councils corporate social media Facebook and Twitter accounts including social media adverts; press release; advert in the only newspaper which was printing and being distributed at the time; and when the libraries were able to open part way through the consultation period a letter of explanation, copies of the non-technical summary, contact slips and response forms were sent to each library in the District and Burntwood Library. The social media campaign was clicked on 115 times and had a reach of 83,726.
- 5.4 Officers were available via telephone, email and face-to-face via electronic media throughout the consultation and dealt with a number of enquiries. One meeting was requested and held with a Parish Council. The level of engagement via social media was higher than the Issues and Options consultation and the response to the Preferred Options consultation received 99 representations which was similar to those within the Issues and Options consultation which received 107 representations
- 5.5 The consultation responses are summarised at Appendix A to this report. Representations were received from residents, developers and landowners, planning agents/consultants, community or other organisations, public agencies and statutory consultees, local authorities, charities and Councillors. Four representations were received regarding the duty to cooperate. In total 99 representations were received, which when broken down into the corresponding questions posed within the Preferred options document provided 518 individual responses plus a further 8 responses to the Sustainability appraisal and 4 responses relating to the other evidence published at the time. The main issues raised by the representations are listed below:
- Quantum of development
 - The quantum was considered excessive
 - There was opposition to additional land being provided to meet the needs from the GBBCHMA.
 - There was also support for the contribution to the unmet need in neighbouring authorities and support for further contributions of an additional 2,000 dwellings.
 - Lack of sites for Gypsy, Traveller and Travelling Showpeople, employment and housing
 - Plan does not allocate additional sites to meet the need, this should be resolved (site promoter).
 - Norton Canes Parish wish to include providing a long-term future site for the travelling show people currently at Grove colliery.

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- Support for the safeguarding of existing employment areas.
 - Objection to the criteria set for consideration of alternative uses on employment sites as too stringent.
 - Amount of employment land identified is insufficient and a replacement allowance should be included.
 - Should be planning for 63-81 hectares.
 - Difficult to commit to training and net zero carbon on speculative development as occupier not known that would enter into agreements, could impact on market as investment is hampered by conditions.
 - How can Local Authority promote use of new/emerging technology it should keep to Building Regulation requirements.
 - Electric Vehicle Charging Points are not necessary, concerns over electricity infrastructure capacity and increased costs.
 - Support increased role of public transport, active travel and freight.
 - Train service to Birmingham is inadequate.
 - Aldi object to changes to Rugeley Town Centre boundary.
 - Holford Farm and Jubilee Field supported for allocation. Kingswood Lakeside should not develop on open space.
 - Watling Street Business park extension should be developed for small units.
 - Site E4 (off A51) is better suited to residential.
 - Pentolver Site E3 Rumer Hill Industrial Estate wish to develop for residential.
 - Site at York's Bridge, Pelsall should be released from Green Belt (landowner) as should Watling Street Business Park and disagree with conclusions of evidence.
- Loss of Green Belt and greenspace
 - Concern at the loss of Green Belt and the green space network.
 - More rigour is required to ensure the unmet need in neighbouring areas is a realistic evaluation of their available land use.
 - Use of brownfield first is supported.
 - Concern at the impact upon biodiversity and the natural environment.
 - Support the rejection of so many Green Belt sites in Norton Canes and Norton Canes being a separate settlement.
 - The scale of development around Fiveways is disproportionate, loss of identity of Heath Hayes and Hawks Green due to over development.
 - Impact upon viability due to enhanced Building Standards and housing mix
 - Desire for greater flexibility on the housing mix.
 - Should be a greater emphasis on single living, greater provision of specialist housing for older people and more affordable homes.
 - Lack of larger 4 and 5 bedroom does not recognize the demand for larger family homes and could increase the proportion of the community who are elderly as they require smaller housing.
 - Additional 4% to support homeworking is unlikely to deliver superfast broadband connections.
 - Policies on National described space standards (NDSS) and increased standards to increase provision for stock design for people with health problems (Part M4(2) and M4(3)) will impact upon viability and higher requirements may result in fewer affordable homes being built.

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- Additional requirements of NDSS, M4(2) and M4(3) and zero carbon should not apply to existing outline permission such as at Rugeley Power Station.
- Zero carbon target will impact upon viability - needs testing.
- Local infrastructure capacity and provision
 - Concern at infrastructure capacity– education, roads – five ways – congestion and air quality, health care, poor quality of parks and leisure and recreation facilities for young people.
 - Additional education infrastructure required, including for special needs and to improve educational attainment.
 - Need for infrastructure in Norton Canes – indoor sports.
 - Norton Canes has had more than its fair share of major housing taking into account the size of the village and the necessary infrastructure has not been provided- off site sport and recreation facilities, additional primary school, improved bus services.
 - Additional housing should be delayed until infrastructure committed.
- Lack of open space standards within the Plan and a request to include parking requirements in policy so they can be debated at the Examination
 - Parking standards should be clear and not onerous.
- Importance of heritage should be reflected throughout the document and Grove Colliery should be designated a Conservation Area.
- Comments on individual site allocations
 - Concern at congestion and air quality at Fiveways.
 - Support various site allocations and further sites proposed.
 - Site at Rawnsley Road, Hazelslade should be included in Green Space Network.
 - Hednesford Hills Raceway and Hednesford Town Football Club should be safeguarded.
 - Development should be required to deliver canal infrastructure and pay for maintenance.
 - McArthur Glen Designer Outlet West Midlands should be recognized as major visitor attraction with specific site policy. Object to loss of Green Belt and countryside at Wimblebury.
 - Should include some housing growth in key rural settlements (landowner promoting site).
 - Grove colliery should have specific policy allowing enabling development. Impact upon historic bridge.
 - Potential impact upon the AONB and its setting.
 - Impact upon ancient woodland, water quality of Chasewater and Southern Staffordshire Coalfield Heaths SSSI and Cannock Extension canal SAC.
 - Impact upon sports and recreation sites.
 - Increase in traffic on A5190 and impact upon air quality at Fiveways, increase in noise.
 - Pressure on Hednesford Park. Intention to relocate football teams from Coppice Colliery Football Ground to Heath Hayes Park or Wimblebury to the north of Five Ways island.
 - Increase in traffic on Wimblebury Road, excessive speeds already and HGV's, congestion at Fiveways.
 - Impact upon Wimblebury mound and wildlife.

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- Concern there may be subsidence to properties in Wimblebury.
 - Concern at all allocations for development in Rugeley impacting upon wildlife, increase in litter, anti- social behaviour, noise, light and air pollution, roads already have heavy traffic, loss of grade A agricultural land.
 - Need more trees.
 - Armitage lane, Brereton is not suitable for a large number of additional vehicles, this would be dangerous to the school children, concern at loss of privacy, school already crowded.
 - Effectiveness of the consultation
 - Disappointed at advertisement of the consultation and short timescale for comments.
 - Request leaflet through the door as only found out through local Facebook group and then Council website.
 - General comments
 - Suggestion for footpath route, alterations to consider bridleways and protection of Public Rights of Way.
 - Homes should have access and spaces for secure cycle storage.
 - Improvements to transport network and linkage of Norton Canes to Kingswood Lakeside, Heath Hayes, Chasewater, employment areas, canal towpath and recreational routes south of the A5, Fiveways to Burntwood.
 - Support the approach to supporting arts and cultural facilities within the town centres.
 - Should be dedicated areas for sustainable energy production. Welcome preparation of Design Codes.
- 5.6 Representations from our duty to cooperate partners on Strategic matters relating to the Duty to Cooperate were:

- Support for partnership working from Transport for West Midlands,
- Site specific comments from Severn Trent Water, National Grid, Staffordshire County Council.
- Current shortfall in housing and employment land within the Black Country and gypsy and traveller sites in neighbouring authorities. The proposed housing contribution is at the lower end of range indicated in the Issues and Options consultation.
- Support continued cross boundary working on Special Areas of Conservation (SAC) and Hatherton Canal Restoration and air quality impacts upon Staffordshire wide SAC.

Next Steps

- 5.7 Further evidence will be completed to support the preparation of the next stage of the Local Plan and discussions continued with our duty to cooperate partners to meet our legal obligations.
- 5.8 A key piece of evidence which is being prepared is the Viability Assessment. A Viability Assessment considers the impact upon the viability of development of the policies within the plan and has been raised as an issue in some of the representations. Ensuring that the development proposed in the Local Plan is

deliverable over the plan period is necessary to show the plan is 'sound' A report has been commissioned to consider the impact upon viability of the policies within the Local Plan. The policies considered to impact viability are: provision of community infrastructure such as schools, provision of leisure, sports facilities and open space, biodiversity net gain, Cannock Chase Special Area of Conservation, affordable housing and housing mix and the policies which require more than the current national standards and include enhanced building standards such as: the nationally described space standards; enhanced building regulation standard for dwelling accessibility to assist in the provision of property to meet the needs of our ageing and mobility restricted population; and the policies which assist in the delivery of the Council's vision for the District to become carbon neutral by 2030.

- 5.9 Some of the policy requirements which impact upon viability can be costed and are not able to be varied. For the remaining policy requirements, the viability assessment will be prepared to ensure the balance between the policy requirements in the Local Plan will be effective, are justified, positively prepared and enable the delivery of sustainable development.
- 5.10 The representations and evidence will inform the next iteration of the Local Plan, the timetable for which is published in the Council's Local Development Scheme. The Local Development Scheme seeks to achieve a pre-submission consultation in winter 2021.

6 Implications

6.1 Financial

There are no direct financial implications for the Council as a result of this report. Any additional costs will need to be contained within approved budgets.

6.2 Legal

The legal implications are set out in the report.

6.3 Human Resources

The Planning and Compulsory Purchase Act 2004 sets out extensive consultation procedures that address human rights matters in relation to the Development Plan.

6.4 Risk Management

Potential legal challenge and the plan not being found sound are the main risks associated with the plan. These risks can be minimised by ensuring that the plan and accompanying documents are legally compliant, that legal support is engaged where necessary and that all interested parties are actively informed and engaged throughout the preparation of the plan. The plan should be based on sound, robust and up to date evidence.

Lesser risks that will primarily impact on costs and timetable are linked to staff resources being available to maintain the plan review as well as potential changes to government planning policy.

6.5 Equality & Diversity

The Local Plan Review is supported by an Equality Impact Assessment that is refined at each stage of the review.

6.6 Climate Change

A Staffordshire wide Climate Change Adaption and Mitigation Strategy Final Report and Climate Change Adaptation and Mitigation Baseline Report were published as part of the Preferred Option consultation. This will feed into the further development of policies to address climate change.

7 Appendices to the Report

Appendix A: Summary of Representations to the Cannock Chase Preferred Option consultation of the Local Plan Review.

Previous Consideration

None

Background Papers

None

REF	Consultee/Organisation Name Consultancy & Consultants name (if applicable)	Summary
General Whole Plan Responses		
LPPO001	A, Webster	It's a well-considered and thorough proposal. I really value the effort taken to ensure consultation takes place during these times of restricted access.
LPPO002	L, Morrall	<p>Cannock Chase has fulfilled its housing quota for approximately the next 5 years (4.8 years certainly - although this is likely to be more with additional building counts). However, the council has an obligation to build so many houses in line with national housing needs policy, and I believe from scouring the documents that the council needs to look for availability for 275 dwellings per year for after this 5 year buffer period is over. Looking at the Green Belt map, most of the brownfield land in the district has now been used for housing and construction. Most of the Chase is obviously, under special protection as an AONB. However, much of the remaining land in the area of the district including Hednesford and Heath Hayes is Greenbelt land. So does this mean that it is inevitable that the greenbelt will be used for future housing to supply for the ever-expanding national population, and the flow from the urban West Mids into the surrounds? Currently the areas to the east of Heath Hayes towards Gentsleshaw and to the South towards Norton Canes (Newlands area) are greenbelt, and these are highly vulnerable. The housing explosion in the district has included the huge Hawkes Green estate, Wimblebury estates, and currently Pye Green area extensive developments. Does this mean that because the Chase is fairly protected, it is inevitable that the rest of the District will become completely urbanised? Is it fair when other districts, like Stafford have vast amounts of land compared to the much smaller Cannock Chase district which is dominated by the Chase? There is a pocket of land to the east of Heath Hayes that is not included in the Greenbelt and I believe it is currently farmland privately owned by Taylor Wimpey. If this land was developed it would set a precedent for building to the east of the village of Heath Hayes. There is also an area to the south of Heath Hayes from opposite Cleeton Street to the mini island where plans have been pitched by developers. This rich area is used by deer and contains numerous important flora and fauna. The increased traffic flow and pollution levels in the Heath Hayes area and especially Cannock and Hednesford Roads are already problematic to residents, and this is before the inevitable traffic increase from the new retail village, and the new crematorium. I know the country needs housing, its population is still increasing, but why should the burden be put on smaller districts with very little brownfield, when larger districts may have large areas of brownfield and much more extensive greenbelt? The green belt is a buffer between provincial Cannock Chase district and neighbouring districts. The district of Cannock Chase has already been developed almost out of recognition, and has certainly contributed hugely to housing needs for the past several decades, with extensive home building and industrial sites. Cannock Chase AONB should of course have protection status, but this should not be at the detriment of the rest of the district, and its greenbelt buffer zone between villages and other districts. The government have relaxed building on greenbelt, which I think is a huge mistake, and it shows the country has reached a point where it can't sustain a much higher population, without irreversible damage to the country's greenbelt and infrastructure. Having spoken to various councillors from different parties in the area, I know my concerns and frustrations are also shared by many of them. I hope special efforts can be made to sustain our wonderful district as a semi rural gateway to Cannock Chase from the heavily urbanised West Midlands districts.</p>
LPPO003	Transport for West Midlands - H, Davies	<p>Transport for West Midlands (TfWM), the transport arm of the WMCA feels this local plan is very relevant to the West Midlands Metropolitan area. In general, we support its vision and associated aims and policies, especially given the strategic importance of the plan and the key role it will play in meeting future economic and housing demand, attracting investment and delivering enhanced connectivity. It is therefore important that TfWM works alongside Cannock Chase DC, as well as the wider region, to provide the necessary transport infrastructure to support such growth. Strategic cross boundary matters such as journey patterns are particularly important for TfWM, with significant numbers of people community into the met area daily from Cannock; impacting on the wider journey to work area. Pre-covid travel data of Cannock Chases 63,379 working age population - 8,851 people (14%) commute into the met area daily, and a further 4,427 commute from the met area into Cannock. This is very high compared to other non-met areas, with rail passengers representing a significant proportion of commuters. Next Steps: TfWM understands the potential benefits growth can bring, such as providing new opportunities for improved sustainable transport infrastructure, which can benefit both new and existing communities and we fully support the local plan in its objectives and vision. In delivering the right transport infrastructure and services, it will deliver multiple benefits and make a huge contribution to communities through quality of life, promotion of good mental and physical health and support economic growth, TfWM will continue to support Cannock Chase in taking forward their Local Plan and we reiterate our support for the partnership approach that has been taken to addressing the strategic transport needs within the plan to date.</p>
LPPO004	Walsall Council - N, Ball	<p>ABCA have engaged actively and positively to the various stages in the preparation of the Local Plan, and we welcome the cooperative engagement with Cannock Chase Council throughout our most recent engagement was our response to the Regulation 18 consultation in September 2019. Our representations addressed two principal issues – housing and employment land, associated with the requirement for the Local Plan to address the Duty to Cooperate and specifically to respond positively to help address the identified shortfall of land to meet growth needs arising in the Black Country. We also made detailed comments in relation to the Hatherton Canal restoration, Special Areas of Conservation, and Gypsies and Travellers. We acknowledge the amendments made to the Regulation 18 Plan in responding to our representations. However, we note that the Preferred Options Plan proposes a contribution to meeting housing needs arising in the Black Country very much at the lower end of the range indicated in the Issues and Options consultation, and the reasoning for this in comparison with the potential higher levels of contribution is not clear. There is also ambiguity about what the total proposed housing target in the Plan actually is.</p>

LPPO005	L, Barratt	<p>The target set for the number of new homes should reflect the views of the neighbourhood and not be driven the views of developers. LPPO Page 63 para. 152 Option C and D recommend the highest number of houses should be built, 6,612 net dwellings for the district(2018-2026) and 7,612 respectively. Page 64 para 6.155 states the above numbers reflects the volume of responses by site promoters which is disproportionate against the number of responses by local groups and individuals. The local groups supported the lower levels of growth. Their views must be reflected. Page 66 LPPO para 6.163 more protection should be given to the districts main villages and hamlets which are currently considered to be semi-rural and not considered remote from the main urban areas. This policy should be reviewed. It's essential we retain the character and distinctiveness of the landscape. SO 7 P188 - This target is not specific enough. Development that would form a hard edge to protected and designated sites should not be permitted. The site referred to as C64 in the current Local Plan (H30 on page 75 Table C LPPO) is still being considered for development even though it was denied permission in 1999. The proposed development would allow a housing estate to run along the edge of the AONB for approx. 0.5km. The Document - Housing Development Capacity Study 2018-2038 March 2020 has this site listed in table 5 (page 10). This site is not part of the housing development capacity and so is not required for the housing need to be met. Why is this site still included when it is 1.7km from a SAC, 100m from an SSSI, 400m from the SBI (Hazelslade Nature Reserve), 350m from the SBI on Rawsley Hill and adjoining the AONB and Forest of Mercia. On Page 46 - of 16 SHLAA December 2020, categorisation is mentioned. It says that its status as a restricted site may change. The locals have been pushing to have this as part of the Green Space Network. It needs protection. The objectives at the moment offer little or no protection to sites like these. In Appendix 11 in the same document, the site is described as not available and more important not suitable for development. Yet it still appears under objective 3 Table C page 75 (H30) as an additional site. SO7.3 Page 188 - The target doesn't mention the distances from the SAC where development can take place. The 8km and 15km boundaries are usually used to calculate impact but no mention is made of building that is very close. This should be taken into consideration. It should mention alongside the SAC other sensitive areas such as SSSIs and SBIs. SO7.1 the table here says no development if it impacts on designated sites unless exceptional circumstances. This statement needs more clarity. Page 141 objective 7 LPPO para 6.434 mentions the safeguarding of international, national and locally designated sites of importance for biodiversity: wildlife corridors and stepping stones that connect them. This statement is not reflected in the strategic objectives. In LPPO - page 153 para 6.91 under NEW EVIDENCE Enhancing the Beauty of Landscapes is mentioned and para 6.492, The Government White Paper, Planning for the Future (August 2020) proposes a range of changes to Local Plans. These include the identification of protected areas (including important areas of green space and locally important features such as protected views). SO7.4 protecting, conserving and enhancing the landscape character of page 155 of the LPPO Preferred Policy Direction. Development proposals within or on land forming the setting of the AONB. Development proposals which individually or cumulatively adversely impact on the landscape and scenic beauty of the AONB or its setting will be resisted. The above is a strong statement that is not reflected in SO7.4. SO7.5 the target here does mention detrimental impact but it is still too vague. While its target is to meet the objectives of the AONB Management Plan, neither SO7.4 or 7.5 mention the Views and Settings Guide by the AONB. Not enough detail on the targets again. It should also mention light and noise pollution under protecting, conserving and enhancing the Green Belt (SO7.6). In addition to mentioning these factors in SO8.5.</p>
LPPO006	Highways England - Pyner, D	<p>It is our role to maintain the safe and efficient operation of the Strategic Road Network (SRN) whilst acting as a delivery partner to national economic growth. In relation to the Cannock Chase Plan area, Highways England's principle interest is in safeguarding the A5, which routes through the Plan area. In line with the DfT Circular 02/2013, we consider that Local Plans should promote development at locations that are or can be made sustainable, that allows for uptakes of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth. We support a pattern of development that minimises trip generation at source and encourage the notion to make the best use of existing infrastructure, reduce the need to travel and increase opportunities for non-car travel such as the use of public transport, walking and cycling, to encourage modal shift away from the car and help to reduce congestion on the SRN. Therefore, we generally support an increase of development within and adjoining the larger settlements in the area, which benefit from a good concentration of amenities and public transport services. We consider that focusing housing in urban areas would be likely to have a lesser impact on the SRN than in rural locations or in close proximity to the A5 due to reduced vehicle trip generation and availability of key facilities and services locally, therefore minimising journey lengths for employment, shopping, leisure, education and other activities. We would expect that future allocated sites within these strategic locations or any other sites with the potential to impact the operation of the SRN to be subject to Transport Assessments in order for their impacts to be assessed appropriately and mitigation to be identified as required.</p>

LPPO007	Spedeworth Motorsports - D, Wood	Rolling Start - D, Carter	<p>Spedeworth Motorsports (incorporating Incarace Ltd) are promoters of short circuit oval motorsports at venues across the UK. Hednesford Hills Raceway was established in the 1950s and is one of the premier venues in the country for stadium motorsports, staging events of national and international significance. The venue attracts participants in a wide range of different race classes not only locally and from across the UK but also internationally, particularly from Mainland Europe and Eire. These participants form part of an active drive base comprising many thousands of people. The events are spectacular and regularly draw large crowds to the venue. As such the raceway also represents one of the most important visitor attractions in Cannock Chase. Users of the stadium make a significant contribution to the local economy in a number of ways. Numerous local businesses built, service and maintain competitors cars and visiting spectators stay overnight in nearby hotels and utilise local services and facilities. While the racing activities are a noisy sport, the number of events is 20 per annum meaning that the site, which lies at the heart of the surrounding SSSI, is maintained and kept secure at all other times. This is a considerable community benefit. Over the past couple of years several motorsport venues have been lost and one of the reasons cited is that no specific protection has been given in the local development plan. This representation seeks to remedy this situation in respect of the Cannock Chase District Local Plan. From our analysis of the consultation there is no reference to Hednesford hills Raceway and its significance as both a sports stadium and important visitor attraction. As a sports venue the need for the raceway is clear and continuing, as evidenced by the number of drivers who wish to participate at the venue. As a visitor attraction, major events continue to attract large numbers of spectators. Whilst many of those spectators will not come from the local community they are sourced from wider 'communities of interest'. This is a strategic consideration that should be reflected by the local plan. Our request is that the Council should consider amendments to the local plan, so the rich heritage and continuing importance of Hednesford Hills Raceway is both recognised and protected. Ideally this would be reflected not only in policy but also through identification of the stadium site (including the parking area) on the policies map. The policy might usefully draw attention to the nature of the activities that take place and, how any nearby future developments need to take full account of this. Without such changes we content that the plan would be unsound as it would fail to be consistent with the provisions of national planning policy as set out in the NPPF. Incidentally, we believe that the similar representations to those above regarding the lack of recognition in the local plan to Hednesford Town Football Club might also apply.</p>
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LPPO008	Stafford Borough Council - A, Yendole		<p>We note that a minimum 5,516 dwellings will be delivered to meet the District's housing need between 2018 and 2038 at a rate of 276 dwellings per annum. A further 500 dwellings are being delivered to help meet a shortfall arising from the wider housing market area, (increasing total delivery to 6,016 dwellings at a rate of 301 dpa). It is also noted that up to 50ha of employment land will be provided to meet the District's requirements. It is acknowledged that in order to meet the District's housing need requires the release of land identified within the Green Belt. We have identified that amendments to the Green Belt are not directly related to the boundary with Stafford Borough and that no sites (employment, housing or mixed use) have been allocated on land that would have an impact on Stafford Borough. We acknowledge Rugeley as an important Town Centre and the opportunities for redevelopment. It is noted that there is a proposal for local design codes to be created based on character areas, of which Etchinghill and Springfields are identified. As this forms part of the built form of Rugeley on the border with Stafford Borough, we would support the creation of design codes and would welcome being involved in this on-going work. In terms of strategic cross border issues we will continue to work with you on all relevant matters relating to protection of the Cannock Chase AONB, SAC & Ramsar Sites, in particular Cannock Chase SAC and the wider nitrogen deposition project. Finally Stafford Borough supports the position of policies seeking to balance recreational uses and control development to protect areas from negative impacts, in particular Cannock Chase AONB.</p>
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LPPO009	Historic England - E, Boden	<p>Firstly, we note that the Plan is accompanied by a HIA, which assesses the impact of development on designated and non-designated heritage assets and their settings, Historic England welcomes this approach and is pleased that the methodology used is generally in line with that set out in Historic England's Advice Note 2: The Historic Environment and Site Allocations in Local Plans, 2015 (HEAN3). We also welcome the fact that this HIA has been prepared with reference to HEAN3 and Good Practice Advice Note 3 (Second Edition): The Setting of Heritage Assets (2017) (GPAN3). However, we note that some of the proposed allocations which may have an impact on the significance of designated heritage assets have not been carried through to the second stage of assessment within the HIA. Historic England considers that the following proposed allocations would benefit from such assessment work to inform decisions, prior to their allocation: H37, H48, H49, H51, H53, M4, M8 and E6. Please see our tabulated comments in the attached Appendix A for further detail. We understand that for certain of the above sites (H37, H48, H49 and H52) the methodology adopted by the HIA has omitted their assessment because they are either located within, or within the setting of, a Conservation Area, and with no other heritage constraints. In these cases, we also note that the HIA recommends that the requirements for new development set out in the relevant Conservation Area Management Plan should be brought to bear for all planning applications on these sites. However, Historic England considers that in omitting these sites from assessment within the HIA it is not clear how the impact on the significance of the relevant Conservation Area has been assessed and how the Council envisages development would take place in respect of the historic environment. The NPPF (Para 185) requires that a positive approach to the historic environment should be demonstrated as part of the Plan process. Since this is not clear at this time Historic England recommends that these matters are addressed in relation to the above sites, prior to the Regulation 19 stage, so as to avoid any issues over the soundness of the Plan. Given the number of sites that have the potential to impact on the significance of designated heritage assets and their settings, historic England would urge you to consider obtaining specialist conservation advice, particularly with regard to interpreting the findings of the HIA. Assessment of potential development should fully consider the impact on the setting of Scheduled Monuments, including the landscape views from Castle Ring (e.g. for development to the north in Rugeley), as well as, and, assets which are outside of the District (e.g. the setting of the Saucer barrow on Spring Hill, or Shugborough Registered Park & Garden). With specific reference to non-designated heritage assets, these can make a positive contribution to the character of our settlements and enrich our sense of place. We recommend that the views of your chosen specialist archaeologists adviser are sought on these allocations to confirm that the evidence base is sufficiently robust to ensure that any proposed allocation is deliverable in accordance with local and national planning policies. Your adviser will inform you on whether further assessment work is required though field assessment prior to allocation to ensure the extent, character and significance has been adequately understood to inform the allocation of a site. Our tabulated comments in the attached Appendix A and your own assessments, highlight a number of non-designated heritage assets that may be affected by the proposed allocations. Areas within the District of note for non-designated historic assets are the A5 corridor and the Cannock Chase AONB. We note that the Local Plan makes reference to the Cannock Chase AONB Management Plan 2019-2024 and recommend that specific links are made to the policies in the Management Plan which have the objectives with the Chase's history and culture. With regard to the interactive policies map, we recommend that this should show the Scheduled Monuments as polygons, not as points, and it should also show Registered Parks and Gardens within the District.</p>
LPPO010	Norton Canes Parish Council	<p>Healthy Living - The NP is proposing policies on provision and improvements to indoor and outdoor sports facilities, play areas, informal open spaces, a formal park, the rural footpath/cycleway network and health services. The proposed options for the development of a formal park are The Mount south of Jerome Road and the recreation round east of Brownhills Road adjoining the community centre. This latter site is also the preferred location for provision of indoor sport and recreation facilities which are currently lacking in the village. The PO document recognises that whilst there are good quality indoor sports facilities across the District there are not easily accessible by public transport from outside the main urban areas. It also recognises the need for improvements to outdoor facilities including artificial green pitches and multi-use games areas. So, it is considered that priority should be given to investment in indoor facilities and improvements to outdoor facilities in the village using S106 funds already obtained any new funding arising from future housing developments. Proposed PO Policy SO2.1 and Policy SO2.3 are supported in principle in the context of the above aims of the NP. The major open spaces within the village are currently protected as part of the Green Space Network (GSN) which PO Policy SO7.8 proposes to continue to protect, conserve and enhance. These spaces include the two possible locations for a formal park so this is welcome. The policy also enables new areas of GSN to be added as they come forward in connection with major new housing developments and areas of green space allocated in Neighbourhood Plans to be afforded the same level of protection which is welcomed. A survey of open spaces not currently in the GSN has been undertaken as part of the NP process and suggestions for improvements will be invited as part of the proposed NP consultation. The NP has not currently addressed the issue of allotment provision but notes that PO Policy SO2.5 lends support to protection of existing and provision of new allotments and this matter will be included in the consultation on use of local open spaces. Sustainable travel – The NP is seeking to achieve delivery of sustainable improvements to bus services, key walking and cycling routes and for major developments to make appropriate financial and practical contributions to deliver such improvements. Negotiations on use of existing committed S106 funds to achieve these aims will continue separately from the new Local Plan. However, support of PO Policy SO5.2 aiming to reduce reliance on private car journeys by improving public transport, walking and cycling routes is welcomed. PO Policies SO5.3 & SO5.4 building on the theme of sustainable travel particularly in relation to electric vehicle charging points, provision of safe walking and cycling routes including canal towpaths, High frequency bus services connecting schools, health services and key employment sites is also welcomed as is support for demand responsive public transport options where timetabled services may not be sustainable. PO Policy SO5.6 aims to safeguard proposed recreational footpath and cycle routes connecting villages, countryside and main urban areas including related infrastructure such as highway crossing points and this is also supported. The NP is putting forward for consultation 4 key walking/cycling routes linking the village to schools, employment and leisure/countryside sites. One priority highway crossing point in need of major safety improvement has been identified as the A5 at the northern end of the Cannock Extension Canal. There is a gap in National Cycle Route 5 (NCR5) between Burntwood and Stafford. The NP is looking at opportunities for an option to route NCR5 through the recreation routes of Norton Canes and onward through Heath Hayes Parish and the AONB. The new Local Plan could support this initiative.</p>

Protecting the countryside as a whole and specific sites of ecological value – The NP is seeking to improve the biodiversity of all protected sites and require all major new developments to make appropriate financial or practical contributions to deliver net environmental gain. PO Policies SO7.1, SO7.2, SO7.3, SO7.4 and SO7.6 are broadly supportive of the NP aims. Reference is made to the Council's Urban Forestry Strategy 2019-2024 which seeks to expand tree and woodland cover. Tree planting as an option on areas of open space within the village will be the subject of NP consultation. The area of the Parish south of the A5 in the Little Wyrley area contains some of the best quality rural landscape outside the AONB some of which has a sense of tranquillity. Policy SO7.4 would provide appropriate support for an NP policy to identify the need to conserve these qualities.

Improving the choice of local shopping facilities whilst supporting the vitality and viability of existing local shops, pubs, take-aways, restaurants and other local services – The NP is proposing to identify a boundary for the village centre within which erection of new buildings/extensions for uses within Class E and related food and drink uses would be supported. The NP is also proposing to achieve environmental improvements to the centre and car park, including vehicle charging points, support the provision of a new convenience store at Norton Hall lane and support roadside retail and service uses on land adjacent to the Turf Inn. The introduction of a national Permitted Development right to change Class E Uses to residential as from the beginning of August may pose some challenge to supporting the retention of Class E uses. PO Policy SO6.1 identifies Norton Canes as a local centre with a role to provide small scale town centre services to serve local need. PO Policy SO5.1 requires all major developments to contribute to reduction in carbon intensive modes of transport including provision of electric vehicle charging points. The land adjoining The Turf is identified as a new employment site in Policy SO4.2.

LPPO011 CPRE Staffordshire - S, Burgess

We recognise and support the council's eight Strategic Objectives. We welcome the increased emphasis on sustainability shown in the document and the encouragement of the development of brownfield sites in preference to new greenfield and Green Belt development. The District Context (Section 3) is useful and the updating and structural change in population and employment are helpful. The consequences for residents of problems arising from deprivation identified. The key issues are well justified. We welcome the emphasis in the protection of the Cannock Chase AONB, the Special Areas of Conservation and the Green Belt. The wider context is well covered in Section 4, although we were surprised that the prospective fundamental changes in planning proposed in the "Planning for the Future" White Paper have not been referred to. (We acknowledge that the Government's current stance following consultation on the White Paper is unknown - as is whether the Queen's Speech will indicate whether there will be new legislation for radical changes in planning during the next parliamentary session. If the proposals of the White Paper are given legislative force, the Local Plan will need to be dramatically changed; it would become much shorter, radically different, omit major elements and, in practice, would largely become a land allocation document). We agree with the eight Strategic Objectives of Section 5, and with the Local Plan Vision and Objectives. We are pleased with the reference in the detailed objectives to the wish to see better design in new developments, which in future are to be distinctive, attractive and safe. We do not agree with Cannock Chase District Council that support for an uplifted housing target figure for housing is the best way to support the delivery of affordable housing (your final bullet point on page 65). We regret that the current document is so unambitious in the provision to be made for affordable homes and housing for social rent (your reference to only 20% on page 79 is well below what has been set and achieved by most other councils). We oppose a number of your proposed amendments to Green Belt in Policy SO7.7 on page 158 which, in all cases, seem to involve removal of land from the Green Belt. We have failed to find the exceptional circumstances and evidence of the offsetting referred to in paragraph 6.513. The primary purpose of the amendments appears to be to provide land for new development. We have major concerns in relation to the additional housing proposed in the Green Belt, particularly land to the south of the A5190, Cannock Road, to the east of Wimblebury Road and to the west of Hednesford Road. It would be helpful if the plan could be usable to iPad users as currently it cannot be zoomed. It would also be very helpful if the plan included the site-specific reference numbers used in the text.

LPPO012 Birmingham City Council, I MacLeod

The City Council previously provided comments to the Issues and Options Stage and welcomes the fact that many of the issues raised in our response have been carried through into the Preferred Options document. The City Council fully supports the approach taken within the document, in particular, in meeting Strategic Objective 3: To deliver a sufficient supply of homes to provide for housing choice and ensure all people are able to live in a decent home which meets their needs. We therefore welcome the commitment set out in the Spatial Strategy to deliver sufficient housing to meet the District's own need and an appropriate and sustainable contribution to the wider housing market area shortfall where justified in adopted plans. As part of this approach, the document acknowledges that Cannock Chase District forms part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) and has resolved to contribute 500 dwellings where infrastructure permits, to meet the shortfall arising from the GBBCHMA. Given the strategic position highlighted above, this potential contribution is welcomed in assisting to meet any shortfalls within the GBBCHMA area and emphasises the commitment of Cannock Chase District Council in fulfilling its Duty to Co-operate obligations in this respect. Birmingham City Council has been instrumental in ensuring that the 14 local authorities that make up the HMA continue to work together to ensure that strategic housing requirements are met. The City Council would therefore endorse and support the development of an agreed Statement of Common Ground in relation to the approach set out in the Preferred Options document at the Submission stage of the Cannock Chase Local Plan. This could either be an agreement across the GBBCHMA, or as a separate agreement between the two Councils if appropriate. The Council is committed to continuing to work with Cannock Chase Council, alongside other local authorities making up the Housing Market Area, to ensure that strategic issues (including identified housing and employment land shortfalls within the West Midlands) can continue to be addressed.

LPPO013	Natural England- G, Driver	Cross Boundary Issues: We note the cross boundary issues identified. We would advise that additional cross boundary issues should be included: • Air quality impacts on designated sites including but not limited to Cannock Chase SAC and Cannock Extension Canal SAC. • Pressure on existing ecological networks and a need to increase these networks and reduce fragmentation of these networks to elevate pressure and for climate change adaption and mitigation.
LPPO014	P, Hewitt (Cllr)	1. Area alongside Cannock Road, Heath Hayes - This is a large area of land, I am concerned about the over development of Heath Hayes and Hawks Green and the village losing its identity. I would challenge that the area could sustain a further influx of people re health care and education. With the new shopping development and the waste site close there are already traffic issues that would be made substantially worse. 2. I would like to confirm that no development or redevelopment is agreed for Hednesford Town FC and it remains a sporting venue. Also that Hednesford Raceway is not used for development.
LPPO015	Lichfield District Council - S, Stray	Lichfield DC agrees that issues identified such as the Cannock Chase SAC, AONB, employment and housing and Rugeley Power Station will be cross boundary issues and also welcomes the continued recognition of the cross boundary travel relationships between Lichfield District and Cannock Chase District.
LPPO016	J, Tovey	There are several things that are of concern to me: 1. Woodcock Road, Crabtree Way, Green Lane, Fermont Way and going on down towards the Springfields. People taking and using the grass verges for their own means, rather than leaving these areas for all to enjoy as intended. Trees have also been incorporated into some of these additional areas by being fenced in. Also in some cases may even been cut down altogether but I am not 100% certain of this but I would not be surprised if it had not happened. The fact that all of the homes around this area are actually owned but seem to have very few rights when other overzealous home owners want more than their allocated pocket of land. This is unfair for those who are trying to do the correct thing. Persimmon Homes are the Venders for the Old William Whittingham Ltd and Area 5 and Weston half of Area 3. 2. There are definite 'Health and Safety' issues for the general public i.e. children coming and going to school. Parents also pickup and take their children to school and this is an added issue of safety. Apart from the fact that the area is 'Open Plan', nothing in front of the building line. I was told recently when I wanted a new window. 3. There are a great deal more people using wood burners as heating in the area and it can be very unpleasant. It would not help people with breathing problems. You go out of the house for a short period and come back in smelling. There are several the other side of the playing fields, March Banks and around there. 4. As I have used a mobility scooter for many years, I do find that there are a few things which could enhance the experience. More dropped kerbs would be good for many, no just people on scooters. I know of places which could be very much improved but I can give you information where they could be introduced but I don't have the time at the minute as I need to get this sent to you before 4.45pm. Perhaps I can make a list of potential sites at a later date? 5. Another point of interest, can mobility scooters use cycle paths if needed and if not, are there other alternatives? Would there be a possibility of having somewhere local where people who have or would like to use a scooter to have a proper lesson, so that they would feel safer when out and about? Just a thought as there are more and more people using them than ever. 6. Cars, trees or bushes either overlapping or parked on the footpaths and on dropped kerns and there are no alternatives but to back up and go another way. 7. Keeping out open spaces. Like the Green Lane Playing Fields and Harley Fields. They are real gems in our community, for us as locals as well as visitors. 8. The Heritage Trail, is a real gem too. 9. If there was a chance to open up a footpath from Rugeley to Wolseley Gardens and the Wildlife Centre etc. That would be amazing for all. Maybe Stafford Council could help?
LPPO017	Christopher, Walker	Whilst I do feel we need to preserve all the green spaces possible for our future generations, I do know there is a need for further growth within the area. This new proposal with the preferred options location given has considered our green spaces and protected them much better than previous plans. Locations highlighted for expansion are now more centralised and have been given better understanding to the flows of traffic and movement of people that will be necessary around the area. Giving much better links for transport in and out of the area without affecting the green spaces and wildlife as much. Previous plans spread the expansion further from the central resources which would have put strain on the already overloaded infrastructures.
LPPO018	S, Walker	Whilst I do feel we need to preserve all the green spaces possible for our future generations, I do know there is a need for further growth within the area. This new proposal with the preferred options location given has considered our green spaces and protected them much better than previous plans. Locations highlighted for expansion are now more centralised and have been given better understanding to the flows of traffic and movement of people that will be necessary around the area. Giving much better links for transport in and out of the area without affecting the green spaces and wildlife as much. Previous plans spread the expansion further from the central resources which would have put strain on the already overloaded infrastructures.

LPPO019	Claire, Walker	<p>My preferred option for building of residential properties would not involve greenbelt land. The plans that have been produced have areas for expansion that have given some understanding to the flows of traffic and movement of people that will be necessary around the area. The larger areas for development are situated where they can give access easier to the A5 and main routes into Cannock. They are also placed close to areas of work and train stations giving rise to fewer cars on the road than there would be if building was placed in other greenbelt areas. Previous plans spread the expansion further from the central resources which would have put strain on the already overloaded infrastructure. Overall, I can see that consideration has been given to concerns about some areas lack of transport links and inability to cope with larger urban sprawls. These options would be preferable to use of any other greenbelt land.</p>	
LPPO020	Clive, Walker	<p>My preferred option for building of residential properties would not involve greenbelt land. The plans that have been produced have areas for expansion that have given some understanding to the flows of traffic and movement of people that will be necessary around the area. The larger areas for development are situated where they can give access easier to the A5 and main routes into Cannock. They are also placed close to areas of work and train stations giving rise to fewer cars on the road than there would be if building was placed in other greenbelt areas. Previous plans spread the expansion further from the central resources which would have put strain on the already overloaded infrastructure. Overall, I can see that consideration has been given to concerns about some areas lack of transport links and inability to cope with larger urban sprawls. These options would be preferable to use of any other greenbelt land.</p>	
LPPO021	Wyrley Estates	Fisher German LLP - N, Borseley	<p>Conclusion: The Local Plan review process is welcomed, and the consultation document is, overall, thorough, and transparent about the challenges facing the district. It is essential to ensure that the needs of the district in terms of housing and employment land are kept under review, and that the figures are both ambitious and achievable. The resultant plan needs to be sufficiently flexible to take account of any uncertainty ahead. As mentioned above, our client has undertaken a masterplan exercise and is also liaising with Norton Canes Parish Council over their draft Neighbourhood Plan. Our client is also very keen to engage with the district councils over the future of the Grove Colliery site, and the current process is a golden opportunity to finally address this under-used site of the benefit of the whole district.</p>
LPPO022	Bloor Homes Ltd	Define Planning & Design Ltd - M, Rose	<p>National and Regional Context: The "presumption in favour of sustainable development" underpins the NPPF and requires plans to "positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change." Except in very specific circumstances, local plans and the strategic policies within them should "as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas" (paragraph 11). That guidance is particularly relevant to CCDC, given that the District forms part of the GBBCHMA, and in light of the ongoing and potential future inability of Birmingham City Council (BCC) and the Black Country authorities to meet their own housing needs. As an authority that borders the Black Country authority of Walsall, as well as the HMA authorities of Lichfield and South Staffordshire, the duty to co-operate with surrounding authorities on strategic matters such as unmet housing need is clearly a central consideration in coming to CCDC's housing requirement and allocating sufficient and suitable land to meet that. As such, it is essential that the emerging Local Plan is positively prepared in a manner that is aspirational but deliverable, in order to provide a framework for addressing housing needs and other priorities, in accordance with NPPF paragraphs 15 and 16. Bloor Homes Ltd (BHL) supports the intention of Policies SO1.2, SO1.3, SO2.2, SO2.3, SO2.4 and SO7.8 which seek to promote well-designed developments by ensuring that new developments;</p> <ul style="list-style-type: none"> • Enhance the quality of the built environment by making a positive contribution to the townscape and landscape (Policy SO1.2); • Create safe places that deter crime and reduce the fear of crime by promoting urban design best practice principles including the creation of natural surveillance, active frontages and spaces of vitality (Policy SO1.3); • Safeguard health and amenity by providing sufficient residential amenity, accessible and attractive green spaces, and active travel and recreational opportunities, as well as achieving low carbon developments (Policy SO2.2); • Improve the provision of active leisure and sports facilities by contributing to new, or enhanced, active leisure and sports facilities (Policy SO2.3); • Provide opportunities for healthy living and activity by promoting active travel, connective green space provision, and physical activity (Policy SO2.4); and • Protect, conserve and enhance the Green Space Network (Policy SO7.8). <p>The above policy requirements reflect what BHL considers to be the key principles of good urban design and have driven the emerging Masterplan that has been prepared for site SH5 that is proposed to be allocated. Further details are provided in the response to Policy SO3.1 However, the LPP fails to set open space standards for new development, despite the LPPO highlighting that an Open Space Assessment and Strategy has been commissioned. It is important that this document comes forward without delay, given the implications that the amount and type of open space provision can have both on the development capacity and viability of proposed allocation sites. Indeed, that will be a particularly important consideration if CCDC are to pursue the suggested approach of requiring a higher level of open space provision within sites to reduce visitor pressures on Cannock Chase. That approach will need to be justified based on proportionate evidence with the implications in relation to development capacity and viability of proposed allocation sites carefully considered. [...].</p>

LPPO023	ENGIE - D, Sager	Barton Willmore - J, Bonner	<p>[...]. We make these representations on behalf of our client, Rugeley Power Ltd, who is the landowner and developer of the former Rugeley Power Station site (the site). Planning permission for redevelopment of the site was granted by CCDC on 7th April 2021 and by Lichfield District Council (LDC) on 8th April with the references CH/19/201 and 19/00753/OUTME1 and the following description of development: [...]. As part of the approved outline, approximately 1,036 of the 2,300 dwellings proposed will be in Cannock Chase District, subject to detailed design and reserved matters. Our client propose to build out the development over some 20 years. This broadly aligns with the proposed Plan period, which will guide and manage development of the District during the period 2023 to 2038. The site is a previously developed site in a sustainable location adjacent to Rugeley with close links to two train stations. Connectivity to the town and the stations for pedestrians and cyclists will be improved significantly and a new Riverside Park will be delivered early in the development for the benefit of existing and new residents. The locational characteristics and sustainability of the site is noted in the Officers Reports to CCDC and LDC Planning Committees. We consider that the delivery of this mixed-use development at the site could help to address many of the key issues identified at Section 3 'The District Context' of the draft Plan including:</p> <ul style="list-style-type: none"> • Housing need, including for affordable housing – the site can deliver a significant contribution towards the Council's housing requirements in the Plan period • Contributions towards Birmingham's unmet housing need – this site is well placed with sustainable links to Birmingham • Ageing population – the site can deliver housing for older people across C2 and C3 uses • Health and education – provision of an all through school with new community sports pitches, as well as significant levels of open space and the Riverside Park • Community deprivation – investment in a previously developed site for a new mixed use community including employment uses • Employment – provision of 5 hectares of employment land, as well as retail and community uses • Transport and Infrastructure – the site contributes towards public transport improvements, including a significant bus subsidy to deliver improved buses in Rugeley; improvements are also made to encourage walking and cycling along the canal • Climate change – the proposals will help with the transition towards a zero carbon future, for instance in the provision of electric vehicle charging and renewables. It should be noted within the draft Plan that Rugeley "A" Power Station and Rugeley "B" Power Station are under different ownerships. Rugeley "A" Power Station was demolished in the 1990s and most of it has subsequently been redeveloped into dwellings, with some land left undeveloped (and included as a draft allocation E4, see below). Our Client is the landowner and developer of Rugeley "B" Power Station, which has now closed and is undergoing demolition and remediation. Conclusion and suggested changes: As discussed above, our client supports the Residential Site Allocation in line with Policy SO3.1. <p>However, we set out a number of suggested changes below which we consider will ensure the draft Plan's objectives are achieved and delivery of the key former Power Station site is protected.</p> <ol style="list-style-type: none"> 1. Amend the proposed allocation at Rugeley Power Station (Site Ref H20) to say a 'minimum of 1,000 dwellings' rather than 'approximately'. 2. Amend the housing mix policy to ensure the requirements for meeting the mix within Table D are flexible and responsive to changing evidence and site-specific matters. 3. Amend Policy SO3.3 to ensure that minimum space standards and accessibility standards do not apply retrospectively to sites with outline planning permissions which predate the adoption of the draft: and provide evidence to support the policy. 4. Amend SO8.2 and SO8.3 so that the measures are not required retrospectively for outline planning permissions that pre-date adoption of the draft Plan. 5. Policy SO4.2 - we object to Site Ref. E4 (Former Power Station off A51) as an employment land allocation. Given the approved development at the former Power Station site, we suggest that a residential allocation would be better suited to the location to ensure compatibility with adjacent uses. 6. It is noted that the draft Residential Site Allocation boundary is not consistent with the approved parameter plans (see Access Parameter Plan at Appendix 1). In particular, the western access point into the site, as shown within the red line, is not covered by the allocation. For completeness, we request that this is amended. 7. In addition, the Employment Site Allocation, which although crossing into LDC site, is inconsistent with the location specified on the approved Land Use Parameter Plan (included at Appendix 2).
LPPO024	The Church Commissioners for England	Barton Willmore - A, Bird	<p>[...]. The commissioners have previously submitted representations to the Cannock Chase Local Plan process and SHLAA, with their most recent representations being to the Local Plan Review Issues and Options consultation in July 2019. The 2020 SHLAA identifies the Commissioners Site as 'Land to the east of John Street/Wimblebury Road' under SHLAA Reference C264, and sub-divided into smaller land parcels under C264(a) to (e) reflecting the proposed phasing of the Site. The SHLAA notes that the Site has an estimated overall capacity of 1,069 dwellings (sub-total of the individual parcels). It is submitted that our Client's site offers a sustainable location for residential development. It is suitable, available and achievable for meeting housing needs within Cannock Chase District. The site should be removed from the Green Belt and identified as a residential allocation. In support of this, an updated Vision Document is included at Appendix 2 to these representations. We have previously submitted supporting technical work alongside the Vision Document, which has been undertaken by the consultancy team appointed by the Commissioners. This work provides a thorough understanding of the site and has informed the proposed development illustrated in the Concept Masterplan within the Vision Document. We attach the following documents at Appendices 3-8:</p> <ul style="list-style-type: none"> • Landscape and Visual Appraisal and Green Belt Review (LVAGBR) (Appendix 3) • Heritage and Archaeology Appraisal (Appendix 4) • Arboricultural Technical Note (Appendix 5) • Ecology Technical Note (Appendix 6) • Transport Note (Initial Access Appraisal) (Appendix 7) • Sustainable Drainage Statement (Appendix 8). <p>Please note that the updated Vision Document (2021) submitted at Appendix 2 considers the Council's updated evidence on Green Belt matters (Cannock Chase Green Belt Harm Assessment, prepared by LUC, February 2021) which has been prepared since our original Green Belt Review work from 2015 (at Appendix 3). The NPPF sets out the key framework for plan-making including the 'tests of soundness' for Local Plans (paragraph 35). The National Planning Practice Guidance (PPG) provides further advice on plan making and how these tests can be met, for instance in terms of evidence base gathering and working collaboratively with other relevant bodies on strategic planning matters. It is noted that this current framework for the preparation and examination of Local Plans is subject to a future review, as detailed in the recent 'Planning for the Future' White Paper (August 2020). However, our comments are submitted with the current national policy framework considerations in mind. We firstly provide an overview of the site and then respond in chronological order to the specific sections and Questions set out in the draft Plan and provide a series of suggested changes as relevant. Further details are provided on our Client's site in support of our comments.</p>

The 8 Strategic Objectives for the Plan are supported and provide a clear vision for the development of the District. It is acknowledged that the Plan sets out the provision for 6,016 dwellings (including 500 for the wider housing market shortfall) at 276 units per annum and 50ha of employment land. Coupled with the spatial distribution of this growth in the Preferred Options Plan we can now work with you towards identifying the precise infrastructure requirements necessary to support the delivery of the Plan. [...]. Education: This sections provides an overview of the likely education infrastructure requirements necessary to support the delivery of identified residential development sites in the Plan. We have provided a summary of the likely mitigation required within each school place planning area. If a school place planning area has not been included, it is because there are no identified sites in that area. This review has been undertaken as at April 2021 and the school organisation team will continue to undertake detailed analysis as the Local Plan emerges and further detail about the potential sites are known and take into consideration any changes in local demographic information. Norton Canes Primary School Place Planning Cluster: The two sites in Norton Canes are both within Jerome Primary School's catchment area. Along with Norton Canes Primary Academy, these are the only two primary schools in Norton Canes. There is existing pressure for primary school places in this area, with an identified need to provide additional primary school places to mitigate housing developments that have recently been built, are ongoing or are due to commence. Any further housing will therefore require the provision of additional primary school places to mitigate its impact. The two identified sites in this school place planning cluster will generate a total of 41 pupils and will increase the pressure for places. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contribution requirements may change in the future. Cannock 1 Primary School Place Planning Cluster: You may be aware that a 1 Form Entry (FE) primary school (Poppyfield Academy) has opened in this cluster area to provide primary school places for the ongoing Pye Green development and has been designed to be able to expand by 1/2 FE. Two of the proposed sites are already known to the school organisation team as planning applications have been submitted and the level of mitigation for these two sites are included in draft S106 agreements. It is also expected that Poppyfield will provide the mitigation for the other proposed site which appears to be an extension of the Pye Green development. There are a further 768 additional dwellings proposed across the remainder of the cluster. Whilst it is noted that there is limited or no expansion potential at two primary schools within this planning area the current pupil movement trend would suggest that there would be potential for primary pupils from proposed housing development(s) in these catchment areas to be accommodated; on the assumption that not all the housing is delivered at the same time. The remaining schools in the cluster either have no proposed housing development in their catchment area or if they do it is expected that the level of development could be accommodated within existing capacity. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contribution requirements may change in the future. Cannock 2 Primary School Place Planning Cluster: There are seven sites identified within this planning cluster, potentially delivering 1, 328 dwellings, with sites identified in all three of the primary schools. Heath Hayes Primary School could not support the proposed level of development within its existing capacity and there is no potential to increase the school site. It may be possible to accommodate a smaller level of development. The number of dwellings proposed are too few to make the provision of a new 1FE primary school viable.

The small development within the catchment area of Five Ways primary could be accommodated within the existing capacity of the school. Within the catchment of Gorsemoor primary, four sites are identified delivering 905 dwellings, three relating to a strategic site delivering the majority of the dwellings (875). Whilst there may be limited expansion potential at the school, currently there is some available capacity. The overall level of development proposed would require the provision of additional capacity which could be achieved by a new 1FE primary school, which would need to be located within one of the proposed sites and additional land may also be required to future proof this area for any future proposed housing development. We would wish to work with CCDC to better understand the timing and size of the development (so being allocated to establish the most appropriate means of mitigation and advise on appropriate Policy provision in the Plan to secure the required infrastructure. This is based on current demographics and the assumption that not all housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contribution requirements may change in the future. During the analysis of the proposed sites in this planning cluster it was noted that a previously considered potential development site East of Wimblebury is no longer included. As such the impact and mitigation required is not included within this response. Cannock Secondary School Place Planning Cluster: Within the five secondary schools within this cluster there are 2,821 dwellings proposed. The number of potential dwellings located in Norton Canes High School catchment is 1,510 dwellings. The school site provides some potential for expansion. The current pupil movement trend would suggest that there is likely to be potential for secondary pupils from proposed housing development(s) in this catchment area to be accommodated. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contributions may be required in the future. There are 164 dwellings proposed within the catchment area of Kinsgmead. Whilst it is noted that there is no potential for expansion at the school, the current pupil movement trend would suggest that depending on the timing of delivery of the dwellings some secondary pupils may be accommodated. The remaining three schools in the cluster could accommodate the level of development proposed within their catchment areas. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change of this period and education contributions requirements may change in the future.

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Rugeley Town Primary School Place Planning Cluster: There are fourteen sites identified within this planning cluster, with all sites located within only three of the nine primary school catchment areas. The total number of dwellings within this area is 1,450 of which the majority of dwellings proposed (1,000) are on the Former Rugeley Power Station Development. This development has now been granted planning permission with a suitably sized All Through School/Primary School on site to mitigate its impact. The remaining 450 dwellings proposed to be built in this school place planning cluster will be delivered within the catchment areas of Chancel, Redbrook Hayes and Hob Hill primary schools. There are six sites to be proposed to be built within Chancel Primary School catchment area, the school is currently full and their is limited potential to increase the school size. Four sites are proposed to be built in the catchment area of Hob Hill CE Methodist (VC) Primary, recently expanded by 105 houses (1/2 FE) to mitigate the impact of development in the South of Rugeley in the current Local Plan. Three sites are proposed to be built within the catchment area of Redbrook Hayes Community Primary School, this school is currently full and offers no opportunity for further expansion. Whilst it is noted that there is limited area or no expansion potential at the above-named primary schools, within this planning area some surplus capacity currently exists. The current pupil movement trend would suggest that there is likely to be potential for primary pupils from proposed housing development(s) in these catchment areas to be accommodated. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contributions may be required in the future.

Rugeley Secondary School Place Planning Cluster: There is currently one secondary school which serves the Rugeley area. This school is full and is expected to remain under pressure for places without any additional housing in the area. Any level of housing will therefore necessitate additional secondary school provision in the town. Secondary school places will be provided either through the delivery of a new All Through School proposed as part of the Rugeley Power Station Development or through the delivery of new secondary school provision in the town. All future development will need to contribute proportionately to support the provision of additional school places.

Transport: Five Ways Junction (A5190/B4154/ Wimblebury Road): At the Last Local Plan consultation phase we identified a constraint at the Five Ways junction. It is noted that Policy SO3.1: PROVISION FOR NEW HOMES identifies new strategic housing sites at : • SH1 South of Lichfield Road, Cannock approx. 875 dwellings; • SH2 East of Wimblebury Road approx. 410 dwellings; • SH5 Land to the north of no.2 west of Hednesford Road, Norton Canes approx. 175 dwellings. Staffordshire County Council (SCC) is concerned that traffic generated by new housing developed in these locations will adversely impact on the A5190/B4154/Wimblebury Road Five Ways Junction. This junction is a known congestion hot spot at peak times and has also been identified as an AQMA. Data shows that the A5190 approach exceeds the national objective for transport related NO2 pollutants impacting on residential properties. Prior to the pandemic, work was undertaken by SCC to identify an improvement scheme (larger roundabout) to address existing deficiencies in the current junction design. This resulted in an expression of interest (EoI) being submitted for Local Pinch Point (LPP) Funding to the DfT in 2020 (Appendix 1).

The LPP EoI notes a number of deficiencies in the current roundabout design; • All 5 arms have single lane approaches with no flaring on the entry or exit • Heavy Goods Vehicles can only circulate at very low speeds due to tight radii • There are no formal crossing facilities and pedestrians and cyclists do so via dropped kerbs and during gaps in traffic. There is no guard rail or tactile paving • Speed limits on the approach roads vary from 30mph to the national speed limit. Capacity constraints are evident in the AM and PM Peak Hours (0800-0900 and 1700-1800 hours) causing significant delays to travellers through the junction. Traffic demand to use the junction is significant with 2017 traffic flows over 2500 vehicles per hour during peak times.

The main movements through the junction are along A5190 Cannock Road with Average Annual Daily Traffic flows (AADT) of between 17366 and 12,616 vehicles per day. There are heavy movements on the B4154 northern and southern approaches of 10,552 and 9682 vapid respectively. Unfortunately, at the details stage it emerged that land outside the Highway maintainable public expense (HMPE) was required to develop and deliver the concept design, and this could not be made available to the planned delivery programme. Funding for third party land acquisition had not been included within the EoI and the submission was withdrawn from consideration for funding (to the successive Levelling Up Fund - LUF), although there is an opportunity to resubmit to a later round of LUF. The LPP EoI was formulated using data collected pre-pandemic. We do not know what the successive 'new normal' travelling conditions might be on this part of the network. Assuming that the pre-pandemic travelling conditions return, we know that improvements are required to address existing concerns and that traffic generated by the proposed allocations will add to the transport and environmental problems in this location. The opening of McArthur Glen West Midlands Designer Outlet opening in 2021 to the west will also add to the traffic demand at Five Ways. In addition to highway works to increase capacity, there will be a need to provide a significant improvement in facilities to enhance connectivity for non-motorised users, particularly cyclists to LTN 1/20 standards (published by July 2020). This will further increase the necessary land take for any improvement scheme. Currently there is no identified solution or funding mechanism to deliver improvements to make these strategic housing allocations acceptable in transport terms. Sustainable Transport (Policy CP10) in the currently adopted Local Plan recognises the need to seek development contributions to support key road infrastructure improvements including Five Ways Island, Heath Hayes. Policies SO5.1: ACCESSIBLE DEVELOPMENT and SO5.4: MAINTAINING AND IMPROVING THE TRANSPORT SYSTEM do not recognise the need for highway improvements at Five Ways. Solution: Work is required to establish new baseline traffic conditions or confirm previous conditions at Five Ways. Traffic forecasts need to be developed to the end of the Local Plan Period, that include the cumulative traffic from these sites.

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A deliverable improvement scheme needs to be identified that can deliver acceptable travelling conditions through Five Ways and reduce traffic related NO2 emissions to acceptable levels. It is requested that a meeting be held between the County and District council to discuss the issues at hand, potential options and mechanisms for delivery (including roles and responsibilities) so that we can work towards an agreed approach for the Publication Plan and future examination. It is recommended that Strategic policies SO5.1 and SO5.4 need to be amended to address this issue positively: 1. SO 5.1 • Developments which, individually or cumulatively, cause an unacceptable impact on the highway network in terms of safety, air quality, capacity or congestion will not be supported, unless it can be demonstrated that they can be satisfactorily mitigated; 2. SO 5.4 ; • Supporting traffic management and highway improvement schemes that will provide for the safe and efficient use of the local highway network; • Reducing transport pollution and carbon emissions, protect the natural environment, and promote improved public health and wellbeing. Site Specific Policies are needed to require the developers of SH1, SH2 and SH5 to work together to develop an evidence base that demonstrates that residential development in these locations can and be made acceptable in transport terms by delivering the necessary improvements at Five Ways to fully mitigate their transport impact. General transport comments: At Paragraph 4.6 replace 'Transport Strategies' with the following: • DfT Gear Change: A bold vision for cycling and walking, July 2020 • Statutory Cycling and Walking Investment Strategy (CWIS), 2017 • Staffordshire Local Cycling and Walking Infrastructure Plan 2021 • Cannock Chase Integrated Transport Strategy (to be reviewed). Strategic Objective: 5 (SO5) should recognise the Core Design Principles for walking and cycling that are embedded in Gear Change and Local Transport Note 1/2 (LTN 1/20) Cycle Infrastructure Design, which is referenced in the National Model Design Code. Walking and cycling networks need to be Coherent, Direct, Safe, Comfortable and Attractive. The Spatial Strategy for Cannock/Hednesford/Heath Hayes (Par 5.16) does not reflect the need to provide walking and cycling network in line with the five Core Design Principles. At Paragraph 6.17 Design and Access Statements need to consider LTN 1/20. List of Relevant Evidence The following should be included in the appropriate lists of relevant evidence: • DfT Gear Change: A bold vision for cycling and walking July 2020 • Statutory Cycling and Walking Investment Strategy (CWIS), 2017 • Local Transport Note LTN 1/20 Cycle Infrastructure Design, 2020 • Staffordshire Local Cycling and Walking Infrastructure Plan, 2021. Within Gear Change, the Government has announced the setting up of an inspectorate led by a new national walking and cycling commissioner. They will be a statutory consultee within the planning system, pressing for high quality walking and cycle provision in Local Plans and planning applications, in line with new standards laid down in LTN 1/20 guidance. Active Travel England will also be publishing annual reports on highway authorities and grading our performance. National Policy Context: The Local Plan should recognise NPPF Paragraph 110a that is highlighted in 14.2.2 of LTN 1/20: NPPF paragraph 110a states that applications for development should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas. Paragraph 6.335 should also make reference to the Cannock Chase Integrated Transport Strategy being supported by Staffordshire's LCWIP. Any relevant Local Design Code to be produced will need ensure consistency with LTN 1/20. Monitoring and Evaluation SO5.1: An indicator should be the number of developments delivered in line with LTN 1/20/ Monitoring and Evaluation SO5.4: Staffordshire County Council will work with the planning authority to agree the appropriate monitoring indicators, targets and contingencies.

Rail: In relation to rail provision in the District we have the following comments to make: Page 12: The Rugeley-Hednesford-Cannock-Walsall-Birmingham, 'Chase Line' rail service continues to grow in its popularity and the three station at Cannock, Hednesford and Rugeley Town carry of 700,000 passengers' per year. The Chase Line electrification and line speed improvements completed in May 2019 have enabled the introduction of faster, longer and more frequent services, including two trains per hour throughout the day to Birmingham, and new direct services to the NEC/Birmingham Airport. The Council is also actively involved in the innovative Chase Line 'Stations Alliance', with the West Midlands Combined Authority, LEPs, Network Rail and West Midlands Trains (the new West Midlands franchise operator). Cannock station in particular is the focus of attention for a major upgrade, in view of its close proximity to the £160m, Mill Green retail designer outlet village, which will attract 3-4million visitors per annum. • Having checked footfall levels from official ORR figures for 2018/19 at these stations, the total footfall is around 500,000. The data therefore needs to be checked and the source and date of the data needs to be referenced. • Reference to the impact of Covid on footfall levels needs to be made in conjunction with the expectation that footfall will begin to grow again with the return of passengers to the railway and building back better. • The Chase Line Stations Alliance is with West Midlands Rail Executive and also Staffordshire County Council. This should replace West Midlands Combined Authority and also the LEPs are involved. Page 15: Rail services have seen significant improvements and strong growth in passenger numbers leading to continued investment in infrastructure. Parts of the District have seen reduced levels or even loss of their bus services and are now more isolated, especially away from the main commuter routes. Social isolation is an issue for many people who do not have access to cars. • It is suggested that this needs to be slightly reworded to take into account the impact of Covid on passenger numbers. This could be reworded to say strong growth in passenger numbers in recent years and prior to the Covid pandemic. Page 16: Rail services have seen significant improvements to Birmingham, London and the north-west. The off-peak Chase Line service frequency to Birmingham has been increased, while the electrification and line speed increase schemes have been completed, including the introduction of longer, faster services to Birmingham with direct services to Birmingham International (Airport/NEC). • It is important to note that whilst there is an hourly direct service to Birmingham International this could change (not aware that it is changing) in the future following the conclusion of negotiations with Government over the content of the Franchise going forward.

Page 28: A masterplan approach to the improvements to the Town Centre will be taken forward that will take in the opportunities to integrate the train station with the Town Centre and Mill Green. The recent upgrade of rail services to Birmingham and London will be reflected in the masterplan to harness the benefits of these improved links and provide a station facility that will be a key feature of the regeneration of Cannock Town Centre. [...]. Page 34: Option B: As above but also to add more specific reference to particular local heritage opportunities in town centres, canals and collieries and former mineral railway lines to help bring new life into town centres and historic commercial buildings, consider other regeneration/leisure opportunities and enhance the footway/cycleway network. This more specific reference to heritage opportunities could also refer in generic terms to the (forthcoming) HIA evidence to provide guidance for managing change at allocated sites. • The concept of using disused railway to enhance the footway/cycleway network is acceptable as long as it is no longer required for railway use in the future. [...]. Page 106: Support the development of rail freight within the District, in particular, the promotion of the Mid-Cannock site as a road/rail interchange depot, and safeguarding inland waterways and wharfage. • Support the above statement but should include the caveat where there is available capacity on the rail network. There also needs to be consideration of impacts on the local and strategic road network. Page 114: The same comments as on page 106 applies. Page 120: These routes are largely former mineral railway lines that carried coal from the coalfields on Cannock Chase to the main line railway for onward distribution to local customers and markets further away. Some routes have been restored as opportunities allow, but the remaining protected routes provide an opportunity for a wider network of off-road sustainable transport corridors. They also link with other local off-road routes including the Cannock Chase Heritage Trail from Cannock to Rugeley via Hednesford and phase 1 of the Brereton and Ravenhill Way from Rugeley Town Railway Station to Brereton. • Need to ensure that these railway lines are not required for future railway use. It may be useful to include a caveat here. Local Design Code: The Plan makes reference to the preparation of Local Design Codes following on from the National Design Code and Guidance. It will be important for discussions to be held with the County Council on the preparation of any design code primarily relation to the design and layout of highway maintainable at public expense and SuDS. Digital Connectivity. There are a couple of key principles that would be worth adopting. Any reference to improving access to services is equally important to both business and residents alike. Government and the industry are moving away from the language of "superfast broadband" to "gigabit capable", "full fibre" or "ultrafast broadband". The Cannock district is quite well served with superfast broadband at 99.54% and are currently 26.70% gigabit capable. It is highly likely suppliers such as Openreach and Virgin will start to address the gigabit capable service, given the majority of the premises in Cannock ought to be commercially viable. Openreach have already announced the Cannock exchange for upgrade to full fibre within their First Fibre programme. [...].

Other Comments: 7 Monitoring Framework - Suggestions above with regards to the production of a Heritage Statement as part of the Design and Access Statement and the production of a Historic Environment Desk Vase Assessment should be considered for inclusion here. Appendix I: Glossary - A definition of what a heritage asset is would be useful here - this could draw the distinction between designated and non-designated. Public Rights of Way The plan doesn't really contain any specific information about public rights of way other than acknowledge that improvements to cycle and footpath networks will be made to enhance connectivity and encourage more active travel, health and well-being (5.17). Whilst this is fully supported ultimately the Plan needs to aspire to improve accessibility on the walking and cycling networks (including towpath links) throughout the District. It is noted that the Plan does not mention horse riding, which is an omission given Cannock Chase District has a number of livery yards and there are public bridleways throughout the District. Future iterations of the Plan should give consideration to the equestrian community and their usage of bridleways, roads and lanes across the District.

The Plan requires new developments should seek to improve non-vehicular public access to the wider path network. This is essential of the aims of increasing the levels of physical activity are to be met and the public rights of way network should be integral to any schemes that are developed to promote this. Where development is likely to affect the path network, either directly or indirectly, such as where development is likely to lead to an increase in usage of the network in the vicinity the Plan should make policy provision for improvements to be sought. This could be via direct delivery via Planning Condition, use of Section 106 Obligations and/or CIL. Where developers are to provide direct improvements the Plan should signpost them to enhance the existing path network where possible in line with SCC's Rights of Way Improvement Plan. This could include: • the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists across Staffordshire where there is currently a shortfall in available access routes. • the creation and promotion of short circular walks to promote the health benefits of walking • the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture. The County Council expects to be consulted on any submitted applications in due course and is able to provide further advice and guidance as and when required. The Plan should ensure that the supporting text makes it clear that where appropriate development needs to take suitable mitigation to ensure the public path network is protected. Further, the Plan should make reference that there are likely to be many non-definitive routes across proposed development sites that should be considered by any applicants. In many cases these routes could have become rights of way by virtue of established usage and should be treated as public. There will also be sites where such usage or historic evidence has already resulted in applications being made to the County Council under Section 53 of the Wildlife and Countryside Act 1981 to add or modify the Definitive Map of Public Rights of Way which affects the land in question.

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Employment It is noted that the plan provides for 50ha of Employment sites against a range of 46-66ha (9net) as identified in the EDNA. The ELAA identifies that 12.47ha of employment sites have been completed since 2018 and the Plan proposes to allocate 27ha of new employment sites to meet the 50ha target. We acknowledge that the target sits within the range identified by the EDNA albeit at the lower end of the range suggested. However, when considering potential losses of employment sites over the plan period the EDNA suggested a higher range which the Plan target is below. Whilst Policy SO4.1 provides protection to safeguard against losses of existing employment areas, which is supported. There is a concern that with only allocating 27ha of new sites against a relatively low target of 50ha will not provide sufficient flexibility to ensure a sustainable pipeline of site and jobs coming forward. The County Council has further land holdings available at the Kingswood Lakeside Business Park, which it has regenerated over the years. The site is now well established and highly regarded. We have received repeated approaches from developers keen to build on the success of Kingswood Lakeside and expand the park further. There is potentially one development area left that would complete the site. We are presently considering a smaller area than that shown in the ELAA 2020 and on the Cannock Chase 2014 Policies Map. The 10.68ha platform under consideration would allow better connectivity for landscape and ecology around each end of the plot towards the open countryside to the northwest. The revised approach could allow us to achieve Biodiversity Net Gain targets more easily and retain more of the existing green space. We recognise that the area under consideration sits within the Green Belt but as it is adjacent to an existing high quality employment site with good sustainable transport links we feel the very special circumstances for its release from the Green Belt could be easily met. We would wish to meet with you to share our plans and discuss the potential for the site to be included as an allocation in the Plan. We would also wish to engage with you on the other site in our ownership A5/M6T that has been allocated and options that could be considered. Economy and Skills The County Council recognises the importance of access to good jobs for its residents. Whilst the new development proposed in the Plan will provide job opportunities for local residents and both construction and operational phases these could be reinforced and complemented by the provision of Employment and Skills Plans (ESP). As such we fully support POLICY SO4.5: PROVISION FOR LOCAL EMPLOYMENT AND SKILLS. The County has been working with District, Borough, and Stoke on Trent City Council colleagues to prepare a draft Employment and Skills Plan Framework that will provide advice and structure on the preparation of Employment and Skills Plans associated with new development. We would welcome that the Plan includes reference in the supporting text to the ESP Framework that will hopefully be agreed and adopted across the SSLEP area in the Summer 2021. [...] Public Health SCC and partners have recently commenced work to establish and implement a whole systems approach (WSA) to address obesity and promote a healthy weight. Obesity is a complex problem with multiple causes and significant implications for health and beyond. Tackling such an ingrained problem requires a long-term, system-wide approach that makes obesity everybody's business, tailored to local needs and works across the life course. Cannock Chase is one of three 'pathfinder' districts in Staffordshire that will be piloting the WSA to obesity in 2021, along with East Staffordshire and Staffordshire Moorlands. The use of the planning system to promote health and reduce inequalities is well established. The Local Plan provides opportunities to demonstrate how CCDC, along with SCC, are working as part of a WSA, where planning forms part of a wider approach to addressing obesity.

The Local Plan 'Preferred Options' document includes eight Strategic Objectives, all of which have some relevance to the health and wellbeing of the community. Key Issues The Key Issues identified within the Updated District Profile include many issues related to health and wellbeing, including: • Low standards of health, which require improvement; • The natural and built environment (inclusive of indoor, built and outdoor sports), which should be planned effectively to encourage opportunities for healthy and active lifestyles amongst all sections of the community; [...]. The Updated District Profiles for Health and Education, Community Deprivation, Transport and Infrastructure, Environment and Climate Change provide detailed overviews and supporting data and evidence of the range of health inequalities which impact on the welfare of the District and its residents. The data and other supporting evidence identified around health inequalities within the Local Plan Preferred Options document is welcome.

The Local Plan Preferred Options document doesn't satisfactorily demonstrate how health inequalities, and health and wellbeing needs identified within the Updated District Profile, might apply to development proposals. Policies The County Council notes that there is an absence of specific detail within the existing and proposed Local Plan Policies that would explicitly support addressing health inequalities or the health and wellbeing needs of the District and its residents. Existing Local Plan Policy "CP5: Social Inclusion and Healthy Living" is referred to in relation to Strategic Objectives 1, 2 and 7. It is considered specifically to help deliver Strategic Objective 2, where Option A is to update and bolster this existing policy in order to help deliver this strategic objective. Option B, to help deliver Strategic Objective 2 is as per Option A but with further policy elaboration via supplementary planning documents, appears to have received the least support/been discounted (as per paragraphs 6.101). The current Policy CP5 includes key elements of infrastructure related to health and wellbeing, including health facilities, parks, open spaces and woodlands, playing pitches and facilities for athletics, tennis and bowling, cycling/pedestrian routes and pathways, sport and physical activity facilities and community facilities and leisure/activity opportunities. It also states that the standard of provision of open space sport and recreation facilities will be identified in a SPD. Notwithstanding the above the proposed updating and strengthening of existing Policy CP5 is welcome. We also welcome and note the inclusion of Strategic Objective 2: to create community infrastructure and healthy living opportunities across the District, and the inclusion of these policies within the Local Plan Preferred Options document. We note that these current policies refer to major development and requirements upon them. There is no indication of any thresholds, other than major development, at which proposals must demonstrate how they will maximise positive impacts on health and healthy living within the development and adjoining areas or how these requirements will apply to smaller-scale developments where there are reasons to indicate that a proposal may give rise to a significant impact on health.

We also note that these policies do not reference any mechanism for development proposals to comprehensively set out how health and wellbeing impacts will be avoided, if not mitigated. The Local Plan Preferred Options document sets out the national policy context around Strategic Objective 2: to create community infrastructure and healthy living opportunities across the district. There are references to the NPPF 2019 paragraphs 91 (b) and 96. There are several other chapters of the NPPF 2019 which promote the wider health and wellbeing of communities, including active travel and physical activity, as well as access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation: [See response for Fig 1. NPPF Chapter's and policies relevant to healthy weight Environment (19)] There is an opportunity to strengthen CCDC's delivery of Strategic Objective 2, by not only elaborating and bolstering existing Policy CP5, but also adding an SPD. A 'healthy lifestyles' SPD would provide detailed advice and requirements in accordance with the Local Plan objectives related to health and wellbeing and draw upon the wider NPPF chapters relating to a healthy weight environment. A SPD would support the authority to better determine planning applications in accordance with the Local Plan and its objectives around health and wellbeing, and health inequalities. Local Plan Preferred Options document paragraph 6.69 references 'Active Design' developed by Sports England and supported by Public Health England. It also states that planning applications will be assessed against how they support healthy lifestyles by facilitating participation in sport and physical activity. paragraph 6.69 is the only reference to assessing health and wellbeing impacts of proposed development. However, the Design and Access Statement information provided within the Local Plan Preferred Options document (paragraphs 6.70 and 6.71) do not include any reference to an Active Design assessment and does not specify that the Design and Access statement should consider health and well-being requirement/impacts. The Local Plan Preferred Options document does not currently provide any mechanism for development proposals to comprehensively set out how health and wellbeing impacts will be avoided, or if not, mitigated. A Health Impact Assessment (HIA) could be used to identify issues related to health and wellbeing which might apply to development proposals. Health Impact Assessments are defined as a "combination of procedures, methods and tools by which a policy, programme or project may be judged as to its potential effects on the health of a population" (European Centre for Health Policy, 1999). HIAs could be applied for the purposes of development management as a process and tool for assessing both the potential positive and negative impacts of a proposal on health and wellbeing and suggest ways in which opportunities to improve health can be maximised and risks to health or negative impacts on health minimised. HIAs could be combined with an EIA if it makes sense to integrate health impacts into the methodology for the EIA. if an EIA is not required, the HIA should form a stand-alone assessment and submission, but would not be recommended as part of the Design and Access Statement, although the design and access statement should draw on the outcomes of the HIA. It is suggested that a meeting is concerned with officers from our Public Health team to discuss further collaborative working address the issues raised above. Sustainability & Climate Change We acknowledge that Climate Change is a key consideration in the Plan and cuts across numerous Policies.

We worked jointly along with the other Staffordshire Borough's and District's to commission the 'Climate Change Adaptation and Mitigation' study that has been used to help inform policies within the Plan. The report suggested opportunities for off-site mitigation/off-setting would potentially have a greater scope if considered over a broader geography than individual District/Borough areas. It is suggested over a broader geography than individual District/Borough areas. It is suggested we progress this matter through the Staffordshire Development Officers Group to consider the merits and operation of a collaborative approach. It is noted that the Norton Canes and Rural areas spatial strategy does not make reference to net zero as per the other areas set out in the Plan. Minerals and Waste Our comments at the previous stage of consultation, in June 2019, highlighted the need to recognise the importance of safeguarding underlying mineral resources, and existing waste and management facilities. These points appear to have been effectively addressed through Draft Policies SO8.7 and SO8.8. In the light of these draft policies, and Policy 2.5 of the Staffordshire and Stoke-on-Trent Waste Local Plan, concerns should be raised over the proximity of Strategic Housing Site SH1 to the boundary of Poplars Landfill. Great care will be needed to ensure that proposals to introduce housing nearby do not lead to constraints on the continued operation of the site. Whilst landfill is at the bottom of the waste hierarchy, and other methods of disposal should be used wherever possible, the demand for this form of disposal will continue for the foreseeable future. Older Persons Housing In relation to the ageing population issue we refer to our comments from the previous rounds of consultation where we set out work undertaken on our 'Next Generation Care' project would be useful in Plan making and provide evidence on need for older age accommodation. However, the evidence base does not appear to include anything other than the Local Housing Needs Assessment 2019. We are happy to provide officer input and assistance from our Next Generation Care project team, which could be useful in helping shape and refine the housing choice and mix policy options. The evidence base and locality analysis, can be found at <https://www.staffordshire.gov.uk/Care-for-all-ages/Information-for-providers/Information-for-providers.aspx> Flood Risk & SuDS We have provided to you separately technical input on flood risk for the sites proposed for allocation, which we will not repeat here. It is noted that Policies SO8.3 and SO8.4 make reference to sustainable drainage systems (SuDS) and surface water management. However, it is not clear to which developments SuDS would apply as SO8.3 refers to SuDS in the context of Protect, improve, and enhance existing woodlands and habitats, and integrate new green and blue infrastructure with SuDS. Policy SO8.4 Managing Flood Risk includes in the supporting text reference to our Sustainable Drainage Systems Handbook but the Policy itself is more about management of flood risk and avoidance of sites known to flood. It is suggested these policies are reviewed to make clear where SuDS would be expected to be delivered and it would also be helpful if the Plan could signpost developers to our website containing our relevant advice: <https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-planners-and-developers.aspx>

Introduction: [...]. RPS and St Modwen welcome the progress being made by the CCDC in preparing the Plan. However, we are concerned that by omitting the Site the Plan is not taking advantage of all opportunities to secure the most positive future for the residents and businesses of the District and based on the evidence base would appear to represent an unsound approach. In particular we consider the proposed employment land requirement to be unjustified and suggest that a higher employment land requirement would maximise the potential of the advantages offered by the District's excellent connectivity, as well as capitalising on the significant infrastructure being delivered nearby including the West Midlands Interchange and the M6/M54/M6 Toll link road. We also note that there is expected to be significant shortfall in the ability of the Black Country to meet its employment land requirement and to discharge its responsibilities under the Duty to cooperate suggest that the Council need to seek to accommodate some of this unmet need. We note that the Site is currently located within the Green Belt, however having undertaken a Site Specific Green Belt Assessment (see Appendix C) and having regard to the Council's previous detailed Green Belt assessment of the site, which has not been undertaken at this stage we consider the harm to the purposes of the Green Belt that would be caused by the release of the Site to be very low. We have also identified inconsistencies in the SA and recommend how they can be addressed. RPS and St Modwen welcome the proposed policy seeking to safeguard existing employment sites for employment uses, including the existing Watling Street Business Park, however we consider that the proposed policy could be strengthened by explicitly stating that the redevelopment of these sites for employment purposes will be supported, particular where, as in the case of the Watling Street Business Park, it is catering for a sector of the employment market that is not being addressed by other sites. [...].

Watling Street Business Park Expansion Land: A vision document has been provided for the Site and has previously been submitted as part of previous representations. This Vision Document is attached as Appendix D. The Vision Document sets out the potential to expand the existing Business Park in a sustainable way which meets the future requirements, expectations and aspirations of CCDC. The Site presents an excellent opportunity to deliver employment development within the current plan period. The expansion land (5.45ha) is situated immediately adjacent to the established Business Park and benefits from the existing access and infrastructure serving the current development. Existing business operators would be able to continue to operate with minimal disruption. The Site is also very well located in relation to the strategic highways network being accessed off the A5 Watling Street and lying in close proximity to the junction with the M6 (Toll), a location attractive to the expansion of existing businesses and providing opportunity for new inward investment. Proposed built development would be screened very effectively at the outset by the established framework of hedgerows, tree belts and woodland copses located along the Site's perimeter. Such features will be retained as the basis for a comprehensive Green Infrastructure framework, which encompasses the site. There are no substantive constraints which prohibit the expansion of the Business Park. The whole site area would measure approximately 12ha and its removal from the Green Belt would not undermine the overall purposes and integrity of the Green Belt. The landscape within which the site sits is visually enclosed by the existing Business Park and A5 Watling Street to the north, the Cannock Extension Canal to the west, and by woodland at Wyrley Common to the south. The Site can deliver sustainable high quality employment development meeting the following objectives: • Provide opportunities for employment development at a strategic location; • Provide development in a sustainable location extending the existing Business Park; • Provide development in a location without detriment to the local landscape character or visual amenities of the rights of way network; • Create a cohesive Green Infrastructure centred on the framework of retained hedgerows and tree belts; and • Existing retained features to be supplemented with new habitats maximising opportunities for biodiversity and landscape enhancement.

Conclusions: RPS, on behalf of St Modwen, welcome the progress that the Council are making with the preparation of the Cannock Chase Local Plan. However, we content that the Watling Street Business Park site should be included as an allocated employment site. We have identified issues with the current employment land evidence with regards to demonstrating that the approach set out in the PPG has been followed and have made suggestions as to how this can be addressed. In particular we note that limited consideration has been given to demand and market signals and so St. Modwen will instruct further work to provide evidence regarding this which will be provided to the Council in due course. It is not clear from the available evidence that an allowance has been made to address likely losses of employment land over the plan period and we encourage the Council to include this within the employment land requirement to ensure that it is robust. We consider that the most appropriate allowance for losses is 0.96ha per annum or a further 19.2ha over the 20 year plan period. We also consider there to be a compelling case for the Plan to accommodate some of the anticipated unmet need for employment land that is expected to arise from the Black Country, given the significant shortfall that has been identified through the initial evidence for the Black Country Plan. This will ensure that the Council can demonstrate that they have met the Duty to Cooperate. The District has enviable location al advantages and further sites, including the Site, should be identified along the A5 corridor which is an established industrial location to maximise the opportunities for the residents and businesses of Cannock Chase District that this provides. RPS understand the employment requirement in the Plan to be based on a labour supply restricted scenario. We note that the methodology for calculating this requirement assumes out commuting continues at the same rate throughout the plan period. This would have negative sustainability implications and does not recognise that providing additional employment land above the labour supply restricted level would in fact have beneficial effects on sustainability by providing opportunities to recue out commuting. RPS have identified inconsistencies with how the SA has scored the Site in relation to the following objectives: • SA objective 1: Protect and enhance biodiversity, fauna and flora and geodiversity • SA objective 2: Minimise pollution and protect and enhance air, water, and soils • SA objective 5: Reduce the risk of flooding • SA Objective 14: Access to services Provide easy access to community services and facilities to meet people's needs and avoid isolation

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• SA objective 17: Conserve and enhance the built and historic environment (including heritage assets and their respective settings) . Amending the scoring for the Site as we have suggested indicates that the development of the site would be sustainable. We have undertaken a Site Specific Green Belt Assessment (Appendix C) which demonstrates that the release of the Site from the Green Belt would only cause very low harm to the purposes of the Green Belt. RPS suggests that even if the Expansion Land Parcel is not released from the Green Belt that there is a compelling case for the release of the Business Park Parcel as it does not make any contribution to Purposes 1-4 of the Green Belt and only a very weak contribution to Purpose 5. RPS also note that this would be consistent with the proposal to release site NE5 Turf Field. As demonstrated by the accompanying vision document the Site can deliver sustainable high quality employment development meeting the following objectives: • Provide opportunities for employment development at a strategic location; • Provide development in a sustainable location extending the existing Business Park; • Provide development in a location without detriment to the local landscape character or visual amenities of the rights of way network; • Create a cohesive Green Infrastructure centred on the framework of retained hedgerows and tree belts; and • Existing retained features to be supplemented with new habitats maximising opportunities for biodiversity and landscape enhancement. RPS welcomes the proposed policy identifying Watling Street Business Park as an existing employment area to be safeguarded for employment uses. However, we suggest that the policy could be more positively prepared by being amended to make clear that the redevelopment of such sites for employment uses will be supported. RPS is broadly supportive of the proposed policy for Employment and Skills Plans, but RPS recommend that the policy is redrafted to make clear that it will only be applied to operational phase if the end occupier is known. This will avoid potential issues with speculative development. RPS also recommend that the policy is redrafted to allow for Employment and Skills Plans to be secured by way of planning condition when appropriate as this is more proportionate than requiring a legal agreement, with the associated costs, in all circumstances. Finally, additional work is being undertaken to address concerns expressed by officers with regards to the potential development of the Site. This will be provided to officers in due course.

LLPO027	Taylor Wimpey (Land East of Wimblebury Rd)	RPS - P, Hill	<p>Conclusions: These representations have been prepared on behalf of Taylor Wimpey with respect to their interest in Land East of Wimblebury Road. The site has been identified in the Cannock Chase Local Plan Review Preferred Options consultation document (CCLPR) as a housing allocation (SH2 - for 410 dwellings). The identification of the site in the CCLPR is welcomed and supported. However, a number of concerns have been identified that should be considered prior to publishing the next iteration of the CCLPR. These include: • Define site allocations capacities as 'minima' rather than as 'approximate' as currently stated. • Consider taking a greater proportion of unmet need (housing shortfall) from neighbouring areas, on the basis that the Council assumes other neighbouring authorities are proposing take higher numbers than otherwise suggested in their own local plan reviews to date. This relates to South Staffordshire District, who the Council assume will be taking 4,500 dwellings, but is actually only considering a figure up to 4,000. • As drafted, the wording of the CCLPR assumes that site SH2 is being expected to accommodate a new primary school. However, given the nearby site allocation (Land South of Lichfield Road) is over twice the size (in area) it is not considered fair and reasonable to expect SH2 to accommodate such a large piece of infrastructure. A fairer approach would be to allow SH2 to provide a financial contribution to assist the viability of providing the school on the larger allocation. • Whilst it is considered the proposed release of Land East of Wimblebury Road (ref. W112) from the Green Belt is justified, concerns are raised that the Council's updated Green Belt Assessment for W112 and other adjacent land parcels (summarised in chapter 4 of this submission) potentially over-states the potential harm that would be caused were these parcels, in particular W112 and OA9, to be released from the Green Belt. • In addition, the CCLPR does not identify any additional safeguarded land to help meet the development needs of the District beyond the plan period (2018-2038). This is despite the fact that Green Belt release is likely to be a recurring feature of plan reviews in Cannock Chase given the lack of capacity to accommodate significant growth within existing urban areas (as reflected in the wording of proposed Policy SO7.7 of the CCLPR – see paragraph 4.5 of this submission). • This submission therefore proposes additional land ('Proposed Safeguarded land Parcel') to be safeguarded for future needs in the CCLPR located contiguous with the Proposed Allocated Land Parcel identified in SH2 (Figure 4.4 illustrates the extent of the land in question).</p>
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The District Context		
LLPO028	P, Dale-Pearson	Health and Education (Page 7) - With Cannock Chase residents demonstrating a higher than national average in obesity, why are we continually reducing Green belt for housing? Would this land be better served as an outside usable space for families to exercise. I strongly object to these plans.
LPPO029	P, Dale-Pearson	Housing (Page 9) - As one of the 14 authorities of Greater Birmingham and Black Country, I assume we have a larger proportion of Green Belt vs the urban authorities. However the Brownfield sites are largely untapped within these areas. The Green Belt should not be an easy overspill of the urban areas of leaving behind the brownfield sites to decay. I strongly object to these plans.
LPPO030	Cannock Chase AONB Partnership	I note the references to Cannock Chase AONB as a vital asset for outdoor leisure, and the observations regarding increased value of access to open space and nature during the pandemic. As a result of the pandemic the AONB, has seen a significant increase in user pressure with direct and indirect effects such as littering, path erosion, off trail mountain biking, resulting in erosion of its natural beauty and special qualities. This is relevant in the context of the Local Plan to ensure an enhanced awareness of the potential effect of further development on the AONB. The AONB notes reference to the need to protect and enhance the highly valuable and sensitive natural environment, whilst meeting the demand for housing and recreation. Recreation is not the primary purpose of the AONB designation under the Countryside and Rights of Way Act 2000 (CROW), which places a duty on all public bodies to "have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."
LPPO031	G, Green	Preferred Options Policies Map - My concern is for the preservation of the natural environment, which will come under pressure as more housing is built, so I refer to the proposed Safeguarded country park and the SBI. There is something I had hoped would be shown on the map but it missing. I know that the Countryside Officer is aware of it. In between the area highlighted for the countryside park and the highlighted SBA there is a bank site which I have shown on my hand drawn map. This site is known to some as the 'Millennium Woods' because we planted trees there to commemorate the millennium. The site has a right of way. I have voluntarily worked to keep open the paths there which have become overgrown with brambles and unwalkable. During the period of the Covid pandemic, many people have enjoyed walking there and observing the rich variety of birds, animals, trees and plants that exist there. The Countryside Officer has been aware of this and appreciated our tidy-ups. I have put up a barn owl box facing the meadow your map refers to as of biological interest. I think this site should be valued and protected as it already has a well developed ecology, built up over the last decade or so.
LPPO032	Cannock Chase Green Party - Jenking, R	The local plan talks about enhancing and protecting the Green Belt, biodiversity and wildlife and yet is equivocal when it comes to the detail. The comments that concern us the most are: "Ensure that any loss of Green Belt is suitably mitigated" (SO7.7) Clearly there shouldn't be ANY loss of Green Belt. "Green Belt release in order to provide sufficient land to meet Cannock Chase District's housing need with an element of flexibility". There should not be any release of Green Belt land. The Green Belt protections are not designed to be flexible. With regard to housing need. The Green Party believes that housing need can be met by building on brownfield sites. Too often developers are granted planning permission for sites within the existing urban environment that then sit underdeveloped for years and years. The Green Party call upon the Council to produce a register of all planning permissions granted over the last 20-30 years that have yet to be developed. The Council should give notice to the developers that the planning permission will be rescinded if not developed in an appropriate timeframe. The Council should also look at extending it's use of housing management orders to bring back into use un-occupied dwellings.
LPPO033	Canal & River Trust - H, Smith	As at the Issues & Options stage we welcome the identification of the canal within the Transport and Infrastructure and Environment sections of the District Context. Although we strongly welcome reference to the role that our network can play with regards to heritage-led regeneration within the Environment Section, but we do believe that reference to the wider benefits of the canal should be included. Notably, the canal network provides an opportunity for leisure, recreation and sporting activities, supporting physical and healthy outdoor activity. The Health & Education section identifies that the District has particular health related issues in the areas of life expectancy, obesity, early deaths from cardiovascular disease and higher rates of diabetes. Our network provides an easily accessible green infrastructure resource that can help to promote healthy lifestyles, and could help to address some of these challenges, notably in Rugeley & Brereton (communities next to the Trent & Mersey Canal). We therefore advise that reference to canals within the 'Environment Section' should be expanded to refer to their role as strategic Blue-Green Infrastructure corridors. This would help to make the Local Plan more effective, as it would make the potential benefits of our network more obvious to future Decision Makers in addressing some of the key objectives for the Local Plan Period. With regards to the identified Key Issues, for the reasons described above, we strongly welcome the references to the canal network, notably with regards to the potential role of our network in contributing towards recreation, heritage led regeneration, and the aims to promote connections between the canal network and the wider walking and cycling network.
LPPO034	Norton Canes Councillors	In your document on page 16, as part of the District Context you identify Norton Canes as an individual area and give a reasonably accurate description of the urban village as it currently stands. Our concern though is that on the next page you then process to list rural areas as a separate entity yet include "the rural area to the south of the M6 Toll". In our opinion, these areas are still an integral part of Norton Canes, any description - or indeed analysis - of Norton Canes should treat the rural areas as part and parcel of the community that this Local Plan should represent. We believe the Local Plan should view the rural areas of southern Norton Canes as a unique feature for the district that acts as a natural divide between the urban West Midlands and Staffordshire. The document states that "This area contains some of the most intact rural landscape character in the District." - we believe that the document should contain specific policies to ensure it remains so.

LPO035	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates is generally supportive of the identified District Profile. The profile reflects the requirement to utilise the NPPF and the Standard Method to calculate housing need within the District. This approach is supported rather than utilising the Cannock Chase Local Housing Needs Assessment (2018-2038). In addition, recognition of the shortfall in the GBBCHMA and the need for Cannock Chase to contribute towards the meeting the shortfall is supported. However, the profile needs to incorporate the growth ambitions of the GBSLEP and the Staffordshire and Stoke LEP. The Council is a member of both LEPs and they both show clear support for housing growth and delivery. Similarly, the Council's role as a non-constituent member of the WMCA and the commitment of the WMCA to deliver homes at an accelerated rate should be recognised. The District Profile identifies Cannock Chase District as having a greater employment rate than both the regional and national average. In order to respond to this factor, the District Profile should recognise that the Standard Method does not consider economic growth and, therefore, housing provision should be considered in excess of the Standard Method, which should be treated as a minimum in order to support growth within the district and to ensure a balance between jobs and homes provision. [...] greater recognition should be given to the ability of the District to meet not only the unmet housing need arising from GBBCHMA but also in support of its own local growth agenda and those of the two LEPs and those of the WMCA. The profile recognises the important of the Green Belt in having a number of roles but particularly in maintaining the openness and the rural/urban fringe on the edge of the West Midlands Conurbation. Richborough Estates acknowledges this but the recognition of the Preferred Options approach to release certain sites from the Green Belt, the District Profile should recognise that development in certain locations can have significant sustainability benefits which can provide the exceptional circumstances necessary to amend Green Belt Boundaries. The profile identifies the principle urban areas within the district. These consist of Cannock/Hednesford/Heath Hayes, Rugeley/Brereton and Norton Canes. Richborough Estates supports the recognition of these principle urban areas however greater emphasis should be given to their role in delivering sustainable development in the context of them being the main centres of population and with the greatest range of facilities and transport opportunities.
LPO036	Richborough Estates (Land South of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates is generally supportive of the identified District Profile. The profile reflects the requirement to utilise the NPPF and the Standard Method to calculate housing need within the District. This approach is supported rather than utilising the Cannock Chase Local Housing Needs Assessment (2018-2038). In addition, recognition of the shortfall in the GBBCHMA and the need for Cannock Chase to contribute towards the meeting the shortfall is supported. However, the profile needs to incorporate the growth ambitions of the GBSLEP and the Staffordshire and Stoke LEP. The Council is a member of both LEPs and they both show clear support for housing growth and delivery. Similarly, the Council's role as a non-constituent member of the WMCA and the commitment of the WMCA to deliver homes at an accelerated rate should be recognised. The District Profile identifies Cannock Chase District as having a greater employment rate than both the regional and national average. In order to respond to this factor, the District Profile should recognise that the Standard Method does not consider economic growth and, therefore, housing provision should be considered in excess of the Standard Method, which should be treated as a minimum in order to support growth within the district and to ensure a balance between jobs and homes provision. [...] greater recognition should be given to the ability of the District to meet not only the unmet housing need arising from GBBCHMA but also in support of its own local growth agenda and those of the two LEPs and those of the WMCA. The profile recognises the important of the Green Belt in having a number of roles but particularly in maintaining the openness and the rural/urban fringe on the edge of the West Midlands Conurbation. Richborough Estates acknowledges this but the recognition of the Preferred Options approach to release certain sites from the Green Belt, the District Profile should recognise that development in certain locations can have significant sustainability benefits which can provide the exceptional circumstances necessary to amend Green Belt Boundaries. The profile identifies the principle urban areas within the district. These consist of Cannock/Hednesford/Heath Hayes, Rugeley/Brereton and Norton Canes. Richborough Estates supports the recognition of these principle urban areas however greater emphasis should be given to their role in delivering sustainable development in the context of them being the main centres of population and with the greatest range of facilities and transport opportunities.
LPO037	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates is generally supportive of the identified District Profile. The profile reflects the requirement to utilise the NPPF and the Standard Method to calculate housing need within the District. This approach is supported rather than utilising the Cannock Chase Local Housing Needs Assessment (2018-2038). In addition, recognition of the shortfall in the GBBCHMA and the need for Cannock Chase to contribute towards the meeting the shortfall is supported. However, the profile needs to incorporate the growth ambitions of the GBSLEP and the Staffordshire and Stoke LEP. The Council is a member of both LEPs and they both show clear support for housing growth and delivery. Similarly, the Council's role as a non-constituent member of the WMCA and the commitment of the WMCA to deliver homes at an accelerated rate should be recognised. The District Profile identifies Cannock Chase District as having a greater employment rate than both the regional and national average. In order to respond to this factor, the District Profile should recognise that the Standard Method does not consider economic growth and, therefore, housing provision should be considered in excess of the Standard Method, which should be treated as a minimum in order to support growth within the district and to ensure a balance between jobs and homes provision. [...] greater recognition should be given to the ability of the District to meet not only the unmet housing need arising from GBBCHMA but also in support of its own local growth agenda and those of the two LEPs and those of the WMCA. The profile recognises the important of the Green Belt in having a number of roles but particularly in maintaining the openness and the rural/urban fringe on the edge of the West Midlands Conurbation. Richborough Estates acknowledges this but the recognition of the Preferred Options approach to release certain sites from the Green Belt, the District Profile should recognise that development in certain locations can have significant sustainability benefits which can provide the exceptional circumstances necessary to amend Green Belt Boundaries. The profile identifies the principle urban areas within the district. These consist of Cannock/Hednesford/Heath Hayes, Rugeley/Brereton and Norton Canes. Richborough Estates supports the recognition of these principle urban areas however greater emphasis should be given to their role in delivering sustainable development in the context of them being the main centres of population and with the greatest range of facilities and transport opportunities.

LPPO038	Inspired Villages - E, Pearce	<p>The LPPO consultation document identifies a need for around 4% of new homes to be for nursing homes and other residential institutions of page 10. These targets specifically mention younger people and small households with a combined 88% of new dwellings over the plan period identified for these groups. The target of 4% would equate to just 11 dwellings per annum of the overall housing requirement of 276 dwellings per annum, or 228 units over the plan period (2018-2038). The targets provided are at odds with both population projections outlined at Page 6 of the LPPO consultation document [...]. Further, the age profiles of the District is projected to rise further with those over 70- identified as group with a particular projected rise. Using the ONS, 2018 - Based Population Projections for LAs: Table 2, as reference in footnote 4 of the Preferred Options Consultation document, in 2020, those over 65 in Cannock Chase District comprised 19, 643 persons. In 2038, over the plan period, the number of persons in this age group is projected to rise to 27,452, an increase of approx. 40%. paragraph 6.216 identifies that 60% of new housing should be suitable for the needs of households with health problems or disabilities that affect their housing requirement. Crucially, the Preferred Options Consultation document acknowledges that the increase in older age people raises the profile of health conditions, particularly dementia, the prevalence of which is higher in Cannock Chase District than average in England. Whilst it is accepted that some older people will wish to remain in their homes, there is a clear need for specialist housing for older people in the District, particularly given the existing prevalence of disabilities related to old age, such as dementia.</p>
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LPPO039	Cannock Designer Outlet (GP)Ltd Carter Jonas - K, o/b Cannock Designer Outlet Ltd Gregson Partnership	<p>Whilst the Local Plan Preferred Options document is supported in principle, on behalf of our client who is the operator of McArthurGlen Design Outlet West Midlands ('MGDOWM'), there are several aspects we want to comment on. Transport & Infrastructure (P12) Within the District Context, there is reference to Cannock train station being the 'focus of attention for a major upgrade, in view of its close proximity to the £160m, Mill Green retail designer outlet village, which will attract 3-4million visitors per annum'. As the MGDOWM serves a wide catchment, we support the delivery of the major upgrade to Cannock train station (alongside the electrifying of the line) which will improve a key transport link to the development for a vast number of visitors. The upgrade works will also increase the attractiveness for people having the option of using sustainable modes of travel to one of the major visitor attractions in the District.</p>
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How the Local Plan Fits within the Wider Context

LPPO040	Richborough Estates (Land off Brownhills Road, Norton Canes) Pegasus Group - B, Cook	<p>In terms of the wider context and how the Local Plan fits into the broader more strategic framework, support is given to the Council recognising the Local Plan's role in delivering some key objectives from bodies such as the two LEPs, the WMCA and the GBBCHMA. This should also refer to the objectives of these organisations and in particular their aspirations. At paragraph 4.10 the document refers to discussions with duty to corporate partners and the potential assistance to meet Cannock's housing need and ongoing dialogue in relation to the wider HMA shortfall. Whilst support is given for the need to address the short fall in the HMA, concern is raised relative to the suggestion that the Council is seeking assistance to meet its own housing needs. There is no evidence to establish that the Council cannot meet its own housing requirements, as well as contributing towards meeting the short fall in the wider HMA, and on this basis this element of paragraph 4.10 should be omitted as not being justified.</p>
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LPPO041	Richborough Estates (Land South of Cannock Road, Heath Hayes) Pegasus Group - B, Cook	<p>In terms of the wider context and how the Local Plan fits into the broader more strategic framework, support is given to the Council recognising the Local Plan's role in delivering some key objectives from bodies such as the two LEPs, the WMCA and the GBBCHMA. This should also refer to the objectives of these organisations and in particular their aspirations. At paragraph 4.10 the document refers to discussions with duty to corporate partners and the potential assistance to meet Cannock's housing need and ongoing dialogue in relation to the wider HMA shortfall. Whilst support is given for the need to address the short fall in the HMA, concern is raised relative to the suggestion that the Council is seeking assistance to meet its own housing needs. There is no evidence to establish that the Council cannot meet its own housing requirements, as well as contributing towards meeting the short fall in the wider HMA, and on this basis this element of paragraph 4.10 should be omitted as not being justified.</p>
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LPPO042	Richborough Estates (Land off Main Road, Breton) Pegasus Group - B, Cook	<p>In terms of the wider context and how the Local Plan fits into the broader more strategic framework, support is given to the Council recognising the Local Plan's role in delivering some key objectives from bodies such as the two LEPs, the WMCA and the GBBCHMA. This should also refer to the objectives of these organisations and in particular their aspirations. At paragraph 4.10 the document refers to discussions with duty to corporate partners and the potential assistance to meet Cannock's housing need and ongoing dialogue in relation to the wider HMA shortfall. Whilst support is given for the need to address the short fall in the HMA, concern is raised relative to the suggestion that the Council is seeking assistance to meet its own housing needs. There is no evidence to establish that the Council cannot meet its own housing requirements, as well as contributing towards meeting the short fall in the wider HMA, and on this basis this element of paragraph 4.10 should be omitted as not being justified.</p>
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LPPO043	Cannock Designer Outlet (GP)Ltd Carter Jonas - K, o/b Cannock Designer Outlet Ltd Gregson Partnership	<p>Paragraph 4.2 We support the Council's seven strategic objectives in promoting prosperity across Cannock and in particular, "establishing Mill Green Designer Outlet Village as a major visitor attraction and maximise the benefits it will bring to the District." To ensure the importance of MGDOWM to the local economy is realised alongside it being used to enhance the District's reputation (see paragraph 6.398), we suggest the site is designated as a Designer Outlet offering a specialist retail/leisure destination in the emerging Local Plan Review. This will assist in MGDOWM being recognised as one of the District's key visitor and tourism destinations and is able to be supported through planning policy. We therefore proposed the following policy should be incorporated into the Local Plan: McArthurGlen Designer Outlet West Midlands The area shown below is designated for the purposes of specialist retailing and as a leisure destination in accordance with planning permission CH/20/435. It is important that the specialist offer is maintained so that it complements town centres in the District.</p>
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Local Plan Vision & Objectives

LPPO044	Croft development Consultancy UK Ltd, N, Bubalo	We support Strategic Objective 3 of the Plan to deliver a sufficient supply of housing, of quality and choice and support that in order to achieve this not all need will be able to met in certain locations in the district without the release of greenfield land. Support is also given that the needs of both the wider Black Country and adjoining districts may need to be considered in the plan making process and the Duty to Cooperate provides the appropriate mechanism and working forum in which to carry that debate forward.
LPPO045	Transport for West Midlands - H Davies	Overall, TfWM is very supportive of the documents vision and core aims - including delivering on high quality development, creating healthy living opportunities, providing a sufficient supply of homes, creating a vibrant economy and supporting the provision of sustainable transport and communications infrastructure, which are all vital for the area and wider region. Delivering on this growth, ensuring the right infrastructure provision and necessary transport improvements will be fundamental.
LPPO046	Bromford Housing Group PlanIt Planning and Development - J, Williams	We are generally supportive of the Strategic Objectives identified by the emerging Plan. Strategic Objective 3 refers to delivering a sufficient supply of homes to provide for housing choice and ensure that people are able to live in a decent home. It is our view that this objective should be clearer to reflect the requirements of the NPPF. Paragraph 59 of the Framework requires a sufficient amount and variety of land to come forward to meet the needs of specific housing requirements and that land is developed without unnecessary delay. The size, type and tenure of housing needed for different groups in the community should be addressed and reflected in planning policies. This includes, but is not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families and travellers. Strategic Objective 3 should be expanded to confirm that the District Council is committed to delivering sufficient supply of both market and affordable homes across a variety of tenures to help cater for the requirements of the District's population, and also to contribute towards meeting the growth requirements of the Black Country and Birmingham conurbation. Strategic Objective 4 - Economic Growth We support the reference in paragraph 6.255 of the Plan to the Council adopting a strategy which champions clean growth principles and a highly productive resilient economy. It must be ensured that there is a sufficient number of homes provided to meet the requirements of the working population. The Plan's ambitious employment growth objectives must correspond to the housing requirement. As detailed in our representations this is not, however, the case. The housing requirement is insufficient to meet household growth and support the local economy.
LPPO047	D, Green	<p>Objectives 1-8: Throughout the Evidence Base supporting these proposed objectives, the fact that 80% of the Cannock Chase District's land is either AONB or Green Belt is spoken of in negative terms, it is the clear thrust of the evidence that this 80% of land is an inconvenience and an obstacle. My view is that this is the opposite starting point from the one that the evidence supporting the Local Plan should be taking The fact our District is 80% AONB and Green Belt is what makes it so special, it is a haven for wildlife, it is home to some nationally important landscapes and it provides immense pleasure and wellbeing to the people of Cannock Chase and surrounding areas. It is only an inconvenience or obstacle to those seeking to develop it for their own profits. Rather than looking at how we can assist the surrounding local authorities in the West Midlands by satisfying their housing needs, our contribution should be the natural one. With this in mind, the order of the Objectives should be changed. The first priority should be the protection and enhancement of all of the Green Belt and AONB for the benefit of all of the animals, plants and people that rely on it. Objectives 7 and 8 should be Objectives 1 and 2. All the other Objectives should be expressly stated to be subject to these two over-riding objectives. In terms of the wording of the proposed Objectives 7 and 8. I believe that the language of protection and conservation should be far more robustly and unambiguously stated. There should be a clear statement that there should be no further reduction in the land allocated to Green Belt. To not do this will simply allow a gradual chipping away at the edges of the Green Belt year on year and Local Plan on Local Plan until the Green Belt has been significantly diminished, There is no such thing as a low impact reduction of the Green Belt because the overall impact of reduction will always be severe. Likewise there should be an express statement that development up to the boundary of the AONB and Green Belt should be permitted. Objective 5: should be amended to require the appointment of a "Sustainable Transport Tsar" who will have oversight of the entire sustainable transport network in the district. This will ensure that different permitted developments work together to provide a cohesive sustainable transport network.</p> <p>At present the sustainable transport network is developed piecemeal leading to cycle paths that lead nowhere and a lack of safe routes for pedestrians and cyclists to complete their entire journey. I have specific comments to make about two of the areas where the Local Development Framework Interactive Policies Map indicates there will be a reduction of/development on land that was declared Green Belt in the 2014 Local Plan: Land to the East of Wimblebury Road: This land is recorded as being within the Green Belt in the 2014 Local Plan, but is marked as a Residential Strategic Sites in the latest documents. I object to this site being removed from the Green Belt and to it being designated for development. I note that the site has not been included in the Green Belt Detailed Harm Assessment for Wimblebury and we believe that it should have been. I believe that failing to do so demonstrates a flawed approach to the consideration of this parcel of land. The land is an important area of Green Belt representing the hard Eastern border of Heath Hayes. To allow development here is to encourage urban sprawl and is a first, inappropriate, step towards neighbouring areas of Green Belt suffering the same fate. Developing here would be contrary to Objectives 7 and 8 of the proposed Local Plan. Land to the South of the A5 at Churchbridge, designated CA10 in the Green Belt Detailed Harm Assessment for Cannock and Churchbridge: The Local Development Framework Interactive Policies Map suggests that it is proposed to remove this site from the Green Belt. We object to this. There should be no diminution of the Green Belt. This site is an important green buffer between the settlement at Churchbridge and the wider open countryside, given the substantial impact of the A5 and M6 Toll on its border. It should be preserved as a buffer and sanctuary/green corridor for wildlife. To develop this site would be contrary to Objectives 7 and 8 of the proposed Local Plan. It would also be contrary to Objectives 1-3 which talk of providing "safe", "healthy" and "decent" development and housing. To allow housing so close to the pollution emanating from the A5 and M6 Toll would be seriously detrimental to the wellbeing of anybody living or working on that land.</p>

LPPO048

Historic England - E, Boden

Strategic Objectives: Historic England welcomes that the 'Preferred Options' document includes policies that seek to conserve and enhance the historic Environment, and thus deliver Strategic Objective 1. However, it is not readily apparent from the title of Strategic Objective 1, that the consideration of the historic environment is encompassed within this objective and we suggest that the title of this objective is amended to make specific reference to this historic environment. With regard to Strategic 6, Historic England recommend that reference be made to the wider, social, cultural, economic and environmental benefits that conservation of the historic environment can bring such areas (NPPF Para 185). With regard to Strategic Objective 8, Historic England recognises the urgent need for positive action in response to the global climate crisis and is committed to achieving net zero carbon emissions. Heritage assets can be a valuable aid to achieving sustainable development and we therefore suggest that reference to the re-use of historic buildings should be specifically included within this strategic objective; with reference made to the carbon saving benefits of sympathetic restoration and retention of historic buildings, rather than their demolition and replacement. Spatial Priorities: Historic England welcomes the inclusion of safeguarding historic assets as a spatial priority in the future development of the District (para 5.1). The Spatial Strategy: Reference to the Local Plan protecting cultural and heritage assets within the overall spatial strategy is welcomed by Historic England. With regard to the spatial strategies for Cannock and Rugeley, historic England welcomes the Masterplan approach to town centre improvements in these settlements and would welcome the opportunity to be involved in the master planning process at an early stage. Historic England also suggests that within the spatial strategies for these settlements reference should be made to maximising opportunities to better reveal the significance of heritage assets and their Conservation Area. We also welcome reference to the prioritisation of residential and commercial units that respect the historic town centre of Rugeley but note that any such reference to the historic Environment is absent from the spatial strategy for Cannock and should be included.

LPPO049

Norton Canes Parish Council

The Spatial Strategy for Norton Canes should identify the key issues and opportunities faced by the area and propose that they be addressed positively. Norton Canes is a large parish stretching to Cannock and Heath Hayes to the west and north and incorporating large areas of Green Belt and the rural area south of the A5. The importance of economic, social and environmental connectivity to these areas, as well as to neighbouring Chasewater, Burntwood and Brownhills should be acknowledged. Much of the spatial strategy for Norton Canes on p.29 of the PO is welcomed. In particular, that the identity of Norton Canes as a separate settlement safeguarded and enhanced. However, the rest of the strategy does not go far enough in setting a positive vision for the area's issue and opportunities. We suggest the following amendments. - Residential and commercial development opportunities will be prioritised within the urbanised areas of Norton Canes where they can make a positive and sustainable contribution to the growth of the district. Employment opportunities aimed at providing for the growth of small businesses will be a priority. - The delivery of transport, education and sports and recreation facility infrastructure required to support previous major developments will be a priority; and any further major developments will be supported by contemporaneous infrastructure provision. - The provision of specialist housing accommodation for the elderly will be supported to address the lack of this type of facility to serve what is a large and separate community. Major new housing developments will incorporate a proportion of small bungalows for the elderly. - A masterplan approach will be supported for heritage-led regeneration of this historic site at Grove Colliery. This will consider enabling development to support the creation of a work, recreation and leisure hub connected to appropriate recreation uses in the surrounding countryside. - Norton Canes is a designated Local Centre and opportunities for its improvement will be supported in order that it is better able to serve the local needs of a growing population, the result of past and current major residential developments. - Improvements to transport networks will include improved cycle/footpath links to Kingswood Lakeside to Heath Hayes; to Chasewater; and to the employment areas and canal towpath and recreation routes south of the A5. In this context, a safe crossing of the A5 in the vicinity of the Cannock Extension Canal will be supported. - The unique characteristics of Norton Canes parish creates opportunities to provide extensive recreational footpath/cycle routes connecting the urban areas with the surrounding Green Belt and rural countryside. The improvement of such routes will be prioritised. In particular, the relocation of unauthorised Gypsy and Traveller encampments from the bridleways in Norton Canes will be a priority. - The Local Plan supports the enhancement of the biodiversity link between Sutton Park and Cannock Chase as well as areas further afield and in this context the protection and improvement of the No Man's Bank SSSI and the several SBIs in Norton Canes will be supported. - The intact rural landscape south of the A5, with its historic farmsteads and the hamlet of Little Wyrley dating back to medieval times will be protected. Conservation Area status will be considered for the hamlet with its Listed Buildings and the industrial heritage of the former Grove Colliery and the Cannock Extension Canal. Some of the above may require consequential amendments to The District Context Section.

Item No. 6.31

LPPO050	Canal & River Trust - H, Smith	<p>The updated objectives have removed reference to the canals from Strategic Objective 2. Whilst we can see that the more generic wording can be more widely interpreted, we would suggest that the wording be amended to create and improve existing community infrastructure for sport and leisure opportunities. Where existing facilities are provided along the canals and other watercourses improvements can enhance the benefits for local communities. Including this wording will help to ensure that third party developments and planning decisions take account of these benefits and how they might be provided. We welcome the revised wording to Strategic Objective 5, which takes on the comments made at the Issues and Objectives stage regarding the need for the canal network to be seen as part of an integrated transport network. We welcome reference to the promotion of renewable technology and green technologies within Strategic Objective 8. We also welcome the aim to reduce pollution, which could help to promote improved water quality our canals, the protection of the canals as important wildlife habitats and would be compliant with the aims of paragraph 170 (part e) of the NPPF. Spatial Strategy (pages 25-29): We welcome the aims of the spatial strategy which encompasses many of our objectives for the canals. We do request that the strategy should include wording that states that new developments will seek to connect and positively engage with strategic green infrastructure and open space. To make the Local Plan more effective and precise, we advise that an additional statement should be included that states that development will positively engage with and link in with existing walking and cycling routes. We believe this would directly help to promote active travel in the District. The "Improvements to cycle and footpath networks will be made to enhance connectivity and encourage more active travel, health and well-being" within the Spatial Strategy for Rugeley and Breerton is welcomed along with "high-quality natural environment will be protected and enhanced through improved quality of the existing green space network, enabling greater use and support for wildlife." Strategic Objective 2 (page 48) Our Waterways are accessible to and can be easily utilised by a wide section of the population. We believe that our network is uniquely placed to make a significant contribution to improving the wellbeing of those people living within easy reach of one of the free-to-use towpaths running alongside our canals and rivers. A report commissioned by the Trust 'Assessing the wellbeing impacts of waterways usage in England and Wales' written by social impact consultancy Simetrica, reveals: - The associated benefits of visiting a canal or river increase with the length of visit, with research showing higher levels of happiness and low levels of anxiety for longer trips. - Any visit to a waterway is associated with higher levels of life satisfaction and visiting regularly is associated with even higher levels of life satisfaction. The Trust's research also reveals that three quarters of towpath users say that they visit to 'get away from it all and clear my head'. and because they are 'great places to relax and de-stress' (Towpath Survey, 2017). Nationwide, whilst 8 million people live within 1km of our network, only 3/10 ever visit (as calculated by the Trust's Waterway Engagement Monitor (WM) April 17 to March 18). As a result, any policy that promotes additional visits to our network has the potential to make a significant impact to the wellbeing of local populations. The wording of this Strategic Objective 2 differs from the wording of Strategic Objective 2 on page 22. The wording of this Strategic Objective (Page 48) encompasses the need for new/improved community infrastructure to meet the needs arising from new development, such as the improvement of an existing towpath with surfacing/signage/improved access.</p>	
LPPO051	E, Waldron	<p>My query is page 26. What reassurances will the council provide, that brownland urban sites will be used as the preferred area for development. Which areas of Green Belt have been identified for housing?</p>	
LPPO052	West Midlands Housing Association Planning Consortium	Tetlow King Planning - L, Storate	<p>We support the draft Strategic Objectives which all seem appropriate and reasonable expectations for the delivery of local plan. In particular, we fully support Strategic Objective 3 which states that the local plan will deliver a sufficient supply of homes to provide for housing choice and ensure all people are able to live in a decent home which meets their needs, including helping meet local need for affordable dwellings. Housing Associations can facilitate the achievement of Strategic Objective 3 by maximising the delivering affordable homes in the district.</p>
LPPO053	Cannock Chase Independents Group - P, Woodhead (Cllr)	<p>Whilst the Strategic Objectives are to be taken as a collective we believe that the current Objective 8 should be drafted higher in the order. This is important to reflect the Council declaration of a Climate Emergency and should be the first thing people read when considering development in our community. The language within this section is non-committal and should be drafted stronger to reflect the desire of the Council and the Community that all new developments must be Zero-Carbon and must incorporate measures around thermal insulation, micro power generation in every home, grey water harvesting etc. Further that any developments over 10 dwellings must be constructed to be energy consumption which does not need to draw upon the national grid. There should be a specific policy statement which does not permit the extraction of fossil fuels and in particular unconventional means within the District. Carbon offsetting and external measures should not be accepted. Linking Objective 8 to Objective 5 all developments over 10 dwellings must create means of active travel linking to the existing active travel routes and developments over 100 dwellings must contribute to the wider establishment of active travel in the District with the creation of new routes to link up our communities. This may include the promotion of public transport infrastructure linked to the active travel routes. Social infrastructure should be developed as a priority within the timing of a development being built with a presumption of these elements being built first before dwellings are occupied. Strategic Objective 1 talks about the distinctive, high quality development where development over the past decade of more has been more about the standard build by standard building companies. If this is to be a Strategic Objective then we need to define what we mean by distinctive and high quality. The quality of employment land is insufficient for our resident population and this must be balanced against any proposed growth in housing. A key element of addressing the Climate Emergency is to reduce the travelling miles in particular for work, therefore the development of commercial and industrial infrastructure should have greater emphasis to accompany a wider commitment to the promotion of smaller business, business incubation and local services. We believe there should be a dedicated quantity of land directed towards sustainable energy production in the same manner as employment land. Objective 2 should emphasise creating a healthy environment in which to live and less emphasis on more built facilities. We acknowledge this is more difficult to achieve but greater research and understanding of active travel and outdoor living as opposed to more Leisure Centres will likely improve life outcomes for everyone in Cannock Chase.</p>	
LPPO054	Severn Trent	<p>Strategic Objective 8: Supporting a Greener Future We recognise the objectives effort to reduce flood risk and maximise flood protection. This will be especially important in the context of climate change. New development can play a pivotal role in improving the current level of flood risk within communities. The objective around ensuring development makes efficient use of previously developed land where possible, minimising further development of greenfield will help towards reducing flood risk. We would emphasise the importance of surface water management and adherence to the drainage hierarchy especially when considering potential allocations for the emerging plan. Allocating development whereby no sustainable discharge for surface water exists locally may result in such development connecting surface water to the combined or foul sewerage system. This would be detrimental to the strategic objective of reducing flood risk and protecting communities from the impact of climate change.</p>	

LPPO055	Richborough Estates (Land off Pegasus Group - B, Brownhills Road, Norton Canes) Cook	<p>Strategic Objective 1: It is noted that the context for preparing the policies relating to objective 1 has included taking on board the proposed revisions to the NPPF published in January 2021. This includes such considerations as: • Referring to the term 'beautiful' in response to the Building Better; Building Beautiful Commission's Findings • The role that neighbourhood planning groups can have in regard to design policies • Preparation of design guides or codes which reflect local character and preferences • Reference to giving communities a greater say in the design standards set for their area . Some caution should be exercised in preparing a local plan based on what are potential changes to the Framework and are subject to consultation, as these changes may not necessarily be taken through to be adopted as national policy. However, the Local Plan's approach in taking on board other changes including to the Town and Country Planning (Use Classes) Regulations 2020, which have been enacted, are supported as representing the current regulatory framework. Similarly, a recognition of the extension to permitted development rights as set out in the Preferred Options is supported. The Spatial Strategy for the District has set out the number of bullet points over pages 25-29 of the Local Plan Preferred Option document. Whilst the general approach of the Spatial Strategy, in particular to focus development on the most sustainable locations it should identify the settlements which are the most sustainable. These would consist of Cannock Chase/Hednesford/Heath Hayes, Rugeley and Brereton, and Norton Canes. The Spatial Strategy for Rugeley and Brereton should make plain that it constitutes the second most sustainable location in the District and also identified that there is potential for Green Belt release to allow for sustainable housing development. The approach for Norton Canes similarly identifies that there is potential for Green Belt release to deliver sustainable residential development. In addition, the Spatial Strategy should not be left to supporting text within the broader document. It should be set out in its own strategic level policy identifying the three settlements which are the most sustainable and their overarching objectives relative to new development including the potential for Green Belt release to deliver sustainable development. Strategic Objective 2: The objective deals with safeguarding existing community infrastructure and providing new community infrastructure, safeguarding the health and amenity of local communities, providing active leisure and sports facilities, providing healthy living opportunities and increasing physical activity and providing opportunities for allotments and local food growing. Strategic Objective 3: The objective set out does not reflect the Government's overall objective for housing which is to significantly boost the supply of homes. This should be reflected in the overall wording of the Strategic Objective 3. The document sets out the various scenarios for housing provision set out in the Issues and Options Consultation of 2019. There are four options ranging from not providing any contribution towards meeting unmet need across the wider HMA to potentially contributing 2,500 dwellings. Richborough Estates had previously commented that the 2,500 dwelling contribution was the most appropriate, should be set as a minimum requirement and should also be boosted in conjunction with the economic growth ambitions of the District Council and the LEPs of which it is a member. The consultation document acknowledged that the majority of respondents considered the higher levels of growth included in Option C (contribution towards 1,500 dwellings towards the shortfall) and Option D (a contribution of 2,500 dwellings towards the shortfall) were the options which received most support. In terms of housing mix policy options, the 2019 Issues & Options Consultation proposed four options. This included continuing with the current policy approach of encouraging appropriate mix of housing sizes, types and tenures on a district wide basis or alternative towards specific percentages of housing on sites.</p> <p>Richborough Estates make clear that Option A of continuing with the current policy approach was the most appropriate and that recognition should be given to the larger sites being able to provide a broader mix of accommodation. Strategic Objective 4: Strategic Objective 4 deals with the economy and employment land. It sets out a number of key issues but does not refer to the Local Plan making sufficient provision for employment development within the area. It also does not refer to the need to support economic growth nor does it refer to local industrial strategies. The objective should be reworded to provide a more positive context for economic growth within the District and development of employment land. As part of the Issues & Options consultation the Council identified a number of potential options. Richborough Estates supported Option A which sought to consider utilising sites already identified for employment development within urban areas and exploring opportunities for further supply on urban sites, Option B1 using an employment led mixed use redevelopment of Rugeley Power Station and Option C1 focusing on the Green Belt around Kingswood Lakeside and other existing employment areas. In particular, previous representations made on behalf of Richborough noted that this approach for employment development would enable a balanced strategy for the District as Rugeley's economic growth needs would be assisted by the employment-led redevelopment of Rugeley Power Station. It is also noted that the Cannock Chase Economic Prosperity Strategy sets out an ambitious vision for the District whereby it could be a leader in West Midlands in championing clean growth principles. The supporting text also refers to an over reliance on manufacturing, skill and trades and elementary occupations in comparison to regional and national averages. Whilst it is acknowledge that there is little support to continue with a reliance on elementary occupations, it is not clear why skilled trades would fall into the same categorisation as a negative current circumstance. In addition, the supporting text also notes that the ABCA have indicated that there is a potential shortfall of employment land within their administrative area and ask whether Cannock Chase could deliver employment land in excess of local needs. Strategic Objective 5: deals with sustainable transport and communications infrastructure. It seeks to manage the need to travel by providing for major new development in locations that can provide access for all sections of the community. It also requires the clustering of the development of services and facilities in locations that can provide convenience access for all sections of the community. Policy SO5.1 deals with accessible development.</p> <p>Amongst other things the policy identifies that proposals should set out, as appropriate, how and when the development will contribute to the delivery of the reduction in reliance on the private car by locating a development where it can provide a full choice of sustainable travel options, co-locate shopping, education and leisure facilities in convenient "hubs", and layouts should provide the capacity for public transport access. The policy also refers to development which individually or cumulatively cause an unacceptable impact on the highway network, will not be supported. Strategic Objective 6: Strategic Objective 6 and the subsequent policies of SO6.1 , SO6.2, SO6.3, SO6.4, SO6.5. SO6.6 and SO6.7 relate to town centres. Richborough Estates have no comment to make on the above policies or supporting text. Strategic Objective 7: Strategic objective 7 deals with the protection and enhancement of the natural environment. It seeks to minimise impact on and provide net gains for biodiversity. The policy refers to highest degree of protection been given to the protected landscape of the Cannock Chase AONB and the Green Belt. In terms of this objective it is not clear how the Green Belt has been identified as having any "protected landscape" character. Green Belt designation is a policy tool rather than a recognition of landscape. The objective should be amended to remove reference to the Green Belt and its "protected landscape". Policy SO7.1 states development proposals will support the protection, conservation, enhancement and restoration of designated biodiversity sites. It also indicates that development that results in the loss of harm to SAC, ancient woodland, ancient trees or veteran trees will need to demonstrate there are imperative reasons for overriding public interest.</p>
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Strategic Objective 1: It is noted that the context for preparing the policies relating to objective 1 has included taking on board the proposed revisions to the NPPF published in January 2021. This includes such considerations as: • Referring to the term 'beautiful' in response to the Building Better; Building Beautiful Commission's Findings • The role that neighbourhood planning groups can have in regard to design policies • Preparation of design guides or codes which reflect local character and preferences • Reference to giving communities a greater say in the design standards set for their area . Some caution should be exercised in preparing a local plan based on what are potential changes to the Framework and are subject to consultation, as these changes may not necessarily be taken through to be adopted as national policy. However, the Local Plan's approach in taking on board other changes including to the Town and Country Planning (Use Classes) Regulations 2020, which have been enacted, are supported as representing the current regulatory framework. Similarly, a recognition of the extension to permitted development rights as set out in the Preferred Options is supported. The Spatial Strategy for the District has set out the number of bullet points over pages 25-29 of the Local Plan Preferred Option document. Whilst the general approach of the Spatial Strategy, in particular to focus development on the most sustainable locations it should identify the settlements which are the most sustainable. These would consist of Cannock Chase/Hednesford/Heath Hayes, Rugeley and Brereton, and Norton Canes. The Spatial Strategy for Rugeley and Brereton should make plain that it constitutes the second most sustainable location in the District and also identified that there is potential for Green Belt release to allow for sustainable housing development. The approach for Norton Canes similarly identifies that there is potential for Green Belt release to deliver sustainable residential development. In addition, the Spatial Strategy should not be left to supporting text within the broader document. It should be set out in its own strategic level policy identifying the three settlements which are the most sustainable and their overarching objectives relative to new development including the potential for Green Belt release to deliver sustainable development. Strategic Objective 2: The objective deals with safeguarding existing community infrastructure and providing new community infrastructure, safeguarding the health and amenity of local communities, providing active leisure and sports facilities, providing healthy living opportunities and increasing physical activity and providing opportunities for allotments and local food growing. Strategic Objective 3: The objective set out does not reflect the Government's overall objective for housing which is to significantly boost the supply of homes. This should be reflected in the overall wording of the Strategic Objective 3. The document sets out the various scenarios for housing provision set out in the Issues and options Consultation of 2019. There are four options ranging from not providing any contribution towards meeting unmet need across the wider HMA to potentially contributing 2,500 dwellings. Richborough Estates had previously commented that the 2,500 dwelling contribution was the most appropriate, should be set as a minimum requirement and should also be boosted in conjunction with the economic growth ambitions of the District Council and the LEPs of which it is a member. The consultation document acknowledged that the majority of respondents considered the higher levels of growth included in Option C (contribution towards 1,500 dwellings towards the shortfall) and Option D (a contribution of 2,500 dwellings towards the shortfall) were the options which received most support. In terms of housing mix policy options, the 2019 Issues & Options Consultation proposed four options. This included continuing with the current policy approach of encouraging appropriate mix of housing sizes, types and tenures on a district wide basis or alternative towards specific percentages of housing on sites. Richborough Estates make clear that Option A of continuing with the current policy approach was the most appropriate and that recognition should be given to the larger sites being able to provide a broader mix of accommodation.

Strategic Objective 4: Strategic Objective 4 deals with the economy and employment land. It sets out a number of key issues but does not refer to the Local Plan making sufficient provision for employment development within the area. It also does not refer to the need to support economic growth nor does it refer to local industrial strategies. The objective should be reworded to provide a more positive context for economic growth within the District and development of employment land. As part of the Issues & Options consultation the Council identified a number of potential options. Richborough Estates supported Option A which sought to consider utilising sites already identified for employment development within urban areas and exploring opportunities for further supply on urban sites, Option B1 using an employment led mixed use redevelopment of Rugeley Power Station and Option C1 focusing on the Green Belt around Kingswood Lakeside and other existing employment areas. In particular, previous representations made on behalf of Richborough noted that this approach for employment development would enable a balanced strategy for the District as Rugeley's economic growth needs would be assisted by the employment-led redevelopment of Rugeley Power Station.

It is also noted that the Cannock Chase Economic Prosperity Strategy sets out an ambitious vision for the District whereby it could be a leader in West Midlands in championing clean growth principles. The supporting text also refers to an over reliance on manufacturing, skill and trades and elementary occupations in comparison to regional and national averages. Whilst it is acknowledge that there is little support to continue with a reliance on elementary occupations, it is not clear why skilled trades would fall into the same categorisation as a negative current circumstance. In addition, the supporting text also notes that the ABCA have indicated that there is a potential shortfall of employment land within their administrative area and ask whether Cannock Chase could deliver employment land in excess of local needs. Strategic Objective 5: deals with sustainable transport and communications infrastructure. It seeks to manage the need to travel by providing for major new development in locations that can provide access for all sections of the community. It also requires the clustering of the development of services and facilities in locations that can provide convenience access for all sections of the community. It also requires the clustering of the development of services and facilities in locations that can provide convenience access for all sections of the community. Policy SO5.1 deals with accessible development. Amongst other things the policy identifies that proposals should set out, as appropriate, how and when the development will contribute to the delivery of the sustainable travel options, co-locate shopping, education and leisure facilities in convenient "hubs", and layouts should provide the capacity for public transport access. The policy also refers to development which individually or cumulatively cause an unacceptable impact on the highway network, will not be supported. Strategic Objective 6: Strategic Objective 6 and the subsequent policies of SO6.1 , SO6.2, SO6.3, SO6.4, SO6.5. SO6.6 and SO6.7 relate to town centres. Richborough estates have no comment to make on the above policies or supporting text. Strategic Objective 7: Strategic Objective 7 deals with the protection and enhancement of the natural environment. It seeks to minimise impact on and provide net gains for biodiversity. The policy refers to highest degree of protection been given to the protected landscape of the Cannock Chase AONB and the Green Belt. In terms of this objective it is not clear how the Green Belt has been identified as having any "protected landscape" character. Green Belt designation is a policy tool rather than a recognition of landscape. The objective should be amended to remove reference to the Green Belt and its "protected landscape". Policy SO7.1 states development proposals will support the protection, conservation enhancement and restoration of designated biodiversity sites. It also indicates that development that results in the loss of harm to SAC, ancient woodland, ancient trees or veteran trees will need to demonstrate there are imperative reasons for overriding public interest.

Strategic Objective 1: It is noted that the context for preparing the policies relating to objective 1 has included taking on board the proposed revisions to the NPPF published in January 2021. This includes such considerations as: • Referring to the term 'beautiful' in response to the Building Better; Building Beautiful Commission's Findings • The role that neighbourhood planning groups can have in regard to design policies • Preparation of design guides or codes which reflect local character and preferences • Reference to giving communities a greater say in the design standards set for their area. Some caution should be exercised in preparing a local plan based on what are potential changes to the Framework and are subject to consultation, as these changes may not necessarily be taken through to be adopted as national policy. However, the Local Plan's approach in taking on board other changes including to the Town and Country Planning (Use Classes) Regulations 2020, which have been enacted, are supported as representing the current regulatory framework. Similarly, a recognition of the extension to permitted development rights as set out in the Preferred Options is supported. The Spatial Strategy for the District has set out the number of bullet points over pages 25-29 of the Local Plan Preferred Option document. Whilst the general approach of the Spatial Strategy, in particular to focus development on the most sustainable locations it should identify the settlements which are the most sustainable. These would consist of Cannock Chase/Hednesford/Heath Hayes, Rugeley and Brereton, and Norton Canes. The Spatial Strategy for Rugeley and Brereton should make plain that it constitutes the second most sustainable location in the District and also identified that there is potential for Green Belt release to allow for sustainable housing development. The approach for Norton Canes similarly identifies that there is potential for Green Belt release to deliver sustainable residential development. In addition, the Spatial Strategy should not be left to supporting text within the broader document. It should be set out in its own strategic level policy identifying the three settlements which are the most sustainable and their overarching objectives relative to new development including the potential for Green Belt release to deliver sustainable development. Strategic Objective 2: The objective deals with safeguarding existing community infrastructure and providing new community infrastructure, safeguarding the health and amenity of local communities, providing active leisure and sports facilities, providing healthy living opportunities and increasing physical activity and providing opportunities for allotments and local food growing. Strategic Objective 3: The objective set out does not reflect the Government's overall objective for housing which is to significantly boost the supply of homes. This should be reflected in the overall wording of the Strategic Objective 3. The document sets out the various scenarios for housing provision set out in the Issues and options Consultation of 2019. There are four options ranging from not providing any contribution towards meeting unmet need across the wider HMA to potentially contributing 2,500 dwellings. Richborough Estates had previously commented that the 2,500 dwelling contribution was the most appropriate, should be set as a minimum requirement and should also be boosted in conjunction with the economic growth ambitions of the District Council and the LEPs of which it is a member. The consultation document acknowledged that the majority of respondents considered the higher levels of growth included in Option C (contribution towards 1,500 dwellings towards the shortfall) and Option D (a contribution of 2,500 dwellings towards the shortfall) were the options which received most support. In terms of housing mix policy options, the 2019 Issues & Options Consultation proposed four options. This included continuing with the current policy approach of encouraging appropriate mix of housing sizes, types and tenures on a district wide basis or alternative towards specific percentages of housing on sites. Richborough Estates make clear that Option A of continuing with the current policy approach was the most appropriate and that recognition should be given to the larger sites being able to provide a broader mix of accommodation.

Strategic Objective 4: Strategic Objective 4 deals with the economy and employment land. It sets out a number of key issues but does not refer to the Local Plan making sufficient provision for employment development within the area. It also does not refer to the need to support economic growth nor does it refer to local industrial strategies. The objective should be reworded to provide a more positive context for economic growth within the District and development of employment land. As part of the Issues & Options consultation the Council identified a number of potential options. Richborough Estates supported Option A which sought to consider utilising sites already identified for employment development within urban areas and exploring opportunities for further supply on urban sites, Option B1 using an employment led mixed use redevelopment of Rugeley Power Station and Option C1 focusing on the Green Belt around Kingswood Lakeside and other existing employment areas. In particular, previous representations made on behalf of Richborough noted that this approach for employment development would enable a balanced strategy for the District as Rugeley's economic growth needs would be assisted by the employment-led redevelopment of Rugeley Power Station. It is also noted that the Cannock Chase Economic Prosperity Strategy sets out an ambitious vision for the District whereby it could be a leader in West Midlands in championing clean growth principles. The supporting text also refers to an over reliance on manufacturing, skill and trades and elementary occupations in comparison to regional and national averages. Whilst it is acknowledge that there is little support to continue with a reliance on elementary occupations, it is not clear why skilled trades would fall into the same categorisation as a negative current circumstance. In addition, the supporting text also notes that the ABCA have indicated that there is a potential shortfall of employment land within their administrative area and ask whether Cannock Chase could deliver employment land in excess of local needs. Strategic Objective 5: deals with sustainable transport and communications infrastructure. It seeks to manage the need to travel by providing for major new development in locations that can provide access for all sections of the community. It also requires the clustering of the development of services and facilities in locations that can provide convenience access for all sections of the community. It also requires the clustering of the development of services and facilities in locations that can provide convenience access for all sections of the community. Policy SO5.1 deals with accessible development. Amongst other things the policy identifies that proposals should set out, as appropriate, how and when the development will contribute to the delivery of the reduction in reliance on the private car by locating a development where it can provide a full choice of sustainable travel options, , co-locate shopping, education and leisure facilities in convenient "hubs",

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and layouts should provide the capacity for public transport access. The policy also refers to development which individually or cumulatively cause an unacceptable impact on the highway network, will not be supported. Strategic Objective 6: Strategic Objective 6 and the subsequent policies of SO6.1, SO6.2, SO6.3, SO6.4, SO6.5, SO6.6 and SO6.7 relate to town centres. Richborough estates have no comment to make on the above policies or supporting text. Strategic Objective 7: Strategic Objective 7 deals with the protection and enhancement of the natural environment. It seeks to minimise impact on and provide net gains for biodiversity. The policy refers to highest degree of protection been given to the protected landscape of the Cannock Chase AONB and the Green Belt. In terms of this objective it is not clear how the Green Belt has been identified as having any "protected landscape" character. Green Belt designation is a policy tool rather than a recognition of landscape. The objective should be amended to remove reference to the Green Belt and its "protected landscape". Policy SO7.1 states development proposals will support the protection, conservation enhancement and restoration of designated biodiversity sites. It also indicates that development that results in the loss of harm to SAC, ancient woodland, ancient trees or veteran trees will need to demonstrate there are imperative reasons for overriding public interest

LPPO058	Inspired Villages - E, Pearce		<p>The Local Plan Preferred Options sets out eight strategic objectives. Objectives two and three relate to the provision of housing and infrastructure for people within the district. Objective 2, 'Creating Community Infrastructure and Healthy Living Opportunities' sets out at the first bullet point that development should contribute towards new community infrastructure (SO2.1). Retirement Communities, such as those operated by Inspired Villages, provide significant communal facilities. They typical quantum of such communal facilities in a typical Inspired Villages retirement community comprise approx. 25% of its floorspace as non-saleable space. This includes the communal and care facilities available to its residents. Facilities such as a wellbeing centre, cafe and restaurant are typically open to the wider community and can make significant contribution to local infrastructure, as well as the health of the local population. The strategic objectives should acknowledge the contribution and need for such facilities, particularly for older residents, outside of the definition of Community Infrastructure as defined on Page 53.</p>
LPPO059	A, Newton	CT Planning - P, Kreuser	<p>This representation is made on behalf of Mr A Newton with respect to Land at UK Architectural Antiques, Hayfield Hill, Cannock Wood, Staff, WS15 4RU, shown marked red on the attached location plan 4721.77. Land at Hayfield Hill comprises some 0.6ha of previously developed land. Additional land in the ownership of Mr Newton is shown blue on the attached plan. Object to the preferred Spatial Strategy as set out on page 26 of the Preferred Options document. No new housing development is proposed within the larger key villages of the District. The Spatial Strategy therefore fails to meet the requirement of paragraph 78 of the NPPF which states that "Planning Policies should identify opportunities for villages to grow and thrive, especially where this will support local services." The Spatial Strategy does not plan positively for the larger rural villages of the District. Cannock Wood for example, has a degree of sustainable services and facilities in the village that should be actively supported rather than just preserved. The Spatial Strategy should seek to enhance the viability and vitality of key rural settlements as well as urban settlements in the District; the advantages of housing growth and investment should be spread across the District and not just centred on urban areas. Sites for small scale, organic growth in the larger rural villages should be identified through Policy SO3.1 to maintain and enhance vitality and community wellbeing. The Spatial Strategy should be amended to provide for growth in key rural settlements and that allocations for residential development should be appropriately made through the Local Plan/ Such allocations should not be left to inconsistencies of Neighbourhood Planning.</p>
LPPO060	Wyrley Estates	Fisher German LLP - N, Borsey	<p>The overall aim to promote sustainable development is welcomed, as is the ambition to protect and enhance Green Belt land and the AONB. Similarly, the ambition to protect cultural and heritage assets is welcomed. However, this ambition could go much further, particularly in terms of the sustainable enhancement and development of new cultural and heritage assets. Indeed, the suggested approach in this regard is somewhat less ambitious than the 2014 Local Plan, which looked to positively promote historic assets in the rural areas. The District has a rich industrial heritage and existing assets should not only be looked to be maintained, but new opportunities for enhancement should be actively pursued and a policy framework created so that proposals can be confidently brought forward. The enhancement and development of new cultural and heritage assets does not have to conflict with the protection of the Green Belt. It is recognised that Green Belt release has to pass stiff national policy tests. However, the insertion of positively worded policies to provide a positive basis for suitable schemes to come forward within the Green Belt is eminently possible and is an approach which has been successfully employed in other Local Authorities. Strategic Objective 1: This objective states that the historic environment will be protected, conserved, and enhanced, and that local character and distinctiveness will be sustained through managing designated and non-designated heritage assets and their townscape and landscape settings. This is completely supported. However, as stated above, the ambition does not go far enough. The good intentions will not succeed unless there is a clear policy basis for schemes to come forward in a planned and sustainable manner. paragraph 184 of the NPPF provides guidance for LPAs in drawing up heritage policies [...]. The key points to highlight are the need to take a positive approach, the broader benefits of heritage-led development to the wellbeing and sustainability of the wider area, and recognition of the role of new development. Whilst the Cannock Extension Canal SAC and Grove Colliery site are mentioned in the objective, together with the long-standing ambition to see the area developed as a leisure and recreation (and heritage) centre recognised, there is disappointingly no suggestion of a suitable policy to enable a scheme to be progressed, or for the future Norton Canes Neighbourhood Plan to take the matter a step further. This could comprise a more specific Neighbourhood Plan policy, which may in turn create a clearer and more certain policy framework for proposals to come forward through a masterplan, and potentially even through a Neighbourhood Development Order subject to local support and due process. It is crucially important to get the Local Plan policy right to ensure that aspirations at the Cannock Extension SAC/Grove site can be brought to fruition. It is recognised that previous policy has not led to any tangible progress, but the Estate has been looking to establish partnership working with the District Council (who own a large part of the site), the Norton Canes Parish Council (who are developing a Neighbourhood Plan, and who recognise the value of the site and its potential) and suitable developers. There is clear potential and interest in the site, but it requires the certainty of District Council support and a Local Plan policy hook to provide the certainty and confidence to take matters forward to the next level. Most recently, the Estate have undertaken the following actions to try and move a scheme forward towards reality: i. It is in the final stages of purchasing the former Colliery Offices site from the Borough Council; ii. It has commissioned a high-level masterplan through Richborough Estates, which is the first stage to putting together a more detail set of proposals and timeframe for delivery. These achievements signal the clear intention from the Estate to take the matter forwards and to see the long-standing ambitions finally realised. It will require the collaboration and cooperation of all stakeholders, not least the District Council, who own a large part of the land. Recent discussions have been encouraging and the site is indeed at a crossroads.</p>

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The ambitions can only be delivered as a partnership, and this requires all parties to hold the shared ambition and to use any tools at their disposal to try to provide the most favourable background. The District Council has a unique position, as it owns a large part of the land, but also has a golden opportunity to create a local planning policy basis for the realisation of future development proposals. Clearly, the site will remain within the boundaries of the Green Belt. Although its removal would be the best outcome, it is understood that this is unlikely to pass the strict NPPF tests. However, there is no reason why a positively worded policy could not be included which recognised the high bar for development set by Green Belt policy, but which provided a route for a suitable leisure, recreation, and heritage scheme to come forward as part of a comprehensive masterplan, which was linked to a suitable Neighbourhood Plan policy and would deliver specified and significant benefits. There are examples of other important Green Belt sites elsewhere that have specific policies which provide a broad framework for the forms of development that may be acceptable, subject to passing certain minimum tests. One such example is Chester Zoo near Chester. The Local Plan Part 2 contains a broad policy identifying key commercial sites in the Green Belt (Policy GBC1) and then a range of specific policies relating to each site (in the case of Chester Zoo, Policy GBC1.A). These policies do not seek to override Green Belt policy, which remains the fundamental policy basis, but sets out the broad classes of development which may be acceptable in principle, subject to Green Belt considerations and range of criteria. Similarly, there are examples where there has been the successful regeneration of former colliery sites, such examples include: • Bates Colliery in Blyth- 30-acre site has been regenerated to provide a Primary School, development of specialist accommodation and residential development of 142 homes. • Kellingley Colliery in Yorkshire (closed 2015)- small section of land at the site to be redeveloped to provide industrial units for small-medium sized businesses, forms part of a wider 151ac future scheme. • Cefn Coed Colliery Museum in Neath- Providing a museum of the former site for visitors. It is noted at paragraphs 6.51 and 6.52 that a Local List is currently being taken forward through the Design Guide PSG, and it is suggested that the remaining buildings on site centred on the former colliery office buildings are a prime candidate. This would give some policy recognition of their local importance and assist in bringing forward suitable proposals. Strategic Objective 3: The objective strives to deliver a sufficient supply of homes, and the provide and range of housing types accessible to all people. The Grove Colliery site has the potential to deliver specialist housing to meet with the Objective 3 in striving to achieve diverse types of housing. For example, live/work housing, this type of housing can enable development to meet with targets whilst also delivering other council priorities.

Strategic Objective 4: The objective seeks to encourage a vibrant local economy and workforce, including supporting sustainable tourism and the rural economy and encouraging development of live/work housing types. In achieving this objective there requires a specific suitable policy which is clear and robust. Strategic Objective 7: Protecting and enhancing the natural Environment is a very important Objective. The objective strives to achieve this through appropriate preferred policies. The objectives seek overall to provide support for biodiversity and natural environment protection and enhancement, Green Belt protection, and recognition of the importance of the Cannock Extension Canal SAC. The related policies need to be aligned to provide a basis for suitable proposals to deliver these aspirations. Strategic Objective 8: What development takes place now and within the next 10 years will be critical to how we achieve Net Zero by 2050 (or earlier). It's important that the points made within Strategic Objective 8 are carried out through development, and importantly included within the Local Plan and its policies. Without clear-cut policies to follow through development it will be difficult for the council to achieve this Objective.

LPPO061	The Church Commissioners for England	Barton Willmore - A, Bird	At Objective 3, the draft Plan states it will deliver a sufficient supply of homes to provide for housing choice via several key priorities including 'facilitating sustainable housing provision for this plan period and the next' and 'delivering sufficient housing to meet the District's own need and an appropriate and sustainable contribution to the wider housing market areas shortfall where justified in adopted plans.' We are supportive of objective 3 and the need for the draft Plan to accommodate both local housing needs and the wider housing market area needs. In the context of 60% of the District being designated Green Belt, we also support the principle that exceptional circumstances exist to warrant a review of the Green Belt to meet housing needs and the need to consider longer term planning of Green Belt boundaries. This is in accordance with the NPPF, paragraphs 136-137 and case law, namely that of <i>Calverton Parish Council v Great Nottingham Councils</i> [2015] EWHC 1078 (ADMIN). As recognised within the draft Plan, we consider that these exceptional circumstances exist by virtue of the degree of the housing needs of the District and the wider housing market area; the lack of sufficient urban capacity (including potential for density uplifts) and other suitable non-Green Belt sites; and the inability of neighbouring authorities to assist in meeting the District's housing needs (as detailed further in the supporting text to draft Policy SO1.3). The principles of this Objective do not however appear to have been carried through fully within the draft Plan policies. We comment in further detail on these draft Plan policies within these representations, however, we particularly note that the draft Plan does not safeguard land for development beyond the Plan period. In line with the NPPF (paragraph 139(e)) the draft Plan should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period. This safeguarded land should be identified in accordance with the spatial strategy. The Draft Plan (pages 26-29) sets out the Spatial Strategy for future development up to 2038. This identifies that new development will be located in the most sustainable locations, focused on the existing urban areas and will protect and enhance Green Belt land and the AONB. Housing and employment requirements will be met as far as possible within the existing urban areas or within a planned expansion to the urban areas in accessible and sustainable locations. In our view, this includes our Client's site. The draft Plan identifies that Green Belt release is considered necessary to provide sufficient land to meet the District's housing need with an element of flexibility. The draft Plan will seek to deliver a minimum of 5,516 dwellings (2018-2038) to meet local housing needs, with a further 500 dwellings provided to help meet the GBBCHMA shortfall. Therefore, a total minimum of 6,016 dwellings is to be provided. The draft Plan (page 27) identifies that the urban area of Cannock/Hednesford/Heath Hayes will be the main priority area for the new residential and commercial development. Paragraph 138 of the NPPF states that "when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account" and that "plans should give first consideration to land which has been previously-developed and/or is well-served by public transport".
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The principle that sustainable development should be of paramount importance has been reinforced by the findings of Local Plan examinations. Most recently a High Court judgement (Compton Parish Council & Ors v Guildford Borough Council & Anor [2019] EWHC 3242 (Admin) (04 December 2019)) in relation to the Guildford Local Plan (2019) identifies that 'exceptional circumstances' for the release of Green Belt land in relation to the meeting of housing needs can take into account the nature and degree of the need, alongside considerations of why the need cannot be met in sequentially preferable sites; the impact on the functioning of the Green Belt; and what other advantages sites released from the Green Belt might bring, for example, in terms of a sound spatial distribution strategy. We therefore support the draft Plan approach to the release of Green Belt sites adjacent to the most sustainable urban areas, particularly at the main urban area of Cannock/Hednesford/Heath Hayes. We consider that the draft Plan should allocate further sites in line with this approach, as per our responses to Questions 10, 11, 13 and 46 of these representations. Our Client's Site lies adjacent to the Cannock/Hednesford/Heath Hayes urban boundary at Wimblebury and represents a sustainable location for residential development.

SO1.1: Protecting, Conserving & Enhancing the Distinctive Local Historic Environment

Question 1: Do you support the preferred policy direction to protect, conserve and enhance the distinctive local historic environment?

LPPO062	Inland Waterways Association, P, Sharpe	IWA supports policy SO1.1 on the historic environment	
LPPO063	Cannock Chase AONB Partnership	The policy direction is supported to ensure protection of historic assets within the AONB.	
LPPO064	Lichfield & Hatherton Canals Restoration Trust - L, Walker	We support policy option 1.1. to protect and enhance the historic Environment - particularly in respect of the Hatherton Canal on the route shown.	
LPPO065	Historic England - E, Boden	Historic England welcomes this policy direction on the historic Environment and has the following comments to bring the policy into greater alignment with the NPPF: - The policy should set out a positive strategy for the conservation and enjoyment of the historic Environment. - We suggest that designated and non-designated heritage assets are dealt with separately within the policy; - The policy asks for a 'Design and Access Statement' for development proposals affecting heritage assets. We recommend that the policy should require a specific 'Heritage Statement' and that this should also consider the contribution to significance made by the setting of a heritage asset and the effect of proposals therein. - We recommend that the policy includes recognition of the historic Environment as a catalyst for positive recognition of the historic Environment as a catalyst for positive regeneration. For example, with regard to new development in Conservation Areas, and within the setting of heritage assets, we suggest inclusion of a positive policy approach, to encourage development proposals to preserve elements of their setting and to enhance, or better reveal their significance. - We suggest a separate section/point within the policy on non-designated archaeology, requiring an appropriate desk-based assessment/field evaluation as necessary and setting out how development proposals affecting archaeological interests will be considered. - Great benefits can be realised from the re-use of historic buildings, but conversions/changes of use should be carried out sensitively. We suggest that consideration/guidance on this should be included within the policy. - We suggest that the scope of the policy should be widened to include measures for preserving or enhancing heritage assets, including Heritage at Risk. -With regards to the 'Explanatory Text', accompanying the draft policy, we welcome reference to the Cannock Chase District Conservation Areas Management Plan SPD, to the area-specific Management Plans relating to the individual Conservation Areas and to the Local List. These are useful sources of information and indicators about the state of the historic environment locally, and we recommend that they are kept up-to-date	
LPPO066	Norton Canes Parish Council	The NP is proposing to consult on a list of buildings which could be candidates for local listing, to take a master planning approach to heritage-led regeneration of the former Grove Colliery and surrounding rural landscape and support Conservation Area status for the hamlet of Little Wyrley with the potential to include the industrial heritage of the former colliery and canal wharf. PO Policy S01.1 makes general reference to the protection of historic features associated inter alia with the coal industry, supports the general principle of having locally listed buildings and notes that the historic environment can act as a catalyst for positive regeneration. In addition to Policy SO1.1 the Parish Council would wish to see specific policies in the Preferred Option to support heritage led regeneration of the former Grove Colliery including permitting reasonable scope for "enabling development" which would otherwise be contrary to normal Green Belt policy together with a commitment to taking forward designation of a Conservation Area for the Cannock Extension Canal linked to the hamlet of Little Wyrley.	
LPPO067	Canal & River Trust - H, Smith	The canal network is a valuable reminder of the industrial heritage of the area and is a multi-functional resource which can play a wide range of roles in supporting and helping to deliver new development which can bring a variety of benefits which enhance a working heritage asset by providing an attractive and positive setting for new development as well as being an important leisure and recreational resource for both visitors and the local community, and can thus help to support social and economic regeneration schemes. Although parts of our network are within Conservation Areas and include listed assets, we strongly believe that our network as a whole forms a heritage asset, which would need to be considered as part of any future development proposals that could impact its setting. This would include the need for non-designated heritage assets to be considered and would comply within the aims of the NPPF, which asks for the effect of applications on the significance of non-designated assets to be taken into account (e.g. paragraph 197).	
LPPO068	Norton Canes Councillors	We wholeheartedly agree with the Parish Council's submission regarding the recognition of the Grove Colliery site and would strongly urge officers to beef up proposals for heritage-led regeneration of this area; positive words must be matched with action. This is a key aspect of our emerging Neighbourhood Plan, we implore the District Council to work constructively and proactively with Norton Canes Parish Council and Little Wyrley Estates to realise a sensitive and varied regeneration of the site.	
LPPO069	Together Active - J, Brennan	Yes support his policy direction. 6.22 but also support the inclusion of additional design standards in the Local Plan including active design principles and protection of the historic Environment. 6.25 also particularly supportive of securing the future of the Cannock Extension Canal SAC to promote both active leisure and active travel as a safe and connected cycling and walking routes.	
LPPO070	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates are supportive of the general approach and that the Policy does refer to public benefits and the potential mitigation to limit harm. However, the policy could be developed further to recognise that suitable sensitive development can result in improvements to existing heritage assets.
LPPO071	Richborough Estates (Land South of Cannock Road, Heath Hayes)	Richborough Estates are supportive of the general approach and that the Policy does refer to public benefits and the potential mitigation to limit harm. However, the policy could be developed further to recognise that suitable sensitive development can result in improvements to existing heritage assets.	
LPPO072	Richborough Estates (Land off Main Road, Brereton)	Richborough Estates are supportive of the general approach and that the Policy does refer to public benefits and the potential mitigation to limit harm. However, the policy could be developed further to recognise that suitable sensitive development can result in improvements to existing heritage assets.	

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LPPO073	Wyrley Estates	Fisher German LLP - N, Borseley	The only relevant preferred policy SO1.1. In principle, the preferred policy direction is supported, but it does not go far enough to encourage the creation of new facilities in a sustainable manner, with particular reference to the Cannock Extension Canal SAC and Grove Colliery Site. A high-level Masterplan has been created, and this is attached to this representation, at appendix A. Being the last remaining evidence of the District's former mining past, it is considered that the site and its regeneration should be a key priority in the next Local Plan. The Council is asked to reconsider the matter and to include an additional specific policy which provides broad support to a leisure, recreation, and heritage-led regeneration of the former Grove Colliery site, which shall come forward as part of a masterplan framework and subject to Green Belt policy and the criteria set out in any future specific policies or guidance notes, including any subsequent Neighbourhood Plan policy. Such a policy would be NPPF compliant and provide the necessary hook for a Neighbourhood Plan policy and future collaboration to see the scheme become a reality. As mentioned above, and as set out in the NPPF, a sensitive and well-planned development scheme would have wider benefits. This would link to several other Local Plan preferred policies and objectives.
LPPO074	Staffordshire County Council - J, Chadwick		Firstly, it must be noted that one of the key aspirations of the emerging Local Plan to ensure that new development in the district will be accommodated whilst protecting and enhancing the historic and built environment is very much welcomed. The preferred policy direction, which sees the protection, conservation and enhancement of the distinctive local historic environment forming part of the SO1.1 is supported, however, it is suggested that consideration is given to the overall title of Strategic Objective 1 to better reflect the inclusion of the historic environment here. A suggested simple amendment could be: 'Delivering High Quality Development that is Appropriate, Distinctive, Attractive and Safe'. It is also suggested that mention of sites of archaeological interest could be specifically mentioned in SO1.1 (as is the case in Section 1.10 in the non-technical summary). With regards to the Preferred Policy Direction (page 36) where the requirement for a Design and Access Statement to be produced for all major development proposals and all Listed Building consent applications is proposed, it is recommended that this Design and Access Statement should incorporate, or be supported by a Heritage Statement which would 'describe the significance of any heritage assets affected, including any contribution to their setting' as per Para 189 of the NPPF, and where more complex remains or larger developments are being considered, then a full historic Environment Desk-Based Assessment should be prepared. In all cases these documents should be prepared at an early stage by appropriately experienced historic environment specialists and they will inform discussions with the LPA and their historic environment advisors regarding the need for and scale of any historic Environment interventions including opportunities (where appropriate) to enhance heritage assets within a scheme. Other Suggestions: 6.41 could also include reference to the Extensive Urban Surveys and historic Environment Character Assessments which form part of the evidence base. Likewise, the Chase Through Time Project. Also, would it be appropriate to include these studies and the HIA in the list of relevant evidence on Page 39?
SO1.2: Enhancing the Quality of the Built Environment			
LPPO075	Cannock Chase AONB Partnership		The AONB would welcome reference to the need for particular attention to sympathetic design and enhancement in the AONB, as appropriate to its designated status along with sign posting potential applicants/developers to the AONB Design Guide.
LPPO076	Historic England - E, Boden		Historic England welcomes the references in this policy direction to local distinctiveness and character, in terms of heritage, as well as building materials and detailing, which offers the opportunity to enhance townscape and landscape quality through the built environment. We are also pleased to see the intention to prepare Local Design Codes for the defined Character Areas and Historic England would welcome the opportunity to engage in developing these, with regard to specific considerations for the historic environment.
LPPO077	Canal & River Trust - H, Smith		The integration of high quality proposals with existing features and facilities is important to the success of schemes. We support the wording of this policy, in particular respecting the local distinctiveness of the surroundings and the provision of access to and from nearby locations and facilities.
LPPO078	Together Active - J, Brennan		Yes support his policy and 6.55 also support the inclusion of additional design standards in the Local Plan including active design principles, and increased protection of the historic Environment. 6.61 also support in line with draft revisions (Jan 2021) of the NPPF ambition to ensure that all new streets are tree-lines and that existing trees are retained wherever possible; improves attractiveness of public help and to contribute to carbon offsetting. 6.69 Active Design is included in the list of other relevant plans and policies. This should be included in future SPDs or Design Codes.
LPPO079	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Policy SO1.2 relates to enhancing the quality of the built environment. It refers to the need to retain and enhance the distinct and separate character of each of the District's settlements. This approach has some inconsistency with the recognition in other parts of the local plan that Cannock/Hednesford/Heath Hayes has an extent merged to become a single settlement and therefore a more homogeneous character. The policy should be refined to further make clear that different approaches to character may be required depending on the location within the District. In general terms and subject to the caveats set out above the approach in the local plan is supported.
LPPO080	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Policy SO1.2 relates to enhancing the quality of the built environment. It refers to the need to retain and enhance the distinct and separate character of each of the District's settlements. This approach has some inconsistency with the recognition in other parts of the local plan that Cannock/Hednesford/Heath Hayes has an extent merged to become a single settlement and therefore a more homogeneous character. The policy should be refined to further make clear that different approaches to character may be required depending on the location within the District. In general terms and subject to the caveats set out above the approach in the local plan is supported.
LPPO081	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Policy SO1.2 relates to enhancing the quality of the built environment. It refers to the need to retain and enhance the distinct and separate character of each of the District's settlements. This approach has some inconsistency with the recognition in other parts of the local plan that Cannock/Hednesford/Heath Hayes have merged to become a single settlement and therefore a more homogeneous character. The policy should be refined to further make clear that different approaches to character may be required depending on the location within the District. In general terms and subject to the caveats set out above the approach in the local plan is supported.
LPPO082	Staffordshire County Council - J, Chadwick		Yes, the proposed policy direction to retain and enhance the district and separate character of each of the District's settlements, and deliver the highest quality of building design and layout which has been developed to enhance the District's distinctive character and heritage assets is very much supported. Also please see under Q1 above regarding what should be included/accompany a Design and Access Statement in terms of archaeology and the historic environment.

Question 3: Should the preparation of Local Design Codes be based on the Character Areas that were included in the Cannock Chase Design SPD?

LPPO083	Cannock Chase AONB Partnership		Local Design Codes are supported as a means of ensuring development is appropriate to local character. Figure 2(P43) identifies Character Areas, of which Slitting Mill, Cannock Wood and (part of) Hazelsalde & Rawnsley fall within the AONB. The AONB would welcome reference to the recently produced AONB Design Guide to be considered alongside the Cannock Chase Design Supplementary Planning Document (2016), in these areas and across the AONB. The AONB Guide aims to promote good practice and encourage future building development that is landscape-led and would not detract from the natural beauty of the AONB. The Guide includes an overview of Cannock Chase AONB, describing its varied character and characteristic settlement types and this provides the evidence base that supports design advice. The advice (Part 2 of the Guide) covers principles of good design and detailed guidance for different types of development appropriate for the AONB, including sections on domestic development; commercial; employment & industrial development; public realm; agricultural and other rural development buildings; recreation and leisure and stabling and menages.
LPPO084	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The SPD identified 20 character areas, not all of which will be in locations where they'll be any significant development. An approach which targeted those parts of the district where development is likely to come forward would potentially be a better focus for resources. Policy SO1.3 deals with the need to deter and reduce a fear of crime.
LPPO085	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The SPD identified 20 character areas, not all of which will be in locations where they'll be any significant development. An approach which targeted those parts of the district where development is likely to come forward would potentially be a better focus for resources. Policy SO1.3 deals with the need to deter and reduce a fear of crime.
LPPO086	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The SPD identified 20 character areas, not all of which will be in locations where they'll be any significant development. An approach which targeted those parts of the district where development is likely to come forward would potentially be a better focus for resources. Policy SO1.3 deals with the need to deter and reduce a fear of crime.
LPPO087	Staffordshire County Council - J, Chadwick		Yes, and it is suggested that the (ideally updated - as per our suggestion in our response to the I&O consultation) Historic Environment Character Assessments and Extensive Urban Survey should be utilised to help better understand the special character of these areas.

SO1.3: Creating Safe Places Which Deter Crime and Reduce the Fear of Crime

Question 4: Do you support the preferred policy direction to create safe places which deter crime and reduce the fear of crime?

LPPO088	Brindley Heath Parish Council		Brindley Heath Parish Council has noted the significant increase in crime over the past few years within its boundaries and beyond and at the same time a drastic reduction in Police numbers. It is beyond belief that the area of Etching Hill and the Chase is covered by just two PCSOs and a visiting real Policeman, compared with other areas in the Country. This is utter stupidity and CCDC should be putting pressure on the Police Authority to improve provision across the District where night provision is probably the worst in the country.
LPPO089	Together Active - J, Brennan		Yes partially support clear sight lines for paths and cycle ways.
LPP0090	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates support this approach.
LPPO091	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates support this approach.
LPPO092	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates support this approach.

SO2.1: Safeguarding the Provision of Community Infrastructure

Question 5: Do you support the preferred policy direction to safeguard the provision of community infrastructure?

LPPO093	K, Jones		I have lived on the Longford Estate for 2 years. Sadly there are very poor facilities here. Is there any development of community facilities planned for the estate? For example to my knowledge the children's park on Wellington Drive has not been updated for 25years. The pavements on all roads on the estate are also in very poor condition.
LPPO094	Cannock Chase AONB Partnership		A requirement that all major development will contribute towards new community infrastructure, and amenity space is supported. The AONB welcomes a requirement to link, and to and enhance the authority's district wide green space network, particularly where this would provide alternative semi-natural recreational sites away from the AONB that could potentially help to relieve recreational pressure in the AONB, and thereby assist in delivering a more sustainable future for the AONB.
LPPO095	Norton Canes Parish Council		Community Facilities - The NP is proposing a policy to protect existing community facilities comprising the Community Centre, Library, churches, church halls, pubs and clubs whereby potential loss will only be supported if a replacement facility of equal or better quality is provided or after a minimum 12 months of active marketing it is concluded that the facility is no longer viable in either its existing use or an alternative community use. PO Policy SO2.1 is supportive of the proposed NP policy so is welcomed. Education - The NP is seeking to ensure that SCC delivers appropriate improvements to primary education arising from the committed major new housing developments in the village using S106 funds and asking for an assurance that there is a secure future for Norton High School. PO Policy SO2.1 continues with the existing processes of new residential developments contributing to improvements to education arising from increases in demand generated by them via either S106 agreements or CIL. In addition, in connection with a proposed new housing allocation site C116a south of A5190 Cannock Road a capacity of approx. 885 units is needing a new primary school. It is understood that this will be delivered on land within the development. The Parish Council wishes to receive an assurance that no additional pressure will be put on the two village primary schools in the event that site C116a is confirmed as a proposed housing allocation.

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LPPO096	Canal & River Trust - H, Smith	<p>The Canal & River Trust generally seeks to maintain its assets in a "steady state", and this is based on current usage. Where new development has the likelihood to increase usage, this could result in additional liabilities for the Trust, from erosion and litter for example. We consider that it is reasonable to request a financial contribution from developers to mitigate this impact of additional use, which could include resurfacing works to make routes more robust, or safety improvements necessary to ensure that the network can accommodate additional users safely. Should this not be included, there is a risk that new developments could result in the degradation of existing walking and cycling routes, which could hamper efforts by the Plan to promote sustainable means of transport. Where new development has the likelihood to increase usage we consider that it is reasonable to request a financial contribution from developers to mitigate this impact by addressing issues such as those set out above. Community Infrastructure is very tightly defined by this policy to the exclusion of informal recreation which is acknowledged elsewhere within the plan to be of significant importance to the health and wellbeing of the District. Whilst CIL would allow for the funding of key infrastructure investments, as set out in the regulation 123 list, we believe there is a need for policy to identify that S106 payments may be necessary to fund improvements to accommodate the expected increased usage brought by specific developments onto our network (i.e. to mitigate any harm, and to make the development acceptable in planning terms). It is noted that the detail of the policy awaits further guidance from Government, but in doing so we suggest that mechanisms through which improvements to the canal corridors are provided are considered further ensuring that the impacts of developments on the canal network are mitigated by developers. The Trust are happy to engage further with the Authority on this.</p>	
LPPO097	Brindley Heath Parish Council	<p>Attention is needed to the educational provision across the area which is clearly failing the less academic students and leads to real difficulties to their finding suitable employment later. It is a poor reflection on the District and is the source of many later problems when schooldays are over. The provision of help to young children with special needs is very poor and requires immediate improvement.</p>	
LPPO098	Theatres Trust - T, Clarke	<p>We welcome the Council's approach to supporting arts and cultural facilities within town centres, which is supported by policy SO2.1 which seeks to protect valued facilities. We recommend it is made clear this policy applies to cultural facilities such as theatres in accordance with the range of uses covered by paragraph 92 of the NPPF (2019).</p>	
LPPO099	Norton Canes Councillors	<p>Since the development of the Chasewater Grange estate on the former greyhound track site on Brownhills Road, every housing site in Norton Canes has come with an allocation of money from developers for the provision of an additional primary school places in the village. We would like to stress how important it is that the more than £1 million already received from developers for this purpose is spent sooner rather than later. We are concerned with the suggestion that a new primary school could be built on the development south of Cannock Road. We would like assurances in the Local Plan that this would not affect the provision of the much-needed expansion of one of our primary schools in Norton Canes. To illustrate this point, please note that Jerome Primary School received 71 applications for 30 places for the 2021/22 school year. This high level of demand is largely being driven by the new Norton Hall Meadow estate off of Norton Hall Lane, an estate which will expand by around 200 additional homes in the coming years. We believe that a combination of a rebuilt two form entry school at the Norton Canes Primary Academy on School Road and redrawn catchment areas for the village's two primary schools is the best option to expand local capacity. We welcome the recognition on page 12 that there are concerns about local capacity for GP surgeries and would like to see this specifically mentioned in the spatial strategy for Norton Canes. The failure of local health authorities to request funding from developments for local GP provision means this is likely to be a particular pressure point in terms of local infrastructure. Residents already report difficulties in booking appointments and in addition to patients from our village, Norton Canes Health Centre serves many residents from Heath Hayes, an area identified in the Local Plan for significant housing growth.</p>	
LPPO100	Together Active - J, Brennan	<p>Yes I wholeheartedly support this but with the emphasis on the new draft NPPF 2021 guidance for attractive pedestrian and cycle routes and the Building Better Building Beautiful Commission's recommendations on supporting walkable neighbourhoods; and emphasis that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and efforts to address climate change. PPS focuses on more formal structured use of playing pitches, but it is also important to secure, improve and increase access to informal green space necessary for leisure, recreation and play. 6.101 I support Option C but the principle of the importance of smaller local areas of green space to wellbeing and supporting climate change needs to be included in the local plan. Also support Option D 6.102 support the enhancement of opportunities to walk and cycle, the provision of adequate green space within new developments for wellbeing and physical activity - green space should be welcoming space and accessible to all and not merely adequate.</p>	
LPPO101	Sport England - R, Bahey	<p>Sport England notes that both Policy SO2.1 and SO2.3 sets out exceptions for when development proposal will result in the reduction in the provision of active leisure and sports facilities. However, the exceptions are not consistent with each other with the wording being slightly different in the relation to the alternative provision criteria. It would also assist if a definition of active leisure and sports facilities is provided to establish where best elements of the provision would be best considered in either SO2.1 or SO2.3. It should be noted that the policies relating to open space, sports and recreational buildings and land, including playing fields should be consistent with NPPF para 97 criteria (b) and (c). Policy SO2.1 also makes reference to the co-location of community infrastructure where practicable, and the provision will be planned and phased in parallel with new development. Sport England supports this provision though consider reference to SO2.4 should also be incorporated within the policy.</p>	
LPPO102	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	<p>The Policy needs to refer to major development contributing towards new community infrastructure where no current capacity exists and where directly and proportionally applied to the proposed development and in accordance with the CIL Regulations or their equivalent successors. However, it would also be appropriate, subject to the above tests for new facilities in association with new housing developments. The policy should give recognition in general terms to new housing developments being able to deliver additional community facilities which can meet the needs not only of new residents but also of the existing community, meeting current gaps in infrastructure provision.</p>
LPPO103	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	<p>The Policy needs to refer to major development contributing towards new community infrastructure where no current capacity exists and where directly and proportionally applied to the proposed development and in accordance with the CIL Regulations or their equivalent successors. However, it would also be appropriate, subject to the above tests for new facilities in association with new housing developments. The policy should give recognition in general terms to new housing developments being able to deliver additional community facilities which can meet the needs not only of new residents but also of the existing community, meeting current gaps in infrastructure provision.</p>

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LPPO104	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The Policy needs to refer to major development contributing towards new community infrastructure where no current capacity exists and where directly and proportionally applied to the proposed development and in accordance with the CIL Regulations or their equivalent successors. However, it would also be appropriate, subject to the above tests for new facilities in association with new housing developments. The policy should give recognition in general terms to new housing developments being able to deliver additional community facilities which can meet the needs not only of new residents but also of the existing community, meeting current gaps in infrastructure provision.
LPPO105	Inspired Villages - E, Pearce		In response to Question 5, the policy direction to safeguard the provision of community infrastructure is supported, however, alternative providers of such infrastructure should be given greater acknowledgement and support in the wording of Draft Policy SO2.1

SO2.2: Safeguarding Health and Amenity

Question 6: Do you support the preferred policy direction to safeguard health and amenity?

LPPO106	Cannock Chase AONB Partnership		A requirement that all major development will contribute towards new community infrastructure, and amenity space is supported. The AONB welcomes a requirement to link, add to and enhance the authority's district wide green space network, particularly where this would provide alternative semi-natural recreational sites away from the AONB that could potentially help to relieve recreational pressure in the AONB, and thereby assist in delivering a more sustainable future for the AONB.
LPPO107	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We support policy option 2.2. in respect of creating linkages to the Greenspace Network, including to the towpath of the Hatherton Canal.
LPPO108	Historic England - E, Boden		We suggest that acknowledgment of the critical role the historic environment plays in the health and welfare of individuals and communities is included within this policy.
LPPO109	Together Active - J, Brennan		Yes support this 'promote walking and cycling' needs to be strengthened to prioritising active travel through safe, integrated walking and cycling routes. Local Design Codes need to include SE Active Design Code.
LPPO110	Natural England- G, Driver		We welcome this policy direction, specifically the links to the natural environment and reducing pollution and carbon. Natural England is one of the partners involved in a project to test how to increase use and connectivity to green social prescribing in England to improve people's mental health.
LPPO111	Severn Trent		We welcome policy SO2.2 suggestion for linking to and enhancing a district wide Greenspace Network, we too recognise the multiple benefits that these can provide. We have a designated programmes seeking opportunities to collaborate with partners such as planning authorities, lead local flood authorities, the Environment Agency or community action groups, Natural England for enhancing biodiversity and implementing green infrastructure, We welcome any discussion and wish to be approachable for any such ideas. Green infrastructure and sustainable urban drainage system can provide health and amenity value as well a wider flood risk and water quality benefit, helping to protect communities from the impact of climate change.
LPPO112	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Whilst the general approach of the policy is supported certain elements either repeat what is set out in other policies (the requirements of Policy SO8.2 which is separately objected to) or are too vague to be meaningful (reference to avoiding unacceptable on-site or off-site risk or harm). In addition, reference to achieving the lowest carbon emissions that can be achieved lacks any evidential basis or method of assessment. This should be deleted. Subject to the revision set out above a general approach is supported.
LPPO113	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Whilst the general approach of the policy is supported certain elements either repeat what is set out in other policies (the requirements of Policy SO8.2 which is separately objected to) or are too vague to be meaningful (reference to avoiding unacceptable on-site or off-site risk or harm). In addition, reference to achieving the lowest carbon emissions that can be achieved lacks any evidential basis or method of assessment. This should be deleted. Subject to the revision set out above a general approach is supported.
LPPO114	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Whilst the general approach of the policy is supported certain elements either repeat what is set out in other policies (the requirements of Policy SO8.2 which is separately objected to) or are too vague to be meaningful (reference to avoiding unacceptable on-site or off-site risk or harm). In addition, reference to achieving the lowest carbon emissions that can be achieved lacks any evidential basis or method of assessment. This should be deleted. Subject to the revision set out above a general approach is supported.

SO2.3: Provision of Active Leisure and Sport Facilities

Question 7: Do you support the preferred policy direction to provide active leisure and sports facilities?

LPPO115	Podmore, D		Please when formulating a plan for the future, do not forget our young people. Whilst sports facilities in the area are good, entertainment and leisure for young people is abysmal. Please get fairs back to our parks as soon as possible. The majority of our pubs at least those that survive Covid are in fact now restaurants. Many of our young people have mental issues not only do they have the poison of the internet to deal with they have little in the way of entertainment or leisure as a release valve. I know that many of the issues in this letter are not of your making or your responsibility however any measures that can be taken to improve facilities, leisure and socialising for our young people should be pursued with vigour. We cannot just bung up thousands of new houses and retail parks and kid ourselves we have improved the area.
LPPO116	A, Johnson		Cannock Chase is fortunate to have two excellent sports facilities, neither of which, I believe, has been referenced nor included in the Local Plan. Hednesford Hills Raceway: The area is fortunate to have a longstanding motorsport stadium of national and international significance. It attracts competitors and spectators locally, nationally and indeed, internationally. This provides recognition of the area and benefits local services and accommodation providers. It is an important visitor attraction for the area. Several motor sport stadiums have been lost over recent years and continue to be under threat. Inclusion in the Local Plan would offer some protection to Hednesford Hills Raceway. Hednesford Hills raceway is a thriving asset for the area. I have studies to the best of my ability the requirements of the NPPF document. Inclusion of the Hednesford Hills Raceway in the Local Plan, would be consistent with the requirements of this document. Hednesford Town Football Stadium: Hednesford Town Football Club is another local sports stadium of significance that doesn't seem to have been reference in the local plan. It is another asset to the area that I believe ought to be recognised and included in the Local Plan as a facility of local, national importance and indeed, international importance having not so long ago, in 2019, hosted an England v. Brazil under 18s international match.
LPPO117	Canal & River Trust - H, Smith		Whilst this policy does support the integration of new development with links to the wider Green Space Network this is only required for major developments. Within built up areas minor proposals can have a significant affect on accessibility and legibility if not carefully designed by third parties. We would therefore support the widening of this policy to ensure that any development proposals promote active leisure.

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LPPO118	Norton Canes Councillors		We believe that Norton Canes has considerable potential to be a hub for outdoor recreational activity but our current infrastructure with respect to this is lacking. The canal and mineral lines that run through the village, as well as the proximity to the National Cycle Route through Chasewater, offer the potential for Norton Canes to act as a gateway for district and regional wide cycle and footpath routes that can offer access to the Cannock Chase AONB, Chasewater, the West Midlands canal network and beyond. This potential should not be underestimated, but for this we must amplify the Parish Council's suggestion that there must be a toucan crossing over the A5 to ensure a safe exit from those using the Cannock Extension Canal routes. As you are aware, Norton Canes is due to receive sums of money for sport and leisure facilities from local housing developments. Although it is recognised in the Local Plan that access to indoor sporting facilities is not good for areas like Norton Canes, we agree with the Parish Council's submission that there needs to be investment in an indoor sporting facility in the village. Furthermore, we would like to extend this suggestion to include a provision for youth facilities within that facility and the Local Plan to recognise this ambition which would go a long way to making up for provision which has been lost in the last decade, causing a range of knock-on effects for our young people. We feel that access for youth facilities would be a good way of adding value to indoor sporting facilities in the community – since the closure of the youth clubs the existing community facilities have been inadequate to accommodate more energetic youth activities such as indoor football, dodgeball and basketball.
LPPO119	Together Active - J, Brennan		Yes support this policy direction. Also welcome the acknowledgment that "All major development will ensure that the design and layout of the development will promote walking and cycling (in line with Policy SO5.3) and create new green infrastructure within the development which links to the wider Green Space Network" but 'promote walking and cycling' needs to be strengthened to prioritising active travel through safe, integrated walking and cycling routes. As well as formal leisure and sports facilities it is also important to protect more informal sports, recreation and play areas not covered by the PPS or Cannock Chase Sport and Leisure Facilities Needs Assessment to encourage active, healthy and integrated communities.
LPPO120	Sport England - R, Bahey		Sport England notes that both Policy SO2.1 and SO2.3 sets out exceptions for when development proposal will result in the reduction in the provision of active leisure and sports facilities. However, the exceptions are not consistent with each other with the wording being slightly different in the relation to the alternative provision criteria. It should be noted that the policies relating to open space, sports and recreational buildings and land, including playing fields should be consistent with NPPF para 97 criteria (b) and (c). Sport England consider that the policy and/or its supporting text should make reference to the proposed approach as to how contributions will be sought from developments towards sports facilities (swimming pools and sports hall) and playing pitches, with reference being made to Sport England's planning tools such as Sport Facilities Calculator and the Playing Pitch Strategy New Development Calculator (NDC). The policy could also be improved by stating that proposals for active leisure and sports facilities will be supported where it meets an identified need within the Playing Pitch Strategy (and any subsequent updates). As a note Sport England would encourage the authority to undertake an annual update of its Playing Pitch Strategy to ensure that it remains robust in line with Sport England's Playing Pitch Strategy Guide (Stage E).
LPPO121	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The reference to contribution to improvement to sports/leisure facilities being linked to where additional demand is created is welcomed. However, it also should reference capacity exists so as to be compliant with national policy. Finally, not all sites are likely to be directly linked to the Green Space network so this element should be qualified.
LPPO122	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The reference to contribution to improvement to sports/leisure facilities being linked to where additional demand is created is welcomed. However, it also should reference capacity exists so as to be compliant with national policy. Finally, not all sites are likely to be directly linked to the Green Space network so this element should be qualified.
LPPO123	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The reference to contribution to improvement to sports/leisure facilities being linked to where additional demand is created is welcomed. However, it also should reference capacity exists so as to be compliant with national policy. Finally, not all sites are likely to be directly linked to the Green Space network so this element should be qualified.
SO2.4: Providing Opportunities for Healthy Living and Activity			
Question 8: Do you support the preferred policy direction to provide opportunities for healthy living and activity?			
LPPO124	Cannock Chase AONB Partnership		A requirement that all major development will contribute towards new community infrastructure, and amenity space is supported. The AONB welcomes a requirement to link, add to and enhance the authority's district wide green space network, particularly where this would provide alternative semi-natural recreational sites away from the AONB that could potentially help to relieve recreational pressure in the AONB, and thereby assist in delivering a more sustainable future for the AONB.
LPPO125	G, Green		I whole heartedly supports this and fear that our area will receive less attention in the government's drive to increase the number of cycle routes. I have responded previously to the consultation about the crematorium at Heath Hayes, suggesting that it presented an opportunity to make an off-road cycle route between Five Ways and the 'Skoda' roundabout at Burntwood, as that road is very hazardous for cyclists, and traffic is slowed down by any cyclists. I have also lobbied my MP and local councillors about this. Many people could use that road to go to work, visit people or cycle to Chasewater.
LPPO126	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We support policy option 2.4 in respect of the Green Space Network, including the towpath of the Hatherton Canal. With respect to Strategic Objective 4 , on page 86, we note and welcome the emphasis on sustainable tourism and the rural economy - to which the restoration of the Hatherton Canal contributes.
LPPO127	Canal & River Trust - H, Smith		The aims of this policy are supported and we would wish to be involved in the drafting of Local Design Code to assist further in the integration of the canals into the wider community.
LPPO128	Together Active - J, Brennan		Yes, completely support this policy and welcome the consideration of SE Active Design principles. I would like to see the SE Active Design principles formally adopted as a design code or SPD.
LPPO129	Natural England- G, Driver		We welcome this policy direction, specifically the link to human well being and environment. Long term projects such as the Midlands Heartland Heathland and Policy SO7.2: Biodiversity Net Gain will provide more green spaces for wildlife and people. Natural England continuously works on green infrastructure and has a number of publications on health and the natural environment. We are currently working on the green infrastructure standards. If you would like further information, please contact us.

LPPO130	Sport England - R, Bahey		Sport England supports the inclusion of Active Design principles and Active Travel within Policy SO2.4. The policy provides a positive and proactive approach to help address health and inactivity issues within the authority by ensuring good design which will contribute positively to making places better for people, to create environments that make the active choice the easy and attractive choice for people and communities. In relation to the policy text relating to development proposals resulting in a reduction in the Greenspace Network, this seems to be out of context with thrust of the policy. Sport England also considers that the provisions within this policy are also covered Policy SO7.8. If there is no crossover then clarity is sought as to the difference between the two policies.
LPPO131	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	In general terms Richborough Estates support the approach, however some elements of the policy are unclear. One criterion refers to providing infrastructure that will enable sport and physical activity to take place inside and around buildings. It is unclear what this policy criteria is aimed at achieving, particularly the reference to 'around buildings'. This requires further clarification. As above the contention that all sites can link to the Green Space Network needs amendment. Sites in the Cannock Town Centre, for instance, are unlikely to link to the Green Space Network.
LPPO132	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	In general terms Richborough Estates support the approach, however some elements of the policy are unclear. One criterion refers to providing infrastructure that will enable sport and physical activity to take place inside and around buildings. It is unclear what this policy criteria is aimed at achieving, particularly the reference to 'around buildings'. This requires further clarification. As above the contention that all sites can link to the Green Space Network needs amendment. Sites in the Cannock Town Centre, for instance, are unlikely to link to the Green Space Network.
LPPO133	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	In general terms Richborough Estates support the approach, however some elements of the policy are unclear. One criterion refers to providing infrastructure that will enable sport and physical activity to take place inside and around buildings. It is unclear what this policy criteria is aimed at achieving, particularly the reference to 'around buildings'. This requires further clarification. As above the contention that all sites can link to the Green Space Network needs amendment. Sites in the Cannock Town Centre, for instance, are unlikely to link to the Green Space Network.

SO2.5: Allotments and Community Food Growing

Question 9: Do you support the preferred policy direction to protect existing, and provide additional, allotments and community food growing sites?

LPPO134	Together Active - J, Brennan		Yes, welcome this policy and would welcome the provision of additional allotments and community food growing sites which can help reduce food mileage and reduce carbon emissions.s.
LPPO135	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates supports the overall objective set out in the policy. Reference could be given to support being given for new developments which can deliver additional allotments/community food growing sites. In particular it is new housing development that is the potential delivery mechanism for new facilities of this type and this ought to be recognised in the policy.
LPPO136	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates supports the overall objective set out in the policy. Reference could be given to support being given for new developments which can deliver additional allotments/community food growing sites. In particular it is new housing development that is the potential delivery mechanism for new facilities of this type and this ought to be recognised in the policy.
LPPO137	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates supports the overall objective set out in the policy. Reference could be given to support being given for new developments which can deliver additional allotments/community food growing sites. In particular it is new housing development that is the potential delivery mechanism for new facilities of this type and this ought to be recognised in the policy.
LPPO138	Staffordshire County Council - J, Cheshire		Yes, these provide small areas of linking habitat in otherwise poor areas. New allotments should be designed with good biodiversity principles in mind too.

SO3.1: Provision for New Homes

Question 10: Do you agree that the amount of housing proposed will meet the local needs of Cannock Chase District as required by the standard methodology?

Item No. 6.46

LPPO139

Walsall Council - N, Ball

Our representations at Issues and Options stage endorsed Option D, the highest figure with a proposal for 2,500 homes beyond local need to contribute to the requirements of Birmingham and the Black Country. This would have resulted in the plan containing a total housing target of 7,612 homes, or 423 dwellings per annum. We noted that between 2010/11 and 2015/16 the net total number of residents exported from the Black Country to Cannock Chase was 4,450 people (278 per annum). Looking in more detail at the migration data for 2016 – 2017, there was a net-inflow of 480 people to Cannock Chase from the Black Country. Our more recent household migration data suggest that between 2002 and 2019 there was net inflow of 5,596 people moving from the Black Country to Cannock Chase (the equivalent of 321 pa annum). The current draft of the Plan has extended the plan period from 2036 to 2038, which means that there is a commensurate increase in the housing requirement to meet local need. The national methodology used in the standard method to calculate local housing need means that the precise figure changes each year, but in the case of Cannock Chase this has only resulted in the local housing need reducing by 1, from 277 to 276 dwellings per annum. However, the Plan only proposes to offer 500 homes to meet the needs of Birmingham and the Black Country, or only 25 per year. The migration data suggests that the net local housing need of Cannock Chase almost entirely comprises migration from the Black Country. It is unclear what the total housing target would be. Policy SO3.1 states Housing provision will be made for a minimum of 5,516 dwellings (net) to meet the objectively assessed local housing needs, and ensuring a sufficient supply of deliverable and developable land is available to deliver around 276 dwellings each year. Housing provision will be made for a minimum of 5,516 dwellings (net) to meet the objectively assessed local housing needs, and ensuring a sufficient supply of deliverable and developable land is available to deliver around 276 dwellings each year. This would imply that the actual total target would be 6,016, however this is considerably lower than the target of 7,612 under Option D in the Issues and Options consultation, despite the Plan now intending to cover an additional two years. Paragraph 6.155 of the Plan states Representations to the Issue and Options consultation showed that the majority of respondents considered the higher levels of growth options C and D should be chosen, this reflects the larger number of responses from site promoters. The majority of individual responses preferred the options supporting the lower levels of growth. Representations were received from neighbouring authorities who considered that the option A was unlikely to assist in meeting the cross boundary needs that were known at the time. Paragraph 6.154 acknowledges that a large proportion of the potential site options available to meet the unmet need lie within the Green Belt, however it is unclear from the Plan what the total capacity of non-Green Belt sites would be.

LPPO140

J, Astbury

No more housing developments in Heath Hayes. Excessive in terms of numbers proposal, locations; (Protect & Preserve Green Belt). Loss of village identity. Infrastructure of Roads, in particular Five Ways Island (Clean Air Enforcement Required). Too much saturation concentrated on one community.

LPPO141

Bromford Housing Group

PlanIt Planning and
Development - J,
Williams

Policy SO3.1 advises that provision will be made for a "minimum" of 5,516 dwellings (275.8dpa) during the period 2018-2038 to meet the objectively assessed local housing needs of the District. In addition, provision will be made for 500 dwellings (25dpa) to help meet the unmet needs of neighbouring authority areas. We have concerns with both aspects of the proposed housing requirements. The NPPF advises at paragraph 60 that when quantifying the minimum number of homes needed, strategic policies should be informed by a Local Housing Needs Assessment, conducted using the "Standard Method" as set out in the NPPG, unless exceptional circumstances justify an alternative approach. In addition to the Local Housing Needs figure, any needs that cannot be met in neighboring areas should also be taken into account in establishing the amount of housing to be planned for. In the first instance it is, therefore, necessary to use the Standard Method to identify the required minimum number of homes. It is then necessary to consider whether there is any additional evidence to increase the housing requirement beyond the Standard Method figure. Applying the Standard Method in Cannock Chase results in a minimum housing needs figure of 276dpa, and this is carried forward into the Preferred Options consultation version of the Local Plan without any form of amendment. There are however a number of considerations which suggest that the housing requirement should be increased significantly beyond the Standard Method figure 1) Delivering Affordable Housing Footnote 23 of the Preferred Options plan confirms that the annual need for affordable housing is 110dpa. This is equivalent to 40% of the total housing requirement. The principal delivery mechanism during the course of the Plan period will be through S106 Agreements. The emerging Plan only requires 20% affordable housing provision on qualifying sites due to viability constraints. A number of residential development sites will fall below the 10 units threshold and will not deliver affordable housing at all. The emerging Plan is, therefore, not capable of delivering a quantum of affordable housing required for the District. One way of addressing this would be to increase the overall housing requirements. That way a greater number of affordable houses could be provided. It is our view that the housing requirement for the Plan should have been increased to assist in the delivery of affordable housing. 2) Up to date Household Projections The current version of the Standard Method is based upon the application of 2014 household projections. These household projections are, however, out-of-date. The most recent household projections have a base date of 2018. The 2018 household projections advise that in 2018 CCDC had a population of 42,982. By 2038 this is predicted to increase to 50,696. This amounts to an increase of 7,714 households during the course of the 20 year plan period. This is equivalent to 385.7 households per annum. The emerging Plan is planning for significantly fewer homes than is required to meet the projected household growth within the District. There is no explanation within the Plan, or any other supporting evidence base document, to explain how the 2018 household projections have been considered in the context of the Standard Method housing figure. This is, in our view, a significant omission.

The growth strategy in the emerging plan will result in households either leaving the District, or becoming "concealed" households, due to a shortfall in provision.

3) Preventing Economic Decline It is confirmed at page 7 of the emerging Plan that the 2018 based population estimates suggest that the population profile of the District will change during the course of the Plan period. There is expected to be a rise in the proportion of older residents in the District compared to other age groups. The emerging Plan rightly seeks to support economic growth. The housing figure should be increased upwards to ensure that a sufficient number of people of working age are retained in the District to support its economic base. The 500 dwellings proposed to support the growth requirements of the conurbation is not based upon robust evidence. The Birmingham Development Plan was adopted in Jan 2017. Policy PG1 - Overall Levels of Growth, advises that 89,000 dwellings are required to meet the growth requirements of Birmingham between 2011 and 2031. It is not, however, possible for this quantum of development to be accommodated within Birmingham's administrative area. As such the BDP makes provision for the development of 51,100 dwellings. The shortfall of 37,900 dwellings is expected to be met in the other authorities and HMA, including Cannock Chase. The City's most recent AMR 2019-2020 advises that a review of the Plan is not yet required. There is no suggestion that Policy PG1 requires amending in part or whole. As such the shortfall figure remains real and robust. Whilst the City Council have produced a SHLAA that suggests that there may be greater urban capacity than previously expected, the SHLAA confirms that not all sites identified would be suitable for planning permission. Clearly, just because a site is included in the SHLAA does not mean that it will come forward for residential development or a planning application will be approved if it is submitted. The fact that there is a more up-to-date SHLAA does not, therefore, reduce the housing shortfall identified by PG1. There are also other related matters which are a concern; these are: - The revised changes to the Standard Method increase Birmingham's housing requirement significantly. The adopted BDP plans for 4,450 dpa. The changes to the Standard Method put in place a minimum housing requirement of 4,829 dwellings for Birmingham. - The BDP Plan period runs to 2030. The Cannock Chase Plan period runs to 2038. There will be a housing shortfall in Birmingham between 2030 and 2038 that needs to be accommodated in other local authority areas. It is not catered for in the emerging Cannock Chase Plan. In terms of the Black Country housing shortfall the Black Country authorities produced and I&O Black Country Core Strategy in June 2017. This document identified a housing requirement of 78,000 dwellings for the Black Country authority. However, it is established that only 56,000 of these dwellings could be accommodated within the urban area. This left a housing shortfall of approximately 22,000 dwellings. As referred to in paragraph 6.180 of the Preferred options Cannock Chase Plan, the Black Country authorities have more recently announced that they have a housing shortfall of 29,260 dwellings. The total housing conurbation shortfall is in the region of 67,160 dwellings. Cannock Chase has offered to accommodate 500 dwellings which is the equivalent of 0.7% of the entire shortfall. As detailed in paragraph 6.179 of the Preferred Options document South Staffordshire, by way of example, is proposing to deliver nine times this amount of development to meet the growth requirements of the conurbation. Drawing upon this, it is our view that the housing requirement should be increased significantly and, consequently, additional allocations will need to be included in the Plan.

Land South of Cannock Road A5190 Heath Hayes SHLAA Site C116(c): These representations propose that the site be included in the land to be released from the Green Belt for housing development during the new Local Plan period to 2038. The evidence to justify release of the site has been obtained from the Preferred Options document itself, with all the relevant background information relating to formulation of proposed policy SO3.1 in addition the contents of the 2020 SHLAA, the Cannock Chase Development Capacity Study and The Green Belt Study Part 2 March 2021 have been examined. KGL (Estates) Ltd is intending to work with Cameron Homes to bring the site forward for development of approximately 160 units with a range of market and affordable homes. A separate statement has been produced by Cameron Homes in this regard. Description of Site: The site with a total area of 7.93ha largely comprises low grade grazing land divided into three main fenced enclosures together with an area of unmanaged deciduous woodland containing a pond (approx.2.8ha) through which runs the Newlands Brook. The woodland continues to the west of the site onto land within proposed housing site SH1. [...]Adjoining the site to the east is a detached dwelling associated within a petrol station and vehicle hire business, beyond which are two storey dwellings with long gardens backing on to gardens of dwellings fronting eastern end of Newlands Lane. [...]. Case for release of the KGL Land: The components of the case for release of the site are as follows: 1. The site is identified in the Green Belt study as contributing less overall value to the main functions of a Green Belt than the land to the west being proposed for release. If not developed it would comprise a small area of open land sandwiched between existing and proposed housing developments, which could make no significant contribution to any of the functions of Green Belts identified in the NPPF. 2. The site has the same sustainability credentials as the adjoining land to the west with no constraints on deliverability. In relation to sustainability it is a more appropriate location than land east of Wimblebury Road which is also proposed for release from the Green Belt for housing. 3. The Council is likely to come under considerable pressure to offer more than a contribution of 500 units to the wider GBBCHMA housing shortfall currently proposed in order to fulfil its duty to cooperate. 4. A number of sites in the 2020 SHLAA and Urban Capacity Study identified as deliverable in the 5 to 15 year period have significant constraints on development and it is considered that the Council has overestimated the contribution these can make to overall supply. 5. The KGL site can make contributions via a S106 agreement and/or CIL to the local infrastructure needed to support the proposed housing developments in this part of the District comprising a primary school, improvements to Five Ways Island, new and improved open spaces, improvements to biodiversity and access to the countryside. 6. The site can be developed with around 160 units via a single access to Cannock Road and there is a housebuilder in a position to deliver the development in the short to medium term. 1. Green Belt Having considered all other options within the urban areas of the District the Council has decided that it needs to release Green Belt land for housing development in order to meet its locally generated housing need plus a small contribution to the wider GBBCHMA need which cannot be met within the West Midlands conurbation. [...]. The most strategic and largest proposed releases are sites SH1 south of A5190 in Norton Vanes Parish but adjoining existing housing areas in Heath Hayes and SH2 east of Wimblebury Rd Heath Hayes with a combined capacity of 1285 units of which 875 are on site SH1. The Council commissioned a detailed Green Belt study to help inform choices on release of sites analysing the contributions to the purposes of GBs/potential harm of release. Of the five criteria in the NPPF, preserving the setting and special character of historic towns was not considered to be relevant to Cannock Chase District and assisting in urban regeneration was considered to be of equal weight in all cases. [...].

Site SH1 was assessed as high and Site SH2 was assessed as moderate/high but nevertheless both sites have been chosen on the basis of best strategic fit and having no "show stopping" environmental constraints such as AONB and Nature Conservation designations. The KGL land is assessed as partly moderate/high and partly high, so overall less harm than site SH1 which it adjoins. As noted in the site description it is less prominent in the currently rural landscape than site SH1 which rises rather than falls away from the A5190 and has a much more open prospect. If not released for development the site would be sandwiched between the proposed development at SH1 and existing housing/commercial development on the south side of Cannock Road, in both cases extending south to Newlands Lane. It would therefore make no contribution to checking the unrestricted spread of large built up areas nor preventing neighbouring towns merging from one another. The site would no longer be seen as a significant area of open countryside but would be dominated by urban development on three of four boundaries. The southern boundary of Newlands Lane would form a very defensible new Green Belt boundary as described above, which has been accepted as an appropriate boundary for site SH1 to the west. So there is no logical reason for excluding the KGL land from the proposed strategic Green Belt release south of the A5190. The other site proposed for release to the west of Newlands Lane is dominated by the substantial mounds of the Poplars landfill site which is operational with no agreed end date. It is unlikely to be a site which would be attractive to housing developers. 2. Sustainability Issues Having made the decision that SH1 is the most sustainable location for a major urban extension in the Green Belt there is no logical reason on sustainability grounds for excluding the KGL land. It is equally accessible by public transport to Cannock, Burntwood, Brownhills and Lichfield and within reasonable distance of Cannock railway station. It is also easily accessible to local shopping facilities in Hednesford Road Heath Hayes and the Hawks Green District Centre. In relation to these matters the site is better located than proposed site SH2. A new primary school is proposed on site SH1. 3. Wider housing supply issues across the GBBCHMA The Council acknowledges that it will need to make a contribution to the shortfall in housing land supply in the wider GBBCHMA and the Preferred Option offers a figure of 500. South Staffordshire and Lichfield are proposing contributions of 4000 and 2665 respectively including releases of Green Belt Land. The ABCB has formally requested the authorities in the GBBCHMA, including Cannock Chase District, to assist in meeting unmet needs. Cannock Chase Council will need to be part to a "duty to cooperate" agreement across the wider HMA in order for its Local Plan to be found sound.

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It is very unlikely that the current offer of 500 units will be sufficient to achieve an agreement. Including the KGL site for housing can clearly assist with moving towards an agreement without damaging the overall strategy put forward in the Preferred Options. 4. SHLAA and Urban Capacity Figures For several reasons it is considered that there is some uncertainty that a number of sites identified as deliverable will in fact come forward during the proposed plan period. There is an inherent conflict between proposed policies in the Preferred Options which proposed protection of existing industrial estates/business parks for employment use and sites in these locations which are included in the SHLAA for residential development. SHLAA sites C220a and C220b with a combined capacity of 67 units are included in the 15-year developable category but are both within industrial estates in the Hawks Green area identified for protection and are both occupied by businesses. R43a and R43b (also identified in Table C in the Preferred Options Document) at Redbrook Lane industrial estate Brereton with a combined capacity of 93 are currently fully occupied by a major logistics company. The western edge of the site also has an historic underground fire in a former railway embankment which would be extremely expensive to resolve to enable residential development to be achieved but it is nevertheless identified as developable. These four sites have been included in the SHLAA for many years with no evidence of progress having been achieved to bring forward residential development. None of the town centre sites identified in tables B and C in the Preferred Options document have schemes that have been worked up and tested for viability. [...] For the record the former Aelfgar School site in Rugeley has a capacity of 58 dwellings (planning permission recently granted) not 85 as recorded in Table C. So in conclusion it is considered that expected contribution to housing supply from these sites is likely to be overestimated. 5 Planning Obligations and CIL Development of the KGL site can deliver improved public access to and management of the woodland which extends along the western site of the site and links with another part of the same area of woodland on site SH1. In addition either via a planning obligation and/or CIL the development can make appropriate contributions to the major infrastructure items identified in the Preferred Options, the proposed primary school, country park and a solution to the problem of congestion at Five Ways Island. 6 Delivery of housing requirement Please see separate letter from Cameron Homes Ltd confirming their intentions to progress an agreement with KGL to deliver a comprehensive housing development on the site.

LPPO143	Hazel Slade & Rawnsley Community Association - D, Williams	The association agree that a need for new housing has to be met, and that consultation with those most affected (i.e. residents) is a key part of the process of determining where the preferred locations should be. However we do not agree that the provision of new homes should be guided by the supply side of the housing market. We strongly object to outside organisations with wide ranging commercial objectives associated with the housing market should be able to exercise influence in a process left by our democratically elected representatives. It is not acceptable that development promoters should be a valid determinant of how and where development should take place. (page 64 para 6.155). It may be inevitable that neighbouring authorities would not consider that option A (page 64 para 6.152) would not deliver the requisite volume of new build homes that pressure on availability in their own area struggles to meet. We recognise the obligation to cooperate with neighbours in this regard, but do not consider it is inevitable that provision should be made for their lack of capacity without the most rigorous demonstration of need. The amount of housing need should be constrained to Option A levels.
LPPO144	Canal & River Trust - H , Smith	A number of existing and allocated residential areas lie adjacent to the Trent and Mersey Canal in Rugeley. This includes the residential site allocations (H49; H52; and H20). The ecological network provided by the canal should be considered an integral part of the design of such allocated sites, to secure measurable net gains for biodiversity and contribute to climate change resilience with air, water, soil, noise and light pollution avoided or mitigated, as per Objectives 7 and 8 of the Local Plan Policy Options document.
LPPO145	Brindley Heath Parish Council	Currently we are not meeting our local need but simply catering for the desires of people within the West Midlands to move from their town homes to a more rural aspect. The majority of new build are 3/4/5 bed houses with hardly any social or renting dwellings. This reflects the greed of both the developers and the Council and is not in the interests of less affluent families and individuals within the District. We do not recognise the figure of 5,516 as being anything but a shot in the air by regional planners and then imposed on our District Council. Over recent years, this area has provided more expensive housing than enough outsiders and needs to get to grips with its own needs. The proposal of 20% social and renting housing in the future is a pipe dream - it has not been achieved in the past and would not be entertained by the developers in the future. The density of housing today is deplorable. It is a disgrace in this day and age and once again reflects the greed of both the developers and this Council. Gardens are the size of postage stamps and hark back to the days of Victorian mass housing. It is little wonder that these families have to get in their cars and come to the AONB or other recreational areas to enjoy a little space. The car parking provision for flats and similar developments is woeful given that couples and families tend to have two cars and thus the surrounding streets become blocked with parked cars. At the very least there should be an off-road space for each dwelling.

LPPO146 Home Builders Federation - S,
Green

As set out in the 2019 NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period (para65)). The determination of the minimum number of homes needed should be informed by LHN assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). In Cannock Chase, there are no exceptional circumstances to justify an alternative approach. The NPPG sets out the standard methodology for calculating the LHN figure using demographic data and an affordability adjustment. Using the standard methodology, the minimum LHN for Cannock Chase is 276 dwellings per annum based on 2014 SNHP, 2020 as the current year and 2019 affordability ratio of 6.73. As set out in the NPPG, the LHN is calculated at the start of the plan-making process but this number should be kept under review and when appropriate revised until the Local Plan is submitted for examination. The minimum LHN for the District may change as inputs are variable. The minimum LHN for Cannock Chase based on 2014 SNHP, 2021 as the current year and 2020 affordability ratio of 6.72 increases to 317 dwellings per annum. The NPPG clearly states that the standard methodology is the minimum starting point in determining the number of homes needed. The NPPG explains that "circumstances" may exist to justify a figure higher than the minimum LHN. The "circumstances" for increasing the minimum LHN are listed in the NPPG including, but not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous level of housing delivery/assessments of need, which are significantly greater than the outcome from the standard methodology. The NPPG indicates that if previous housing delivery has exceeded the minimum LHN, the Council should consider whether this level of delivery is indicative of greater housing need. It is noted that the 2020 Housing Delivery Test Results identify housing completions of 930 dwellings in 2019/20, which exceeds the proposed minimum LHN of 276 dwellings per annum and the adopted Local Plan housing requirement of 241 dwellings per annum. The Council should consider if there are "circumstances" to justify a housing requirement above the minimum LHN. Th 2019 NPPF seeks to achieve sustainable development by pursuing economic, social and environmental objectives in mutually supportive ways (para 8.). The Council should be seeking to support the long-term sustainability of the District by achieving a sustainable balance between employment and housing growth. The Council should also recognise economic benefits of housing development in supporting local communities as highlighted by the HBF's latest publication Building Communities - Making Place A home (Autumn 2020).

The Housing Calculation based on The Economic Footprint of House Building (July 2018) commissioned by the HBF estimates for every additional house built in Cannock Chase the benefits for the local community include creation of 3 jobs (direct & indirect employment), financial contributions of £27, 754 towards affordable housing, £806 towards education, £297 towards open space/leisure, £1, 129 extra in Council Tax and £26, 339 spent in local shops. The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. As set out in the NPPG, an increase in the total housing figures may be considered where it could help deliver affordable housing. The NPPG also sets out that households whose needs are not met by the market, who are eligible for one or more of the types of affordable housing as defined in Annex 2: Glossary of the 2019 NPPF, should be considered in need of affordable housing. The Council's calculation of affordable housing need may be significant in comparison to the minimum LHN. The HBF acknowledges that the Council may not be able to meet all affordable housing needs but a housing requirement above the minimum LHN will make a greater contribution to delivering more affordable housing. As set out in the NPPG, the Government is committed to ensuring that more homes are built and support ambitious Councils wanting to plan for growth. The NPPG states that a higher figure "can be considered sound" providing it "adequately reflects current and future demographic trends and market signals". However, the NPPG does not set any limitations on a higher figure, which is a matter of judgement. The Government's objective of significantly boosting the supply of homes set out in the 2019 NPPF remains (para 59). A housing requirement above the minimum LHN would support economic growth, deliver more affordable housing and contribute to any arising unmet housing needs from neighbouring authorities.

LPPO147	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	<p>Richborough Estates support the general approach of Policy SO3.1 in providing to meet the objectively assessed local needs for Cannock District and also contributing towards the unmet needs in neighbouring areas. However, utilisation of the standard method alone does not take account of the need to address the economic growth aspirations of both the Local Plan itself, the District Council and its membership of the two principal LEPs. The level of housing provision set out in Policy SO3.1 should include an uplift to take account of these economic factors. In addition, the level of contribution being made towards meeting the undersupply in the wider HMA of 500dwellings is considered inadequate in the context of neighbouring authorities, the sustainability of the District and in particular some of the settlements within it and the need to meet that unmet housing need as close as possible to where the need is being generated, i.e. the West Midlands Conurbation. Cannock Chase District is located immediately adjacent to the conurbation, is relatively sustainable with good transport links into the conurbation and could meet a higher proportion of the unmet need in a manner which would be more sustainable than it being met in further distant locations. There is limited evidence available to substantiate how the 500 dwelling contribution has been identified. As a comparison it is notable that for the period 2018-2020 the supporting text within the Local Plan Preferred Options identified that the District had completed 1,124 dwellings which equates to an annual delivery of 562dwellings. This single year of completions exceeds the amount of contribution towards the unmet needs of the GBBCHMA. It is clear from both the comparison and the contributions being made by others in similarly constrained Green Belt locations (South Staffordshire DC and Lichfield DC) that the contribution by Cannock Chase is not proportionate. The supporting next of Policy SO3.1 includes Table A, Table B and Table C. With regards to Table C these all represent in effect windfall sites which the Council have already made an allowance for in their housing supply and as a consequence could result in double counting. Furthermore, the veracity of the Development Capacity Study is open to some debate when it includes numerous sites which are still in operation for alternative uses which may prohibit their potential redevelopment for housing e.g. the Beecroft Road car park, Danilo Road car Park or Park Road bus station. There is significant doubt that a large number of their sites will come forward in the LP period. The policy also fails to identify any remedial measures that would result if housing did ever fall below targets and the Council were not able to establish a five-year supply. Policy SO3.1 should deal with this issue based on the principles established in the Spatial Strategy, however, the Spatial Strategy is not set out clearly within any of the Local Plan documents. This would be necessary to provide a clear foundation to both the approach within the Local Plan itself and circumstances when housing delivery may be falling short of the requirement. Whilst the plan identifies the key and most sustainable settlements within the District this ought to be set out in a specific overarching policy. The settlements identified should be referred to and are: Cannock/Hednesford/Heath Hayes, Rugeley/Brereton, Norton Canes. Lastly, it is not clear why the Council is utilising 2018 as a base-date for the Local Plan. Given that the Plan is not anticipated to be adopted until 2023, it will therefore already be five years into the plan period upon adoption. Indeed, if this date slipped further and the Plan was adopted past 2023 the Plan will have less than 15years to run. Moving the plan-period forward to 2019-2039 would reduce this risk.</p>
LPPO148	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	<p>Richborough Estates support the general approach of Policy SO3.1 in providing to meet the objectively assessed local needs for Cannock District and also contributing towards the unmet needs in neighbouring areas. However, utilisation of the standard method alone does not take account of the need to address the economic growth aspirations of both the Local Plan itself, the District Council and its membership of the two principal LEPs. The level of housing provision set out in Policy SO3.1 should include an uplift to take account of these economic factors. In addition, the level of contribution being made towards meeting the undersupply in the wider HMA of 500dwellings is considered inadequate in the context of neighbouring authorities, the sustainability of the District and in particular some of the settlements within it and the need to meet that unmet housing need as close as possible to where the need is being generated, i.e. the West Midlands Conurbation. Cannock Chase District is located immediately adjacent to the conurbation, is relatively sustainable with good transport links into the conurbation and could meet a higher proportion of the unmet need in a manner which would be more sustainable than it being met in further distant locations. There is limited evidence available to substantiate how the 500 dwelling contribution has been identified. As a comparison it is notable that for the period 2018-2020 the supporting text within the Local Plan Preferred Options identified that the District had completed 1,124 dwellings which equates to an annual delivery of 562dwellings. This single year of completions exceeds the amount of contribution towards the unmet needs of the GBBCHMA. It is clear from both the comparison and the contributions being made by others in similarly constrained Green Belt locations (South Staffordshire DC and Lichfield DC) that the contribution by Cannock Chase is not proportionate. The supporting next of Policy SO3.1 includes Table A, Table B and Table C. With regards to Table C these all represent in effect windfall sites which the Council have already made an allowance for in their housing supply and as a consequence could result in double counting. Furthermore, the veracity of the Development Capacity Study is open to some debate when it includes numerous sites which are still in operation for alternative uses which may prohibit their potential redevelopment for housing e.g. the Beecroft Road car park, Danilo Road car Park or Park Road bus station. There is significant doubt that a large number of their sites will come forward in the LP period. The policy also fails to identify any remedial measures that would result if housing did ever fall below targets and the Council were not able to establish a five-year supply. Policy SO3.1 should deal with this issue based on the principles established in the Spatial Strategy, however, the Spatial Strategy is not set out clearly within any of the Local Plan documents. This would be necessary to provide a clear foundation to both the approach within the Local Plan itself and circumstances when housing delivery may be falling short of the requirement. Whilst the plan identifies the key and most sustainable settlements within the District this ought to be set out in a specific overarching policy. The settlements identified should be referred to and are: Cannock/Hednesford/Heath Hayes, Rugeley/Brereton, Norton Canes. Lastly, it is not clear why the Council is utilising 2018 as a base-date for the Local Plan. Given that the Plan is not anticipated to be adopted until 2023, it will therefore already be five years into the plan period upon adoption. Indeed, if this date slipped further and the Plan was adopted past 2023 the Plan will have less than 15years to run. Moving the plan-period forward to 2019-2039 would reduce this risk.</p>

<p>LPPO149</p>	<p>Richborough Estates (Land south of Cannock Road, Heath Hayes) Pegasus Group - B, Cook</p>	<p>Richborough Estates support the general approach of Policy SO3.1 in providing to meet the objectively assessed local needs for Cannock District and also contributing towards the unmet needs in neighbouring areas. However, utilisation of the standard method alone does not take account of the need to address the economic growth aspirations of both the Local Plan itself, the District Council and its membership of the two principal LEPs. The level of housing provision set out in Policy SO3.1 should include an uplift to take account of these economic factors. In addition, the level of contribution being made towards meeting the undersupply in the wider HMA of 500 dwellings is considered inadequate in the context of neighbouring authorities, the sustainability of the District and in particular some of the settlements within it and the need to meet that unmet housing need as close as possible to where the need is being generated, i.e. the West Midlands Conurbation. Cannock Chase District is located immediately adjacent to the conurbation, is relatively sustainable with good transport links into the conurbation and could meet a higher proportion of the unmet need in a manner which would be more sustainable than it being met in further distant locations. There is limited evidence available to substantiate how the 500 dwelling contribution has been identified. As a comparison it is notable that for the period 2018-2020 the supporting text within the Local Plan Preferred Options identified that the District had completed 1,124 dwellings which equates to an annual delivery of 562 dwellings. This single year of completions exceeds the amount of contribution towards the unmet needs of the GBBCHMA. It is clear from both the comparison and the contributions being made by others in similarly constrained Green Belt locations (South Staffordshire DC and Lichfield DC) that the contribution by Cannock Chase is not proportionate. The supporting text of Policy SO3.1 includes Table A, Table B and Table C. With regards to Table C these all represent in effect windfall sites which the Council have already made an allowance for in their housing supply and as a consequence could result in double counting. Furthermore, the veracity of the Development Capacity Study is open to some debate when it includes numerous sites which are still in operation for alternative uses which may prohibit their potential redevelopment for housing e.g. the Beecroft Road car park, Danilo Road car park and Park Road bus station. There is significant doubt that a large number of their sites will come forward in the LP period. The policy also fails to identify any remedial measures that would result if housing did ever fall below targets and the Council were not able to establish a five-year supply. Policy SO3.1 should deal with this issue based on the principles established in the Spatial Strategy, however, the Spatial Strategy is not set out clearly within any of the Local Plan documents. This would be necessary to provide a clear foundation to both the approach within the Local Plan itself and circumstances when housing delivery may be falling short of the requirement. Whilst the plan identifies the key and most sustainable settlements within the District this ought to be set out in a specific overarching policy. The settlements identified should be referred to and are: Cannock/Hednesford/Heath Hayes, Rugeley/Brereton, Norton Canes. Lastly, it is not clear why the Council is utilising 2018 as a base-date for the Local Plan. Given that the Plan is not anticipated to be adopted until 2023, it will therefore already be five years into the plan period upon adoption. Indeed, if this date slipped further and the Plan was adopted past 2023 the Plan will have less than 15 years to run. Moving the plan-period forward to 2019-2039 would reduce this risk.</p>
<p>LPPO150</p>	<p>Inspired Villages - E, Pearce</p>	<p>In response to Question 10, the target of 4% of new dwellings to be provided for nursing homes and residential institution is not considered to sufficiently address the current and projected ageing population of the District and would conflict with the strategic objective 3 which explicitly aims to provide "housing choices for an ageing population". The provision of choice for the elderly, including housing and care options, are also reference on Page 63 of the Preferred Options Consultation Document. The Planning Practice Guidance advises that plan-making authorities "could also provide indicative figure figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period"(Paragraph: 006 Reference ID: 63-006-20190626). This emphasis is in accordance with the PPG identifying that the need to provide housing for older people is 'critical', the only group identified as such in national policy guidance (Paragraph: 001 Reference ID: 63-001-20190626). We would recommend Cannock Chase District Council to commission an older persons housing need assessment to fully understand the current provision of different forms of housing for older people, and projected demand across different tenures and types, including retirement communities. Following such an assessment, the Council should include a specific policy identifying a minimum provision of specialist housing for older people.</p>
<p>LPPO151</p>	<p>Bloor Homes Ltd Define Planning & Design Ltd - M, Rose</p>	<p>Housing Requirements: Bloor Homes Ltd (BHL) welcome the recognition throughout the plan that the District must meet its own local housing need (LHN) as well as make a contribution towards the unmet needs arising elsewhere in the GBBCHMA, and recognise that this approach is wholly in accordance with the requirements of the NPPF. BHL do, however, dispute the level of the contribution to be made to meeting the unmet needs of the wider HMA, and as such are not in agreement with the overall level of growth specified by Policy SO3.1. Policy SO3.1 as currently drafted sets out [...]. That is, CCDC effectively identify an overall requirement of 6,116 dwellings, albeit that housing requirement is not explicitly stated within the policy as NPPF paragraph 65 requires. Whilst BHL has no objection to the minimum housing requirement being based upon the LHN figure of 5,516dpa (276dpa), which has been calculated in accordance with the Government's Planning Practice Guidance (PPG), it does not agree that a contribution of 500 dwellings to the unmet needs arising in the wider HMA is sufficient or appropriate. Rather, it is BHL's position that an increased contribution should be made to reflect the perilous housing supply position that BCC and the Black Country Authorities are in. Indeed, the latest GBBCHMA Position Statement (July 2020) found that, whilst the unmet need from BCC had reduced to 2,597 dwellings in the period to 2031, there would still be a significant shortfall beyond 2031 (the scale of which is currently unknown), and that there is an anticipated shortfall of 7,485 dwellings arising from the Black Country Authorities alone in the period to 2031, and a further 20,000 dwellings post-2031. As CCDC's emerging plan period runs to 2038, it should take into consideration the shortfall both prior to and post-2031. However, that position does not take into account the Government's current approach to the calculation of LHN in urban areas. The updated PPG specifies that urban areas including Birmingham and Wolverhampton should apply a 35% uplift above the authority's LHN to boost housing delivery. Both BCC and the Black Country authorities will now have yet more substantial shortfalls both in the period to 2031 and post-2031 as a result of that. CCDC's March 2021 Sustainability Appraisal Report/ Integrated Impact Assessment assesses at Page 682 the SA outcomes for the overall housing growth policy options that were considered, including a contribution of 500 dwellings as pursued (Option B), 1,500 dwellings (Option C) and 2,500 dwellings (Option D).</p>

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That assessment finds that Options C and D have an identical assessment to Option B (the chosen option) but for a potentially (i.e. uncertain) greater negative impact on Previously Developed Land (PDL) and a potential (again, uncertain) negative impact on housing; which appears somewhat counter-intuitive given that the delivery of more houses does not impact upon the delivery of PDL sites, and will unlock greater housing benefits by meeting a higher proportion of the unmet need. CCDC must therefore incorporate an increased contribution (and consequently overall housing requirement) to address the growing unmet need in the surrounding HMA and clearly should not limit their contribution to neighbouring authorities where there are suitable and available sites in sustainable locations for growth; as is the case here. Policy SO3.1 should therefore be revised to set a housing requirement of a minimum of between 7,016 dwellings (LHN of 5,516 dwellings, plus a contribution of 1,500 dwellings) to 8,016 dwellings (LHN of 5,516 dwellings, plus a contribution of 2,500 dwellings), depending on the availability of suitable and deliverable sites. Unlike the current iteration of Policy SO3.1, that should be included as an explicit housing requirement. Furthermore, given the scale of the unmet need, any caveat that this housing contribution should only be provided "where infrastructure permits" (see paragraph 5.9 for example) should be removed to provide certainty of CCDC's commitment to the HMA's unmet needs. Rather, it is for the LPR itself and its supporting Infrastructure Delivery Plan to ensure that key stakeholders identify and facilitate the delivery of the infrastructure needed to support the level of growth required in the District, in accordance with NPPF paragraph 20. That is, the level of growth should inform the level of infrastructure required, as opposed to the level of infrastructure informing (and potentially limiting) the level of growth. Spatial Strategy: BHL support the recognition in Policy SO3.1 that development will be guided by the Spatial Strategy, [...]. Moreover, the recognition that Green Belt release is required to provide sufficient land to meet the needs arising in the District and wider HMA is welcomed and is a wholly sound approach to the District's spatial strategy for growth that is in accordance with the requirements of the NPPF. NPPF paragraph 136 states that Green Belt boundaries "should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans." That requirement is demonstrably met in the context of the District's own housing need and the growing unmet need in the wider HMA, particularly in light of the lack of clarity given as to the HMA authorities' ability to meet that unmet need given the uplift in housing delivery that is now required for some urban authorities. Therefore, the approach to releasing Green Belt land is considered sound in that regard. Furthermore, CCDC can clearly demonstrate that it has fully examined "all other reasonable options for meeting its identified need for development" besides Green Belt release, as required by NPPF paragraph 137. CCDC's SA considered numerous options in relation to its "strategy for meeting overall housing growth" including focus development on urban areas (Option A), urban areas in conjunction with the mixed-use redevelopment of the former Rugeley Power Station (Options B1 and B2), and finally a combination of focussing development on urban areas, the former Rugeley Power Station have sought to maximise the potential of existing non-Green Belt land within urban areas, including previously developed land, as reflected in the inclusion of some 1,000 dwellings to be delivered from sites that were identified through the Council's Development Capacity Study.

The requirements of paragraph 137 of the NPPF have been demonstrably met in that regard. BHL also supports CCDC's recognition within the Spatial Strategy (paragraph 5.18) that Norton Canes is a sustainable settlement and, therefore, an entirely suitable location for significant growth. Indeed, that Spatial Strategy states that "residential and commercial development opportunities will be priorities within Norton Canes where they can make a positive and sustainable contribution to the growth of the District." As such the proposed release of Green Belt land immediately adjacent to Norton Canes for development (through the proposed allocation of Strategic Housing Allocation SH5) is also in accordance with the NPPF's approach to removing land from the Green Belt. Primarily, the release of the land would promote "sustainable patterns of development" in accordance with NPPF paragraph 138, in that the site is considerably less constrained than other alternatives given its distance from the Cannock Chase AONB and its relative distance from SACs, and is also well-served by public transport (including a bus route that runs adjacent to the site along Hednesford Road, and an excellent pedestrian and cycle network surrounding the site). Thus, the release of Green Belt land to the north-west of Norton Canes is justified and sound, and reflects the demonstrable suitability of this location to accommodate residential growth. That said, however, BHL are of the position that CCDC should take the opportunity to release additional land from the Green Belt immediately adjacent to Strategic Housing Allocation SH5 given that the site is an eminently suitable opportunity for development that is demonstrably available and deliverable. Indeed, the development of SHLAA Parcels N24 and N64 alongside proposed Strategic Housing Allocation SH5 would assist in meeting the District's own housing need *which the current supply falls short of doing, as below), would remove any risk from the District's supply (arising as a result of the matters raised in relation to 'housing supply' below), and in doing so would make a valuable contribution to meeting the longer-term housing needs of the District and wider HMA. BHL are of the view that CCDC should release SHLAA Parcels N24 and N64 for residential development on that basis. That approach would be entirely justified in accordance with NPPF paragraph 139, which requires alterations to the Green Belt to effectively ensure that sufficient land has been identified to meet identified requirements (requirement a), that longer-term development needs beyond the plan period have been taken into account, which may be through the safeguarding of land (requirement c), that Green Belt boundaries will not be need to be altered at the end of the plan period (requirement e), and that clear and defensible boundaries that are likely to be permanent are defined (requirement f). That is, when an authority seeks to adjust its Green Belt boundaries, it should seek to release sufficient land at that point, to ensure that it does not have to continually revisit the Green Belt boundaries during subsequent plan period. CCDC should therefore consider the opportunity available releasing additional land to the north-west of Norton Canes to meet the needs of the authority (preferably as an allocated site, or as safeguarded land); particularly given the location's clear suitability for development. Indeed the allocation, or even safeguarding (for future development), of SHLAA Parcels N24 and N64 would be wholly in accordance with the NPPF as demonstrated below, and would provide CCDC with more flexibility in its supply of land. In addition, taking a comprehensive approach to SHLAA Parcels N24, N33 and N64 would allow the provision of a very high-quality development that creates a robust Green Belt boundary along Long Lane. The suitability of those additional parcels, as well as the opportunities present for their development, is discussed below. Notwithstanding that point, the other objectives set out within the Spatial Strategy for Norton Canes are noted by BHL, and include the desire to deliver enhanced transport links including those to Kingswood Lakeside, enhance biodiversity strategic links, and enhance Grove Colliery and support appropriate recreational uses therein.

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Those aspirations are recognised by BHL, who note that residential development can play an important role in realising those objectives, and more generally can enhance or maintain the vitality of such settlements (as identified by NPPF paragraph 78). Housing Supply: Policy SO3.1 and its supporting text sets out that CCDC's housing supply comprises the following: • Strategic Housing Allocations (i.e. Allocations SH1 – SH5): 1,538 dwellings; • Sites under Construction (Table A): 1,260 dwellings; • Proposed allocations which already have planning permission, are already allocated, or have a resolution to grant planning permission (Table B): 1,432 dwellings • Additional Sites from Development Capacity Study: 1,007 dwellings. Supply from those sites totals 5,237 dwellings, which is below the housing requirement of 6,116 dwellings as currently set out in Policy SO3.1 and is a long way short of the housing requirement of between 7,016 and 8,106 dwellings as put forward by BHL. Regardless of what the housing requirement is, NPPF paragraph 67 is clear in stating that local authorities should "identify a sufficient supply" of housing land, and as such further site allocations should be made to, as a minimum, meet the final housing requirement. SHLAA sites N24 and N64 should be allocated in that regard. In addition to that, it is important that those sites are considered to be deliverable (for years 6 onwards) to ensure that there is a degree of certainty that sufficient land will come forward. Specifically, it is noted that there is a considerable dependence on the complex Rugeley Power Station site (1,000 dwellings) and land that has been identified in the Development Capacity Study (1,007 dwellings) which may no longer be available or being promoted for residential development. Indeed, whilst a planning application for the development of the Former Rugeley Power Station site is currently being determined, it's development will nonetheless be complex. Indeed, the SHLAA assessment of the site (REF.127) notes the requirement for significant demolition, the presence of historic landfill, the requirement for ground remediation works (which can often delay or halt development schemes), and the need to sensitively accommodate the retained substations and associated infrastructure on-site, alongside existing wayleaves/easements, and new residential development and its associated infrastructure. For that reason, the proposed development constitutes EIA development and the site is very clearly a sensitive and complex one. As such, whilst BHL have no objection to the inclusion of brownfield sites within CCDC's housing supply, the increased potential for delays halting of development should be taken into account in ensuring that CCDC can identify sufficient land to meet its housing requirement (whatever that may be). As such, it is BHL's position that a buffer should be incorporated above CCDC's housing requirement to ensure that there is flexibility in the Council's land supply and therefore certainty that sufficient housing land will come forward throughout the plan period. Indeed, a March 2016 report by the Local Plans Expert Group recommends that an additional 20% uplift is incorporated into a Council's housing supply above its base requirement to allow for flexibility in the District's land supply. Whilst a 20% uplift would be considerable, given the constraints present within the District, it is suggested that CCDC's housing supply should comfortably exceed the housing requirement of either 7,016 dwellings or 8,016 dwellings (by BHL's contention).

LPP0152	ENGIE - D, Sager	Barton Willmore - J, Bonner	The draft Plan identifies that housing provision will be made for a minimum of 5,516 dwellings (net) to meet the objectively assessed local housing needs and ensuring a sufficient supply of deliverable and developable land is available to deliver around 276 dwellings each year. Alongside the NPPF (paragraph 60) which requires application of the standard method, the PPG 'Housing and Economic Assessment' (Reference ID: 2a-010-20201216) states this is the minimum starting to point in determining housing need and that there will be circumstances where it is appropriate to plan for a higher housing need figure than the standard method. This can include factors related to growth strategies for an area or taking on unmet need from neighbouring authorities. The draft Plan proposes to accommodate an additional 500 dwellings to the minimum local housing need figure to help meet the GBBCHMA shortfall. However, we consider that the proposed contribution of 500 dwellings is not a sufficient contribution in terms of the scale of unmet needs over the draft Plan period. It is noted that the unmet needs of Birmingham (and likely the Black Country) are an ongoing issue that remains unresolved - more so now regarding growth beyond 2031, as set out in the latest Greater Birmingham and Black Country Housing Need and Housing Land Supply Position Statement Update (dated 21st September 2020). To meet housing needs, the draft Plan gives priority to the re-use of previously developed land, including the former Rugeley Power Station site. Indeed, supporting paragraph 6.198 states that "the delivery of the redevelopment of the former Rugeley Power Station and the opportunities identified locally through this are fundamental to the delivery of sustainable development." We support this and agree that the former Power Station will be fundamental in delivering sustainable development, as well as a number of other objectives including regeneration. This approach to maximise opportunities on brownfield sites is supported by the NPPF, where there is a string emphasis placed on encouraging the effective use of land by reusing previously developed land. Para 117 states that: "Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land." The proposed allocation at Rugeley Power Station (Ste Ref. H20) is listed in Table B within the draft Plan. The capacity for the site (taken from the SHLAA) is 1,000 homes. This has fed into the Spatial Strategy for Rugeley which sets out the: "provision of approx. 1,000 additional homes within Cannock Chase District will be delivered through the larger cross boundary replacement of the former Rugeley Power Station." Given the identified housing need in the District and the wider unmet needs, and the contribution the site can make delivering this housing sustainably, it is considered the draft policy (Site Ref. H20) should not restrict the site's potential to deliver above and beyond this, subject to a future planning application. It is considered that there is greater capacity on the site than approved through the outline planning permission (approximately 1,036 dwellings in Cannock). Based on the above and opportunities around this brownfield site, it is considered that the draft Plan should refer to a "minimum" of 1,000 dwellings, not approximately. This should also be reflected in the site-specific allocation policies which we understand will be prepared as part of the next stage of the Local Plan process. In terms of local infrastructure requirements, Table B should list the off-site highway works that our Client has committed to, so that any subsequent developments in the local area take account of the extant permission and the related infrastructure requirements, and make proportionate contributions where required. This includes the potential improvements to the
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LPPO153	The Church Commissioners for England	Barton Willmore - A, Bird	<p>Housing need and requirement: The draft Plan (at paragraphs 6.167-6.169, 6.189 and 6.196) identifies how the application of the standard method for calculating local housing needs results in a minimum housing requirement of 5,516 dwellings (2018-2038). Alongside the NPPF (paragraph 60) which requires application of the standard method, the PPG 'Housing and Economic Needs Assessment' (paragraph: 010 Reference ID: 2a-010-20201216) states this is the minimum starting point and that there will be circumstances where it is appropriate to plan for a higher housing need figure than the standard method. This can include circumstances related to growth strategies for an area or taking on unmet need for neighbouring authorities. The draft Plan proposes to accommodate an additional 500 dwellings to the minimum local housing need figure to help meet the GBBCHMA shortfall (we comment on this further at Question 11). However, there does not appear to be consideration of whether other factors, such as a economic growth ambitions, necessitate any increases to the minimum local housing need figure in addition to unmet need. The EDNA Update (December 2020) recommends range of 48-66ha (net) or 63-81 hectares (gross) of employment land is provided (2018-2038) and identifies (at paragraph 5.115) that the preferred level of employment land will be in influence by the Economic Prosperity Strategy for Cannock Chase District. The draft Plan (at draft Policy SO4.2 Provision for New Employment Uses) looks to provide up to 50 hectares of employment land which lies within the range recommended by the EDNA. The EDNA (at paragraph 6.8) goes on to state the following: "If the housing requirement is at or below the 7,020 net dwelling growth under about supply scenario 5 (276 dwellings per annum standard method + 1,500 dwellings unmet need, which equates to 46ha net, or 61ha gross [employment land]) the this could have repercussions on the employment land target which may have to be reduced as a consequence to ensure the two are not misaligned. It is strongly recommended that in these circumstances the Council undertake more detailed housing modelling to ensure the job projections are aligned closely with their housing requirement." In line with national policy and guidance, the draft Plan should therefore consider whether there is a need for additional housing growth over and above the standard method to ensure alignment with economic growth ambitions, taking account of its own evidence base recommendations. The PPG also notes that "an increase in the total housing figures included in the local plan may need to be considered where it could help deliver the required number of affordable homes" (PPG Paragraph: 024 Reference ID: 2a-024-20190220).</p> <p>At paragraph 6.123 of the draft Plan it is noted that the evidence shows the need for affordable dwellings across the District will not be met in entirety by the Plan. Whilst it is recognised that the standard method for calculating local housing needs includes an affordability uplift (and that affordable housing needs will not necessarily be met in full) the Council should consider whether any further uplift to the minimum local housing need figure could help to deliver additional affordable housing in the context of the Plan's Objective 3 priorities; including helping to meet local needs for affordable dwellings. Housing Supply: The draft Plan (2018-2020), deliverable and developable sites within the SHLAA there is a shortfall in supply of 1,384 dwellings (against the minimum local housing need of 5,516 dwellings) or 1,883 dwellings (against the housing requirement of 6,016 dwellings including 500 dwellings towards unmet needs from neighbouring authorities. The DCS then reviewed the potential for additional supply from other non-Green Belt sources to meet this shortfall (in line with the NPPF paragraphs 136-137) and identified that a further 989 dwellings could be provided (Table 18 within the DCS). Combined with the SHLAA supply of 4,132 dwellings, this provides a total supply of 5,121 dwellings., The remaining shortfall is therefore 395 dwellings (against the minimum local housing need of 5,516 dwellings) or 895 dwellings (against the housing requirement of 6,016 dwellings including 500 dwellings towards unmet needs from neighbouring authorities). This has been addressed via the release of Green Belt sites within the District, focused around the main urban areas and mainly adjacent to the Cannock/Hednesford/Heath Hayes settlements. We are supportive of the draft Plan considering the release of Green Belt sites to accommodate the identified shortfall in the housing land supply</p>
LPPO154	Trine Developments Ltd - N, Beattie	G, Fergus	<p>Proposed Objection: Paragraph 138 of the NPPF says "when drawing up or reviewing Green Belt boundaries [...]" This is clear guidance that adhering to Green Belt boundaries should not be at the expense of sustainable patterns of growth. This should come as no surprise, after all, the opening words of the NPPF are: "The purpose of the planning system is to contribute to the achievement of sustainable development." The Warwick Local Plan was adopted in September 2017; it is an LPA where 80% of District is covered by Green Belt and this is a similar case to Cannock. In that case the Inspector had to wrestle with the release of Green Belt and how significant growth, including meeting of unmet needs from Coventry, could be sustainably distributed; while sustainable towns such as Kenilworth, which are enclosed by Green Belt, could still be allowed to prosper, and meet the needs of existing and future residents over the plan period. The Inspector who considered the Warwick Local Plan demonstrated that Green Belt should not be used as a barrier to providing sustainable patterns of growth, and that releasing Green Belt that is well-related to sustainable settlements, whose needs cannot be met in non-Green Belt land, is a clear demonstration of the requisite exceptional circumstances; and equally importantly, that sustainable levels of growth in non-Green Belt areas which fail to conform with the spatial strategy for an area are not to be considered sound - demonstrating clearly that Green Belt release is not a last resort. In the Inspector's report into the Lichfield Local Plan, he states that "In my judgement the lack of more sustainable sites outside the Green Belt to meet the identified need for housing in a way that is consistent with the Plan; urban and Key Centre strategy amounts, in this instance, to the exceptional circumstances that justify the release of Green Belt Land ... [207]" The Inspector clearly in this case balanced a range of sustainable considerations in forming the view that the demonstration of exceptional circumstances and determination of Green Belt boundaries should take account of the need to promote sustainable patterns of development - to approach this from the alternate perspective that sustainability is secondary to retaining Green Belt boundaries would be wrong and inconsistent with national policy. Norton Canes is a sustainable settlement, and the LPA is correct in its decision to allow it to grow during the plan period. However, the above case studies demonstrate clearly that sustainability is not the servant of Green Belt designation; on the contrary, the duty in determining Green Belt boundaries is to take account of the need to promote sustainable patterns of development. Our case is that the LPA in this instance has taken the wrong decision in relation to the allocation of Residential Strategic Site (S03.1). We will utilise the evidence that we have prepared to date to frame an objection to the LPA Preferred Option, arguing that the strategic allocation at Norton Farm (SH5 Land West of Hednesford Road, Norton Canes - 175 dwellings) is unsustainable and remote from facilities and services, and should therefore be reduced in size overall, by deletion of the northern field, NC28 (Green Belt Review) which makes a strong contribution to encroachment on the countryside (NPPF Paragraph 134). That is why, the harm resulting from its release, as an expansion of Norton Canes is recognised to be 'moderate-high'. The site we are promoting - The land off Norton Springs (NC23), will accommodate 64 dwellings and under the Green Belt Review it is 'moderate' and more sustainable in terms of the existing pattern of development and proximity to facilities and services in Norton Canes; and through a combination of this site and the southern field that part of the Strategic Site (NC26) will accommodate the dwellings number above. Furthermore, we are proposing to introduce new open space and new tree and woodland planning along the northern and western site of parcel NC23. This is recognised by the LPA to help reduce the urbanising influence of the development and enhance the coalfield farmlands landscape character, in accordance with landscape strategies set out in the Landscape Character Assessment for Cannock Chase (2016).</p>

LPPO155

Taylor Wimpey (Land East of
Wimblebury Rd)

RPS - P, Hill

RPS is broadly supportive of the overall approach to the identification of land to meet the local needs of the District based on the standard method. Nonetheless, RPS notes that the Council cannot currently demonstrate a five-year supply of deliverable land (calculated as 4.8 years in Table 8 of the SHLAA December 2020 report) as at April 2020. On this basis, any reference to housing targets and site allocation capacities should be expressed as 'minima' rather than 'approximate'. RPS notes that Policy SO3.1 makes provision for a 'minimum of 5,516 dwellings' and so for consistency, this qualification should be applied to new site allocations. This will ensure greater opportunity for the Council to meet its housing needs over the plan period.

Question 11: Do you agree that provision should be made to meet the unmet needs of neighbouring areas?

LLPO156

Walsall Council - N, Ball

The Housing Development Capacity Study has been published alongside the document, however this takes as its starting point the question of whether there is capacity for the 6,016 dwellings proposed in the Plan, rather than an assessment of capacity that is independent of the numbers proposed in the plan. It may assist the robustness of this study if it clarified two figures independent of the local housing need, first the total capacity without the use of Green Belt and second what capacity might be provided if potential Green Belt sites were brought forward through a Green Belt review. The Black Country has provided detailed evidence in the form of an Urban Capacity Review Update 2019. This study has demonstrated that the Black Country's housing need between 2019 – 2038 is 71,500 homes, of which 44,500 homes can be accommodated in the urban area leaving a shortfall of 27,000. This shortfall is likely to increase by around 5,000 homes as a result of the publication in December 2020 of the new national method to calculate local housing need. The up-to-date shortfall figure, based on housing need and supply data for 2020-2039 and the most recent delivery evidence, will be made available in the UCR Update 2020, which is due to be published in May 2021. The draft Black Country Plan, due to be published for consultation in summer 2021, will be based on the UCR Update 2020 figures. From this evidence, it is clear that the Black Country cannot accommodate all of its needs in the urban area. We have undertaken discussions with our neighbouring local authorities, as part of our Duty to Co-operate requirements, to determine their ability to accommodate some of the Black Country's unmet need. A number of local authorities including South Staffordshire, Lichfield, Cannock and Shropshire have indicated that they will seek to test their ability to accommodate additional housing needs over and above their own local needs as part of their local plan review process. At this stage, we anticipate that these contributions could accommodate in the region of up to 10,500-12,500 homes and in the best-case scenario, this would leave the Black Country with a significant shortfall of approximately 14,550-16,500 houses, plus some further 5,000 homes added to this shortfall as a result of the new national method outlined above. We are engaging with other local authorities who have a functional relationship with the Black Country and it is possible that further contributions will come forward - these include Telford & Wrekin, Solihull and Bromsgrove. In terms of non-urban opportunities within the Black Country, we have undertaken a Green Belt and Landscape Sensitivity Assessment, supplemented by comprehensive environmental evidence, including historic landscape characterization and ecological surveys, which severely constrain capacity to deliver large scale development across much of the Black Country. Whilst we have still to finalise our site assessment, viability and delivery work, we envisage that market deliverability will also limit the capacity of the Black Country Green Belt up to 2039. This assumption is based on the case of the Birmingham Plan, where the Peter Brett Associates (PBA) Delivery Study concluded that market deliverability placed significant constraints on the amount of housing which could be delivered in the Birmingham Green Belt up to 2031. These constraints reduced the actual capacity of the urban extension identified in the Plan consultation from 10,000 to 5,000 homes, over the 15-year period of the Plan. This assumption was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands. As the majority of the Black Country Green Belt is located primarily in Walsall and, to a lesser extent, in Dudley, these are the two main housing market areas for potential delivery of housing in the Green Belt, with only small amounts of housing potential in Wolverhampton and Sandwell.

Therefore, based on a scenario that there was sufficient unconstrained capacity identified in the Black Country Green Belt, a Delivery Study based on similar principles to that completed for Birmingham, may reasonably conclude that the Black Country could only be expected to deliver some 10,000 homes in the Green Belt over the 15-year Plan period, leaving a significant shortfall to be met in neighbouring authorities. Please note that at this stage the statement does not reflect the findings of any of our key studies or our Green Belt assessment. We will be able to provide a clearer idea of the Black Country's position once we have finalised our evidence base. This will be set out in our Draft Plan, due to be published in late Summer 2021. However, it is clear that on the basis of the maximum capacity of the urban area, the potential contribution of neighbouring local authorities, and the indicative market capacity of the Green Belt, it is likely that the Black Country will be unable to meet its own housing land needs. We understand that neighbouring authorities may be reluctant to consider releasing Green Belt land to meet the needs of the Black Country in advance of the publication of the Black Country Plan. However, we request that the Cannock Chase Local Plan should recognize that there could continue to be a shortfall of land in neighbouring areas which could be accommodated within the Plan area. This could form a suitable trigger for an early review of the Local Plan. This approach has been used in a number of West Midlands Local Plans - most recently in Wyre Forest, Stratford on Avon and North Warwickshire where it was considered that there was sufficient information to progress the Plan at that time, but recognizing that there could be a shortfall of land in neighbouring areas which could be accommodated within that Plan area. The scope of an early review would need to be guided by the scale and locational requirements of an identified need, and could test the capacity for new sources of land supply, or the early release of Safeguarded Land on sites which have been taken out of the Green Belt but not proposed to be brought forward within the current Plan period. We would welcome the opportunity to discuss the detailed wording of an appropriate early review approach with you.

LPPO157	South Staffordshire Council - E, Fox	<p>We welcome the publication of the Preferred Options Plan and support the commitment towards contributing towards the GBHMA housing supply shortfall. In our submission to the Issues and Options consultation we noted that a contribution of 500 dwellings towards the shortfall would align with the approach South Staffordshire has adopted in responding to the recommendations within the 2018 HL Hearn Study. This approach is welcomed however we note that there is no reference to the GL Hearn study in the explanatory text supporting the proposed 500 dwelling contribution. It is suggested that references to this study be included prior to submitting the plan for public examination. The GL Hearn study represents the primary evidential basis which provides the context for consideration by the GBHMA constituent authorities of potential approaches to making good the wider HMA shortfall. The omission of reference to the study removes the principal justification for the proposed 500 dwelling contribution within the draft plan. The proposed contribution now appears as an apparently arbitrary response to an issue which the plan recognises is significant and which needs to be addressed. Whilst we welcome the proposed contribution of 500 homes towards unmet HMA needs, South Staffordshire would support any further suitable site opportunities for proportionate dispersal identified within Cannock that would increase this contribution, should these be forthcoming at a later date. It is evident that the new Cannock Chase Local Plan will lead to new development in close proximity to communities in South Staffordshire. It is therefore essential that the impact of proposals in Cannock on local amenities and the surrounding road network, including in South Staffordshire, is fully considered through the plan-making process. It is anticipated that we continue an ongoing dialogue with Cannock Chase District Council to consider the implication of any cross-boundary issues including the potential impact of growth and air quality on designated sites of nature conservation value.</p>
LPPO158	Hazel Slade & Rawnsley Community Association - D, Williams	<p>Much greater rigor should be adopted in ensuring that an unmet need in neighbouring authorities is a realistic evaluation of their available land use.</p>
LPPO159	Birmingham City Council - I, MacLeod	<p>Strategic Housing Need and Duty to Cooperate. As you are aware, the adoption of the Birmingham Development Plan (BDP) in 2017 confirmed a housing shortfall of 37,900 homes primarily to be met by other authorities in the Greater Birmingham and Black Country Housing Market Area (HMA). In arriving at the scale of the housing shortfall to be met outside of Birmingham, the BDP Inspector concluded that the allocation of additional sites within the city boundaries would not be justified and that evidence shows that, for many years, a substantial proportion of Birmingham's need has been met in other parts of the West Midlands. Since that time, the 14 authorities that comprise the HMA, including Cannock Chase District Council, have worked together to regularly update housing land supply capacity across the whole HMA area. In addition, the HMA authorities commissioned and published a Strategic Growth Locations Study to identify possible solutions and areas of search which could be further explored within individual Local Plan reviews across the HMA area. Significant progress has been made in identifying land to meet the shortfall identified within the Housing Market area (including that of Birmingham) up to 2031. The latest position Statement published by the 14 HMA Authorities in September 2020 identifies a shortfall of only 2,597 homes across the whole HMA up to 2031, with a significant proportion of this shortfall met by Birmingham City Council itself, mainly through high density windfall schemes not previously identified coming forward in and around the City Centre. However, a proportion of this shortfall is also being met through local plan reviews where local planning authorities are proposing to provide additional housing over and above their Local Housing Need (LHN) figures. The West Midlands Strategic Growth Study (GL Hearn) was also commissioned by the 14 local authorities which make up the HMA which suggested scenarios for higher growth to meet housing shortfalls which were to be tested in Local Plan Reviews across the HMA area. The situation beyond 2031 is emerging as we shall be seeking authority from Council Cabinet in June to officially begin an update of the Birmingham Development Plan following a recent review. Work is also progressing on the Black Country Plan and it is therefore envisaged that housing shortfalls will continue to be experienced within the HMA beyond 2031. The Black Country has already evidenced a shortfall of 29,260 dwellings between 2019 and 2038 through its 2019 Urban Capacity Review, which it will consider through the Black Country Plan review. This position will be further exacerbated by recent changes to the Government's housing needs methodology which is to place a 35% uplift on top of the identified housing need for Birmingham (as well as for Wolverhampton) as one of the top twenty largest cities within England. This means that, potentially, a significant pre-2031 shortfall could arise and so the need for Duty to Cooperate arrangements within the HMA will therefore continue to be crucial to ensure that shortfalls can be considered within local plan reviews in neighbouring local authorities.</p>

LPPO160	Lichfield District Council - S, Stray	<p>The contribution of 500 homes to meet HMA need is welcomed; however, it is noted this will be at the lowest end of the 500-1500 range identified within the previous consultation. It is acknowledged by Lichfield District, along with other authorities within the HMA and neighbouring CCDC that they should seek to provide a proportionate and meaningful contribution toward the unmet need arising from the GBBCHMA. Accordingly and given CCDCs links to the HMA and in particular the Black Country Authorities, who have identified a significant emerging shortfall, LDC would like to stress the importance of proactively seeking to identify potential sites from Urban Capacity work and from robust consideration of additional Green Belt release where appropriate. It is acknowledge within the supporting evidence (Housing Development Capacity Study 2021) that there is the potential for an additional 554 dwellings which could be policy compliant and allocated within the Cannock Chase District Local Plan. These are excluded from allocation over concerns regarding deliverability. Further evidence/justification as to why these sites have been excluded from allocation and potential supply, particularly given the HMA context, may therefore be beneficial. It is of course entirely possibly that such constraints could be overcome within the plan period and it is suggested that should this take place such windfall developments assist in meeting CCDCs and/or wider HMA need. Lichfield DC note the recent housing delivery rates referenced at para 6.173 with 1,124 homes delivered between 2018 and 2020. With this in mind it is considered that further evidence and justification could be required as to why CCDC have not suggested delivering a higher quantum of housing over the plan period, particularly when considering the shortfall from the wider HMA area and CCDCs close geographical links to the HMA when recent delivery rates would suggest there is scope for delivery at a higher rate. The Green Belt Review evidence base work is noted along with the intention to release three sites from the Green Belt to bring forward housing development. It is also noted that the evidence suggests that there are further potential Green Belt sites that have been assessed that could be brought forward to meet CCDCs own housing need and to enhance the contribution to the HMA shortfall. Noting the Housing Development Capacity Study 2021, the Green Belt Review evidence and CCDCs recent delivery rates outlined above it may be helpful for CCDC to review their contribution of 500 dwellings and consider whether further provision could be made towards the HMA over the plan period which is justified and appropriate. Particularly given CCDCs geographical links to the HMA in particular the Black Country Authorities. Paragraph 6.179: LDC suggests the below amendment to paragraph 6.170 for clarity: "A number of authorities have contributed additional housing to meet this identified shortfall. Our neighbouring authorities of South Staffordshire and Lichfield, who share the GBBCHMA are proposing an additional provision for up to 4,000 between 2018-2038 and 2,665 homes between 2018-2040 through their Local Plans respectively. These proposals include sites being release from the Green Belt to help meet the shortfall. Our other neighbouring authority is Stafford Borough and they are not part of the GBBCHMA".</p>
LPPO161	Solihull Metropolitan Borough Council - C, Jones	<p>Solihull Council welcome the provision in the Preferred Options Plan to meet CCDCs housing and employment land needs in full, as well as the principle of contributing an additional 500 dwellings to meet the wider HMA unmet housing needs up to 2038. It would be helpful to have further clarification on whether these assumptions have been taken into account in the July 2020 GBBCHMA Position Statement, of if it is intended to include them within the next update, currently under consideration. The latest position on the Contribution from Solihull is set out in the 2020 Draft Submission Plan, upon which CCDC were invited to make representations. The two Councils are close to agreement on the Statement of Common Ground for Solihull's Draft Submission Plan. Solihull welcomes continuing dialogue with CCDC as their plan progresses to examination, though the Duty-to-Cooperate process.</p>
LPPO162	Home Builders Federation - S, Green	<p>As set out in the 2019 NPPF, the Council is under a Duty to Cooperate with other LPAs and prescribed bodies on strategic matters that cross administrative boundaries (para 24). To maximise the effectiveness of plan-making and fully meet the legal requirements of the Duty to Cooperate, the Council's engagement should be constructive, active and on-going. This collaboration should identify the relevant strategic matters to be addressed (para 25). Effective and on-going joint working is integral to the production of a positively prepared and justified strategy (para 26). The Council should demonstrate such working by the preparation and maintenance of one or more Statements of Common Ground identifying the cross-boundary matters to be addressed and the progress of cooperation in addressing these matters. Therefore, as set out in the 2019 NPPF, the Local Plan should be positively prepared and provide a strategy, which as a minimum seeks to meet its own LHNs in full and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a). The GBBCHMA Position Statement published in July 2020 seeks to demonstrate that the housing need can be met across the sub-region for the period 2011-2031. However, Table 5: Housing Shortfall for GBBCHMA 2011-2031 is somewhat misleading by showing a housing shortfall of only 2,597 dwellings. Table 5 compares an updated Housing Land Supply against a minimum housing requirement of 207, 979 dwellings (based on Strategic Growth Study re-based 2014 household projections model plus a contribution to Coventry & Warwickshire HMA) rather than the adopted housing requirements and unmet housing needs set out in Table 2. The minimum housing requirement in Table 5 of 10,399 dwellings per annum is below the housing requirement in Table 2 of 10, 961 dwellings per annum (annual housing requirement plus unmet need not provided for). Table 2 is also an under-estimation of housing need because of the exclusion of the identified shortfall in the Black Country of 29, 260 dwellings between 2019-2038 of which 7,485 dwellings arise by 2031 (see para 4.2). The addition of the Black Country shortfall would increase the housing requirement in Table 2 to 11, 585 dwellings per annum. Furthermore, future housing need in Local Plan Reviews will be based on the Government's revised standard methodology for calculating LHN including Step 4 - Cities & Urban Centres uplift of 35% which is applicable to Birmingham, Coventry and Wolverhampton. The estimated HLS in 2019 of 205, 382 dwellings set out in Table 3 relies upon un evidenced allowances of 11, 413 dwellings from proposed allocations in emerging Local Plans yet to be tested at Examination, an additional urban supply of 19, 410 dwellings and windfall development of 14, 111 dwellings. It is noted that Table 6: Changes in Housing Capacity 2017-2018 identified a 27% increase of 13,492 dwellings in Birmingham. The deliverability of residential development in these locations will be dependent upon the viability of previously developed land and the demand of high density city living post Covid-19. The HBF content that the housing shortfall in the GBBCHMA is greater than 2,597 dwellings shown in Table 5 of the Position Statement because housing need has been under-estimated and HLS has been overestimated. There is a long history of on-going engagement between the GBBCHMA authorities but to date there is no conclusive outcome from this engagement in relation to the strategic cross-boundary matter of re-distribution of unmet housing needs from Birmingham and Black Country authorities which indicates that this engagement is an unsound basis for plan-making. After 4 years since the adoption of the Birmingham Development Plan in January 2017, which identified an unmet housing need of 37, 900 dwellings, there is no agreement on meeting in full the housing needs of the GBBCHMA. There is every likelihood that reaching a consensus on this strategic matter will be a lengthy disharmonious process within the GBBCHMA authorities. The Cannock Chase Local Plan should make a provision to meet unmet housing needs of neighbouring areas. However, in absence of any signed SoCG, there is no real commitment to resolving the redistribution of unmet housing needs. The GBBCHMA authorities should produce a SoCG setting out where unmet housing need will be met</p>

LPPO163	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	In accordance with the Duty to Cooperate, which still remains, the Council must do its utmost to assist in meeting unmet needs across the HMA. For the reasons already set out above the identification of 500 additional dwellings is insufficient and disproportionate contribution towards meeting the unmet needs of the GBBCHMA. There is little evidence to substantiate why 500 additional dwellings is considered an appropriate contribution and in the absence of this and detailed evidence to substantial that any increase should result in significant harm, the figures should be increased to that set out in the initial Issues and Options document of 2,500 dwellings. The Council should demonstrate how it has arrived at any figure through the preparation and maintenance of one or more Statements of Common Ground with neighbouring authorities identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters.
LPPO164	Richborough Estates (Land off Main Road, Breerton)	Pegasus Group - B, Cook	In accordance with the Duty to Cooperate, which still remains, the Council must do its utmost to assist in meeting unmet needs across the HMA. For the reasons already set out above the identification of 500 additional dwellings is insufficient and disproportionate contribution towards meeting the unmet needs of the GBBCHMA. There is little evidence to substantiate why 500 additional dwellings is considered an appropriate contribution and in the absence of this and detailed evidence to substantial that any increase should result in significant harm, the figures should be increased to that set out in the initial Issues and Options document of 2,500 dwellings. The Council should demonstrate how it has arrived at any figure through the preparation and maintenance of one or more Statements of Common Ground with neighbouring authorities identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters.
LPPO165	St Modwens (Land at York's Bridge, Pelsall)	RPS - P, Hill	The Principle: Yes, Cannock Chase should be making a contribution towards meeting the unmet need of neighbouring areas. Cannock Chase lies within South Staffordshire on the northern edge of the Black Country administrative areas. Cannock Chase District is one of the 14 authorities in the GBBCHMA. The GBBCHMA has a significant housing shortfall and Cannock Chase should be helping to meet the unmet housing need. As set out in the 2019 NPPF, the Council is under Duty to Cooperate with other LPAs and prescribed bodies on strategic matters that cross administrative boundaries (para 24.). To maximise the effectiveness of plan-making and fully meet the legal requirements of the Duty to Cooperate, the Council's engagement should be constructive, active and on-going. This collaboration should identify the relevant strategic matters to be addressed (para 25). Effective and on-going joint working is integral to the production of a positively prepared and justified strategy (para 26). The council should demonstrate such working by the preparation and maintenance of one or more SoCG identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters. Therefore, as set out in the 2019 NPPF, the Local Plan should be positively prepared and provide a strategy, which as a minimum seeks to meet its own LHNs in full and is informed by agreements with other authorities so that unmet need for neighbouring areas is accommodated (para 35a). The GBBCHMA Position Statement published in July 2020 seeks to demonstrate that the housing need can be met across the sub-region for the period 2011-2031. However, Table 4: Housing Shortfall for GB&BCHMA 2011-2031 is somewhat misleading by showing a housing shortfall of only 2,597 dwellings. Table 5 compares an updated Housing Land Supply (HLS) against a minimum housing requirement of 207, 979 dwellings (based on Strategic Growth Study re-based 2014 household projections model plus a contribution to Coventry & Warwickshire HMA) rather than the adopted housing requirements and unmet housing needs set out in Table 2. The minimum housing requirement in Table 5 of 10,399 dwellings per annum is below the housing requirement in Table 2 of 10,961 dwellings per annum (annual housing requirement plus unmet need not provided for). Table 2 is also an under-estimation of housing need because of the exclusion of the identified shortfall in the Black Country of 29,960 dwellings between 2019-2038 of which 7,485 dwellings arise by 2031 (para 4.2). The addition of the Black Country shortfall would increase the housing requirement in Table 2 to 11,585 dwellings per annum. Furthermore, future housing need in Local Plan Reviews will be based on the Government's revised standard methodology for calculating LHN including Step 4 - Cities & Urban Centres uplift of 35%, which is applicable to in Birmingham, Coventry and Wolverhampton (ID 2a-004-20201216). The estimated HLS in 2019 of 205, 382 dwellings set out in Table 3 relies upon unevicenced allowance of 11,413 dwellings from proposed allocations in emerging Local Plans yet to be tested at Examination, an additional urban supply of 19, 410 dwellings and windfall development of 14, 111 dwellings. It is noted that Table 6: Changes in Housing Capacity 2017-2019 identifies a 27% increase of 13, 942 dwellings in Birmingham. The deliverability of residential development in these locations will be dependent upon the viability of previously developed land and the demand for high density living post Covid-19.

The HBF contend that the housing shortfall in the GBBCHMA is greater than 2,597 dwellings shown in Table 5 of the Position Statement because housing need has been under-estimated and HLS has been over-estimated. There is a long history of on-going engagement between the GBBCHMA authorities but to date there is no conclusive engagement from this engagement in relation to strategic cross-boundary matter of redistribution of unmet housing needs from Birmingham and Black Country authorities, which indicates that this engagement is an unsound basis for plan-making. After four years since the adoption of the Birmingham Development Plan in January 2017, which identified an unmet housing need of 37,900 dwellings, there is no agreement on meeting in full the housing needs of the GBBCHMA. There is every likelihood that reaching a consensus on this strategic matter will be lengthy disharmonious process within the GBBCHMA authorities. The Cannock Chase Local Plan should make provision to meet unmet housing needs of neighbouring areas. However, in the absence of any signed SoCG there is no real commitment to resolving the redistribution of unmet housing needs. The GBBCHMA authorities should produce a SoCG setting out where unmet housing need will be met. The approach of the Preferred Options: We support that the Preferred Options recognises this significant housing shortfall across the GBBCHMA and Cannock Chase's commitment to assisting in meeting the unmet housing needs of the neighbouring authorities is reflected in Strategic Objective 3 in Fig 5. Policy SO3.1 sets out that a housing provision will be made for 500 dwellings to meet unmet needs of neighbouring areas and ensuring a sufficient supply of deliverable and developable land is available to deliver around an additional 25 dwellings each year. There is clearly a recognised housing need arising from neighbouring authorities and Cannock Chase are proposing that they assist in meeting this unmet housing need, which is very much supported. However, RPS notes that the Council has chosen to go forward with Housing Growth Option B: LHN figure plus unmet need of an additional 500 dwellings giving a total housing growth figure of 5,612 dwellings for the District (2018-2036) or 312 net dwellings per annum, which was presented in the Local Plan I&O Consultation (May 2019). It is our view that Cannock should consider making a contribution greater than 500 dwellings to assist in addressing the significant shortfall from the GBBCHMA. Notwithstanding the figure of dwellings proposed by Cannock to address the unmet need, we propose that including a policy mechanism in the Cannock Chase Local Plan for the land at York's Bridge, Pelsall would help to demonstrate that the District is helping to meet Walsall, and the wider unmet housing needs of the GBBCHMA and enable the sites full potential to be delivered. Whilst it is acknowledged the principal components of the site, including the site access falling within Walsall District and within the remit of the BCP, it is essential that the Cannock Plan is sufficiently flexible within its policy base, to enable the element of the site which sites within its administrative boundary to come forward, in the event the BCP allocated the principal component of the site for housing. RPS acknowledges, that the element of the site which falls within Cannock would be unlikely to be allocated in isolation and therefore we are suggesting a policy mechanism is provided to ensure an appropriate and sound approach is taken with regard to DtC issues.

The Need for a Policy Mechanism - The SWDP/JCS Example: By way of an example, we set out below how Wychavon District Council and Tewkesbury Borough Council have allocated a cross boundary site to assist in meeting the unmet housing needs of Tewkesbury. A situation which is very similar. [...] The allocation of the land at Mitton is a good example of a commitment to assisting neighbouring authorities in meeting their unmet housing needs under the duty to cooperate through allocation of a cross boundary site. We propose that the land at York's Bridge is committed, in a similar way as the land at Mitton, through one of the following: a) The provision of a policy hook in the Cannock Local Plan, entailing a future review of the Cannock Local Plan to take place and ensure the site's full development potential is realised, in the event that the BCP allocates the site, or b) Removing the land within Cannock Chase from the Green Belt and safeguarding for residential development so in the event that the wider site is proposed for allocation in the BCP Preferred Options it can be released for development. RPS would be happy to work with the Council on the precise wording and to ensure that the Local Plan and its strategic policies establishes the vase for any subsequent change to the Green Belt at this location, given its clear cross boundary basis. As such we propose that Draft Policy SO3.1 is amended in line with one of the following two options a) or b) (See Main Document for Options).

LPPO167	Wyrley Estates	Fisher German LLP - N, Borseley	The estate agrees and supports the housing numbers, however, does recognise the LP needs to make provision for specialist housing types, such as self-builds, live/work units, first homes, among others. However, the 'rural areas' section of Policy SO3.1 needs to include the provision of specialist housing types and enabling development for identified regeneration schemes in rural area, such as Grove Colliery. The estate does have other land which remains potentially available for new housing development, of which may provide such specific specialist housing types.
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LPP0168	The Church Commissioners for England Barton Willmore - A, Bird	<p>We agree that the draft Plan should be contributing to the unmet needs of the GBBCHMA. However, we consider that the current contribution of 500 dwellings is not a sufficient contribution in terms of the scale of unmet needs over the draft Plan period. At paragraphs 6.176-6.182 the draft Plan provides the background to the need for Cannock Chase to accommodate the unmet housing needs of neighbouring authorities. It notes the Birmingham City Council shortfall (established as part of the Birmingham Development Plan, 2017) as well as the more recent Black Country authority's shortfall of 29,260 dwellings for 2019-2038 (established via the Black Country Urban Capacity Study, 2019). The preferred option of a 500 dwelling contribution towards the GBBCHMA shortfall represents the minimum option proposed in the previous Issues and Options Local Plan consultation (2019), which was based upon the Strategic Growth Study (2018) suggested options for accommodating additional development. We consider that the level of contribution should be higher considering the evidence base for the shortfall. It should firstly be noted that since the adoption of the Birmingham Development Plan, no Local Plan has been adopted in the GBBCHMA which provides for Birmingham's unmet needs; the North Warwickshire Local Plan Review has reached the most advanced stage but is not yet adopted (at Examination). Whilst the GBBCHMA Position Statement (September 2020) suggests that the shortfall has reduced to 2,597 dwellings it should be noted that some of the capacity within this statement remains untested via Local Plan examinations and unsecured i.e. within the Position Statement (at Table 3) some of the capacity identified to meet the shortfall is that which is 'emerging' in Local Plans. There is also a significant proportion of windfall supply identified 914,111 dwellings across the GBBCHMA) and not all of the GBBCHMA authorities include a non-implementation discount to their supply (Table 4 of the Position Statement). It is unclear if this is justified. Furthermore, the Position Statement only monitors housing requirements and land supply up to 2031. It does not provide an assessment up to 2031 (end of plan period for the draft Plan). The Position Statement (paragraphs 4.2-4.3) notes the post-2031 picture setting out how the Black Country Authorities have evidenced a significant shortfall of up to 29,000 dwellings between 2019-2038. Some of this shortfall (7,500 dwellings) arises up to 2031, however the majority is beyond. The GBBCHMA shortfall post 2031 will also be further informed by the review of the BDP when it commences. Whilst figures may not be confirmed, the Position Statement concludes that a shortfall post 2031 is emerging (paragraph 6.3) stating it is: "now apparent that there will be a HMA shortfall post 2031, with the Black Country along estimating a shortfall of 29,260 dwellings, which it will consider through the Black Country Plan review. The scale of the post 2031 shortfall for Birmingham, and potentially over authorities, is not yet know, therefore the post 2031 shortfall for the whole HMA cannot yet be calculated." It is clear that the GBBCHMA authorities are of the view a significant shortfall post-2031 will exist. We would also highlight that the recent changes to the standard method for local housing needs (December 2020) result in a 35% uplift to the minimum local housing needs of Birmingham and Wolverhampton, with implications for the wider housing market area shortfall. Consequently, it is considered that the Council should seek to provide further flexibility within the housing land supply to help meet the ongoing shortfall up to 2038.</p>
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At present, the difference between the local housing need for Cannock Chase itself (95,516 dwellings - minimum local housing need) and the housing land supply secured for allocations and permissions of 6,361 dwellings represents a headroom of only 15%. This is reduced to 6% once the 500 dwelling contribution to unmet needs is taken into account. As noted above in response to Question 10, this flexibility may also be lower once non-implementation rates are taken account of. This is less than what has been considered reasonable in other recent Local Plans where unmet needs are also being considered. For instance, in the case of Guildford Local Plan (2019) the Inspector considered that additional 'headroom' in the housing land supply was justified, partly as a result of helping to meet likely unmet housing needs from Woking which whilst not fully qualified was expected to demonstrate an ongoing shortfall in supply. The headroom between the local housing requirement for Guildford (which does not include a specific requirement for Woking's unmet needs) and the supply was around 36%, which was considered reasonable by the Inspector. This also provided flexibility for slippage in the housing trajectory and to address affordability issues. In the case of the South Oxfordshire Local Plan (adopted December 2020) the Inspector supported the housing land supply position that provides the equivalent to a 27% headroom to the housing requirement (which includes local unmet housing needs) [see footnote 1 in response]. The draft Plan should therefore look to provide further flexibility within the housing land supply, equivalent to similar levels considered reasonable in recent Local Plan examinations. This would help to provide for the current shortfall up to 2031 and the significant shortfall post 2031 as detailed in the evidence base. We would also note that there does not appear to be any evidence at this stage on the extent of agreement with other GBBCHMA authorities on the appropriateness of this level of contribution to unmet needs. The Council has not published a separate Duty to Cooperate Statement or any Statement of Common Ground to address strategic policy matters as required by the NPPF (paragraph 27) to date. The PPG 'Maintaining Effective Cooperation' section provides guidance on the format of these statements and states these should be maintained throughout the plan production process and published with the draft Plan (paragraph 020 ID: 61-020-20190315). Given that there are no accompanying Statements of Common Ground the extent of agreement with other local authorities on strategic issues such as the GBBCHMA shortfall contribution is not fully apparent.

LPP0169	Taylor Wimpey (Land East of Wimblesbury Rd)	<p>RPS - P, Hill</p> <p>In principle, yes Cannock Chase should make a contribution towards meeting the unmet needs of neighbouring areas. Nonetheless, RPS notes that the CCLPR (at paragraph 6.179) refers to South Staffordshire proposal to an additional provision of 4,500 dwellings to assist the wider GBBCHMA. However, at this time, South Staffordshire has only consulted on proposals for 'up to 4,000 dwellings' (as set out at paragraph 5.1 of the South Staffordshire Council Local Plan Review - Spatial Housing Strategy & Infrastructure Delivery October 2019) and has yet to issue any further updated material for consultation since that time. It is therefore incorrect for the Council to suggest that other areas are taking more of the housing shortfall than what has been formally concluded on in their own plans up to this point. The implication here is that the Council is assuming more of the unmet need is being catered for elsewhere than is actually the case. Consequently, the Council should reconsider the need for additional housing land from the GBBCHMA shortfall to be accommodated in Cannock Chase. RPS notes that the Council has chosen a preference for taking 500 dwellings (under Growth Policy Option B referred to at paragraph 6.152 of the CCLPR). In light of the comments raised above, RPS contends that Cannock could, and should, consider making a contribution greater than 500 dwellings for the unmet housing numbers emanating from the GBBCHMA.</p>
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Question 12: We know the large strategic allocations at South of Lichfield Road and East of Wimblesbury Road will need to address the congestion issue at Five Ways island and will require a new primary school, are there any other infrastructure requirements they or any of the other strategic allocations should address?

LPPO170	L & J, Astbury	<p>We were dismayed to find that Heath Hayes has been suggested for both removal from Greenbelt and earmarked for yet more housing development. Three areas of concern. The development on Wimblebury Road, initially for 150houses opposite Heath Hayes Primary School, followed by 400 plus houses further up the road. This area looks to be removed from the Greenbelt? The development on Cannock Road/Lichfield Road? A development on the Hednesford Road opposite the new Crematorium? In our opinion these developments are excessive and we would like to know how the road network is going to cope with these proposals? The area around Five Ways is already subject to poor quality air condition. The tailbacks past our house which is close to said island are horrendous. Can you tell us how soon these proposals are likely to come to pass and also what you would be doing to mitigate an environmental disaster?</p>
LPPO171	Hazel Slade & Rawnsley Community Association - D, Williams	<p>The potential development I Rawnsley Road (submission made in the Autumn of 2020) H30 cannot address the many strategic (AONB, SSSI, SAC, SBIS) and local constraints (severe contours of land, drainage, service provision) as a viable development, and the land should be redesignated as originally proposed in 2014.</p>
LPPO172	Natural England- G, Driver	<p>We advise that there is a requirement for green and blue infrastructure. Green/blue infrastructure is the network of green/blue spaces and natural elements that intersperse and connect our cities, towns and villages. It is the open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage and open countryside. Green blue/infrastructure provides multiple benefits for the economy, the environment and people and will be essential in reducing recreational pressure on protected sites such as Cannock Chase SAC. Further information on green/blue infrastructure can be found here.</p>
LPPO173	Severn Trent	<p>All strategic allocations should consider how they will dispose of surface water. The outputs from the recent Water Cycle Study should be utilised to identify sites where surface water disposal may be an issue. A holistic surface water strategy should be considered for the major allocations in this area to ensure they do not discharge surface water to the combined sewer network.</p>
LPPO174	Taylor Wimpey (Land East of Wimblebury Rd) RPS - P, Hill	<p>Infrastructure Issues relating to SH2: RPS acknowledges that any new major residential development is likely to generate a need for additional infrastructure. Such provision should, in principle, meet Regulation 122 of the Community Infrastructure Levy Regulations 2020, which requires that any planning obligations must comply with the three relevant tests [...]. In relation to the highway impact of the land South of Lichfield Road and East Wimblebury Road, TW will aim to work closely with the highway authority to ensure an appropriate highway mitigation package is produced and delivered to address congestion issues at Five Ways island and the proportional impact from its proposals. In relation to the provision of a new primary school at SH2, RPS accepts that such provision could, in principle, meet the first two tests listed above as the new homes provided are likely to generate a demand for additional school places from school aged residents living at the development. RPS assumes that any new school would then be located on SH1. The provision of a new school on site SH2 would not be appropriate, given the delivery of 410 homes on the site. This is because the total expected delivery from both sites would total 1,285 dwellings but the majority would be located on SH1 (875 dwellings). The developable area of SH1 is estimated by the Council to be in the region of 25.5ha, more than double the equivalent area available at SH2 (11ha). On this basis, RPS contend that a fair and equitable solution would be to locate the new primary school on land at SH1, rather than at SH2. By doing so, this would provide the opportunity for the developer of SH2 to help fund the proposal for the new school through developer contributions secured via a section 106 agreement on approval of development at the site. This would, in RPS opinion, address all three tests under the CIL Regulations. Such an approach could also be written into the site-specific policy for the site (see response to q14 in chapter 5 of this submission). It is understood this is the intention for SH1, given the master planning proposals already presented by the promoter of SH1 for on-site provision at Land South of Lichfield Road. The policies for both sites therefore need to clarify this position and make it clear that delivery of a new school on SH1, should not prevent delivery of SH2 and in effect financial contribution from TW land interests if appropriate to address school capacity should only be held by the County until such a stage when delivery of the school on SH1 comes forward and this does not in any way hinder delivery of SH2.</p>

Question 13: Do you support the proposed allocations of the sites listed in Tables B and C?

LPPO175	L, Barratt		Why has site H30 been included in Table C page 78, 6 Local Planning Options, when it has been identified in Appendix 11 in the SHLAA, as restricted and unsuitable for development.
LPPO176	Archdiocese of Birmingham, Deacon P. O'Connor		As landowner of H53, I can confirm that the Archdiocese supports the allocation of Land of Lichfield Road, Rugeley for residential development. I can also confirm that the site will be available in the plan period as there is an intention to progress as soon as is practical. Noting the density, the final provision on-site will be influenced by conservation, design and viability requirements and therefore there may be some opportunity for a high density if the proposal satisfies Development Management requirements.
LPPO177	Inland Waterways Association, P, Sharpe		IWA notes that policy SO3.1 on new homes includes an allocation in Table C of site H49 for 40 houses. The road access over the canal bridge is narrow and steep with no footpath and poor sight lines. The bridge dating from 1770 is of considerable heritage value and in the Trent & Mersey Canal Conservation Area. Any development here should be low density, no more than 2 stories high, set well back from the canal to preserve as much as possible of the tree cover in order to help screen the industrial area from the canal, to limit its impact on the Conservation Area, and to limit additional traffic over the canal bridge.
LPPO178	A, Boot		I object to the fact that the Preferred Spatial Strategy doesn't include my land for the following reasons: 1) I have been approached by CCDC to apply for a Travellers Caravan Site on my land some five years ago or more, which would have included heavy machinery and HGV Vehicles using a very poor road surface. 2) Currently, Commonsides, as a highway is very poorly maintained by CCDC. There are several potholes beyond repair throughout the length of the road that are constantly refilled to no avail (Photographs are available if required). This road would be properly resurfaced by any building scheme. 3) Part of the Land at 89 Commonsides has already been developed to include three additional properties. 4) Part of the Land at 89 Commonsides is licensed for HGV vehicles and is currently in full use. 5) Commonsides has been 'land locked' since the commencement of the M6 Toll development and has therefore become detached from the Green Belt Area. In fact, a development almost identical to the one I propose (although somewhat smaller in size) has actually taken place on Land at Walsall Road, Norton Canes WS11 9PW under planning reference CH/18/176, some 67 dwellings. This land is situated on the other side of the M6 Toll (next to my land, Postcode WS11 9PY). 6) The Land at 89 Commonsides is suitable for all types of housing, including affordable and I feel should be considered as part of the Preferred Spatial Strategy. In conclusion, I would like to point out that I have been approached by several large building consortiums. Any development of my land would assist your Core Housing Strategy and has the full support of all my neighbours.
LPPO179	St Modwen	RPS - P, Hill	We have been instructed by St Modwen to submit these comments relating to Land West of Pye Green Road (the site). RPS is supportive of the decision to review the Local Plan, in particular to roll forward the time period until 2036 and retain the land West of Pye Green Road as a strategic allocation. As the Council is aware, the site measures over @60ha and is allocated as a Strategic Site under Policy CP6. For the reasons explained below St Modwens consider the site should continue to be recognised as a strategic site in the Local Plan Review and for the reasons explained below, the level of housing (as has always been maintained by St Modwen) suitable at the site is considerably in excess of 900 dwellings. The increased capacity has come about as a direct result of the approved reserved matters applications delivering housing development at a density significantly higher than was anticipated in the original outline consent, along with the original masterplan proposals for on-site sports pitches not being a requirement, due to the off-site 106 contribution in its place, in effect freeing up additional space on the site. As identified above, however, the true capacity for the site is in excess of the strategic allocation in the adopted plan, with additional areas of the site having been delivered or consented. As indicated in the table below, the additional areas of land (Areas E and I) will indicatively deliver an additional 129 dwellings (Area E is 51 dwellings and Area I is 78 dwellings) whilst retaining the existing level of SANGS/School/Local Centre. Overall, this would increase the site wide capacity to 1,000 dwellings. It should be observed that both sites at Area E and Area I at Pye Green are included under Section 6 at Table B under references H16 and H17. St Modwen supports the sites contained within Table B and C.
LPPO180	Cannock Chase AONB Partnership		The proposed allocation of site H30 for 60 houses, concerns the AONB. The SHLAA 2020 categorises this site under 'Greenbelt, AONB and Restricted Sites'. The site directly abuts the AONB boundary and forms an integral component of its setting. The site's sloping landform challenges potential development of 60 houses to be delivered in an appropriately sympathetic manner that responds to landform and can accommodate landscape structure that would assimilate the development into the landscape and deliver visual mitigation, so there is a high risk that development would have detrimental effects on the landscape and natural beauty of the AONB. The AONB requests this allocation is reconsidered. H47 - this site is in the immediate setting of the AONB, on previously developed land. Chetwynd Coppice Ancient Woodland lies less than 150m from the site boundary. This woodland is already detrimentally affected by disturbance and compaction due to user pressure. Should this site be allocated for housing, and to ensure preferred Policy SO7.1 is complied with, the AONB requests the Authority prepares a development brief setting out expectations for development that minimises impacts on the AONB and its setting, along with provision of high-quality green space on the site. The AONB would welcome measures to deliver enhancements to Chetwynd Coppice through developer contributions.
LPPO181	Bromford Housing Group	PlanIt Planning and Development - J, Williams	We support the identification of site H30, for residential development by the emerging Plan. The site is subject to a planning application submitted on 26/10/2020 (CH/20/381) by Bromford Housing Group. The Applicants are currently in discussions with the local authority and are working with Officers towards a positive determination of the application. It is anticipated by the time that the emerging Plan is at pre-submission consultation stage the application will have been approved. The site is approx. 2.3ha in size and triangular in shape. It is currently used as grazing and is relatively featureless. The proposal has a number of significant benefits including: - The site is in a sustainable location for development with access to public transport opportunities and to services and facilities within the local neighbourhood. - The proposal will make a positive contribution to the emerging Plan's housing requirement by developing a site which is in the main urban area of Cannock, as shown on the Policies Map of the adopted Cannock Chase Local Plan. - The site is an underused land resource comprising rough grazing land. - Significantly, all of the proposed dwellings will be affordable in accordance with the definition contained within the NPPF. The proposal will therefore make a significant contribution to the current affordable housing shortfall within the District. As referred to in our response to Policy SO3.1, the emerging Plan does not plan to meet the full affordable housing requirement. This emphasises the benefit of this site being brought forward for residential development.

LPPO182	A, Barratt	I am sure that you will be aware that site H30 is currently the subject of a planning application on behalf of Bromford Housing Association. There is considerable opposition to this proposal (approx. 130 objections) from local residents. The detail and range of objections can be viewed on your website. The objections range from the unsuitable nature of the site, i.e. the topography, the level and extent of earthworks necessary to form a platform for development which even when carried out would appear to provide poor access for people with disabilities. The visual impact on the adjoining AONB and the SSSI (Hednesford Hills), the traffic impact and the limited local facilities and amenities, doctors surgeries, shops etc. This development represents a scheme of 60 low spec affordable dwellings. The site is currently a valuable area of green space to the local residents which while it is not public open space its use as a paddock to graze horses enhances the local environment to the valued enjoyment of local people. It is considered that in Planning terms the development of this land for affordable social housing is clearly at odds with good Planning aims and objectives. Immediately adjacent to the proposed site is the Eastgate/Westgate estate and opposite the site are a range of terraced houses all of which represent social and affordable homes. How can the proposal to construct a further 60 affordable homes in this area represent an integrated approach in Planning terms to include house types and sizes reflecting the social and economic spectrum of a vibrant community.
LPPO183	Historic England - E, Boden	Historic England's detailed comments on the proposed housing allocations assessed within the Council's HIA can be found at Appendix A to this letter. However, Historic England notes that there are a number of proposed housing allocations that have not been assessed, but which may have an impact on the significance of a heritage asset/s and therefore considers that these would benefit from such an assessment, prior to allocation. These include: H37, H48, H49, H51 and H53.
LPPO184	Hazel Slade & Rawnsley Community Association - D, Williams	Site reference H30 has already been subject to planning application refusal in 1999. A full application made in 2020 did not fulfil all the requirements that determine the suitability of development in this particularly sensitive location, and consequently may be subject to further unwelcome consideration by the Planning Committee. We do not support site H30 and cannot sensibly comment on other sites identified.
LPPO185	Natural England- G, Driver	We provide the following advice on the proposed allocations listed in Tables B and C. Table B: All the sites will have potential for recreational impacts Cannock Chase SAC/SSSI and potentially air quality impacts on the Cannock Chase SAC/SSSI, Cannock Extension Canal SAC and West Midland Mosses SAC. The sites below have the following additional potential impacts listed below: H16/H17 - very close proximity to Cannock Chase AONB. Table C: All the sites will have potential recreational impacts Cannock Chase SAC/SSSI and potentially air quality impacts on the Cannock Chase SAC/SSSI, Cannock Extension Canal SAC and West Midland Mosses SAC. The sites below have the following additional potential impacts listed below: SH2 (part) Land to the East of Wimblebury Road, Heath Hayes • Close to Chasewater and Southern Staffordshire Coalfield Heaths SSSI-significant recreational impact, potential water quality/quantity and air quality impacts. • Hydrological linked to Chasewater and Southern Staffordshire Coalfield Heaths SSSI (unit 13) and consequently Cannock Extension Canal SAC. • Site is adjacent to priority habitat- deciduous woodland. H30: • Significant recreational impact on Cannock Chase SAC and Hednesford Hills (Chasewater and Southern Staffordshire Coalfield Heaths SSSI which is part of the functional connectivity of Cannock Chase SAC). • Significant landscape/visual impacts on the setting of the AONB. • Loss of priority habitat -lowland acidic grassland. • See NE's response to the current planning application CH/20/381 for further details. H29, H44 and H47: • See NE's response to the current planning application CH/20/381 for further details. We advise you to look at the Cannock Chase AONB Views and Setting Guidance to help understand and assess potential impacts on the AONB from the proposed allocations.
LPPO186	Sport England - R, Bahey	In viewing the interactive proposal plan it is noted that SH1, H35 and H50 are proposed allocations. The sites are either active or lapsed sports and recreation sites and the loss of provision should be replaced where appropriate in line with the requirements of NPPF para 97 or in the case of lapsed sites contributions towards enhancement to existing sports sites could be sought to address shortfalls identified within the Council's Playing Pitch Strategy. Sport England would welcome further discussions regarding this matter.
LPPO187	Lichfield District Council - S, Stray	LDC note the cross boundary planning application for the Power Station site that gained outline planning permission on 8th April 2021 with the Reserved Matters planning application forthcoming and also the sites allocation with the PO document for 1,000 dwellings (H20: Table B) and employment land identified within Table F of Policy SO4.2. We note that the split of uses and dwellings will be based on the administrative boundaries between the two authorities with the larger proportion of homes being located within Lichfield District.
LPPO188	Severn Trent	The following table summarises some of the sites where we envisage potential risk to the sewerage network depending on how they come forward. These risks are not confirmed nor are they "show stoppers" they are purely an indication of sites which are in a location or of a size where there may be an impact to the sewerage network which requires infrastructure capacity work. The surface water risk indicates that a site may not have a sustainable surface water disposal option from the drainage hierarchy and could end up discharge flows to the combined network.
LPPO189	Home Builders Federation - S, Green	Policy SO3.1 allocates new housing sites within the existing urban areas and as sustainable urban expansions. There are 5 strategic housing allocations for approximately 1, 538 dwellings. Table B comprises of 12 sites for circa 1,432 dwellings. Table C comprises of 27 sites for circa 1,007 dwellings. The HBF have no comments on individual sites proposed for allocation but an accurate assessment of availability, suitability, deliverability, developability and viability should be undertaken. It is critical that the Council's assumptions on lead in times and delivery rates are correct and realistic, which should be supported by parties responsible for the delivery of housing on allocated sites. The Council's HLS should provide a sufficient supply of land to meet the housing requirement, to ensure the maintenance of a 5YHLS and to achieve HDT performance measures. The 2019 NPPF sets out that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and if appropriate to set out the anticipated rate of development for specific sites (para 73). Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies. There should be a short and long-term supply of sites on brownfield and greenfield land. The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides competition in the land market. A diversified portfolio of housing sites also offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. As set out in the 2019 NPPF at least 10% of the housing requirement should be accommodated on sites no larger than 1ha or else demonstrate strong reasons for not achieving this target (para 68a). For Cannock Chase, 10% of the housing requirement is approximately 600 dwellings. The Council should confirm that this national policy requirement will be achieved.

LPPO190	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The inclusion of land within Table C is queried. This includes numerous sites within the urban areas which are still fully operational and the likelihood of them becoming available for alternative housing development of the LP period is open to conjecture. As a result the overall provision of housing within the Plan, as it is reliant on Tables B and C, is questioned.
LPPO191	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The inclusion of land within Table C is queried. This includes numerous sites within the urban areas which are still fully operational and the likelihood of them becoming available for alternative housing development of the LP period is open to conjecture. As a result the overall provision of housing within the Plan, as it is reliant on Tables B and C, is questioned.
LPPO192	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The inclusion of land within Table C is queried. This includes numerous sites within the urban areas which are still fully operational and the likelihood of them becoming available for alternative housing development of the LP period is open to conjecture. As a result the overall provision of housing within the Plan, as it is reliant on Tables B and C, is questioned.
LPPO193	A, Newton	CT Planning - P, Kreuser	This representation is made on behalf of Mr Andrew Newton with respect to Land at UK Architectural Antiques, Hayfield Hill, Cannock Wood, Staff, WS15 4RU, shown marked red on the attached Location Plan 4721.77. Land at Hayfield Hill comprises some 0.6ha of previously developed land. Additional land in the ownership of Mr Newton is shown marked blue on the attached plan. Object to Policy SO3.1, and particularly Table C - Proposed Allocations. All the proposed 27 allocations in Table C are located within or adjacent to the urban areas of Cannock/Hednesford/Heath Hayes, Rugeley and Norton Canes. There are no allocations within the rural villages. The Spatial Strategy and consequently Table C should be amended to allocate appropriately sized housing allocations in the key rural villages. Such allocations will help support local housing and community needs. Land at UK Architectural Antiques, Hayfield Hill is located closed to the existing settlement boundary for Cannock Wood. The site comprises previously developed land. It is appropriately located as a housing allocation. The site is located in a sustainable location: Chaserider bus service 62 runs along Hayfield Hill adjacent to the site providing a service between Chase Terrace/Sankeys Corner and Cannock. Cannock Wood has a village hall and shop and a nearby primary school. Additional community services and facilities can be found at Sankey's Corner some 2km from Land at UK Architectural Antiques. There is a footpath along Hayfield Hill. It is submitted that the site should come forward for residential development for some 20 dwellings. Such new dwellings would serve a local need and would help maintain and enhance the vitality of the village. There is also sufficient land within the wider land holding to provide additional woodland planting and public access to offset the loss of Green Belt land as part of any compensatory improvements to local quality and accessibility in line with the requirements of paragraph 138 of the NPPF. The Settlement Boundary to the south of Cannock Wood should be extended to include Land at UK Architectural Antiques and the site allocated for residential development in Table C to Policy SO3.1.
LPPO194	Pentalver Cannock Limited	Tetra Tech Ltd - N, Abbott	Our comments are in relation to the former Rumer Hill Industrial Estate to the south east of Cannock Town Centre which under the Preferred Options Local Plan is currently proposed to be allocated for employment purposes under site E3 in Table F (Employment Site Allocations). The allocation follows the grant of the March 2020 planning permission (CCDC ref: CH/19/280) for the expansion of the container storage depot. As a result both of the impacts of the pandemic and their operating requirements, the landowner, Pentalver Cannock Limited is no longer looking to implement the planning permission for the expansion land and consider, due to its location adjacent existing residential properties on Rumer Hill Road that the site is suitable for residential development and therefore request that the site is included as a residential allocation to be added to Table C. As the Council will know, back in 2020 the land was the subject of an outline application for residential development (CCDC ref: CH/10/0364) which was supported both by officers at the time and the members of the Planning Control Committee although ultimately that application was withdrawn. It is also noted that within the Council's Local Plan Preferred Options Development Capacity study which provides part of the Local Plan's evidence base, Section 6.3 identifies three sites including the former Rumer Hill Industrial Estate land which are stated may offer capacity for housing development in the longer term but are currently being used for, or in this case, were proposed for alternative uses i.e. employment use. The report then goes on to state that the sites will be monitored overtime to see if they could be included as part of the longer-term housing capacity. In light of the above and the current circumstances and objectives of Pentalver Cannock Limited., we would hope that the Council would agree to allocating this land for residential purposes. The western-most part of the former Rumer Hill Industrial Estate land is owned by the Coal Authority as a mine water lagoon and therefore is excluded from the land available for residential development. The land available for residential allocation is shown edged on the plan below and amounts to 2.38ha in area. Applying a notional 35 dwelling per hectare density assumption suggests that the land has capacity for up to 99 dwellings. Any future residential scheme will need to include suitable acoustic mitigation measures to ensure that the operation of the adjoining container terminal is not adversely impacted.
LPPO195	The Church Commissioners for England	Barton Willmore - A, Bird	The proposed allocations listed in Tables B and C include a number of brownfield redevelopment sites within the urban areas. Whilst we are supportive of the principle of utilising brownfield redevelopment sites within the urban areas. Whilst we are supportive of the principle of utilising brownfield redevelopment sites as far as possible (in line with the NPPF, paragraph 137 and Chapter 11) in order for the housing strategy to be effective it should be ensured that the sites identified are capable of being delivered over the draft Plan period (as per the NPPF, paragraph 67). For instance, there are some proposed site allocations within town centre/existing urban areas may have more complex suitability and land availability considerations to factor in the SHLAA (2020). For example, proposed allocation M1 (Multi Storey Car Park, Market Hall and Retail Units, Cannock) for 40 dwellings, where the SHLAA (Site Reference states C504) states this is part of a wider redevelopment scheme and the site is located adjacent to a Conservation Area and a listed building. Former employment sites, such as proposed allocation H47 (Former Kodak and Milk Depot, Brereton) may have land contamination issues to address (as noted within the SHLAA, Site Reference R43 (a) (b)) and lie within existing industrial estates, giving rise to issues regarding amenity. By providing further flexibility within the housing land supply via additional allocations for sites which are suitable, available and achievable, the draft Plan would be able to better mitigate the risks associated with some of the proposed allocations and providing a greater 'contingency' in the event that their delivery is delayed, or they do not come forward. This would ensure the housing strategy is effective.
LPPO196	Staffordshire County Council - J, Chadwick		We have not reviewed each of these, but provisionally yes, so long as they have been assessed as part of the HIA exercise, and any potential harm can be mitigated as per the recommendations of that report. Further archaeological evaluation and recording works may be required as per NPPF 189 and 199 for specific applications.

LPPO197	Taylor Wimpey (Land East of Wimblebury Rd)	RPS - P, Hill	Proposed Site Allocation SH2: Policy SO3.1 of the CCLPR identifies a number of new proposed housing allocations, including SH2 East of Wimblebury Road, with a suggested capacity of approximately 410 dwellings. Site SH2 is listed in Table C of the CCLPR under this policy. [...] The principle of this allocation is strongly supported. RPS notes that the Cabinet report seeking approval to undertake consultation upon the preferred options version refers to the site having capacity for 260 homes, while text in the preferred options version (at Table c) also refers to a capacity for 150 homes as identified through the Cannock Chase District Development Capacity Study 2021. It is understood that these figures relate to the additional capacity that would be created through the release of additional land from the Green Belt (under SHLAA ref C279), and the capacity of the current safeguarded area respectively (under ref C84). Together, these two figures sum to the 410 dwelling capacity stated in Policy SO3.1: Provision for New Homes. RPS supports the proposed allocation of Land East of Wimblebury Road, Cannock (SH2) for 410 dwellings in the CCLPR. The only policy constraint impacting on the site (C279) relates to the current Green Belt designation covering that portion of the site as a whole. The SHLAA 2020 (Appendix 10 and 11) identifies some potential constraints relating to sub-parcels, but these relate more to proximity to those constraints, rather than factors affecting the suitability of the site directly. As highlighted in the previous chapter, TW has commissioned new evidence, which will address all technical issues relating to the site and thus, will support the contention that site SH2 is suitable for residential development following the release of sub-parcel C279 from the Green Belt. Proposed Policy for Site SH2: It is acknowledged that the Regulation 19 Plan will contain policies for the individual allocations. Set out below is proposed wording for a site-specific allocation policy for Land East of Wimblebury Road (SH2). It draws on the overarching policy approach set out in Policy SO3.1 (Provision of New Homes) to inform the range of criteria that development at the Site should, reasonably, be expected to address. [See document for draft text].
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Question 14: In the next iteration of the Plan we will develop site specific allocation policies. Are there any local infrastructure requirements the sites in Tables B and C should address?

LPPO198	D, Hughes		General comments about the CCLP for Brereton and specifically the proposals for housing for the sites marked as R43 (H47) which appears to be converting various business use sites to housing developments on Redbrook Lane. I believe there are opportunities to solve some traffic problems in the area. With large numbers of huge trucks running through the mainly residential areas of Ravenhill and Brereton down past the CO-OP to access the A460 Main Road, Brereton. These trucks have consistently intimidated local traffic and chewed up the road surfaces in these areas causing numerous potholes which tend not to get repaired. It seems there is an opportunity (when the residential developments go in at the R43 sites) to separate the industrial and business uses that are located up Redbrook Lane, The Levels and Kimberley Way and closing that access from the business area. Instead forcing commercial traffic out via Colliery Road and discouraging them from cutting through the narrow roads of the residential areas. If heavy business traffic is not going to be tracking through the adjacent residential areas on a regular basis in the future, perhaps the severe traffic calming measure in these areas (Redbrook Lane, Birch Lane, Talbot Road and others) could be lowered so as to reduce the damage to normal cars.
LPPO199	Archdiocese of Birmingham, Deacon P. O'Connor		H53 - Given that this is a brownfield site, there are no infrastructure blockages to development, there should be no concern regarding the final total of dwellings.
LPPO200	St Modwen	RPS - P, Hill	Specifically in relation to infrastructure requirements associated with Areas E and I (H16 and H17), the Council will be aware that the proposals themselves contain both on site infrastructure (SuDS/Access etc) and additional off-site infrastructure through the provisions with the Section 106 for each site which have now reached an advanced stage and contain proposals for additional infrastructure proposals which fully mitigate the impacts of both developments. In addition to which both parcels are CIL liable. Therefore, no additional infrastructure proposals are required, beyond those already committed in respect of the Land West of Pye Green Road site.
LPPO201	Hazel Slade & Rawnsley Community Association - D, Williams		We would not wish to see site H30 incorporated in any plan. There are already significant infrastructure deficiencies. E.G. high speed broadband, footpath between Rawnsley Road and Rugeley Road.
LPPO202	Severn Trent		For the sites in the above table that have a "surface water constraints" as medium or high; these sites may benefit from some form of policy around how they manage surface water to ensure they can come forward sustainably.
LPPO203	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Any infrastructural requirements should be proportionate and reasonable in the same way that infrastructure requirement for the larger strategic allocations must also be. They must also be subject to detailed viability appraisal.
LPPO204	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Any infrastructural requirements should be proportionate and reasonable in the same way that infrastructure requirement for the larger strategic allocations must also be. They must also be subject to detailed viability appraisal.
LPPO205	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Any infrastructural requirements should be proportionate and reasonable in the same way that infrastructure requirement for the larger strategic allocations must also be. They must also be subject to detailed viability appraisal.

LPPO206 In response to Question 13, specialist accommodation for older people should be located in a variety of spatial forms to provide the greatest choice for future residents. Sites should be allocated for specialist accommodation with evidenced housing targets produced for this use. A needs assessment should be produced to determine the current and anticipated provision of housing for older persons in all tenure types. Many Councils argue that older persons accommodation should be provided through windfall sites alone. The provision of specialist housing for this population through windfall sites alone is not sufficient. In combination, the allocation of sites through strategic housing areas, windfall sites, and specific specialist accommodation allocations will allow CCDC to set targets for the number of specialist housing for older people with a more targeted approach to the provision of housing for this growing population. Finally, I would also draw your attention to the NPPG Paragraph 4 (Ref ID: 63-004-20190626) which states that the future needs for specialist accommodation for older people should be broken down by tenure and type. The sites proposed for allocation in tables B and C do not explicitly state whether any such strategic or other site allocations will include the requirement for housing for older people, despite this being supported by the majority of representations to the previous consultation on the Reg 18 Issues and Options consultation (para 6.203). Further, we direct the Council to the enclosed document titled 'Representation by Inspired Villages' 9 November 2020, recommendations one, two, three and four in particular.

SO3.2: Housing Choice

Question 15: Do you support the level of provision of affordable dwellings?

LPPO207	Walsall Council - N, Ball		Given that some of the housing proposed will meet needs arising from the Black Country, it is important that this includes a good proportion of affordable housing. Paragraph 6.206 of the Plan states that the Local Housing Need Assessment calculated that 37% of the new housing proposed should be affordable dwellings. However, the proposed policy direction only states that at least 20% of dwellings should be affordable (and this policy will only apply for developments above 10 homes). The proposed policy is ambiguous in respect of whether it applies to sites of above 10 homes or 10 homes or more.
LPPO208	Bromford Housing Group	PlanIt Planning and Development - J, Williams	Objective 3 of the emerging Plan states that developments of 10 dwellings or more should provide at least 20% of the total number of houses as affordable properties. We fully support the provision of affordable housing. It is a clear aspiration of the Framework to ensure that affordable housing is provided where it is needed. However, 20% affordable housing provision is insufficient to meet the affordable housing requirements of the District. As referred to in our representations to Policy SO3.1, approximately 40% of the total housing requirement would need to be delivered as affordable dwellings to meet the identified affordable housing need. This is not, however, possible, due to viability constraints and as such it is not possible or appropriate to increase the percentage level of provision further. It is, therefore, our view that it would be beneficial for the Plan to make it clear that significant weight will be afforded to development proposals that provides in excess of 20% affordable housing. This will assist the local authority in delivering much needed affordable homes.
LPPO209	Norton Canes Parish Council		Policy SO3.2 concerning affordable housing and housing standards this is broadly supported. However given the support at National policy level, clear evidence of need and the fact that other Local Plans include such a policy, it is wished to see a requirement for a percentage of small bungalows designed for the elderly on major new housing development sites to be a requirement.
LPPO210	West Midlands Housing Association Planning Consortium	Tetlow King Planning - L, Stoaite	The Council should set the affordable housing requirement at a level which viably maximises delivery on all sites, enabling delivery in a wide range of circumstances. The preferred policy direction states that the Council will be looking to set a threshold of at least 20% affordable housing on sites for major applications. We encourage the Council to be ambitious in setting its affordable housing thresholds, particularly as the preferred options document states at paragraph 6.206 that 37% of new housing proposed should be affordable dwellings, and that "the need for affordable dwellings across the district will not be met in entirety by this plan" (Paragraph 6.213). The Council should seek to maximise on-site delivery of affordable housing where this will meet needs, and consider off-site financial contributions as an exception, in line with the revised NPPF expectation for viability discussions to become truly exceptional. We see that the policy direction also outlines the Council's preferred affordable tenure split as "80% for rent and 20% for intermediate housing or other routes to affordable home ownership". The Council will need to clarify if this is social or affordable rent and will need to justify this tenure split with robust evidence that takes into consideration of all of the affordable housing tenures available on the market following the revisions to the NPPF affordable housing definition in 2019. The HAPC recognises that the government intends to introduce First Homes as an alternative affordable home ownership product, which will require local planning authorities to secure First Homes as 25% of the affordable housing contribution. The exact detail is yet to be confirmed in a forthcoming Written Ministerial Statement, but we are concerned that the First Homes requirement will squeeze out shared ownership as alternative affordable homeownership tenure. Notwithstanding the requirement for First Homes, we hope that Cannock Chase will continue to support shared ownership as an affordable homeownership tenure which is a well-recognised and enables many to access the property ladder. Clearly the requirement for First Homes is another considering in determining the appropriate tenure splits for the district and therefore 80% rent does seem too high. It remains appropriate for the Council to set a district-wide policy of encouraging development to deliver a sufficient mix of house types, tenures, and restrictions to meet specific needs where these occur, and as viable. The Local Housing Needs Assessment (LHNA) (2019) reveals an annual need of 110 affordable dwellings between 2018 and 2038, of which, 11% are needed to be one bed, 65% two bed, 16% 3 bed and 8% 4+ bed. The preferred housing mix at Table D on page 79 aligns with these findings. Policy on housing mix should reference not only the most up to date evidence base but allow developers to demonstrate how proposals will meet local needs in accordance with any other up to date evidence, such as housing need surveys, the housing register, and reference to existing stock. We are therefore pleased to see that the tenure mix and type of affordable provision will be agreed with the Council's housing manager on a site by site basis and secured through an appropriate legal agreement. We note at paragraph 6.210 that S106 agreements will be expected to ensure that affordable housing remains at an affordable price in perpetuity. While it is true that the NPPF requires provisions for affordable rented properties to remain at an affordable price for future eligible households, it does not remove the right for housing associations to sell their affordable housing on non-rural exception sites. The NPPF's sole reference to retaining affordable housing in perpetuity is in Annex 2 where this is sought for affordable housing delivered on rural exception sites only. This principle is appropriate and supported by our Members as this helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported. We are therefore pleased to see that the Council will support the delivery of affordable housing on rural exception sites in line with draft policy SO3.1.

LPPO211	Home Builders Federation - S, Green		The Council's preferred policy approach on sites of 10 or more dwellings is for at least 20% of dwellings to be affordable housing, with 80% for rent and 20% for intermediate housing or other routes to affordable home ownership. The Council should viability test the provision of at least 20% affordable housing. At Examination, viability will be a key issue in determining the soundness of the Local Plan. In plan-making, viability is inseparable from the deliverability of development. Therefore, the viability of individual developments and plan policies should be tested at the plan making stage. Without a robust approach to viability assessment, land will be withheld from the market and housing delivery will be threatened. Viability assessment should not be conducted on the margins of viability. The Council's proposed affordable housing tenure mix is inconsistent with national policy. The 2019 NPPF promotes affordable home ownership by requiring at least 10% of new dwellings built to be available for this tenure leaving only the remained for other affordable housing tenures (para 64). The Government's Changes to the Current Planning System (ended on 1st October 2020) and The Government's consultation on Draft Revisions to the NPPF (ended on 27th March 2021) also propose further changes to facilitate the delivery of First Homes. The Council's proposed affordable housing tenure mix should be amended to accord with national policy.
LPPO212	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The proportion of affordable dwellings is identified at 20% with 80% of this for rent and 20% for intermediate housing or other routes to affordable home ownership. The Government have identified in the NPPF (para 64) that they are seeking to provide 10% of all new units across the board as available for affordable home ownership. The approach set out in the Preferred Policy Direction in the LP would not deliver this requirement. The Policy Direction identifies hat 20% of the total would be affordable and of this one fifth would fall within the intermediate housing bracket which would include routes to affordable home ownership. Rather than delivering 10% of the total this would deliver only 2% falling within the intermediate bracket and even if this was given entirely over towards the Government's proposed requirement for affordable home ownership would not deliver 10%. The Government's Changes to the Current Planning System (ended on 1st October 2020) and the Government's consultation on Draft Revisions to the NPPF (ended on 27th March 2021) also propose further changes to facilitate the delivery of First Homes. The Council's proposed affordable housing tenure mix should be amended to accord with national policy.
LPPO213	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The proportion of affordable dwellings is identified at 20% with 80% of this for rent and 20% for intermediate housing or other routes to affordable home ownership. The Government have identified in the NPPF (para 64) that they are seeking to provide 10% of all new units across the board as available for affordable home ownership. The approach set out in the Preferred Policy Direction in the LP would not deliver this requirement. The Policy Direction identifies hat 20% of the total would be affordable and of this one fifth would fall within the intermediate housing bracket which would include routes to affordable home ownership. Rather than delivering 10% of the total this would deliver only 2% falling within the intermediate bracket and even if this was given entirely over towards the Government's proposed requirement for affordable home ownership would not deliver 10%. The Government's Changes to the Current Planning System (ended on 1st October 2020) and the Government's consultation on Draft Revisions to the NPPF (ended on 27th March 2021) also propose further changes to facilitate the delivery of First Homes. The Council's proposed affordable housing tenure mix should be amended to accord with national policy.
LPPO214	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The proportion of affordable dwellings is identified at 20% with 80% of this for rent and 20% for intermediate housing or other routes to affordable home ownership. The Government have identified in the NPPF (para 64) that they are seeking to provide 10% of all new units across the board as available for affordable home ownership. The approach set out in the Preferred Policy Direction in the LP would not deliver this requirement. The Policy Direction identifies hat 20% of the total would be affordable and of this one fifth would fall within the intermediate housing bracket which would include routes to affordable home ownership. Rather than delivering 10% of the total this would deliver only 2% falling within the intermediate bracket and even if this was given entirely over towards the Government's proposed requirement for affordable home ownership would not deliver 10%. The Government's Changes to the Current Planning System (ended on 1st October 2020) and the Government's consultation on Draft Revisions to the NPPF (ended on 27th March 2021) also propose further changes to facilitate the delivery of First Homes. The Council's proposed affordable housing tenure mix should be amended to accord with national policy.
LPPO215	Friel Homes Ltd	CT Planning - P, Kreuser	[...] Support the inclusion of Policy SO3.2 Housing Choice and Housing Mix Table D in the Local Plan Preferred Options. Indicative Site Layout (ALR-001 Rev B) submitted with this representation demonstrates that the site SH4 can deliver the 33 dwellings as required in Policy SO3.1. The housing mix on the Indicative Layout comprises some 1, 2 and 3no. bedroomed properties and is broadly broadly compliant with the Local Plan preferred Housing Mix set out at Table D on page 79 of the Preferred Options document. (see document for housing mix proposed for SH4). The indicative Layout includes for some 11 of 33 dwellings to be provided as bungalows. The provision of a high proportion of bungalows on the site will assist housing choice in the local area. There is a demand, and an increasing future demand for single storey living by the elderly and those living with limiting long term illness; a matter recognised and sought to be addressed in Policy SO3.3 (Delivery High Quality Housing). Cannock Chase District is expected to experience an increase of 41% in the population of 65years and over during the period of the Local Plan. The Local Authority has a requirement to provide for the needs of different groups in society. The provision of Affordable Housing on the site will assist Cannock Chase District Council in achieving their obligation.

LPPO216	ENGIE - D, Sager	Barton Willmore - J, Bonner	<p>The draft Plan sets out that for developments above 10 homes, at least 20% of the total number of dwellings should be affordable housing with 80% for rent and 20% for intermediate housing or other routes to affordable home ownership. We note that the draft Plan is not yet supported by an up-to-date Viability Assessment and therefore this policy should be kept under review in light of the emerging evidence base. This approach is in accordance with the NPPF (paragraph 34) which states that policies setting out the levels and types of affordable housing provision required, should not undermine the deliverability of the Plan. In principle we have no issues with the affordable housing targets and we support the aims, subject to ensuring there is evidence to support it. The draft policy provides detail on housing mix, stating that: "a mix of housing sizes, types and tenure appropriate to the area and as supported by local evidence should be provided...". "The size, type and tenure of homes on sites of 15 or more units (including conversions) will be specified in the site allocation policy or where not specified will be in accordance with Table D below or its subsequent revisions. The housing mix in Table D will not be applied to developments falling within Class C2 of the Use Classes Order." This approach is generally supported, but we would encourage an emphasis on flexibility given the length of the Plan period and changing evidence on housing need. We would suggest that the overall policy wording could be clarified further state that where a housing mix is broadly in line with the requirements set out in Table D (or Site Allocation Policy) it will be considered acceptable. The policy should recognise that the requirements set out in Table D cannot be applied as a blanket approach. It needs to be applied flexibly to reflect the individual characteristics of the site. For example, delivering at higher densities in sustainable locations may necessitate the delivery of flats on part of a site, which may affect the ability to deliver the desired mix. We would also note that site specific matters may require alternative approaches that may not be apparent at the point of the mix being determined at the allocation or planning permission stage, and so the policy should acknowledge this need for flexibility to assist with delivery.</p>
LPPO217	The Church Commissioners for England	Barton Willmore - A, Bird	<p>The principle of these draft Policies to address the specific local housing needs of the District is supported. Nevertheless, in line with the NPPF (paragraph 34) and PPG ('Viability' see Paragraph 001 Reference ID: 10-001-20190509 and Paragraph 002 Reference ID: 10-002-20190509) the requirements should be fully evidence by supporting assessment work, including a Viability Assessment. This should ensure the cumulative requirements of the draft Plan policies do not undermine the deliverability of the plan overall. We note that the draft Plan is not yet supported by an up-to-date Viability Assessment and therefore this policy should be kept under review in light of the emerging evidence base. In accordance with the PPG (Paragraph: 010 Reference ID: 10-010-20180724) as part of the Viability Assessment and therefore this policy should be kept under review in light of the emerging evidence base. In accordance with the PPG (Paragraph: 010 Reference ID: 10-010-20180724) as part the Viability Assessment the Council should look to engage with key stakeholders as part of the process including developers and landowners.</p>

Question 16: Do you support the approach to encouraging home working?

LPPO218	Together Active - J, Brennan		Yes, I support his for work life balance and climate change reasons
LPPO219	Home Builders Federation - S, Green		The Council's preferred policy approach proposed that on sites of 15 or more dwellings, housing mix will be specified in the site allocation policy or where not specified will be in accordance with Table D - Housing Mix or its subsequent revisions. Where market housing is supported by connection to superfast broadband, a flexibility of 4% will be permitted across the dwelling sizes to facilitate homeworking. All households should have access to different types of dwellings to meet their housing needs. As set out in 2019 NPPF, the housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (para 61&62). All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The Councils should recognise that market signals are important in determining the size and type of housing needed. An overly prescriptive policy approach on housing mix is inappropriate. The Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households rather than prescribing specific housing mixes for individual sites. The Local Plan should ensure that suitable sites are available for a wide range of different types of development across a wide choice of appropriate locations. The Council should consider allocating sites for older persons and other specialist housing subject to criteria such as the proximity of sites public transport, local amenities, health services and town centres. If Table D is retained, additional flexibility should be provided by setting out ranges of percentages.
LPPO220	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The approach to homeworking seems to consist of a flexibility of 4% in regard to market housing size restrictions if superfast broadband connections are provided. This would allow 76% of the total market housing to be within the three-bedroomed sector rather than the 72% prescribed in Table D. As set out above the whole approach to prescribing the size of market housing is flawed and this minor amendment is unlikely to foster provision of superfast broadband. Policy SO3.3 sets out the Council's approach for delivering high quality housing. The Council's approach has been to target larger homes consistent with the Nationally Prescribed Space Standards and to require developers to provide for households with health problems or disabilities. The Council's jurisdiction derives from the Local Housing Needs Assessment that states that 60% of all new housing should be suitable for the needs of households with health problems or disabilities. The Council goes on to state that this could be through the provision of single level accommodation such as bungalows and ground floor flats or through the provision of dwellings which comply with Part M4(2) or Part M4(3) of the Building Regulations or can be easily adapted to meet these standards. The explanatory text goes on to indicate that the 60% provision of new housing to meet the needs or households with health problems or disabilities reflect future forecasts and deficiencies in the existing housing stock. It also supports the need for a target of 13% of all housing to meet M4(3) Category 3 requirements and a 47% of all housing to meet M4(2) Category 2 requirements. The explanatory text also requires that the Nationally Prescribed Space Standards will assist the Authority in attracting greater numbers of people to work from home which will assist the Council in achieving its zero carbon ambitions. Richborough Estates supports the objective of delivering high quality design and resilience and providing adequate space to achieve good living standards. However, objection is raised to providing a minimum of 60% of new homes to be suitable for households with health problems or disabilities. The justification to the Policy refers to the SHMA and the need to remedy deficiencies in the existing housing stock. This suggests that households not suffering from health problems/disabilities will need to utilise existing housing stock whilst 60% of new stock is designed for people who have health problems. The policy is also unclear as, whilst the policy text itself refers to 60% of the total number of units being suitable for households with health problems/disabilities, it is supporting text which provides clarity of what this actually means and is defined as being 13% of all housing meeting M4(3) Category 3 housing and 47% M4(2) Category 2 housing. The Local Plan Preferred Options has made reference to the need for viability assessment to take place through the plan making process. However, no information is currently available which has assessed the potential impact of the requirement of Policy SO3.3 on viability.
LPPO221	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The approach to homeworking seems to consist of a flexibility of 4% in regard to market housing size restrictions if superfast broadband connections are provided. This would allow 76% of the total market housing to be within the three-bedroomed sector rather than the 72% prescribed in Table D. As set out above the whole approach to prescribing the size of market housing is flawed and this minor amendment is unlikely to foster provision of superfast broadband. Policy SO3.3 sets out the Council's approach for delivering high quality housing. The Council's approach has been to target larger homes consistent with the Nationally Prescribed Space Standards and to require developers to provide for households with health problems or disabilities. The Council's jurisdiction derives from the Local Housing Needs Assessment that states that 60% of all new housing should be suitable for the needs of households with health problems or disabilities. The Council goes on to state that this could be through the provision of single level accommodation such as bungalows and ground floor flats or through the provision of dwellings which comply with Part M4(2) or Part M4(3) of the Building Regulations or can be easily adapted to meet these standards. The explanatory text goes on to indicate that the 60% provision of new housing to meet the needs or households with health problems or disabilities reflect future forecasts and deficiencies in the existing housing stock. It also supports the need for a target of 13% of all housing to meet M4(3) Category 3 requirements and a 47% of all housing to meet M4(2) Category 2 requirements. The explanatory text also requires that the Nationally Prescribed Space Standards will assist the Authority in attracting greater numbers of people to work from home which will assist the Council in achieving its zero carbon ambitions. Richborough Estates supports the objective of delivering high quality design and resilience and providing adequate space to achieve good living standards. However, objection is raised to providing a minimum of 60% of new homes to be suitable for households with health problems or disabilities. The justification to the Policy refers to the SHMA and the need to remedy deficiencies in the existing housing stock. This suggests that households not suffering from health problems/disabilities will need to utilise existing housing stock whilst 60% of new stock is designed for people who have health problems. The policy is also unclear as, whilst the policy text itself refers to 60% of the total number of units being suitable for households with health problems/disabilities, it is supporting text which provides clarity of what this actually means and is defined as being 13% of all housing meeting M4(3) Category 3 housing and 47% M4(2) Category 2 housing. The Local Plan Preferred Options has made reference to the need for viability assessment to take place through the plan making process. However, no information is currently available which has assessed the potential impact of the requirement of Policy SO3.3 on viability.

LPPO222	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	<p>The approach to homeworking seems to consist of a flexibility of 4% in regard to market housing size restrictions if superfast broadband connections are provided. This would allow 76% of the total market housing to be within the three-bedroomed sector rather than the 72% prescribed in Table D. As set out above the whole approach to prescribing the size of market housing is flawed and this minor amendment is unlikely to foster provision of superfast broadband. Policy SO3.3 sets out the Council's approach for delivering high quality housing. The Council's approach has been to target larger homes consistent with the Nationally Prescribed Space Standards and to require developers to provide for households with health problems or disabilities. The Council's jurisdiction derives from the Local Housing Needs Assessment that states that 60% of all new housing should be suitable for the needs of households with health problems or disabilities. The Council goes on to state that this could be through the provision of single level accommodation such as bungalows and ground floor flats or through the provision of dwellings which comply with Part M4(2) or Part M4(3) of the Building Regulations or can be easily adapted to meet these standards. The explanatory text goes on to indicate that the 60% provision of new housing to meet the needs or households with health problems or disabilities reflect future forecasts and deficiencies in the existing housing stock. It also supports the need for a target of 13% of all housing to meet M4(3) Category 3 requirements and a 47% of all housing to meet M4(2) Category 2 requirements. The explanatory text also requires that the Nationally Prescribed Space Standards will assist the Authority in attracting greater numbers of people to work from home which will assist the Council in achieving its zero carbon ambitions. Richborough Estates supports the objective of delivering high quality design and resilience and providing adequate space to achieve good living standards. However, objection is raised to providing a minimum of 60% of new homes to be suitable for households with health problems or disabilities. The justification to the Policy refers to the SHMA and the need to remedy deficiencies in the existing housing stock. This suggests that households not suffering from health problems/disabilities will need to utilise existing housing stock whilst 60% of new stock is designed for people who have health problems. The policy is also unclear as, whilst the policy text itself refers to 60% of the total number of units being suitable for households with health problems/disabilities, it is supporting text which provides clarity of what this actually means and is defined as being 13% of all housing meeting M4(3) Category 3 housing and 47% M4(2) Category 2 housing. The Local Plan Preferred Options has made reference to the need for viability assessment to take place through the plan making process. However, no information is currently available which has assessed the potential impact of the requirement of Policy SO3.3 on viability.</p>
LPPO223	Wyrley Estates	Fisher German LLP - N, Borsey	<p>The estate does support the approach to encourage home working, however the policy SO4.4 needs to expand further, in particular the support for live/work housing types to be in identified suitable locations. Currently the policy is very broad.</p>

SO3.3: Delivering High Quality Housing

Question 17: Do you support the preferred policy direction for delivering high quality housing?

LPPO224	West Midlands Housing Association Planning Consortium	Tetlow King Planning - L, Stoaite	<p>We agree with the council that new housing development should be of a high quality in terms of its design and resilience, and provide adequate space to achieve good living standards, as required by the NPPF. We accept that there is a growing need for properties which comply with Part M(2) or Part M(3) of the current Building Regulations and so we support this policy direction, although we would like to remind the Council how the increased delivery of such properties may affect viability and overall affordable housing delivery in Cannock Chase. It appears that the Council is looking to require that all new residential development adheres to the Nationally Described Space Standard (NDSS). If the Council seeks to require NDSS across all residential development, it must be demonstrated that it is being done to address a clearly evidenced need, as set out in Planning Practice Guidance (Paragraph: 002 Reference ID: 56-002-20160519). In the absence of this evidence, a blanket application of NDSS may undermine the viability of development schemes and through viability testing of application proposals, will result in fewer affordable homes being delivered across Cannock Chase. The NDSS is not a building regulation and remains solely within the planning system as a form of technical planning standard. It is not therefore essential for all dwellings to achieve the standard in order to provide good quality living. For affordable housing in particular, there may be instances where achieving NDSS is impractical and unnecessary. We recommend that the Council reviews the local plan viability assessments with regard to these matters in accordance with the PPG tests which require that where a need for the standards is identified, local planning authorities should justify inclusion of a policy, taking account of need, viability and timing:</p> <ul style="list-style-type: none"> • "need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. • viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. • timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions." (Paragraph: 020 Reference ID: 56-020-20150327)
LPPO225	Together Active - J, Brennan		Yes, but also where possible homes should have adequate access and spaces for secure cycle storage.
LPPO226	Home Builders Federation - S, Green		<p>If the Council wishes to apply the optional NDSS to new homes, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46). Footnote 46 states that "policies may also make use of the NDSS where the need for an internal space standard can be justified." As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out that "where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing". Before adopting the NDSS, the Council should provide a local assessment evidencing the case of Cannock Chase. The NDSS should only be introduced on a "need to have" rather than a "nice to have" basis. Need is generally defined as "requiring something because it is essential or very important rather than just desirable". If it had been the Government's intention that generic statements simply stating in some cases the NDSS had not been met justified adoption of the NDSS then the standard would have been incorporated as mandatory in Building Regulations, which is not the case. There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The Council's policy approach should not compromise the viability of development. NDSS compliant house typologies should be tested in the Council's viability assessment. The Council should recognise that customers have different budgets and aspirations. The introduction of the NDSS for all new homes may lead to customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs causing the unintended consequence of potentially increasing overcrowding and reducing the quality of their living environment. Smaller dwellings may be required to ensure that those on lower incomes can afford a property, which meets their bedroom requirements. An inflexible policy approach to NDSS for new homes may also impact on affordability and effect customer choice for First Homes and other affordable homeownership products, which may affect delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be determined by market affordability at relevant price points of dwellings and maximising absorption rates. A worsening of affordability may translate into reduced or slower delivery rates. If the proposed requirement for NDSS is carried forward, the Council should put forward proposals for transitional arrangements.</p>

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Land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approach prior to a specified date. Furthermore, under Preferred Policy SO3.3, developments providing a minimum of 60% of dwellings as suitable for households with health problems or disabilities will be supported. This provision could be provided as bungalows and ground floor flats or dwellings, which comply with Part M(2) or Part M(3) of the current Building Regulations (as a minimum) or can be easily adapted to meet these standards. As set out in the 2019 NPPF for effectiveness, a policy should be clearly written and unambiguous (para 16d). The Council's preferred policy approach should be clearer so both applicants and decision makers know what is required. However, if the Government implements proposed changes to Part M of the Building Regulations as set out in the "Raising Accessibility Standards for New Homes" consultation, which closed on 1 December 2020, the Council's proposed policy approach will be unnecessary. In the meantime, if the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46) and the NPPG. Footnote 46 states "that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties." As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focus focussed tightly on supporting and justifying the policies concerned (para 31). Therefore, a policy requirement for M4(2) dwellings must be justified by credible and robust evidence. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG. The Council's policy approach should not compromise the viability of development. Therefore, additional costs associated with M4(2) and M4(3) compliant dwellings should be included in the Council's viability assessment. The Government's consultation "Raising Accessibility Standards for New Homes" (ended 1st December 2020) estimates the additional cost per new dwelling is approximately £1,400 for dwellings, which would not already meet M4(2). The extra costs for M4(3) are much higher. In September 2014 during the Government's Housing Standards Review, EC Harris estimated the cost impact of M4(3) per dwelling as £15,691 for apartments and £26,816 for houses. These costs should be applied plus inflationary cost increases since 2014. M4(2) and M4(3) compliant dwellings are also larger than NDSS (see DCLG Housing Standards Review Illustrative Technical Standards Developed by the Working Groups August 2013), therefore larger sizes should be used when calculating additional build costs for M4(2) and M4(3) and any other input based on square meterage. Moreover, these enlarged sizes are unlikely to generate additional value.

LPPO227	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates support the principle of delivering high quality housing however some of the approach set out in Policy SO3.3. can have potentially significant implications. The requirements to meet with M4(2) Category 2 requirements and M4(3) Category requirements of the Building Regulations may have implications for the viability of some developments. This does not appear to have been assessed. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in NPPG (ID 56-005-20150327 to 56-011-20150327). It is also worth noting that have a development made up of 60% bungalows and flats would very likely not deliver a high-quality scheme based on design best practice.
LPPO228	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates support the principle of delivering high quality housing however some of the approach set out in Policy SO3.3. can have potentially significant implications. The requirements to meet with M4(2) Category 2 requirements and M4(3) Category requirements of the Building Regulations may have implications for the viability of some developments. This does not appear to have been assessed. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in NPPG (ID 56-005-20150327 to 56-011-20150327). It is also worth noting that have a development made up of 60% bungalows and flats would very likely not deliver a high-quality scheme based on design best practice.
LPPO229	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates support the principle of delivering high quality housing however some of the approach set out in Policy SO3.3. can have potentially significant implications. The requirements to meet with M4(2) Category 2 requirements and M4(3) Category requirements of the Building Regulations may have implications for the viability of some developments. This does not appear to have been assessed. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in NPPG (ID 56-005-20150327 to 56-011-20150327). It is also worth noting that have a development made up of 60% bungalows and flats would very likely not deliver a high-quality scheme based on design best practice.
LPPO230	ENGIE - D, Sager	Barton Willmore - J, Bonner	Preferred Policy SO3.3: Delivering High Quality Housing requires new dwellings to meet Nationally Described Space Standards. We note that Footnote 46 of the NPPF advises that policies may make use of the nationally described space standard, "where the need for an internal standard can be justified". As set out in the NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate, and focussed tightly on supporting and justifying the policies concerned (paragraph 31). The PPG (Reference ID: 56-020-20150327) identifies that "where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing." The Council should therefore ensure the supporting evidence base to the draft Plan is available and reflects the PPG requirements. We also consider that the policy should exclude this requirement for sites which already have outline planning permissions which predates adoption of the draft Plan, as retrospectively applying the policy on reserved matters may affect deliverability. In respect of the need for developments to provide housing that is suitable for households with health problems or disabilities, the policy is unclear what the target requirement is (with 60% being supported, not required). This should be clarified and supported by evidence around deliverability. NPPF (Footnote 46) States that "planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties." The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG (Reference ID: 56-005-20150327 to 56-011-20150327). Again, as with minimum space standards it may be appropriate to exclude sites with extant outline planning permission.

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LPPO231	R, Elphick	SH1 (C116a) - From the plan, it is clear that the only access to the area would be from two new islands on the A5190. With some estimated 700 dwellings, a school and country park this would without a doubt create an enormous amount of increased traffic on the Cannock Road. Over the last 20years, there has been a very significant rise in the volume of vehicles including HGVs using this road. Another most important point definitely worth noting, is with the Designer Outlet due to open shortly, this will without question, contribute even more towards the problem. Finally the subject, of air pollution is a most serious factor also to be considered. Apparently the Monitoring Unit which is sited near Five Ways Island reveals a reading above the national acceptable limit.
LPPO232	L, Guy	I strongly oppose all of the housing developments planned for our area. I personally feel the area is built up enough already. We have issues with traffic for the tip, which causes the traffic to build up and can cause frustration, road rage and dangerous driving this would surely only increase. Traffic along Cannock Road is getting worse. Schools are already to capacity, where will all these new children go? The better facilities for out door activities are always over populated when the weather is nice, like Hednesford Park and the one near the SNAP centre. What other amenities are being proposed for older children/teenagers? It is near impossible to get an appointment with the doctors due to them having none left, what will be done about this? Have these all been thought about? As I feel it is more about making money, and not about maintaining a nice area for people who live here already. Why do we need to keep developing on our green spaces? If there is space for development why can't something be put there to benefit people who already live here like a new park. Putting a tiny little park with barely any equipment on it in a new development like it has been done in Hednesford and Burntwood is of no benefit to anyone.
LPPO233	O, Lakin	I write to express my utter disbelief that I have seen plans to build new houses on the beautiful green land in front of our homes! The very small amount of green land left in Heath Hayes, may I add compared to surrounding areas! The damaging affect of the McArthur Glen is enough on the noise, traffic and air pollution to our homes facing this main road without a new build estate being built outside our windows. We are all feeling overwhelmed with the unwanted traffic and noise from a massive designer outlet shopping centre being build, without 100s of new homes. This is making our lives hell! It's an invasion on our houses facing the fields. It's destroying the homes of so many woodland animals. Deer are on those fields every day! It's yet again, on top of the outlet adding more noise pollution to out lives. Those fields and the fair garden we have created in that woodland has been our only happiness and escape the last year! We will not have that taken away from us.
LPPO234	Croft Development Consultancy UK Ltd - N, Bubalo	Policy SO3.1 is also supported and specifically SH3 and inclusion on the Policies Map. Whilst we acknowledge that there is a nominal capacity against delivery of the site we would ask that this is regarded as a minimum and that the planning application should dictate the precise numbers of units that can be accommodated on the site. Whilst we acknowledge that the Local Plan can only deal with issues and allocations within the Administrative Boundary of Cannock Chase DC, Land referenced as SH3 which is within a single ownership straddles the administrative boundary between the District and South Staffs DC, with the majority of the site sitting in Cannock. In terms of future delivery of the site the whole will need to be considered for development. We would support the Council through Duty to Cooperate to seek the release of that part of the site sitting in South Staffs for development.
LPPO235	Beau Desert Golf Club - P, Benbow	BDGC recognise the pressures that the demands for new housing place on available land within the Council's area. Given then location of the golf course is the heart of the AONB our commitment to the environment and the landscape that we have inherited is absolute. Adjoining the course, but also in the ownership of BDGC is 22ha of landfill land that had previously been worked out as a sand and gravel quarry. The land (HE15 in the Green Belt Assessment) is now scrubland (not grassland as indicated in the assessment) and is capable of "enhancement" ...by the introduction of a new native broadleaf wood leaved varieties of trees , in accordance with landscape strategies set out in the Landscape Character Assessment for Cannock Chase and the AONB Landscape Character Framework". BDGS strongly endorse this ambition. To achieve an appropriate economic balance that also enables essential landscaping and other supporting infrastructure, re-forestation would need to be undertaken in concern with much needed additional housing land adjacent to Rugeley Road. No more than 15% of the total site (includes HE15, 16 & 17) area would be affected by housing development. Integrating both Objective 3 and Objective 7 sensitively in a location that provides safe access for leisure in one direction, and easy access to essential transport links, and also within walking distance of the town centre would be the outcome.
LPPO236	A&B, Highman	We would particularly like to object to 410 dwellings on land East of Wimblebury Road for the following reasons: - Wimblebury Road is a busy main road with Heath Hayes Academy School located exactly opposite where the dwellings would be built. As local residents and also parents of two pupils at Heath Hayes Academy we would be extremely concerned as to the increase in traffic and pollution at this site, both as a result of the build and as a result of the 410 families who would then additionally move into the area. There is not another road which could be used as an alternative to the development. Heath Hayes Academy has been completing a pollution study over recent months/years and the current level of pollution at pick up drop off times is already a known health concern. A development of 410 dwellings would no doubt put our children at risk both in terms of the traffic increase, but also in terms of the pollution. - Wimblebury Road is a main feeder road to Five Ways Island. It is a busy road with a 30mph limit and speed humps (which need repairing). We believe there is a weight limit on the road but we often experience lorries using the road, and traffic rarely abiding to the 30mph limit. Five Ways Island is already extremely congested for the majority of the day and we have personally witnessed many near-miss accidents at this spot. We would be extremely concerned that a development of this size would be 'an accident waiting to happen'. - The area of land which is proposed to be used is surrounded by 'Wimblebury Mound', allotments, Heath Hayes park and forest. The area is a beautiful spot which attracts an abundance of wildlife and, particularly during the last 12months, has seen an increase in local people using the area for recreational facilities such as jogging, dog walking and bird watching. The local nursery also uses these facilities once a week as an outdoor learning space for its pupils. We would be extremely concerned as to the long term impact on wildlife, and also to the mental health of local residents who now enjoy using the spot. The NPPF makes clear that changes should only be made to the Green Belt in exceptional circumstances and they should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Compensatory arrangements would not solve this issues and this is certainly not an exceptional circumstance when other sites are available.

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- As a resident of Wimblebury Road who only moved to the property earlier this year, we are disappointed with Cannock Chase Council's advertisement of the Local Plan Consultation, particularly with the short time scale given for comments when it is such a lengthy document. As a resident who would be directly affected by this proposal, we have had no direct information 'leaflet-dropped' through our door - We have only discovered the information through joining a local Facebook group and then researching myself from your website. Several months ago we emailed Cannock Chase Council planning office and Lichfield District Council planning office to ascertain whether there were proposals for this land. The reply was that there were no proposed developments for this site - we are now aware that this site was touted as a proposed location three years ago in the original consultation and we feel let down by the planning office in respect of the reply we were given. We understand the need for further housing in the area but the plan for 410 dwellings East of Wimblebury Road, 875 dwellings South of Lichfield Road and 175 dwellings on land west of Hednesford Road, Norton Canes, would mean an increase of 1460 dwellings (potentially 3000 vehicles) within a half mile radius. We feel developments of this size would mean Norton Canes and Heath Hayes losing their own identities and our current infrastructure would certainly not support this change (e.g. roads, schools; recreational facilities). We do not feel new housing planned for this area is proportionate - 1460 dwellings in this small area compared to 45 dwellings at Longford House and 33 in Armitage Lane. Additionally, our home suffered subsidence around 50 years ago. Due to the historical mining links and the extremely close location to the former pit entrance, can the Council be sure that any of these proposed developments on the land discussed will not cause further subsidence/further issues to current properties, particularly due to the likelihood of unknown shafts?

LPPO237	Historic England - E, Boden	Historic England notes that two of the five proposed strategic housing allocations have not been included for assessment within the HIA, due to there being no heritage assets on/near to these sites. With regard to the assessment of proposed sites SH1, SDH3 and SH5, historic England's detailed comments can be found at Appendix A to this letter.
LPPO238	S, Ballance	I have recently been made aware of the preferred options for future development of the Cannock Area, in particular the proposal for 410 dwellings on the land to the east of Wimblebury Road. I wish to place on record my objection to this development on the following grounds: 1. As a resident of Cannock and Hednesford all of my life (65years), I have seen a gradual depletion of open land. The areas between Cannock and Hednesford, Heath Hayes and Norton Canes. Hednesford and Heath Hayes which were previously farm land or open space for leisure and wildlife have all but disappeared and the whole area has become one large conglomeration, devoid of individual identity. Nature has suffered a massive decline in the area and open space for leisure activities has perished so that it is now a rare resource. Parks and manicured gardens cannot replace farmland and wild spaces for the biodiversity that they offer. As an example, skylarks and lapwings, which are species of birds massively in decline nationally, are often seen in the area to the east of Wimblebury Road. Additional housing in this area will impact massively on such species. Wildlife such as bats, butterflies, newts, foxes, badgers and even Red Deer in the wooded area directly adjacent to the development would also be affected. There are attractive trails that are used by walkers, cyclists, nature lovers etc. This is a vital resource that is sadly lacking in today's towns. At a time when mental health is a national concern such a facility is valuable to the community. 2. Approximately 40 years ago plans were passed for opencast mining on land adjacent to the east of the proposed development. This was immensely disruptive for local residents who had to endure noise, pollution and traffic problems for many years. Now that this has ceased it is incredibly unfair for the local population to again face destruction of their local environment. 3. If the proposal goes ahead there will inevitably be greater traffic problems. An increase in the local population of approximately 1,000 people will cause problems on roads that already struggle to operate at peak times. Five Ways island, in particular, is a hot spot for traffic queues and parked cars on Wimblebury Road itself consistently cause delays. Any further housing will inevitably exacerbate this. Wimblebury Road is already subject to considerable traffic, including heavy lorries, travelling to and from a dept in Wimblebury. 4. A primary school and nursery in Wimblebury Road has monitored pollution levels in the past and found them to be worryingly high. How much worse will they become if a further five or six hundred cars are travelling backwards and forwards along this road each day? The additional traffic will also inevitably raise the risk to the children of road traffic accidents. 5. Older residents will recall that Wimblebury Road was subject to subsidence some years ago. Any significant development could possibly cause further land movement. 6. The local infrastructure will face enormous pressure if this and associated plans involving land to the south of Lichfield Road go ahead. Schools, health centres, policing, leisure facilities etc. would encounter difficulties unless significant resources were provided to expand these services. I understand that the Local Authority have an obligation to provide additional housing. However, brownfield sites should be a first priority and green belt only used when really necessary. I urge CCDC to reject the proposal.

LPPO239 Norton Canes Parish Council

Inevitably this is the most controversial policy topic with a widely held view in the village supported by the Parish Council that Norton Canes has had more than its fair share of major housing developments taking account of the size of the village and that the necessary infrastructure to support these developments has not been provided. It is factually correct to say that none of the major items of infrastructure for which funding has been obtained from major housing developments has yet been delivered. This comprises new and improved off-site sport and recreation facilities, additional primary school capacity and improved bus services. So this is why the Parish Council is seeking delay in any additional housing allocations for general market housing on releases of new land around the village until the infrastructure proposed to be delivered has at least been committed but preferably delivered. The only exception to this is seeking a potential site for specialist housing for the elderly, which, if a suitable site can be found, the Parish would consider promoting via a Neighbourhood Development Order to be brought forward alongside the Neighbourhood Plan. Other key issues relating to housing which are proposed to be brought forward in the NP are: - Seeking policy support requiring a proportion of small bungalows aimed at catering for the elderly wishing to downsize to be included in future housing allocations and identified on small sites within the village. - Support for the provision of Gypsy and Traveller sites in association with new development in the Green Belt specifically to provide replacement accommodation for the unauthorised encampments on Stokes Lane and Long Lane. - Support housing plus a retail convenience store on land between the M6 Toll and the current housing development site off Norton Hall Lane (ref N13a) as an alternative to employment use. - Prior to the start of the consultation on Local Plan Preferred Options the Parish Council had assumed that some releases of Green Belt would be likely to be required to enable the District to meet its local need plus a contribution to the wider housing market. It was intending to consult the community on sites contained in the SHLAA considering their suitability alongside potential local gains or benefits which might be achievable. This was also in the context of seeking to influence the District to reduce the growth in Norton Canes in the next plan period to 8% of the District wide total which is more in line with the village's proportion of the overall population of the District. Given the wide choice of potential sites in the SHLAA it was proposed to indicate as a guide that this process may favour land west of Norton Hall Lane (ref N66 and part of N52), land west of Hednesford Road (ref N33) and the site south of the Willow Road estate and north of the M6 Toll (ref. N51) and the site south of Cannock Road A5190 (ref. C116a). In light of the two sites proposed in Norton Canes Parish in PO Policy SO3.1, comprising SH1 land south of Cannock Road A5190 (part of SHLAA site C116) with a capacity of approximately 875 units including provision of a primary school and creation of a country park south of Newlands Lane and SH5 west of Hednesford Road (SHLAA Site N33) with a capacity of 175 units the Parish Council may wish to review its intention to carry out a wider consultation on the other SHLAA sites. In relation to SH1 the Parish Council would wish to be assured that the inclusion of a primary school would mean no additional pressure on existing village primary schools; that wider environmental and countryside access improvements will be included extending beyond the proposed country park to benefit the wider community of Norton Canes; and that the development would contribute to the list of "asks" addressing needs identified for the Norton Canes Community set out in the Parish Council's letter dated 25/01/2021. In addition, the Parish Council would wish to be assured that a deliverable solution to congestion at Five Ways Island can be found. Unless and until these assurances are given the Parish Council maintains a holding objection to the inclusion of this site. In relation to SH5 the Parish would wish to see the feasibility of inclusion of specialist housing for the elderly included as part of the development, or such development being enabled on a site closer to the village centre.

LPPO240 C, Wilkinson (Cllr)

I write in full support of the response sent to you by David Williams, Chair of Hazel Slade & Rawnsley Community Association in reference to site H30, land off Rawnsley Road. The association are fortunate to have members whose areas of professional knowledge enable them to write a succinct and thorough response to the plan, which I have full confidence in. I, along with many other Rawnsley residents, strongly oppose any housing development on this site and seek to protect this land from any further planning applications given its location between Cannock Chase AONB and Hednesford Hills SSSI. Dedicated residents have worked tirelessly to campaigning to preserve this land for future generations.

LPPO241 R, White

Specific reference to Green Belt Land in Rugeley/Slitting Mill area. I have grave concern that the Council would ever consider destroying the Green Belt in this area, particularly as we are faced with a massive development of the Power Station Site. I have concerns with the possible development of areas: RU1 RU2 RU3 RU4 RU5 RU6 RU11 RU12 RU15 RU14 RU21 RU10 RU7 RU21 RU22 RU18 RU19 RU20. All of these areas make a huge contribution to the health and well-being of local residents. Of PARTICULAR importance is the enabling of wildlife diversity in our areas. The areas RU22 RU24 RU21 RU20 RU18 and RU19 which border the Slitting Mill village is of natural and historic significance. I have observed deer, bats, owls, foxes, badgers, skylarks, woodpeckers, a variety of species of bee and other pollinating insects, hedgehogs and numerous birds in this area. Any development either in or around would bring noise, light and air pollution. EVEN MORE litter, anti-social behaviour from young people gathering to drink, take drugs and basically trash the area. Members of my family regularly clean up the litter in this area. Roads-as Rugeley is situated in a barley pollution would be a major issue. This would be totally unacceptable in Sherbrook Valley. Rugeley roads are already heavy with traffic, we do not have good infrastructure now, situation would be worse. Loss of prime grade A agricultural-land where will crops be frown/animals grazed. Climate Change- we need MORE trees and hedgerows not less. The surrounding area will be losing a lot of woods/trees/meadows etc. to the building of HS2. Preserve what we have, add to it but please do not destroy it. Once our Green belt is gone it can never be replaced. Since lockdown many people have discovered the beauty of this area. Let's keep it that way for future generations.

LPPO242	Cannock Chase Independents Group - P, Woodhead (Cllr)	<p>The quantum of new build dwellings is excessive towards the available land within the District and no additional need should be accepted from the Greater Birmingham Housing Need Assessment. This report clearly shows many other areas which are much more suitable to cover the wider need for housing and Cannock Chase does not need to take this quantum in to the calculations. It is disappointing that the Local Plan presents the development in Greenbelt land ahead of exhausting brownfield development as its strategic housing sites and this should be reconsidered. The continued expansion from Norton Canes to Heath Hayes and now in the other direction is not supported by social infrastructure, including roads, and not fit for purpose. Within the Tables are areas of land identified for development as a preference of the Council in the Local Plan there are a number of these which we do not support owing to their erosion of the Green Space Network in its many guises. In particular to mention two sites; the land identified as H30. This is an important nature corridor and must be maintained to link Hednesford Hills SSSI through to the Cannock Chase AONB. The land identified as SH2. This creates an extensive new building line which encroaches in to the wider green space network needed to maintain the existing village structures which are already eroded with the conjoining Heath Hayes and Wimblebury and should be maintained as Green Belt. There are other locations which could be considered ahead of any consideration of green belt development. The maintenance of nature corridors and routes should be a major priority of any development plans. The housing choice needs greater emphasis on single living either as people owning their first home, working age people living alone or older residents needing a range of single living accommodation options. We have more rooms per head of population than any time in our history but have a poverty emergency and homelessness crisis. Any development should acknowledge these conditions and preference addressing this social and economic inequality.</p>	
LPPO243	Norton Canes Councillors	<p>With respect to housing, we are all of the belief that following the last Local Plan period Norton Canes has provided more than its fair share of housing and strongly agree with the Parish Council's argument that no new development in Norton Canes should be permitted until the infrastructure investment that will come from the existing developments is provided; this is a sentiment very much felt by the vast majority of residents in the village who are already experiencing the consequences of infrastructure pressures despite hundreds of homes still to be built. We feel that this time to allow for infrastructure investment to be made is not unreasonable considering Norton Canes has provided just under a quarter of all new housing in the district despite its population constituting less than 10% of the district's. We welcome the rejection of so many greenbelt sites within Norton Canes for consideration for housing. As recognised in the spatial strategy, Norton Canes's identity as a separate settlement will be safeguarded and enhanced. Nevertheless, we are concerned with the proposed housing land allocations, particularly with regards to the long term future of Five Ways Island. The Local Plan rightly points out that this junction needs to be comprehensively redeveloped but should this fail to materialise, it would make the suggested sites east of Wimblebury Road and south of Cannock Road unviable. Our concern is what this would mean for the previously rejected sites in Norton Canes. Should the county council not come forward with an appropriately ambitious scheme for Five Ways Island, we would recommend that attention move to a discrete site that can accommodate a larger number of houses along with the necessary infrastructure incorporated within the development, as opposed to the approach of adding smaller sites to the urban area of Norton Canes where spending on infrastructure will come at a later date, exacerbating existing pressures in our village. We believe that the District Council has already identified alternative sites which could fulfil this criteria and do not lie within Norton Canes. We would also echo the Parish Council's assertion that thought needs to be given to the provision of specialist housing for the elderly and more bungalows in Norton Canes. We are aware of many elderly residents in our community who would like to downsize but also wish to remain in our village, meaning they must stay in homes too large for them which could benefit a young family. We feel this is a niche housing issue which should be addressed by the Local Plan.</p>	
LPPO244	Messrs. Dean and Weldon, owners of The Coppice Colliery Football Ground	S.P.Faizey Chartered Architects - S, Faizey	<p>I am commenting on behalf of the owners of the Coppice Colliery Football Ground. The owners fully support the recommendation for the release of the site from the Green Belt (SH1). It should be noted that this land is in separate ownership from other land shown further north on Lichfield Road within SH1. There is no link between the sites and we assume that they have been combined within the same zone purely as an administrative procedure by the Council and the sites would be developed independently. In this respect it would be preferable for the sites to be identified as separate entities. Our assessment of the Coppice Colliery Football Ground site is that c45 homes could be accommodated with a mix of 1, 2 and 3bed houses aimed at the affordable housing sector in a sustainable location close to Heath Hayes village centre. The intention would be to relocate the football teams to a new pitch and facilities on land within or adjacent to the recreation area in Heath Hayes Park or Wimblebury to the north of Five Ways Island. This would have the potential for providing facilities for use by the local community.</p>
LPPO245	C & P, Wolfenden	<p>Armitage Lane in Brereton is a no through road, this road was shut when the bypass was built and one of the reasons for not opening it again to traffic was due to the school and the danger to the children. The impact of building 33 houses behind the school with access of Armitage Lane will have a significant effect on the road. If the access is on Armitage Lane we will have probably 66 more vehicles trying to manoeuvre around the Lane at the time when most parents are dropping children to school. At the moment we have parents parking on both sides of the road and it is already a difficult task to exit the Lane. It is the access to this parcel of land that we are more concerned about than anything. The access off Armitage Lane is not suitable for a large number of additional vehicles. We also feel that the houses, as they are being nominated is on a hill, will have views into residents properties (especially those on the same side of the street), this is unfair on the residents. The additional houses will also have a large impact on a very crowded school who has already had to extend to accommodate additional pupils from the Pippins estate and who will no doubt also have to absorb children from other estates. We are surprised that this quiet, green area has been proposed when the power station is due to be demolished this year and so many houses will be erected in its place.</p>	
LPPO246	D, Todd (Cllr)	<p>I would like to raise concerns about all of the sites located in Heath Hayes especially off Cannock Road and Wimblebury Road in Heath Hayes which have been put forward for consideration. I would like the land to remain in the Greenbelt. We have wonderful wildlife habituating and we need to keep our green buffers. Five Ways Island is a major issue too. We already have congestions and high pollution. We have a monitor already to look at pollution, only 1 of 3 in the District. There has just been the first case of a child dying of pollution and yet it is being considered to have more housing in a high pollution area. There is a back up site which may be more suitable. Please consider what the many residents have said keep Green Belt and remove these sites from the local plan.</p>	

LPPO247	Freil Homes - C, Lynch	<p>We have reviewed these well thought out documents and, whilst we do not have any further comments, we hoped that you may be able to provide some clarification on the preferred option for our site off Armitage Lane Brereton. I have taken a screen grab which shows our site on the Preferred Options Policies Map as a Residential Strategic Site with Greenbelt Amendments. However, the site description in the Preferred Options Consultation Document and other supporting documents lists this site as is "SH4 Land East of The Meadows and land to the north of Armitage Lane Brereton approx. 33 dwellings". We believe this relates to our site as the details match up but note that our site is located to the south of Armitage Lane rather than the north, as you can see from the image. In the SHLAA we believe our site is listed as "R32 Land East of The Meadows, Armitage Lane, Brereton" The details in the SHLAA are a correct description of our site so we just thought it was worth getting in touch to ensure we have the correct understanding of the implications for our site.</p>
LLPO248	Richborough Estates (Land off Brownhills Road, Norton Canes)	<p>Pegasus Group - B, Cook</p> <p>Housing Supply (2018-2038) The Council's approach is to utilise the standard method to calculate its minimum housing requirement which comprises of 275.7dpa. The Council then identified the breakdown of its outstanding housing supply as follows: • The standard method provides a requirement of 5,516 dwellings over the period • Between 2018-2020 1,124 dwellings have been completed therefore reducing the requirement to 4,392 dwellings • The SHLAA identifies a further 1,359 dwellings which with adjustments relative to the Council's five-year housing land supply position (including windfalls of 54 dwellings and non-implementation discount of 28 dwellings) would provide 1,385 dwellings. This reduces the requirement to 3,007 dwellings • The SHLAA identifies further major and minor sites which could deliver a further 1,623 dwellings during the plan period. This reduces the requirement from 3,007 dwellings to 1,384 dwellings. The supporting text within the Preferred Option document references the contributions which are proposed to be made by South Staffordshire District Council (4,500 dwellings) and Lichfield District Council (2,665 dwellings) towards the shortfall in the GBBCHMA. The supporting text also notes that the ABCA are preparing a Joint Local Plan and have identified a shortfall of 29,260 dwellings between 2019-2038. Finally, the supporting text acknowledges that in order to contribute towards this shortfall in the wider housing market area both South Staffordshire District Council and Lichfield District Council will need to utilise Green Belt sites. Policy SO3.1 identifies that a minimum of 5,516 dwellings will be provided for within the Plan (276dpa) with a further 500 dwellings to meet the unmet needs of neighbouring areas. It indicates new housing allocations are concentrated within the existing urban areas or within planned expansion to the urban areas in accessible and sustainable locations. The Policy goes on to identify strategic housing allocations. As set out in Chapter 5 of this representation, it is submitted that Land off Brownhills Road, Norton Canes, is suitable for residential development and should accordingly form part of this Policy list. Preferred Policy - Housing Choice The Local Plan Preferred Options identifies that the most favoured option relative to housing mix was to retain the flexible approach currently being utilised by the Council but was not overly prescriptive. However, the Preferred Policy Direction as set out in the Preferred Options sets out a prescribed mix for market housing, affordable housing and affordable housing/home ownership (including those aspiring to home ownership). This runs counter to those responses made in the previous consultation exercise nor is evidence provided to substantiate that the previous approach resulted in housing which did not meet established needs. In addition, the Preferred Policy Direction identified within Table D provides prescriptive framework for each of the separate housing tenures. For affordable housing (rented and shared ownership) it identifies 8% provision within four plus bedroom accommodation and 5% for affordable housing/home ownership, however for market housing it identifies that there is no requirement at all for dwellings of four or more bedrooms. The justification for this is in a single sentence set out in paragraph 6.207. This is not sufficient to provide the prescriptive breakdown in size relative to each tenure sector. In particular, there can be no circumstances whereby there is no demand at all for market housing of four or more bedrooms. In addition, by only permitting new private housing in smaller dwellings will mean a significant proportion of the housing market (larger family homes) will not be met at all. This could have ramifications for the demographic make up of the District, resulting in a further increase in the proportion of the community who are, for instance elderly, as they require smaller housing and the policy focuses on providing these.</p>
LPPO249	Richborough Estates (Land off Brownhills Road, Norton Canes)	<p>Pegasus Group - B, Cook</p> <p>Land off Brownhills Road, Norton Canes: The site comprises approx. 6.68ha of land, located to the west of Brownhills Road and north of the M6 Toll. The site is located immediately south of a development of 130 new homes known as 'Chasewater Grange', developed by Taylor Wimpey in 2015. The site is made up of two agricultural fields, separated by a hedgerow, with further trees and hedgerows comprising the wider side boundaries. An electricity pylon is located to the north-western section of the site. Whilst the site is located within the West Midlands green belt, it is not subject to any other environmental or historical designations. Chasewater and the Southern Staffordshire Coalfield Heaths SSSI is located approx. 199m east of the site, across Brownhills Road. There are no listed buildings located in the vicinity of the site. The site is located within Flood Zone 1, the area at least risk from flooding. Illustrative Proposal: An Indicative Masterplan has also been prepared and is included at Appendix 2 to this representation. This has been prepared having regard to existing constraints, the guidance set out in the Design SPD adopted in April 2016; and standards that are established through the LPP1 and the Developer Contributions and Housing Choices SPD. The indicative masterplan identifies the following key features: • 140 dwellings proposed at an average density of 35 dwellings per hectare (net); • Access utilised from the existing roundabout on Brownhills Road; • Attenuation ponds positioned on western boundary as part of a SuDS scheme; • 40m acoustic offset incorporated between the proposed homes and the carriageway of the M6 toll road; • 30m offset incorporated for on-site overhead power cables; • 15m odour offset allowed around pumping station located on the adjacent Chasewater Grange development; and • On-site pond retained with a 15m ecology offset provided. In respect of standards, the proposed masterplan provides a network of open space that complements provision currently being delivered within the Chasewater Grange development to the north. The amount of open space indicated results in a level of provision that exceeds the Council's OSSR standards for amenity greenspace and provision for young people. In addition, the indicative plan demonstrates how a mix of properties can be delivered to assist in the achievement of a balanced housing market. This includes the provision of smaller dwellings suited to younger people and larger three and four-bedroom houses to meet aspirational needs. The delivery of 20% affordable provision has been assumed within the scheme to meet the requirements set out in Policy CP7. It is recognised that there may be a requirement for appropriate financial contributions to be made in respect of the proposal to mitigate impact of development, including a financial contribution in respect of Cannock Chase SAC. Green Belt: The site is considered within the Council's 2021 Green Belt study, referred to as Parcel NC8. The Green Belt Study provides the following conclusion in respect of the parcel: Parcel NC8 makes a relatively strong contribution to preventing encroachment on the countryside, and a moderate contribution to preventing neighbouring towns merging into one another, and the additional impact of its release on the adjacent Green Belt would be moderate.</p>

Therefore the harm resulting from its release, as an expansion of Norton Canes would be high. Harm could potentially be reduced by the introduction of new woodland belts and or small woodlands within NC8 to the east. This would form a strong Green Belt boundary and would help reduce the urbanising visual influence of the development and the perceived impact on the gap between Cannock and Brownhills/Burntwood. This would also help enhance the planned coalfield farmlands landscape character, in accordance with landscape strategies set out in the Landscape Character Assessment for Cannock Chase (2016). Whilst Richborough Estates is not in control of land to the west of site (that which comprises green belt parcel NC8). However, the illustrative Site Layout included at Appendix 2 to this representation demonstrates how a green belt buffer can be provided within the site which would form a defensible boundary in this location. It is important to note that the site is identified as making only a moderate contribution to both preventing neighbouring towns merging into one another and its impact upon the wider greenbelt. Indeed, the release of this site from the Green Belt would not result in sprawl, as it is contained by a number of barriers, including the M6 toll to the south. It is therefore submitted that the site performs a reduced function in green belt terms than other sites of a similar size and it is therefore considered that the site should be released from the green belt for development. Suitability: The indicative masterplan demonstrates how a scheme for approximately 140 dwellings can be achieved having regard to development design guidelines and development standards currently utilised by the Council. The proposal is sustainable and represents a logical expansion to the settlement of Norton Canes without undermining the purpose of the Green Belt in this location. Deliverability: There is an agreement in place between the landowner and Richborough estates to facilitate the development of the site. Further technical work will be commissioned to further demonstrate the deliverability of this site. However, high level technical work undertaken to date confirms there are no constraints likely to render the site undeliverable in the Plan period. The site is available now. There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the impacts identified by the Council through the initial sustainability appraisal of the site can be mitigated and, in many cases, a positive outcome can be achieved. The site is deliverable and immediately available and, subject to allocation, could deliver homes and associated community benefits within the next 5 years. Richborough Estates was involved in bringing forward development to the north of this site, on the former greyhound track, which was constructed by Taylor Wimpey (Chasewater Grange), demonstrating a market interest in this location. Availability: Richborough Estates has a legal agreement in place with the landowners and are in a position to progress with the promotion of the site for residential led development. If the site is to be successfully allocated for development and removed from the Green Belt, Richborough estates would seek to develop the site immediately, which would contribute considerably to the District's housing supply. By way of a recent example, Richborough promoted two Green Belt allocations through the South Staffordshire Site Allocations Plan and both were granted outline permission shortly after that plan was adopted and the sites removed from the Green Belt

Key Benefits: Development of the site will contribute to building a strong, responsive and competitive economy. In particular, the delivery of new homes at the site will bring economic benefits during the construction, operational and commercial stages. The proposal would assist in the delivery of supporting infrastructure and also provide on-site open space and two community orchards. Overall, the provision of much needed additional open market and affordable homes in the District will contribute to building a strong, responsive and competitive economy in line with the objectives of the NPPF. Conclusion: Richborough Estates is supportive of the Local Plan Preferred Options document in the main, subject to a number of amendments and clarifications set out within this Representation. However, Richborough Estates submits that Land off Brownhills Road, Norton Canes should be allocated for residential development. This site is sustainable located adjacent to the existing urban area of Norton Canes which is identified as the one of the main areas for development within the Local Plan Review. This site is available and deliverable, as identified through the submission of the Illustrative Layout Plan at Appendix 2 to this representation. Exceptional circumstances exist to justify the release of appropriate and sustainable sites located within the Green Belt. These circumstances include the significant un-met housing need arising from both within Cannock Chase District and the GBHMA, combined with the fact that around 60% of the District lies within the West Midlands Green Belt and around 30% lies within the Cannock Chase AONB. Furthermore, it has been recognised through the recent examination of a number of Local Plans that Green Belt release should not be avoided at the overall detriment to sustainability, resulting in an a less sustainable distribution of development as required by the overarching vision for the Local Plan, as well as the NPPF.

LPPO250	Richborough Estates (Land South of Cannock Road, Heath Hayes) Pegasus Group - B, Cook	<p>Housing Supply (2018-2038) The Council's approach is to utilise the standard method to calculate its minimum housing requirement which comprises of 275.7dpa. The Council then identified the breakdown of its outstanding housing supply as follows: • The standard method provides a requirement of 5,516 dwellings over the period • Between 2018-2020 1,124 dwellings have been completed therefore reducing the requirement to 4,392 dwellings • The SHLAA identifies a further 1,359 dwellings which with adjustments relative to the Council's five-year housing land supply position (including windfalls of 54 dwellings and non-implementation discount of 28 dwellings) would provide 1,385 dwellings. This reduces the requirement to 3,007 dwellings • The SHLAA identifies further major and minor sites which could deliver a further 1,623 dwellings during the plan period. This reduces the requirement from 3,007 dwellings to 1,384 dwellings. The supporting text within the Preferred Option document references the contributions which are proposed to be made by South Staffordshire District Council (4,500 dwellings) and Lichfield District Council (2,665 dwellings) towards the shortfall in the GBBCHMA. The supporting text also notes that the ABCA are preparing a Joint Local Plan and have identified a shortfall of 29,260 dwellings between 2019-2038. Finally, the supporting text acknowledges that in order to contribute towards this shortfall in the wider housing market area both South Staffordshire District Council and Lichfield District Council will need to utilise Green Belt sites. Policy SO3.1 identifies that a minimum of 5,516 dwellings will be provided for within the Plan (276dpa) with a further 500 dwellings to meet the unmet needs of neighbouring areas. It indicates new housing allocations are concentrated within the existing urban areas or within planned expansion to the urban areas in accessible and sustainable locations. The Policy goes on to identify strategic housing allocations. As set out in Chapter 5 of this representation, it is submitted that Land off Brownhills Road, Norton Canes, is suitable for residential development and should accordingly form part of this Policy list. Preferred Policy - Housing Choice The Local Plan Preferred Options identifies that the most favoured option relative to housing mix was to retain the flexible approach currently being utilised by the Council but was not overly prescriptive. However, the Preferred Policy Direction as set out in the Preferred Options sets out a prescribed mix for market housing, affordable housing and affordable housing/home ownership (including those aspiring to home ownership). This runs counter to those responses made in the previous consultation exercise nor is evidence provided to substantiate that the previous approach resulted in housing which did not meet established needs. In addition, the Preferred Policy Direction identified within Table D provides prescriptive framework for each of the separate housing tenures. For affordable housing (rented and shared ownership) it identifies 8% provision within four plus bedroom accommodation and 5% for affordable housing/home ownership, however for market housing it identifies that there is no requirement at all for dwellings of four or more bedrooms. The justification for this is in a single sentence set out in paragraph 6.207. This is not sufficient to provide the prescriptive breakdown in size relative to each tenure sector. In particular, there can be no circumstances whereby there is no demand at all for market housing of four or more bedrooms. In addition, by only permitting new private housing in smaller dwellings will mean a significant proportion of the housing market (larger family homes) will not be met at all. This could have ramifications for the demographic make up of the District. resulting in a further increase in the proportion of the community who are, for instance elderly, as they require smaller housing and the policy focuses on providing these.</p>
LPPO251	Richborough Estates (Land South of Cannock Road, Heath Hayes)	<p>Land South of Cannock Road, Heath Hayes: Promoting as a residential led scheme with the potential to deliver a new primary school. In addition, land to the south of Newlands Lane is identified as a new Country Park, Richborough Estates supports that the site identified as a draft allocation in the Preferred Options consultation document and supports the release of the site from the Green Belt to the south of Cannock Road to allow for delivery of the site. The site being proposed for allocation is split into two parts, The first part of the site, approx. 32.45ha in size, is being proposed for a residential-led scheme/ It lies south of Cannock Road, Heath Hayes, and is bounded by Newlands Lane to the south, and existing woodland areas to the east and west. The second part of the site lies to the south of Newlands Lane and is being proposed as a country park to be delivered alongside the residential development. This comprises approx. 14.81ha. The site currently comprises pastoral farmland with some areas used for seasonal crop production. It is not considered to represent best or most versatile agricultural land, however further detail can be provided if required. The land is interspersed with connecting native hedgerows and bounded by mixed species woodland blocks. The landform of the site gently falls from north to south with a topographical range of approx. 171 AOD (Above Ordnance Datum i.e. height relative to the average sea level). The site boundaries and immediate surroundings comprise: • To the north, the site adjoins the existing residential edge associated with Cannock Road (A5150), including the Severn Trent compound to the north-east • To the east – the boundary is well defined by a mixed woodland block, a Public Right of Way and the north – south route of Newlands Brook • To the south – the site adjoins the vegetated Newlands Lane which has been closed to traffic • To the west – the boundary is formed by a mixed woodland block with Newlands Lane beyond. Promotional Document: The promotional document attached at Appendix 2 sets out the following details: • Planning Policy context including demonstration of the Exceptional Circumstances required to release the site from the Green Belt • Sustainability credentials of the site • Local facilities, amenities and services • Access and sustainable transport • Heritage and Archaeology • Landscape and Visual • Ecology • Air quality • Odour • Indicative masterplan and design principles. Deliverability: The site is a suitable area for housing as there are no physical, technical or environmental constraints preventing its development. The Framework requires LPAs to maintain delivery of housing land to meet their housing targets. To be considered deliverable, a site should be: • Available. A site is considered available when there is confidence that there are no legal or ownership problems. • Suitable. A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities; and • Achievable. A site is considered achievable for development where there is a reasonable prospect that housing will be delivered on the site within five years, and in particular, development of the site is viable. Availability: Richborough Estates have a legal agreement in place with the landowners and are in a position to progress with the promotion of the site for residential led development. If the site is to be successfully allocated for development and removed from the Green Belt, Richborough Estates would seek to develop the site immediately, which would contribute considerably to the District's housing supply.</p>

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By way of a recent example, Richborough estates promoted two Green Belt allocations through the South Staffordshire Site Allocations Plan and both were granted outline permission shortly after the plan was adopted and the sites removed from the Green Belt. With its extensive highway frontage there is the ability to have at least two housebuilder outlets running at the same time, thus increasing the delivery of plots and at the same time increasing housing choice for purchasers. Suitability: The site is suitable for residential development for the following reasons: • It offers a suitable location for development and can be brought forward immediately following an allocation; • It would form a natural extension to the established area of Heath Hayes; Achievability: The site has been fully assessed in terms of its environmental considerations and it has been demonstrated that the delivery of the site is achievable and deliverable, and a team of technical consultants has been appointed to support the delivery of this site moving forward. Where technical constraints are identified, Richborough Estates will provide appropriate mitigation and invest in the site to ensure delivery. Richborough Estates has reviewed the economic viability of the proposals in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Cannock. These considerations have been analysed alongside cost factors associated with the site, including site preparation costs and site constraints. Richborough Estates can therefore confirm that the site is economically viable and therefore achievable. Key Benefits: Development of the site will contribute to building a strong, responsive and competitive economy, as well as providing social and environmental benefits. In particular, the delivery of new homes at the site will bring the following benefits: • Much needed affordable housing. • Introducing new housing choice. • New school. • Additional spend in the local economy. • Direct construction jobs and indirect related construction jobs. • New recreation opportunity via the Country Park opening up private land for public use by existing and new residents, as an alternative to using Cannock Chase. • Biodiversity net gain. Conclusion: Richborough Estates is supportive of the LPPO document in the main, subject to a number of amendments and clarifications set out within this Representation. Richborough Estates is also supportive of the allocation of land south of Cannock Road, Heath Hayes for residential-led development. The site is sustainably located adjacent to the existing urban area of Cannock/Hednesford/Heath Hayes which is identified as the main focus for development within the adopted Local Plan Part 1. This site is available and deliverable, as identified through the submission of the Promotional Document at Appendix 2 to this Representation. Exceptional circumstances exist to justify the release of appropriate and sustainable sites located within the Green Belt. These circumstances include the significant un-met housing need arising from both within Cannock Chase District and the GBBCHMA, combined with the fact that around 60% of the District lies within the West Midlands Green Belt and around 30% lies within the Cannock Chase AONB. Furthermore, it is recognised through the recent examination of a number of Local Plans that Green Belt release should not be avoided at the overall detriment to sustainability, resulting in an a less sustainable distribution of development as required by the overarching vision for the Local Plan, as well as the NPPF.

LPPO252	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	<p>Housing Supply (2018-2038) The Council's approach is to utilise the standard method to calculate its minimum housing requirement which comprises of 275.7dpa. The Council then identified the breakdown of its outstanding housing supply as follows: • The standard method provides a requirement of 5,516 dwellings over the period • Between 2018-2020 1,124 dwellings have been completed therefore reducing the requirement to 4,392 dwellings • The SHLAA identifies a further 1,359 dwellings which with adjustments relative to the Council's five-year housing land supply position (including windfalls of 54 dwellings and non-implementation discount of 28 dwellings) would provide 1,385 dwellings. This reduces the requirement to 3,007 dwellings • The SHLAA identifies further major and minor sites which could deliver a further 1,623 dwellings during the plan period. This reduces the requirement from 3,007 dwellings to 1,384 dwellings. The supporting text within the Preferred Option document references the contributions which are proposed to be made by South Staffordshire District Council (4,500 dwellings) and Lichfield District Council (2,665 dwellings) towards the shortfall in the GBBCHMA. The supporting text also notes that the ABCA are preparing a Joint Local Plan and have identified a shortfall of 29, 260 dwellings between 2019-2038. Finally, the supporting text acknowledges that in order to contribute towards this shortfall in the wider housing market area both South Staffordshire District Council and Lichfield District Council will need to utilise Green Belt sites. Policy SO3.1 identifies that a minimum of 5,516 dwellings will be provided for within the Plan (276dpa) with a further 500 dwellings to meet the unmet needs of neighbouring areas. It indicates new housing allocations are concentrated within the existing urban areas or within planned expansion to the urban areas in accessible and sustainable locations. The Policy goes on to identify strategic housing allocations. As set out in Chapter 5 of this representation, it is submitted that Land off Brownhills Road, Norton Canes, is suitable for residential development and should accordingly form part of this Policy list. Preferred Policy - Housing Choice The Local Plan Preferred Options identifies that the most favoured option relative to housing mix was to retain the flexible approach currently being utilised by the Council but was not overly prescriptive. However, the Preferred Policy Direction as set out in the Preferred Options sets out a prescribed mix for market housing, affordable housing and affordable housing/home ownership (including those aspiring to home ownership). This runs counter to those responses made in the previous consultation exercise nor is evidence provided to substantiate that the previous approach resulted in housing which did not meet established needs. In addition, the Preferred Policy Direction identified within Table D provides prescriptive framework for each of the separate housing tenures. For affordable housing (rented and shared ownership) it identifies 8% provision within four plus bedroom accommodation and 5% for affordable housing/home ownership, however for market housing it identifies that there is no requirement at all for dwellings of four or more bedrooms. The justification for this is in a single sentence set out in paragraph 6.207. This is not sufficient to provide the prescriptive breakdown in size relative to each tenure sector. In particular, there can be no circumstances whereby there is no demand at all for market housing of four or more bedrooms. In addition, by only permitting new private housing in smaller dwellings will mean a significant proportion of the housing market (larger family homes) will not be met at all. This could have ramifications for the demographic make up of the District resulting in a further increase in the proportion of the community who are, for instance elderly, as they require smaller housing and the policy focuses on providing these.</p>
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LPPO253	St Modwens (Land off Main Road, RPS - P, Hill Brereton)	<p>Land off Main Road, Brereton: Richborough Estates is promoting land off Main Road, Brereton for residential development, including public open space and new community orchards. Site Description: The site comprises approx. 13.68ha of land, located to the south of Main Road and south-east of Wattfield Close, Brereton, Rugeley. The site is located opposite Land east of the Meadows, which is identified through Policy SO3.1 of the LPPO document as a draft housing allocation (ref: SH4) for 33 dwellings. Land east of The Meadows is to be released from the green belt to facilitate the delivery of that site. The site is made up of several agricultural fields, separated by hedgerows with a number of individual trees dispersed among them. The site also includes a small number of agricultural buildings associated with the current use of the land. Whilst the site is located within the West Midlands green belt, it is not subject to any other environmental or historical designations. There exist several Grade II Listed Buildings some 150m to the north-west of the site, in addition to Brereton Hall, a Grade II* Listed Building. However, these Listed Buildings are set in the context of existing built form and it is not considered that the site comprises part of the setting of these buildings. The site is located in Flood Zone 1, the area at least risk from flooding. Illustrative Proposal: The Illustrative Masterplan included at Appendix 2 illustrates how the site may come forward for 204 dwellings, including 20% affordable homes, at an average density of 34dph. Given the size of the site, there is no reason why a policy compliant housing mix and that relevant guidance regarding separation distances and garden sizes cannot be achieved. The proposed street layout is underpinned by a central-north tree lined avenue, which delivers a looped route and a new means of access from main Road and Batesway. An emergency vehicle access is proposed via Coalpit Lane, subject to vehicle tracking. The proposed streets are aligned to existing contours within the site and the layout retains all existing rights of way and the existing track which crosses the southern area of the site. Development cells are interspersed with structural landscape layers to address soft rising views of the development and to maintain a green backdrop to views from Batesway. Lastly, a substantial development offset allows for the strengthening of landscape along the eastern edge to form a new and enduring green belt boundary. Green Belt: The site is considered within the Council's 2021 Green Belt Study, covered by land parcels RU37 and RU38, although it should be noted that parcel RU38 also extends beyond the site boundary to both the south and east. The Illustrative Site Layout included at Appendix 2 to this Representation demonstrates how a green belt buffer can be provided along the southern and eastern boundaries, which would form a strong and defensible boundary in this location. It is important to note that parcel RU37 in particular identified as making a relatively weak contribution to preventing neighbouring towns merging into one another and the additional impact of its release on the adjacent Green Belt would only be minor-moderate. It is therefore submitted that the site performs a reduced function in green belt terms than other sites of a similar size and it is therefore considered that the site should be released from the green belt for development. Deliverability: The site is a suitable area for housing as there are no physical, technical or environmental constraints preventing its development.</p>
		<p>The Framework requires LPAs to maintain delivery of housing land to meet their housing targets. Availability: Richborough Estates have a legal agreement in place with the landowners and are in a position to progress with the promotion of the site for residential development. If the site is to be successfully allocated for development and removed from the Green Belt, Richborough Estates would seek to develop the site immediately, which would contribute considerably to the District's housing supply/ By way of a recent example, Richborough promoted to Green Belt allocations through the South Staffordshire Allocations Plan and both were granted outline permission shortly after that plan was adopted and the sites removed from the Green Belt. Suitability: The site is suitable for residential development for the following reasons: • It offers a suitable location for development and can be brought forward immediately following an allocation; • It would form a natural extension to Brereton; Achievability: The site has been fully assessed in terms of its environmental considerations and it has been demonstrated that the delivery of the site is achievable and deliverable, and a team of technical consultants has been appointed to support the delivery of this site moving forward. Where technical constraints are identified, Richborough Estates will provide appropriate mitigation and invest in the site to ensure delivery. Key Benefits: Development of the site will contribute to building a strong, responsive and competitive economy. In particular, the delivery of new homes at the site will bring economic benefits during the construction, operational and commercial stages. The proposal would assist in the delivery of supporting infrastructure and also provide on-site open space and two community orchards. Overall, the provision of much needed additional open market and affordable homes in the District will contribute to building a strong, responsive and competitive economy in line with the objectives of the NPPF. We have made the case in these representations that greater consideration must be given to providing more than 500 dwellings for neighbouring authorities. An increase in housing numbers would necessitate further site allocations and land off Main Road is a site and should be one of those additional allocations. Richborough Estates is supportive of the LP document in the main, subject to a number of amendments and clarifications set out within this representation. However, Richborough Estates submits that land off Main Road, Brereton should be allocated for residential development. The site is sustainably located adjacent to the existing urban area of Brereton which is identified as the one of the main areas for development within the Local Plan Review. The site is available and deliverable, as identified through the submission of the Illustrative Layout Plan at Appendix 2. Exceptional circumstances exist to justify the release of appropriate and sustainable sites located within the Green Belt. These circumstances include the significant un-met housing need arising from both within Cannock Chase District and the GBHMA, combined with the fact that around 60% of the District lies within the West Midlands Green Belt and around 30% lies within the Cannock Chase AONB. Furthermore, it is recognised through the recent examination of a number of Local Plans that Green Belt release should not be avoided at the overall detriment to sustainability, resulting in a less sustainable distribution of development as required by the overarching vision for the Local Plan, as well as the NPPF.</p>
LPPO254	St Modwens (Land at York's Bridge, Pelsall) RPS - P, Hill	<p>The land at York's Bridge, Pelsall is a cross boundary site which St Modwen are promoting through the BCP Review and the Cannock Chase Local Plan Review. The site is sustainably located on the edge of Pelsall and would provide a logical extension to the village. The release of the site from the Green Belt would not compromise the five purposes of the Green Belt as demonstrated in the site-specific assessment which has been undertaken. The land within Cannock Chase provides an opportunity for District Council to include a policy mechanism within the Local Plan for the whole site to come forward and realise its full potential for residential development. The Cannock Chase parcel of land would provide 60 dwellings which would assist in meeting the unmet housing needs of neighbouring authorities, and therefore demonstrating that the District Council are meeting its commitment to the Duty to Cooperate. We have recommended two policy mechanisms for the land at York's Bridge to come forward through the Local Plan or through a Local Plan Review once the BCP is adopted and kindly request that these given due consideration.</p>

This representation is made on behalf of Friel Homes Ltd with regards to Land South of Armitage Lane, Brereton, WS15 1ED (SHLAA ref R32). Support the inclusion of the site identified as proposed "Strategic Housing Allocation SH4 Land East of the Meadows and land to the north of Armitage Lane Brereton" in Policy SO3.1 for housing development for up to 33 dwellings in the Preferred Option Local Plan. However, a formal request is made for the site to be renamed as Land South of Armitage Lane. As a matter of fact the site does not lie to the east of the street known as The Meadows, or indeed to the north of Armitage Lane. The site is located to the south of Armitage Lane and to the east of Hob Hill Primary School, and is shown marked red on the attached Location Plan 4934.99. Land to the South of Armitage Lane comprises some 1.7ha of grazing land and is within the Green Belt. The western boundary is adjacent to the Rugeley Settlement Boundary on the Proposals Map to the adopted Cannock Chase Local Plan. The site is broadly rectangular in shape and is enclosed on all four sides. To the north is Armitage Lane, to the east the site is bound by the planted bund to the A51 and to the south by A460 Brereton Hill. To the west the site is bound by the Hob Hill Primary School and by the rear garden of a couple of frontage properties along Armitage Lane. The site is undulating. There is an existing access to the site from Armitage Lane. The majority of the boundaries are marked by hedgerow or tree planting, and there are a number of mature oak trees within the site. The site is well related in scale and size to the existing built-up area of Brereton/Rugeley and is well contained by existing physical features. The site can come forward as a discrete development without encroachment on the wider countryside and Green Belt. The site is located in a highly sustainable location and evidently suitable as a new housing allocation. The nearest bus stop is some 450m from the site along Main Road Brereton opposite Coalpit Lane, providing bus services to Stafford, Rugeley and Lichfield, including Rugeley Town Railway Station. Local services and facilities including a GP surgery, pharmacy, takeaways/restaurants and a convenience store are within easy walking and cycling distance of the site. The site is some 2.5km from Rugeley Town Centre where further services and community facilities can be reached. Primary and secondary schools are within easy reach of the site, including the proposed new All Through School to be built on the former Rugeley Power Station site within 1km of the site. Local employment opportunities can also be reached on the nearby Towers Business Park. Future residents of the site can attend their daily needs by foot or bicycle, where there is a need to travel further afield, sustainable travel alternatives to the private motorcar are available within easy reach of the site. Attached to the submission is an Indicative Site Layout (ALR-001 Rev B). (see document for housing types and numbers). The Indicative Site Layout demonstrates that the site is in conformity with the Policy Proposals of SO3.1, and can deliver some 33 dwellings on the site. Specialist surveys of the site have previously been commissioned by Friel Homes Ltd and submitted to Cannock Chase Council. These include a Transport Appraisal, Phase 1 Ecology Assessment, Desk-based Heritage Appraisal, Flood Risk Assessment and Drainage and Arboricultural Survey. These surveys demonstrate that there are no major constraints to the development of the site for housing.

The primary access to the site will be taken from Armitage Lane. A vehicular access will be provided at the current access to the site. A footpath access will be provided at the south of the site onto Brereton Hill. In terms of other infrastructure requirements Severn Trent has acknowledged that foul and surface water can be adequately disposed of, any other infrastructure requirements would be met through the appropriate CIL/S106 mechanisms. Biodiversity net gain would be provided on the site including the enhancement of the existing mature trees with additional native tree planting to provide areas of natural open space. Footpath and cycleway provision through the site will create an attractive route for local residents. Sustainable design and construction methods would be incorporated where possible to assist in the Local Plan's aspiration to support a greener future. The site is owned by Friel Homes Ltd who have a track record in delivering high quality homes. Friel Homes have the ability and the interest to deliver the site early in the Plan period. The site is developable and deliverable. Development of the site meets the requirements of Strategic Objective 3 of the Cannock Chase Local Plan Preferred Option: Providing for Housing Choice, namely, facilitating sustainable housing provision, assisting in the delivery of housing to meet the District's needs, helping to meet local needs for affordable housing, providing housing choice for an ageing population and catering for the needs of different groups in society. Land South of Armitage Lane is therefore appropriately allocated as strategic housing allocation SH4 in Policy SO3.1.

LPPO256	Bloor Homes Ltd	Define Planning & Design Ltd - M, Rose	<p>Land West of Hednesford Road, Norton Canes (SHLAA Sites N24, N33 and N64): BHL welcome the inclusion of 'Land West of Hednesford Road, Norton Canes' (SHLAA Site Ref. N33) as a strategic housing allocation for the delivery of approximately 175 dwellings under reference SH5. Indeed, that proposed allocation reflects that the site is located in an entirely suitable location for growth and is not subject to any insurmountable technical or environmental constraints, as demonstrated through the site's favourable Sustainability Appraisal scoring. However, BHL are of the view, as set out above, that the adjacent land (SHLAA Parcels N24 and N64) to the south-west of that proposed allocation should also be allocated or safeguarded for residential development in order to ensure that CCDC have taken sufficient land out of the Green Belt to meet its own housing need (with sufficient flexibility) and that it has sufficiently planned for its longer-term needs (in accordance with NPPF paragraph 139), plus a sufficient contribution to the unmet needs of the wider HMA. The allocation of those additional parcels (SHLAA Parcels N24 and N64) would reflect their suitability as demonstrated within both the SHLAA and SA. Indeed, the SHLAA assessment of those omitted parcels are largely similar to the conclusions for the allocated N33; besides noting the presence of historic landfill and coal mining activity, which have been sensitively dealt with in the submitted Masterplan for the 'wider site' (Drawing Ref. DE.387 Repts Plan 2 RevA). Furthermore, the SA assessments of the omitted parcels (N24 and N64) are almost identical to the conclusions for N33 (the allocated parcel). Rather, the SA finds that Parcels N24 and N64 would have a less significant negative impact in terms of pollution and the historic Environment in comparison to Parcel N33. As such, the residual land under BHL's control performs similarly to the proposed allocation site, and therefore can only be seen as being suitable for residential development. The site is an entirely appropriate location for sustainable development in terms of its relationship with the settlement, with its location less than 350m from the local centre ensuring that it benefits from a full range of local services and facilities. Indeed, the settlement and surrounding area benefits from a full range of local services and facilities. Indeed, the settlement and surrounding area benefits from community facilities including a nursery, primary and secondary schools, a community library, churches, a pharmacy, and a doctor's surgery, retail facilities including a chain convenience store and smaller convenience stores, restaurants and takeaways, a bakery, and public houses, and recreational and sport facilities including public open spaces and the playing fields at the rear of the Norton Canes Community Centre. Furthermore, Norton Canes also contains significant employment areas, including the expansive Norton Canes Industrial Park 600m to the south of the site. In addition, the settlement's excellent connectivity with Cannock allows easy access to the Orbital Retail Park, Kingswood Lakeside Employment Park, the Longford Industrial Estate and Cedars Business Centre. Furthermore, the site and settlement benefit from excellent public transport links. A number of bus routes run along Hednesford Road adjacent to the site and along Church Road/Chapel Street, with the 60/60A services providing access to Cannock, Burntwood and Lichfield, and the 3/3A services providing access to Cannock and Walsall, via the villages of Brownhills, Pelsall and Rushall. The site also benefits from excellent pedestrian connectivity via the adjacent road network, and the Public Right of Way network in the surrounding area. Those active travel links will be enhanced through the provision of a pedestrian/cycle route through the site as a result of the site's development, which will tie in efficiently with the existing and proposed recreational routes surrounding the site to promote active movement between the site, the local centre, and the proposed recreation area to the north-west. In addition, the technical and environmental assessments carried out for the wider site to date have indicated that there are no insurmountable technical or environmental constraints.</p> <p>An Access Feasibility Report has identified that site access from Hednesford Road is feasible, and consultation is underway with Staffordshire County Council Highways to detail a scheme of improvements to the nearby Five Ways Roundabout to address congestion and air quality matters in accordance with Policy SO8.5. A drainage strategy that incorporates SUDS features and takes advantage of the site's natural fall to the south is evolving that will provide surface water attenuation at the site's south-west corner, and also provides the opportunity for ecological enhancement in that area. Meanwhile, the gas pipeline that travels broadly north-east to south-west through the site does not constrain development, and will be sensitively incorporated within an open space corridor. Furthermore, the proposed development is considered unlikely to have a significant impact on the wider historic Environment as assessed by the 2009 Historic Environment Character Assessment, and the potential for the re-use of the non-designated heritage asset of Norton Lodge Farm (if feasible) and the retention of the historic field boundaries will be considered throughout the master planning process, and have been incorporated into the proposed scheme as described below. Meanwhile, the site and its immediate surrounds are not subject to any ecological designations, and the opportunity to contribute to the enhancement of an ecological and recreational east-west corridor/network to the north of the site will be realised through the connectivity that the site will provide. In relation to the landscape and visual impact of the scheme, it is noted that the site is not considered to be a valued landscape due to the heavy influence of surrounding detractors (pylons, overhead power lines, infrastructure, industrial buildings) but that the proposed layout will seek to retain attractive features such as the landscape structure/hedgerow patterns, and that the site is well-contained to views within 1km of the site, where the site would be seen in the context of the built development. In terms of Green Belt impact, whilst the site will inevitably result in the growth of Norton Canes and some encroachment into the countryside, the nature of the site, its relationship with the existing urban form, the robust landscape structure in the wider area, and notably the defensible Green Belt boundary that will be provided along Long Lane, mean that the degree of harm arising from the release of the land for development would be limited. Rather, the proposed development of the wider site presents an opportunity for CCDC to meet its development needs in a manner that creates a long-term robust and defensible Green Belt boundary to the north and west of Norton Canes. Indeed, the identification of the residual (N24 and N64), be that through an allocation for the upcoming plan period or safeguarding of the site to meet future needs, would establish a new Green Belt boundary at Long Lane, whereby the extent to the urban area and the countryside to the west would be clearly marked by the well-vegetated Long Lane.</p>
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Public Right of Way. Thus, the development of the entirety of this land would actually benefit the wider Green Belt by creating a 'readily recognisable' and 'permanent' Green Belt boundary that would strengthen the function of Green Belt parcels to the west of footpath in accordance with NPPF paragraph 139f. The Proposed Scheme: The substantive benefits of the site's comprehensive development with Strategic Housing Allocation SH5 on this relatively unconstrained site are clear, and are realised through the emerging Masterplan that has been submitted alongside these representations. That Masterplan provides for the delivery of approx. 168 units within the proposed allocation site, and a further c. 164 dwellings in the adjacent land. The emerging Masterplan for the site's development demonstrates how a well-designed site that relates well with the existing built form will be delivered to provide much needed housing in a sustainable location, with residents having direct access to, and providing support for, the range of local facilities and services within Norton Canes. The development proposals seek to create and nurture a happy, healthy, resilient and sustainable community. The Masterplan for the site's development outlines the delivery of a well-designed scheme that will relate well with the existing settlement, and benefit from excellent accessibility to the services and facilities therein. Specifically in relation to Policy SO1.2, the proposed development constitutes a sensible planned extension to the settlement that will effectively 'round-off' the built form in a manner that will have a limited impact on the surrounding landscape and the experience of the surrounding Green Belt. It will achieve this through the provision of a landscape-led development that responds sensitively to the surrounding landscape, sitting comfortably in the wider landscape structure by retaining and enhancing key features of vegetation. The response to existing residential areas adjacent to the site is similarly sympathetic and will respect both their residential amenity and enhance the existing townscape in accordance with Policy SO1.2; by effectively opening up to the cul-de-sacs of Norton Terrace and Chasewater Way through the provision of a significant area of community/open space at the eastern boundary. That approach, and the manner in which the internal development blocks are orientated to respond to the generous corridor of accessible and attractive green space (which travels from the north-east to the south-west of the site) will ensure that natural passive surveillance is achieved to deter crime and the fear of crime in accordance with Policy SO1.3. The emerging Masterplan also seeks to sensitively respond to the non-designated heritage assets within the site in accordance with Policy SO1.1, which CCDC's HIA defines as being the historic field boundaries of SHLAA Parcel N24. In that light, the emerging Masterplan seeks to retain the existing historic field boundaries (save for the small areas of removal required to accommodate the internal road layout) and enhance some boundaries with additional tree planting to strengthen their structure. In addition to that and given that the HIA notes the potential archaeological significance of these features, further archaeological assessment of the hedgerows will be undertaken prior to the site's construction.

That approach, and the potential conversion of Norton Lodge Farm in the adjacent proposed allocation site (if feasible), is therefore in accordance with Policy SO1.1 in that regard. Alongside that, the development scheme provides a generous quantum of accessible, attractive and safe open space, with the Masterplan incorporating a significant north-east to south-west corridor open space corridor, within which lies a community space/play area at the south/south-east of the site (within SHLAA Parcel N64) to serve existing and new residents. That open space corridor would align with the linear corridor that follows the route of the existing gas pipeline within the adjacent proposed allocation site and would be supplemented by smaller areas of open space located near to the north-western and western boundaries of the adjacent proposed allocation; with those areas of open space to be connected by green corridors focused on the existing hedgerows that will support ecological connectivity along the site's boundaries. As such, the comprehensive development of the entirety of BHL's land ownership (i.e. N24, N33, and N64) would provide a network of accessible and attractive open community space that would deliver significant enhancements to the wellbeing of its residents, and the residents of the settlement more widely, and promote a healthy and active environment for existing and future residents, in accordance with Policies SO2.2. and SO2.4. The scale and typology of that open space will seek to respond to the open space standards that are anticipated in the next iteration of the Plan and will also take into consideration the potential to address the shortfall in allotment/community food growing facilities within Norton Canes, in accordance with Policy SO2.5. The Masterplan also proposes the provision of footpath/cycle links that will maximise the potential of the site's well-connected location and enhance active travel networks between the site and its surrounding uses, including the excellent range of services and facilities within the local centre. It proposes the provision of pedestrian/cycle links with Hednesford Road to the site's east which then travel through the site and link to the Long Lane Public Right of Way via three connections at various points on the site's western boundary, which in turn provides access both to Jerome Primary School and the wider settlement to the south, and the proposed recreational east-west footpath/cycle route (Policy SO5.60 that links Hednesford Road with the safeguarded Country Park location to the site's north/north-west. Effectively, therefore, the site's comprehensive development will accommodate the creation of a much enhanced wider active travel network that connects the local centre and its facilities, surrounding residential areas, Hednesford Road, the site and the attractive countryside and proposed recreational uses to the north. The benefits to enhancing healthy and active lifestyles in accordance with Policies SO2.2 and SO2.4 are clear in that regard and are a significant benefit of residential development in this location. In that context, suitable residential development in this location can play a key role in ensuring the long-term sustainability of the wider District's environment, and in particular the Cannock Chase AONB and other designated areas. Indeed, the incorporation of significant on-site open space and recreational areas within a connected green infrastructure network to meet the needs of existing and residents, and the enhancements provided to the surrounding recreational routes and the manner in which they will increase connectivity with the proposed Country Park to the north, will help to minimise visitor pressure on more sensitive parts of the District in accordance with Policies SO4.3, SO7.1 and SO7.3. The Masterplan for the site's development also incorporates a sustainable drainage scheme at the site's south-west corner and therefore provides an opportunity for ecological enhancements.

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That area will provide the opportunity for the natural Environment to thrive and for a net gain in biodiversity to be realised in accordance with Policies SO7.1 and SO7.2, and will tie in with the wider ecological and recreational green infrastructure network along Long Lane. Overall, therefore, the development proposals set out above will demonstrably provide appropriate mitigation to compensate for the loss of Green Belt land in accordance with Policy SO7.7, given the provision of new and enhanced green infrastructure, additional planting, improvements to biodiversity, habitat connectivity and natural capital, new and significantly enhanced walking and cycling routes, and improved access to recreational facilities. As such, the above analysis and development proposals clearly demonstrate the realisable opportunity to meet the short-term needs of the District through the development of this suitable, available and deliverable site, in a manner that would provide additional flexibility to reduce the risk present within the District's housing supply, and also provide a valuable contribution towards the longer-term needs of the District and wider HMA. In that context, the accompanying Masterplan clearly demonstrates that, whilst significant benefits can be unlocked through the delivery of Strategic Allocation SH5, they would be further enhanced through a comprehensive approach to developing the entirety of BHL's land ownership in order to maximise the potential of residential development in this location. As such, the proposed development would deliver significant socio-economic and environmental benefits and contribute to the realising of the LPPO's wider objectives for Norton Canes, including the enhancement of ecological and recreational networks. It would do so whilst also sustainably rounding-off the built form of Norton Canes through the provision of a new robust and defensible Green Belt boundary to the west and therefore is entirely suitable in that regard. As such, this site reflects an opportunity for CCDC to achieve a number of the wider objectives of the plan, in promoting a happy, healthy, and sustainable community.

LPPO257	The Church Commissioners for England	Barton Willmore - A, Bird	Overview of Land to the east of Wimblebury Road, 'Bleak House': Bleak House is located adjacent to the urban edge of Cannock/Hednesford/Heath Hayes, approximately 2km east of Hednesford town centre and approximately 4km east of Cannock town centre. The site is bounded by residential development at the urban areas of Rawnsley and Wimblebury to the north and west respectively. A thicket of trees and Cannock Wood Road comprise the eastern boundary, with hedgerows and a PRoW defining the southern boundary. The Commissioners also own a large parcel of land further south of Bleak House, which provides a significant spatial gap between the site, the Staffordshire Coalfield Heaths SSSI and Burntwood. For the avoidance of doubt, the Commissioners are not promoting the land to the south for development. However, as noted within the supporting Vision Document whilst release of Bleak House from the Green Belt does not depend upon this there is the potential for the land to the south to be made available as appropriate e.g. to provide environmental improvements. Bleak House is in a highly sustainable location, with two primary schools located within 0.8km of the site. There are also several employment opportunities, including Anglesey Business Park and Lower Keys Business Park, within 1.2km of Bleak House. Within approximately 0.6km of the site lie several existing areas of play areas and public open space. In addition to the PRoW along the southern boundary, another PRoW crosses the north western corner of the site. These PRoWs can provide leisure opportunities for pedestrians and sustainable access to surrounding development in the first four phases of development, as outlined in the accompanying Vision Document. In terms of transport connections, the site benefits from good transport connections with existing bus stops on Cannock Wood Road, John Street and Littleworth Road providing frequent services to Cannock and Lichfield. Bleak House is approximately 2km in walking distance from Hednesford Railway Station offering services to Birmingham and Walsall. Bleak House is located approximately 1.5km north of the A5190 (Cannock Road) which provides direct access westwards to Cannock, where onward connections can be made to the M6 and M6 Toll, and eastwards to Burntwood and Lichfield.
LPPO258	C. Elwell Transport (Repairs) Ltd	J, Heminsley	The owner wishes to develop this site for housing purposes. The company are housebuilders. The site is reference R37 in the 2020 SHLAA and has an area of 2.32ha. The only constraint is the public footpath which crosses the site which links Hednesford Road with Coppice Lane. Taking account of the need to accommodate the footpath the estimated capacity of the site is 40 units. The site is on the edge of the built-area of Rugeley with well-defined boundaries. The location is a sustainable one in relation to good access to public transport, bus and rail, local shops, schools and health facilities all within easy walking distance. It is considered that the contribution to local housing need in Rugeley/Brereton from site within the urban area has been overestimated. Site H47 at Redbrook Lane with a potential capacity of 93 units is currently fully occupied by a major logistics company and the western edge of this site has an historic underground fire in a former railway embankment which would be extremely expensive to resolve and enable residential development to take place. Neither of the Rugeley town centre sites H23 Wellington Drive and H22 Rugeley Market Hall/Bus Station with a combined capacity of 80units have schemes which have been worked up and tested for viability. Site H49 at The Mossley with a potential capacity of 40units has major problems with achieving a suitable access. Site H48 the former Aelfgar School has planning permission for 58units not 85 as stated in table C. So it is considered that the contribution to housing need from these urban site has been overestimated. Development of the proposed site would not constitute a significant encroachment into open countryside with well-defined boundaries on the edge of the built up area and is in the most sustainable location of all the sites on the south-western edge of Rugeley in relation to access to services. It can make a useful contribution towards meeting Rugeley's future housing need and should be allocated for housing development.

LPPO259

Taylor Wimpey (Land East of
Wimblebury Rd)

RPS - P, Hill

Extent of Land: As the Council are aware, Taylor Wimpey (TW) are promoting the site which comprises the land proposed for allocation IN THE cclpr (sh2) 'Land East of Wimblebury Road' for 410 dwellings (the 'site'). TW is therefore committed to bringing forward the site through the plan-led process and is willing to work with the Council on preparing an appropriate policy framework that can guide development on the site. TW therefore welcomes the Council's decision to propose the allocation of the site in the CCLPR. The site allocation comprises land that was previously safeguarded in the 1997 Local Plan and which was also similarly identified in the Cannock Chase Core Strategy adopted in 2014 as safeguarded land, as well as additional parcel of land described as 'East of Wimblebury Road' which lies to the east of the safeguarded land. [...] [see document for plan]. The extent of land under TW control is far greater than that which relates to the site allocation alone. This is significant as it has implications for proposals set out later in this submission (see chapter 4) regarding proposals for potential additional safeguarded land adjacent to the site allocation which forms part of the land under their control. TW has also commissioned new evidence to inform a revised vision and masterplan for the site. As indicated above, this will comprise a Vision Document, which will provide greater detail on scale and nature of the proposals as well as address, as far as practicable, the known technical issues relating to the site. At this stage, an updated indicative masterplan for the site allocation, and adjacent land (proposed for safeguarding in the CCLPR) is set out below and attached as Appendix 2. [...]. Promoting a Sustainable Development: The site is located on the edge of the District's largest urban area - Cannock/Hednesford/Heath Hayes. As the largest settlement in the District, there are several services and amenities in close proximity to the site. [...]. Public transport services are present along Wimblebury Road, Melbourne Road and Hobart Road (19, 20 and 61 services) to the west of the site, providing access to Cannock and Lichfield every 30-60minutes, Monday to Saturday. The majority of the site is within 400m of bust stops for these services and is therefore located within a suitable walking distance with a good level of services available. In addition, other services in the area include bus routes 3, 3A, 60, 61A and 835 providing twice hourly services to Walsall, Lichfield and daily rush hour service to and from Stafford. On this basis, the Site represents a sustainable location in accordance with the NPPF (paragraph 8). Site Deliverability: The site is wholly within the control of a national housebuilder, who has considerable experience of delivering houses within this area and the wider West Midlands. It is not subject to any significant technical or environmental constraints that will prevent it coming forward for housing. The site is considered suitable for residential development. In summary, the Site: • Is in close proximity to a range of local services and facilities; • has no technical or environmental constraints that prevent delivery; and • has strong transport links locally and further afield. TW can therefore confirm that development of the site is economically viable and is confident that residential development can be achieved within the first five years of the plan period. There is therefore an excellent prospect of the site being delivered in the short-term and could, if needed, be brought forward within the first five years of the plan period.

SO3.4: Gypsies, Travellers and Travelling Show People

Question 18: Will the proposed policy assist in meeting the needs arising for gypsy, traveller and travelling show people within the District?

LPPO260	Walsall Council - N, Ball	The Plan does not allocate additional sites for travellers, however it is noted that recent planning permissions have approved additional sites that may contribute to meeting the identified need, which is modest in any case. It is unclear how these relate to the need for a further 11 plots referred to in policy SO3.4. Some clarity of terminology should be made in this policy. The term 'plot' is normally used for a site for showpeople whereas the term 'pitch' is used for one for Gypsies and Travellers.
LPPO261	Historic England - E, Boden	Any sites identified for allocation to meet the needs of these groups would need to be accompanied by an appropriate heritage impact assessment.
LPPO262	Norton Canes Parish Council	In relation to Policy SO3.4 accommodation for Gypsies, Travellers and Travelling Showpeople the analysis of need is noted. However the proposed criteria based policy does not resolve the issue of the environmentally damaging encampments at Stokes Lane/Long Lane and the Parish Council would wish to see a policy giving priority to resolving the issue even if it involves a more appropriate site with suitable facilities sites in the Green Belt. The Parish would also wish to include providing a long term future for the Travelling Showpeople at Grove, who currently only benefit from a temporary planning permission, in the context of the masterplan for Heritage regeneration of the former colliery site.
LPPO263	Brindley Heath Parish Council	We note the need for gypsy and traveller sites but would stress that this must be a carefully considered plan for a Council run site. The present method of granting planning permission to illegal sites within the Green Belt must cease as it continues to encourage others to do exactly the same and there is no justification for such in planning terms.

SO4.1: Safeguarding Existing Employment Areas for Employment Uses

Question 19: Do you support the preferred policy direction to safeguard existing provision for employment use?

LPPO264	Walsall Council - N, Ball	Turning to employment land, the Plan is not explicit about what proportion if any of the additional 50ha of land would meet needs arising in the Black Country. We stated at the Issues and Options stage that Cannock Chase, Walsall and parts of South Staffordshire formed a 'core area' for employment needs, with a high level of inter-dependency between homes and jobs. However, this provision, although modest relative to the total needs of the Black Country, is welcome. The proposals include new site allocations alongside the M6 (toll) at Churchbridge and Norton Canes close to the Walsall boundary. The proposed policy SO4.1 to safeguard existing employment areas for employment uses is welcome. The policy includes a requirement that there is evidence of comprehensive marketing for of the site for at least 12 months. However, evidence from the Black Country is that this is not sufficient; a number of significant employment developments have taken place in recent years on sites in our area where the site was vacant for a decade or longer. A minimum period that relates to the length of an economic cycle is recommended instead.	
LPPO265	Norton Canes Parish Council	Policy SO4.1 proposes to safeguard existing employment areas for employment uses whereby proposals for change of use from employment will only be permitted if there are overriding and demonstrable economic, regeneration and sustainable community benefits, demonstrable ongoing availability of employment land in other locations, comprehensive marketing for at least 12 months, demonstrable environmental benefits and no adverse impact on viability of adjoining businesses. This policy is proposed to be applied to the business areas in the village mentioned above together with Watling Street and Lime Lane Business areas and is supported.	
LPPO266	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Policy SO4.1 seeks to safeguard existing employment areas for employment uses. It sets out a range of criteria which will be utilised when assessing whether an employment site could be lost to alternative uses. As drafted, it is unclear whether all of the seven criteria set out within Policy SO4.1 have to be met to allow employment land to be used for alternative purposes. This needs to be addressed. It is assumed that not all the criteria should be met, for instance Criterion 5, which states that there will be demonstrable benefits arising from the proposal including improvement to local residential and environmental amenity, could in its own right be a sufficient reason to allow the reuse of an employment site for other purposes. In terms of new employment provision, the EDNA (2019) recommend that a range of employment land between 46-66ha should be made available during the plan period. Policy SO4.2 has developed this further to indicate that the Council will provide for up to 50ha of employment land for new development during the LP period to 2038. The policy also identifies 27ha of land across 12 sites which would be protected for employment purposes.
LPPO267	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Policy SO4.1 seeks to safeguard existing employment areas for employment uses. It sets out a range of criteria which will be utilised when assessing whether an employment site could be lost to alternative uses. As drafted, it is unclear whether all of the seven criteria set out within Policy SO4.1 have to be met to allow employment land to be used for alternative purposes. This needs to be addressed. It is assumed that not all the criteria should be met, for instance Criterion 5, which states that there will be demonstrable benefits arising from the proposal including improvement to local residential and environmental amenity, could in its own right be a sufficient reason to allow the reuse of an employment site for other purposes. In terms of new employment provision, the EDNA (2019) recommend that a range of employment land between 46-66ha should be made available during the plan period. Policy SO4.2 has developed this further to indicate that the Council will provide for up to 50ha of employment land for new development during the LP period to 2038. The policy also identifies 27ha of land across 12 sites which would be protected for employment purposes.
LPPO268	Richborough Estates (Land off Main Road, Breerton)	Pegasus Group - B, Cook	Policy SO4.1 seeks to safeguard existing employment areas for employment uses. It sets out a range of criteria which will be utilised when assessing whether an employment site could be lost to alternative uses. As drafted, it is unclear whether all of the seven criteria set out within Policy SO4.1 have to be met to allow employment land to be used for alternative purposes. This needs to be addressed. It is assumed that not all the criteria should be met, for instance Criterion 5, which states that there will be demonstrable benefits arising from the proposal including improvement to local residential and environmental amenity, could in its own right be a sufficient reason to allow the reuse of an employment site for other purposes. In terms of new employment provision, the EDNA (2019) recommend that a range of employment land between 46-66ha should be made available during the plan period. Policy SO4.2 has developed this further to indicate that the Council will provide for up to 50ha of employment land for new development during the LP period to 2038. The policy also identifies 27ha of land across 12 sites which would be protected for employment purposes.

LPPO269	Aldi Stores Ltd	Turley Associates - N, Denison	<p>We object to the wording of Policy SO4.1 as proposed. The policy as worded appears to set out a more stringent set of tests (in the form of criteria defining the exceptions) to be met than the existing equivalent policy in the adopted Local Plan Part 1 (LPP1). It is not clear whether it is the intention of the LPA to restrict the circumstances in which land in employment use can be used for other purposes. If that is the LPA's intention such an approach would have to be justified (in order to meet the tests of soundness set out at NPPF paragraph 35(b)). The LP's evidence base does not justify pursuing such a policy. The likely outcome of the current policy wording being adopted will be the future sterilisation of unviable employment sites from being put to more beneficial uses. The changes proposed on behalf of ALDI are designed to add clarity to the draft policy. The policy, as currently worded, seeks to 'safeguard' land and then provides a list of changes in which change from employment use may be permitted. It is clear that the intention of the policy is that a site should not be required to remain in employment use if a proposal comes within the exceptions set out later in the policy - that intention should be made explicit. The list of exceptions do not include the word 'and' or the word 'or'. It is not clear that whether the list is intended to be read conjunctively or if the exceptions are alternatives. It is clear that it would not be reasonable, or justified, to require a proposal to meet all the criteria listed in order to fall within the exception. In order to add clarity the word 'or' should be added as set out above. Reasoning for objection: The LPA's updated ELAA - Dec 2020 - contains evidence which underpins the emerging Local Plan policies. That document shows an improving picture in terms of available supply to meet assessed needs for employment land over the current LPP1 period to 2028 and over the new Local Plan period to 2038. That document shows that there is 28ha of readily employment available land within the District, which, coupled with completions of 73.45ha over the plan period to date, provides an overall supply of 96.45ha, which comfortably exceeds the current Local Plan requirement, set out in Policy CP8, of 88ha. Moreover, the ELAA indicates that there is a supply of a further 133ha of employment within the District which is not readily available, a proportion of which can be expected to come forward in the period to 2038. One of the key recommendations from the LPA'S EDNA - Covid 19 Update (Dec 2020) is that the District's employment land Objectively Assessed Need (OAN) should comprise a range of between 48ha to 66ha between 2018 and 2038 with no allowance for lost employment land over that period, or between 63ha and 81ha if losses are to be taken into account (at a rate of 0.756ha/annum).</p>
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The LPA indicate in draft Policy SO4.3 that the selected provision for the period to 2038 will be 50ha, with losses of employment land to be addressed through the use of criterion based policy (SO4.1). The EDNA provides evidence that the losses of employment land to alternative uses in the District is at a relatively low level - at an average of 0.756ha/annum over the period 2006/7 to 2019/20. This does not suggest that there is any urgent requirement to introduce a more stringent policy control over loss of employment land than that already in force in the LLP1. Draft Policy SO4.2 sets out the proposed provision for future employment land between 2018 and 2038. That provision is made up of the following components: • 27 ha from 'protected' allocated employment sites; • 16 ha from sites within "Existing Employment Areas" • Between 2018 and 2021 12.47 ha of employment land has been developed (completed). Those three elements amount to a supply of 55.47ha, compared to a required provision of 50ha over that period. Moreover para 6.281 of the Preferred Options document states that further land is likely to become available over the plan period (presumably reference to the 133ha of currently unavailable employment land identified in the ELAA). This indicates that there is no shortage of available employment land to meet the assessed OAN over the new Local Plan period to 2038. Finally, turning to the need to retain land within specific existing employment sites, we note that in respect of the Power Station Road Business Area, the Existing Employment Areas Study (2019 update) (EEAS) concludes at para 3.38 that [...]. Moreover, at Table 3.4 of that document it is recommended that within the wider designated area (of the Power Station Rd Business Area) this land should not be allocated, but retained in existing current use and monitored. Proposals for alternative use should be considered via a criteria-based policy. This site is likely to be a higher priority to consider for redevelopment for residential of opportunity arises in medium-long term. Moreover, para 3.49 recommends that within the Power Station Rd Business Area only the former JCB factory site should be retained for employment uses. It goes on to state that "a further 6 sites (including the remainder of the Power Station Rd Business Area) are considered to have potential to be more suitable for alternative uses in the future. Whilst alternative proposals should be considered against criteria-based policy, there should be no specific presumption in favour of their retention for B-class uses so that alternative uses can be considered in the future if their performance declines." In the light of those recommendations, we do not object to the principle of a criterion based policy to assess the merits of alternative use proposals within existing employment areas - we do, however, have serious concerns that the proposed criterion based policy as currently constructed (SO4.1) sets an almost impossibly high barrier for alternative proposed uses to clear, which will seriously reduce the prospects of such potentially beneficial uses obtaining planning permission. Policy SO4.1 runs counter to the recommendations of the EEAs by starting with a presumption that all land within existing employment areas should be retained for B-class use. It then sets out seven criteria which seemingly must all be met before planning permission for alternative use will be granted. The current adopted Policy CP8 is much more flexible in its approach, stating that [...]. There are subsequently 3 key criteria set out to be addressed. Please see provided response for proposed alternative wording for Policy SO4.1.

LPPO270	St Modwen Industrial & Logistics	RPS - J, Bonehill	<p>RPS welcome proposed policy SO4.1 and the associated identification of Watling Street Business Park as an area to be safeguarded for employment uses which recognise the contribution that the Site makes to providing much needed employment space within a highly accessible location. However, we suggest that in order to ensure that the Plan is positively prepared that it would be beneficial if the policy were revised to expressly indicate that redevelopment of safeguarded existing employment areas for employment uses will be supported. While this is implicitly indicated by the policy, we consider that revising the policy in this manner would be beneficial and provide additional certainty to the owners and operators of these existing employment areas.</p>
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SO4.2: Provision for New Employment Uses		
Question 20: Do you the preferred policy direction to provide land for new employment uses?		

LPPO271	Inland Waterways Association, P, Sharpe		<p>IWA notes that policy SO4.1 on employment provision includes an allocation in Table F of site E12. Any improved road access to this site potentially conflicts with the safeguarded route for the Hatherton Canal Restoration Corridor policy SO5.5. It should be a development requirement that a bridge is provided over the canal route with the necessary headroom as indicated in the 2006 Arup Feasibility Report and drawings.</p>
LPPO272	National Grid	Avison Young	<p>Following a review of the DPD we have identified that one or more proposed development sites are crossed or in close proximity to National Grid Assets. Details of the sites affecting National Grid Assets are provided below. SO4.2 E12 (CE19) - a plan showing details of the site locations and details of National Grid's assets is attached - this plan is illustrative only. Guidance on development near National Grid assets is also provided.</p>

LPPO273	Holford Farm Partnership - P, Holford	<p>Hawksmoor - T, Bathurst My clients fully support the proposed allocation of Site Ref: E10. The site extends to approximately 2.12ha and will therefore provide a meaningful contribution towards the District's future employment land supply over the period up to 2038 and assist in creating a 'hub' of employment uses around the Turf Roundabout on the A5 to compliment existing commercial development. Benefitting from excellent access to the A5 and the M6 Toll Motorway, the site will allow for strong connectivity to surrounding transport networks. Notwithstanding the above, my clients consider that the Council should allocate additional land for employment use as part of the Local Plan Review process. Currently, Policy SO4.2 allows for the allocation of 27ha of employment land. However, it is noted at the first pullet point of paragraph 6.257 of the consultation document that the Association of Black Country Authorities (ABCA) may have a potential shortfall in employment land supply. Given the adjacency of Cannock Chase District to the Black Country, the District should explore options for assisting the Black Country in meeting at least part of the potential shortfall within the District's boundaries. We note from the current consultation at paragraph 6.276 that the EDNA (2020) recommends that " a range of employment land of 46-66ha (net) including flexibility is made available during the period 2018-2038". However, the EDNA (2020) document itself also states in its conclusions and recommendations section at paragraph 6.7 that: "The range [46-66ha(net)] makes no allowance for the replacement of losses. Council officers will need to take a decision regarding the extent to which additional provision should be planned for, over and above the net requirement. The range rises further - to between 63ha and 81ha - if losses are replaced at 0.756ha per annum" The 0.756ha/annum figure for employment land loss is taken as an average of the losses experienced in the District over the past 12years, Whilst the amount of employment land loss will vary year to year, it is no doubt a trend that will continue over time as alternative uses are sought for existing land and buildings. Preferred Options Draft Policy SO4.2 states that the Local Planning Authority will provide for up to 50ha of land for office, manufacturing and distribution employment development during the period to 2038. Given that, even at the lower end of the range provided in the EDNA for gross provision (allowing for the replacement of losses of existing employment land across the plan period) the figure is 63ha of supply, the Council's proposal for providing just 50ha if land appears to fall behind what is required to cover both future demand and also the replacement of loss to existing supply. Our clients also hold land at Jubilee Field, Watling Street located to the south east of the Turf Roundabout - please see attached plan. The site extends to approx. 5.08ha and also shares the benefits of excellent access to the A5 and the M6 Toll Motorway with Turf Field. Jubilee Field has been promoted simultaneously with Turf Field though the Council's previous 'Call for Sites' in January 2019 as part of the ELAA 2020 process (NE6) and also in response to the Local Plan Review Issues & Options Consultation in May 2019 The additional allocation of this land at Jubilee Field would further support an employment development 'hub' in this location and assist in bolstering the provision of land along the A5 corridor. Such an idea was displayed on the diagrams at pages 82 and 83 of the previous 2019 Issues & Options Consultation document relating to Options C1&C2 of the 'Strategy for Meeting Overall Employment Needs'. Moreover, it will allow for a further 5.08ha of land supply to assist in meeting the gross employment land requirement of between 63ha and 81ha across the Plan period. Given the availability of this additional site, and the likely requirement for the Council to find additional employment sites to cover ongoing losses to additional supply, Jubilee Field should be allocated for development.</p>
LPPO274	Walsall Council - N, Ball	<p>Proposed policy SO4.2 which identifies sites for new employment uses states that proposals for new employment development within Use Class E will be directed to the town centres. We would support this requirement. The Economic Development Needs Assessment (EDNA), which identifies strong labour market linkages with the Black Country and Walsall in particular, suggests that close co-operation on employment land supply balance is recommended going forward. The Black Country employment land requirement ranges between 592 ha (baseline growth) and 870 ha (aspirational growth based on West Midlands Combined Authority SEP). Our existing urban employment land supply (including recent completions) provides approximately 305 ha of land, leaving a shortfall of between 263 ha and 500 ha, depending on the growth scenarios applied. As is the case with our approach to housing land, we are considering all opportunities to bring forward additional employment land within the urban area, and land within the Green Belt, but this exercise will not make a significant impact upon addressing our unmet need. Contributions through the Duty to Cooperate are currently limited to 50ha in total (including 30ha in the Shropshire Local Plan), but this work is ongoing and will include a proportion of the consented West Midlands Interchange at Four Ashes in South Staffordshire.</p>
LPPO275	South Staffordshire Council - E, Fox	<p>We support the commitment within the Preferred Options Plan to providing a supply of 50ha of employment land during the plan period. This figure is within the range identified in the recently published Cannock Chase District EDNA 2020 study. It is considered that greater clarity would be provided by committing a sufficient supply of identified sites rather than the present approach which suggests that part of the requirement is 'likely to become available during the plan period'. We note your position on cross boundary employment needs set out at paragraph 4.10 of the Preferred Options document where you state: 'Discussions will continue with our Duty to Cooperate partners to ascertain potential assistance to meet unidentified need for employment land within the authorities which share our functional economic market area.' As an authority who shares a FEMA with Cannock Chase District, South Staffordshire Council fully support this commitment and look forward to continuing our close working relationship to explore how identified shortfall in employment land supply can be addressed. It is evident that the new Cannock Chase Local Plan will lead to new development in close proximity to communities in South Staffordshire. It is therefore essential that the impact of proposals in Cannock on local amenities and the surrounding road network, including in South Staffordshire, is fully considered through the plan-making process. It is anticipated that we continue an ongoing dialogue with Cannock Chase District Council to consider the implication of any cross-boundary issues including the potential impact of growth and air quality on designated sites of nature conservation value.</p>
LPPO276	Lichfield & Hatherton Canals Restoration Trust - L, Walker	<p>We note policy option SO4.2 regarding employment provision and in particular site E12 shown on Table 7. As this is in close proximity to the Safeguarded Route for the Hatherton Canal, particular attention will be necessary to ensure that access to the site does not compromise the canal restoration. The necessary road bridge over the canal should be part of, and funded from, the costs of the development.</p>
LPPO277	Historic England - E, Boden	<p>Historic England notes that most of the proposed Employment site allocations have no designated heritage assets on or near to these sites and therefore have not been included within the HIA for assessment. However, we recommend that proposed employment site allocation E6 should be included for assessment within the HIA prior to allocation and our detailed comments on this site can be found at Appendix A to this letter.</p>

LPPO278	Norton Canes Parish Council	<p>The Parish Council has indicated, subject to community consultation, that in order to provide a choice of future local job opportunities it would support extensions to Kingswood Lakeside employment site but not on any areas currently used for open space, some extension to Watling Street Business Park, in order to provide opportunities for local businesses to expand and a roadside business hub on the site between the Turf and M6 Toll. Any development on these Green Belt sites should be accompanied by appropriate financial or practical contributions to deliver net environmental gain and/or benefits to the local community. The NP would wish to support conversion/sub-division of large vacant units on existing industrial estates to provide space for small local businesses to become established and grow. Policy SO4.2 proposes a total of 10 sites of up to 55ha of new land for offices manufacturing and distribution to 2038 across the District of which 2 are proposed in Norton Canes - E10 Turf Field Watling Street 2.12ha (identified for consultation in the NP as suitable for roadside uses). - E12 land between M6 Toll and A5 and east of Churchbridge known as Streetway Farm. As noted above the NP is supporting E10 for roadside uses. No objection is raised to E12. In addition, the Parish would support an extension to Watling Street Business Park (part of CE20 on the 2018 ELAA Map) focused on small units for local businesses as there is very little available land within the existing Norton Canes business areas off Walsall Road, Betty's Lane, Conduit Road, Norton Green Lane and Lime Lane. This support is based on the proposition that a safe pedestrian crossing of the A5 can be provided. It is understood that further work is being carried out on potential extensions to Kingswood Lakes. If any proposals are brought forward in relation to this the Parish would expect there to be a further consultation.</p>
LPPO279	Canal & River Trust - H, Smith	<p>A number of existing and allocated employment areas lie adjacent to the Trent and Mersey Canal in Rugeley, adjacent to the Hatherton Canal Restoration Route on land south of Bridgtown and adjacent to the Cannock Extension Canal. This includes the Rugeley and Brereton Safeguarded Employment Areas (Towers Business Area and Power Station Road Business Area). The ecological network provided by the canal should be considered an integral part of the design of such allocated sites, to secure measurable net gains for biodiversity and contribute to climate change resilience with air, water, soil, noise and light pollution avoided or mitigated, as per Objectives 7 and 8 of the Local Plan Policy Options document. We would not object to the release of Green Belt land to the south of Bridgtown, upon the route of the proposed Hatherton Canal Restoration to provide a new employment site, but policy SO4.2 does not refer to this matter as a consideration, nor its supporting text. Policy SO5.5 would be highly relevant to this new employment site, so should be cross referenced. We support the requirement for the safeguarding and enhancement of active travel and sustainable travel opportunities, and accessibility to the green space network within this policy which should include the Hatherton Canal Restoration route. Existing employment sites adjacent to the Cannock Canal Extension could impact adversely upon the setting of the canal, and could introduce additional air pollution, which could harm the SSSI. Whilst policy SO8.5 (and more locally policy SP7.3) would be highly relevant to the majority of new employment proposals these are not currently cross referenced.</p>
LPPO280	Nurton Developments Ltd - R, Young JLL - P, Leaver	<p>We do not support the preferred policy direction to provide land for new employment uses. The reasons why are set out below. Context: Policy SO4.2 – Provision for New Employment Uses – provides for up to 50 hectares of land for offices, manufacturing and distribution employment development during the period to 2038. It states further that: "This will provide for a range of sizes and types of employment to meet business needs and encourage inward investment, resilience and new investment, and create a balanced portfolio of employment land". Paragraph 6.276 of the reasoned justification to Policy SO4.2 refers to the EDNA (2019) under the heading of New Evidence. It states that the EDNA "recommends that a range of employment land of 46 to 60 hectares (net) including flexibility is made available during the period 2018-38". Policy SO4.2 allocates 10 sites totalling 27 hectares for employment use. Table F identifies the sites but does not provide the site areas. These are provided though in the Employment Land Availability Assessment (ELAA) 2020. According to the ELAA, the sites range from 0.05 hectares (110 Walsall Road, Cannock) to 9.4 hectares (site between A5 and M6 Toll, Norton Canes) in size and add up to 25.06 hectares. Paragraph 6.276 states that 12.47 hectares have been completed in the two years from 2018 (i.e. the start of the plan period). According to the ELAA, all these completions have been in Cannock. Table G identifies a further 16 sites in existing employment areas which are considered able to contribute to the employment land supply. As with Table F, no individual site areas are provided. However, the ELAA does provide details on most of these sites. They range in size from 0.07 hectares to 3.2 hectares. Paragraph 6.281 states that they total approximately 16 hectares. Together, the allocations, completions since 2018, and potential windfall sites in existing employment areas add up to 53.53 hectares. Policy SO4.2 of the Preferred Options reported to the Council's Cabinet of 4 March 2021 provided up to 55 hectares for the plan period. In addition, it included a further site – E11 – Jubilee Fields, Lime Lane. This site – 5.08 hectares (according to the ELAA) – was removed prior to consultation of the Preferred Options. Critique: We consider the approach taken in determining the provision of employment land, and the identification of sites to meet this need, is deeply flawed. This is for the following principal reasons: - • The provision of a maximum of 50 hectares sits at the bottom of the range set by the EDNA, with no justification provided as to why. • No allowance is made by the Council for future losses of employment land, despite clear advice from the authors of the EDNA, Lichfields, to take this into account. • Taking this into account, the projected need would range from 63 hectares to 81 hectares. • The EDNA under-estimates the projected need based on completions, with this projection leading to significantly less development than previously experienced. • Policy SO4.2 makes no express provision for the logistics sector despite evidence provided by the EDNA and the guidance given in the Planning Practice Guidance (PPG) note. • New allocations and potential windfall sites give a very limited range of sites, with no sites greater than 10 hectares. • No allowance is made for the potential non-delivery of sites. • The largest allocation – Site E12 – is not considered to be viable by the ELAA due to a number of constraints.</p>

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These points are developed in greater detail below. There is no rhyme or reason as to why a maximum of 50 hectares has been chosen. It is only 4 hectares greater than the bottom range figure provided by the objectively assessed net employment land need of the December 2020 EDNA update. Moreover, and more importantly, it takes no account of the replacement of future losses of employment land. This is despite the guidance provided in the PPG on economic need and the advice contained in the EDNA. Paragraph 2a-026-20190202 of the PPG states that “The recent pattern of employment land supply and loss” (our emphasis) is a matter for assessment in preparing evidence on economic need. In addition, paragraph 2a-28-20192020 makes specific reference as to how local planning authorities can identify the existing stock of employment land and the recent pattern of supply and loss of employment land. Lichfields make an adjustment to the net figures to allow for replacement of projected losses. The rationale for this is given in Paragraph 5.80 of the EDNA. It is to ensure that sufficient space is re-provided and ensures some protection against the erosion of employment space over the plan period. It notes that: “This is a widely accepted approach in planning for future employment land needs”. Indeed, Lichfields took this approach with the Stafford HEDNA in January 2020, with a recommended range provided just in gross terms (i.e. taking into account future losses). Lichfields assess the potential loss of employment land over the plan period by three different methods – past losses, the SHLAA, and rate of churn based on various percentages of the built stock. These methods generate a 20 year allowance between 15.12 hectares and 95.70 hectares (Table 5.17 of the EDNA). Lichfields decided to adopt the lowest figure, although acknowledged in Paragraph 5.91 that “even this could be at the lower end of the scale given the amount of stock in the District”. By comparison, Lichfields allowed for 48.2 hectares for replacement of losses for Stafford Borough. Taking into account this modest provision for replacement for future losses, the gross need ranges between 63 hectares and 81 hectares. This is 13 hectares to 31 hectares greater than the provision of 50 hectares. The higher figure is based on medium term past take up rates (i.e. from 2006/2007 to 2019/2020). The longer term past take up figures (which go back to 1996) project a higher figure – 93 hectares. This is discounted on the basis that the take up figures since 2006 are more detailed and, therefore, more reliable. In addition, both medium and longer term take up rates have been manipulated in the EDNA. In both cases, the development of the 700,000 sq ft warehouse built by Gazeley in Rugeley, and subsequently occupied by Amazon, has been taken out of the computations as it is considered to be an anomaly. It is not clear why this is considered to be an anomaly as there have been several cases since of transactions greater than 500,000 sq ft in this part of the West Midlands. In Staffordshire, these include: • Pets at Home – pre-let of 670,000 sq ft warehouse at land north of Redhill Business Park, Stafford. • JLR – 2 million sq ft manufacturing plant at i54, South Staffordshire. • Dunelm – 525,000 sq ft warehouse at Prologis Park, Sideway, Stoke-on-Trent. • Screwfix – extension to existing warehouse to create 630,000 sq ft distribution hub at Trentham Lakes, Stoke-on-Trent. • XPO Logistics – 645,000 sq ft occupation of second-hand space at Tamworth 594, Tamworth. • Screwfix – 562,000 sq ft at Prologis Park, Fradley, Lichfield.

In addition, recently Supermart, a Chinese online retailer, has taken 800,000 sq ft of floor space in four new units in Cannock (M6DC, Conneqt 128, Conneqt 153 and Jupiter). If the Amazon unit at Rugeley was added back, then the average medium take-up rate would be 4.88 hectares per annum. Allowing for a flexibility factor of 6 hectares (as per the EDNA), this would project a need of 103.6 hectares. Arguably, this is still an underestimation of true demand. Cannock has a limited reservoir of land and is restricted by the Green Belt. These two factors will have suppressed demand and constrained take-up over the last 15 to 20 years. As agents involved heavily in the logistics market, we can confirm that demand continues to outstrip supply. 2020 was a record year for take up. However, it is to be emphasised that the market has been strong for some time now and all the market signals – e.g. increasing rents and land values – provide clear evidence of an imbalance of demand over supply. This position was recognised by the West Midlands Strategic Employment Sites Study 2015, which was produced by JLL and PBA. This concluded that planned land supply fell severely short in the three areas of highest demand, with one of these areas being the Black Country and southern Staffordshire. Subsequent studies – West Midlands Land Commission Land Report 2017 and the draft West Midlands Strategic Employment Sites Study Stage 2 (2021), Avison Young and Arcadis – have reiterated the urgent need for additional sites to be brought forward to provide a deliverable pipeline of new sites. The assessment of need and allocation of space for logistics is now covered specifically by the PPG (Paragraph 2a-031-20190722). This acknowledges the critical role played by the logistics sector and its distinct locational requirements. It urges local planning authorities to collaborate with other authorities to identify the scale of need and then consider and identify the most appropriate locations to meet such needs. Despite this, Policy SO4.2 makes no such express provision. The allocated sites are generally smaller, fragmented and not suited to accommodate or attract logistics development. The same applies to potential windfall sites in existing employment areas, as listed by Table G. The largest site is Site E12 – Site between A5 and M6 Toll, Norton Canes. This site (Ref No: CE19 in the ELAA) is 9.4 hectares and is listed under a category referred to as “Restricted and Excluded Sites”. This indicates that this site does not pass the tests set out by the PPG on allocations of suitability, availability and achievability. Summary: Policy SO4.2 significantly underestimates the objective assessed need for employment land for Cannock, with its approach not justified by the available evidence. It is clear that the objectively assessed need has been engineered to fit supply, rather than seek to accommodate and attract the quantity and quality of employment development likely to be demanded and/or required. In addition, it appears that the Council has not worked with other neighbouring local authorities, particularly the Black Country and South Staffordshire, which are located in the same Functional Economic Market Area, to assess and identify the needs of the logistics sector and how best to meet those needs. This approach is plainly unsound and needs to be revisited before the next stage of the development plan-making process.

LPPO281

Norton Canes Councillors

We recognise the need for land to be provided for the economic growth of the district and support the suggested areas to take forward for development. We would also like to concur with the Parish Council's suggestion of extending the Watling Street Business Park to enable development for small local businesses and start-ups. We would also like to see specific mention of the old Durapipe site off Walsall Road in the Local Plan; we also recommend this site for development for smaller business units. However, one point which we made in our last submission and will repeat is that if Norton Canes is expected to provide a large proportion of the growth in employment land in the district, as seems likely, we believe that the village should not be expected to also provide any significant housing growth within the Local Plan period. Employment land expansion may not have an impact on certain infrastructure, such as education or healthcare, but it does have an impact on highways capacity and therefore must be carefully balanced with housing growth.

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LPPO282	Together Active - J, Brennan		I support the inclusion of active travel and access to green space, but it needs wording more strongly. Proposals for new employment development should safeguard and enhance active travel by prioritising active travel through safe, integrated walking and segregated cycling routes where possible and sustainable travel opportunities, and accessibility to the green space network. Workplaces should include cycle racks/cycle storage and changing/shower facilities (Planning and Healthy Weight TCPA & PHE 2014)
LPPO283	Natural England- G, Driver		We provide the following advice on the proposed allocations: All the sites will have potential for air quality impacts on the Cannock Chase SAC/SSSI, Cannock Extension Canal SAC and West Midland Mosses SAC. The sites below have the following additional potential impacts listed below: E10: • Potential impacts on Cannock Extension Canal SAC, Chasewater and Southern Staffordshire Coalfield Heaths SSSI, Stowe Pool And Walk Mill Clay Pit SSSI. E12: • Potential impacts on Stowe Pool And Walk Mill Clay Pit SSSI
LPPO284	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	In view of the supporting context for economic growth in the District, including the Council's own economic strategy, it is unclear why when the evidence base identifies a need for employment land between 46-66ha, the Council has sought to utilise only 50ha within Policy SO4.2. In addition, it is not clear why the policy is drafted to provide for "up to 50ha" as this would be seemingly provide a ceiling on new employment development. This would be inconsistent with the policy context. It is noted that Rugeley Power Station is included in employment site allocation E5 and this is supported. However, the approach has not identified land adjacent to the Lakeside employment area as a new employment location. This is a missed opportunity bearing in mind the success of the Lakeside development and its potential to support growth aspirations in the Plan and allow complementary development to deliver sustainable development. Policy SO4.3 deals with sustainable tourism and the rural economy. It sets out that support will be given to proposals in suitable locations within the rural areas of the District to support the rural economy and safeguard and enhance the character and openness of the rural area.
LPPO285	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	In view of the supporting context for economic growth in the District, including the Council's own economic strategy, it is unclear why when the evidence base identifies a need for employment land between 46-66ha, the Council has sought to utilise only 50ha within Policy SO4.2. In addition, it is not clear why the policy is drafted to provide for "up to 50ha" as this would be seemingly provide a ceiling on new employment development. This would be inconsistent with the policy context. It is noted that Rugeley Power Station is included in employment site allocation E5 and this is supported. However, the approach has not identified land adjacent to the Lakeside employment area as a new employment location. This is a missed opportunity bearing in mind the success of the Lakeside development and its potential to support growth aspirations in the Plan and allow complementary development to deliver sustainable development. Policy SO4.3 deals with sustainable tourism and the rural economy. It sets out that support will be given to proposals in suitable locations within the rural areas of the District to support the rural economy and safeguard and enhance the character and openness of the rural area.
LPPO286	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	In view of the supporting context for economic growth in the District, including the Council's own economic strategy, it is unclear why when the evidence base identifies a need for employment land between 46-66ha, the Council has sought to utilise only 50ha within Policy SO4.2. In addition, it is not clear why the policy is drafted to provide for "up to 50ha" as this would be seemingly provide a ceiling on new employment development. This would be inconsistent with the policy context. It is noted that Rugeley Power Station is included in employment site allocation E5 and this is supported. However, the approach has not identified land adjacent to the Lakeside employment area as a new employment location. This is a missed opportunity bearing in mind the success of the Lakeside development and its potential to support growth aspirations in the Plan and allow complementary development to deliver sustainable development. Policy SO4.3 deals with sustainable tourism and the rural economy. It sets out that support will be given to proposals in suitable locations within the rural areas of the District to support the rural economy and safeguard and enhance the character and openness of the rural area.
LPPO287	Wyrley Estates	Fisher German LLP - N, Borsey	Policy SO4.2 is supported to provide land for new employment uses. The policy is very heavy towards identifying new parcels of employment development land and focussing on town centre retail. In addition, the policy should include the provision for live/work development in suitable locations, the use of specialist housing units has been mentioned in earlier policies, and therefore seems right to include it within an employment policy. Recognition should be given to employment development in the rural area also, of which policy SO4.2 fails to mention. This will further help achieve the overarching aims of sustainable development. The Estate has other land which remains potentially available for new employment development, of which may help to achieve sustainable development, especially in those rural areas.
LPPO288	ENGIE - D, Sager	Barton Willmore - J, Bonner	We generally support the approach of the policy and the allocation of the employment land within the Power Station site (subject to an amendment of the boundary for consistency with the outline parameter plans - see below). However, we object to the allocation of Site E4 (Former Power Station off A51 (adjacent to Towers Business Park), specifically for employment purposes. We consider that residential would be more appropriate and sympathetic to the extant outline application on the former Power Station Site. areas.
LPPO289	Pentalver Cannock Limited		Our comments are in relation to the former Rumer Hill Industrial estate to the south east of Cannock town centre which under the Preferred Options Local Plan is currently proposed to be allocated for employment purposes under site E3 in Table F (Employment Site Allocations). The allocation follows the grant of the March 2020 planning permission (CCDC ref: CH/19/280) for the expansion of the adjoining existing container storage depot in conjunction with the provision of a railhead. As a result both of the impacts of the pandemic and their operating requirements, the landowner, Pentalver Cannock Limited is no longer looking to implement the planning permission for the expansion land and consider, due to its location adjacent to the existing residential development and therefore request that the site is included as a residential allocation to be added to Table C - this is subject to a separate representation in response to Question 13. The Council will be aware that notwithstanding the historic employment use of the site, given the access to the land is via Rumer Hill Road which is a residential road, this makes it less than ideal for access for larger commercial vehicles. Indeed the arrangements for the scheme granted planning permission under CH/19/280 were that HGVs could only access the parking areas within the former Rumer Hill Industrial site by coming through from the existing container terminal to the south and not via the Rumer Hill Road entrance which was to be limited to staff and lorry driver parking and delivery vans to the proposed office only. We therefore request that the Former Rumer Hill Industrial Estate allocation currently included as site ref E3 in Table F is deleted on the assumption that the site is allocated for residential purposes in accordance with our other representations submitted.

Supporting these representations is Appendix A which consists of a technical note that reviews the approach taken by the Cannock Chase EDNA 2018 and the 2020 update, both prepared by Lichfields, to assessing the employment land requirement for the Plan against the PPG. A number of concerns are identified, namely: • A lack of assessment of the locational and premises requirements of particular types of businesses contrary to paragraph 026 of the PPG (reference ID: 2a-026-20190220); • Failure to provide evidence of engaging adequately with developers in assessing market demand contrary to paragraph 026 of the PPG (reference ID: 2a-026-20190220); • Failure to collaborate sufficiently with other authorities, infrastructure providers and other interests with regards to strategic logistics facilities contrary to paragraph 031 of the PPG 031 (Reference ID: 2a-031-20190722); and • Failure to assess the extent to which land and policy support is needed for other forms of industrial and logistics requirements, including the needs of SMEs and 'last mile' facilities contrary to paragraph 031 of the PPG 031 (Reference ID: 2a-031-20190722). Given the issues identified RPS content that the 2020 and 2018 EDNAs do not accord with the guidance in the PPG and so are not a complete evidence base for assessing the employment land requirement of the plan. Accordingly, the proposed employment land policies in the plan cannot be considered to be justified based on the currently available evidence, although RPS consider that this can be easily resolved through a further update to the EDNA. RPS also note that whilst some consideration has been given to market signals by the 2020 EDNA that the evidence presented on this point is relatively limited. To assist with this matter St. Modwen will instruct further work to specifically consider demand and market signals which will be provided to the Council as soon as it is available. General case for increased requirement at local level: Policy SO4.2 states that the Plan will provide for up to 50ha of land for office, manufacturing and distribution employment development during the period to 2038. Of this the policy identifies 10 employment sites to be allocated that amount to 27ha. Paragraph 6.281 states that sites are available within EEAs identified in table G which total approx. 16ha. paragraph 6.276 notes that the ELAA 2020 identifies that there have been 12.74ha of employment land completed since 2018. Although not explicitly stated anywhere in the Plan RPS assume that this means that collectively over the plan period to 2018-2038 provision is being made for 55.47ha of employment land, which is in excess of the up to 50ha requirement set out in policy SO4.2. Given that it appears that a supply of 55.47ha including completions has been identified the policy requirement should be updated to reflect this, although RPS recommend that in fact the Council should be [...] seeking to plan for at least the upper end of the requirement in relation to their own needs. The 2020 EDNA states that this is 66ha net between 2018 and 2038 (inc. flexibility) before consideration is given to adjustments for addressing losses and a contribution to meeting unmet need arising from the Black Country. [...] limited evidence of market demand has been considered by the 2020 in reaching this conclusion. Treatment of Losses: [...]. Given that the indicative FEMA includes part of the Black Country and overlaps with the Black Country FEMA it is clear that the Council should consider meeting unmet need arising from the Black Country. [...].

As such RPS welcome the assessment in the 2020 EDNA of the potential amount of employment land that may be lost of the plan period. As paragraph 5.80 of the 2020 EDNA notes factoring in an allowance for the replacement of future losses of employment space to other uses over the plan period is a widely accepted approach to planning for future employment land needs. RPS strongly recommend (to avoid soundness issues) allowing for loss replacement in the employment land requirement. We also suggest that contrary to the advice in the 2020 EDNA, that a higher allowance for losses should be identified. While we note that factoring an element of future losses is not an exact science, as noted by paragraph 5.91 of the 2020 EDNA, we do not agree with the conclusion that the lowest estimate based on trends should be utilised given that the two other methods of assessing the scale of future losses based on sites identified in the SHLAA or the replacement of 0.5% of existing stock both result in higher and similar figures of 0.9ha per year and 0.9ha per year respectively. On the basis of the evidence provided RPS suggest that a higher figure is justified. RPS recommend that the upper figure of 0.96ha per annum is used which over the 20 year plan period equates to 19.2ha. RPS note that it is not apparent that the Council have chosen to incorporate a loss factor when proposing the employment land requirement in SO4.2, despite the advice in the 2020 EDNA. Should an allowance for the replacement of losses be made by the Council in identifying the employment land requirement for the Plan this should be set out clearly in the reasoned justification to ensure that the plan is justified and therefore sound. Unmet need from neighbouring authorities - Duty to Cooperate: RPS note that paragraph 4.10 of the Plan refers to working with neighbouring authorities in accordance with the Duty to Cooperate in relation to the cross-boundary issue of unmet employment need. However, the wording of this statement appears to indicate that the Council are seeking to export employment land need arising from Cannock Chase District to authorities within the FEMA rather than accommodate employment land need arising from these same authorities. [...]. This brings further into question how the 50ha employment land requirement identified in policy SO4.2 has been arrived at. It is unclear if the Council are proposing that the employment land requirement for the District is higher than 50ha and so they are seeking to request that authorities within the FEMA accommodate a quantity above this and if so what this quantity is. Alternatively this statement could be construed as the Council signalling that they may seek to export an element of the 50ha, although this is assumed to be unlikely given that the Plan identifies sites capable of meeting the 50ha within Cannock when post 2018 completions are taken into account. Fundamentally, however this demonstrates further that the approach to employment land has not been adequately justified and so the Plan as drafted is unsound. RPS suggest that instead of seeking to export an element of the District's employment land requirement, the Council should be considering opportunities to accommodate unmet employment land requirements arising from authorities within the FEMA. RPS note that paragraph 3.108 of the 2018 EDNA states that the Black Country have asked that the Cannock Chase Local Plan considers opportunities to assist the Black Country in accommodating a proportion of their unmet need for employment land. [...]. Given the scale of unmet employment need anticipated to arise from the Black Country RPS suggest that it is unlikely that South Staffordshire will be able to accommodate all of this demand and that other authorities, including CCDC should make a contribution towards meeting the unmet demand. Market Context: [...].

Collectively this evidence suggests that the A5 corridor and the wider District benefits from excellent connectivity which makes it an attractive location for logistics and industrial occupiers. This is illustrated by the District's existing pattern of business activity and the sustained rapid growth of the local economy over recent years, outperforming both the West Midlands and England & Wales. Furthermore, the future opportunities for the local logistics market presented by major infrastructure investment including the West Midlands Interchange and the M6/M54/M6 Toll link road indicate that the district will continue to be an attractive location for occupiers. This indicates that the conditions are there to allow the District to capitalise on a number of the opportunities identified in the SEPs to develop a competitive advantage if an appropriate supply of employment land is readily available. [...]. There is a clear pressing need to identify new employment land across the region of all sizes and quality. RPS contends that Cannock Chase District is particularly well placed to contribute towards addressing this issue, due to the locational advantages that it has, and that there are substantial benefits on offer to the District if it is prepared to do so. However, to maximise the gains that can be realised from this opportunity the District will, in RPS's opinion, need to identify further employment land than is the case in the current version of the Plan. Failing to do so would mean that the Plan would not be positively prepared and so would be unsound. As noted above St Modwen will provided further evidence regarding demand and market signals in due course. RPS anticipate that this will demonstrate that the market recognises these locational advantages. Link between housing supply and employment land: RPS note that in of the future labour supply scenarios tested in the 2020 EDNA consider the implications of housing delivery over the plan period on the basis of the current methodology for the District plus a contribution of 500 dwellings towards meeting unmet needs arising from the Black County [...]. The 2020 EDNA equates to an employment land requirement of 53.99ha factoring in loss replacement of 0.756ha a year. We note that at paragraph 5.109 f the 2020 EDNA that Lichfields suggest that if the housing requirement is at or below the 7,020 net dwelling growth under labour scenario 5 [...] then this could have repercussions on the employment land target, which may have to be reduced as a consequence to ensure the two are not misaligned. RPS understand from discussions with officers of the Council that it is on this basis that the employment land requirement of the Plan is proposed to be set at 50ha. RPS note that a consistent Labour Force Ratio was applied by Lichfield's in calculating the labour supply scenarios which assumes the net outward commuting patterns will persist over the plan period. RPS question this assumption as we understand that the Council are rightly seeking to reduce net outward community for a number of reasons, not least of which is that reducing commuting is generally acknowledged as being more sustainable. If it is assumed that net out commuting reduces over the plan period, this means that the total labour supply in the district will be greater than forecasted in the 2020 EDNA. This would mean under a labour supply based approach the District's employment land requirement would be higher than suggested in the 2020 EDNA. RPS also note that increasing the supply of employment land above the labour supply restricted requirement could in fact contribute to reducing out commuting by providing greater opportunities for residents of the District for work within the District. While it is beyond the scope of these particular representations to suggest what the appropriate housing requirement for the Plan should be, RPS strongly encourage the Council to plan positively and not seek to restrict the economic opportunities on offer to the District through setting the housing requirement at a level that constrains economic growth through a lack of labour supply.

S04.3: Sustainable Tourism and the Rural Economy		
Question 21: Do you the preferred policy direction to develop sustainable tourism and the rural economy?		
LPPO291	Inland Waterways Association, P, Sharpe	IWA supports policy SO3.4 on tourism, including use and safeguarding of the canal network and abandoned canals.
LPPO292	Cannock Chase AONB Partnership	The AONB seeks wording of this policy that development proposals should have no adverse effects on and would protect and enhance Cannock Chase AONB. The requirement for displaying educational material on respecting nature is welcomed which we trust includes measures to 'Leave no Trace'.
LPPO293	Lichfield & Hatherton Canals Restoration Trust - L, Walker	We support policy option SO4.3 regarding sustainable tourism and the rural economy and particularly welcome the provisions to safeguard the existing canal network, and necessary space around it, to enable restoration.
LPPO294	Historic England - E, Boden	Although the policy direction requires tourism and visitor developments to display educational material about the history of the area as part of a mitigation package under the Habitats Regulations, we would be supportive of the inclusion of text refencing the important role of heritage/the heritage sector as supporting sustainable tourism and rural economy.
LPPO295	Norton Canes Parish Council	Policy SO4.3 relates to sustainable tourism and the rural economy supports development in suitable locations in rural areas which support the rural economy and or enhance the character and openness of a rural area, Appropriate and proportionate expansion of existing employment sites in order to support retention of existing employment opportunities is supported as is re-use of suitable buildings for employment use and tourist accommodation. Visitor and recreation facilities of an appropriate scale and nature which contribute to the long term sustainability and viability of the rural economy will be supported. The use of the local canal network and abandoned canal network to support economic growth that is proportionate to the needs and nature of their locations is also appropriate. It is noted that opportunities exist at the former Grove Colliery for long term restoration of landscapes and other historic assets through development of open recreation, leisure and tourism focused activities appropriate within the Green Belt. Whilst the general thrust of this policy is supported the Parish Council considers that in order to achieve as sustainable heritage-led regeneration at Grove, positive support for the principle of enabling development which would "trump" the more restrictive Green Belt policy should be specifically included as a policy statement as already mentioned in the section on the historic environment/heritage assets above.
LPPO296	Together Active - J, Brennan	Yes, but policy should include prioritising active travel through safe, integrated walking and cycling routes (SE Active Design) and follow DfT LTN 1/20 Cycle Infrastructure Design,
LPPO297	Richborough Estates (Land off Brownhills Road, Norton Canes) Pegasus Group - B, Cook	In general terms support is given to the approach set out in the Policy SO4.3 however clarity should be given within the Policy to make clear whether the appropriate and proportionate expansion of existing employment sites would be sufficient to outweigh other policy restrictions such as the Green Belt. As drafted the proposal would need to protect the Green Belt, which could run counter to the objective of allowing for the expansion of existing employment sites within the rural area. The policy should make clear which of these strands of policy takes precedent. Policy SO4.4 deals with live/work units. It states such development will be encouraged.

LPPO298	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	In general terms support is given to the approach set out in the Policy SO4.3 however clarity should be given within the Policy to make clear whether the appropriate and proportionate expansion of existing employment sites would be sufficient to outweigh other policy restrictions such as the Green Belt. As drafted the proposal would need to protect the Green Belt, which could run counter to the objective of allowing for the expansion of existing employment sites within the rural area. The policy should make clear which of these strands of policy takes precedent. Policy SO4.4 deals with live/work units. It states such development will be encouraged.
LPPO299	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	In general terms support is given to the approach set out in the Policy SO4.3 however clarity should be given within the Policy to make clear whether the appropriate and proportionate expansion of existing employment sites would be sufficient to outweigh other policy restrictions such as the Green Belt. As drafted the proposal would need to protect the Green Belt, which could run counter to the objective of allowing for the expansion of existing employment sites within the rural area. The policy should make clear which of these strands of policy takes precedent. Policy SO4.4 deals with live/work units. It states such development will be encouraged.
LPPO300	Wyrley Estates	Fisher German LLP - N, Borsey	The Estate supports the preferred policy direction to develop sustainable tourism and the rural economy, however, should go further to enable creation of new facilities in a sustainable manner. With particular reference to Cannock Extension Canal/Grove Colliery Site. Grove Colliery is the last remaining evidence of a former mining past for the District. The site offers a perfect opportunity for heritage-led regeneration to support a leisure and recreation use. Earlier in SO1.1. it was mentioned the Council is asked to reconsider and include an additional specific policy for the Grove Colliery Site. This policy would also link in here in aiding sustainable tourism and a rural economy.
LPPO301	Staffordshire County Council - J, Chadwick		The proposed use of the local canal network and the abandoned canal network to support economic growth is supported, as is the proposal to safeguard these, along with sufficient space, to enable the associated infrastructure to be reinstated so that the long term potential of these historic features can be realised.

SO4.4: Live Work Units

Question 22: Do you support the preferred policy direction to support the development of live/work units?

LPPO302	Norton Canes Parish Council		Policy SO4.4 promoting the benefits of live/work units and Policy SO4.5 requiring major developments creating over 50FTE jobs to be accompanied by employment and skills plans to demonstrate how development will contribute to training and employability of local people especially young people to be secured via legal agreements are both supported. The potential of live/work units as part of any Grove Colliery 'enabling development' would be supported by the NP.
LPPO303	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	No objection is raised to the approach but currently most dwellings can accommodate homeworking without the need for bespoke live/work units and therefore the benefits of the approach may be limited.
LPPO304	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	No objection is raised to the approach but currently most dwellings can accommodate homeworking without the need for bespoke live/work units and therefore the benefits of the approach may be limited.
LPPO305	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	No objection is raised to the approach but currently most dwellings can accommodate homeworking without the need for bespoke live/work units and therefore the benefits of the approach may be limited.
LPPO306	Wyrley Estates	Fisher German LLP - N, Borsey	The Estate definitely supports the policy direction in development of live/work units of SO4.4. However, the policy does not really provide specific detail or expand on suitable locations for this type of development. It is recognised live/work units could potentially play an important part in enabling important regeneration schemes across the district, including sites such as Grove Colliery site which regeneration could be facilitated through such a scheme. Live/work housing types are development which can take place in a sustainable manner and developed outside of settlement boundaries, and regeneration areas are not always found within settlements, so rural areas need to be considered in policy too.

SO4.5: Provision for Local Employment and Skills?

Question 23: Do you support the preferred policy direction to provide for local employment and skills?

LPPO307	Norton Canes Parish Council		Policy SO4.4 promoting the benefits of live/work units and Policy SO4.5 requiring major developments creating over 50FTE jobs to be accompanied by employment and skills plans to demonstrate how development will contribute to training and employability of local people especially young people to be secured via legal agreements are both supported. The potential of live/work units as part of any Grove Colliery 'enabling development' would be supported by the NP.
LPPO308	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Policy SO4.5 deals with the provision of local employment and skills. This states that major development, where over 50 full-time equivalent jobs would be created during the construction phase and/or by the proposed occupiers, will be accompanied by an Employment and Skills Plan. It states the Employment and Skills Plans will be secured through a legal agreement. The explanatory text indicates that one of the objectives of the policy is to support the contribution to achieving net zero carbon development by reducing the need to travel for employment during the construction and occupancy stage of the development. It is unclear how the policy approach will secure this objective bearing in mind that if local people were employed during the construction phase of the development, once the development was completed they would either have no further employment or would need to travel further afield to another construction site. As a result, the contribution of this approach to achieving a zero-carbon economy must be doubtful. Richborough estates support the general principal of securing opportunities for local people during the construction phase of development but this needs to be realistic and practical bearing in mind most of those engaged in construction have to travel from construction site to construction site.

LPPO309	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Policy SO4.5 deals with the provision of local employment and skills. This states that major development, where over 50 full-time equivalent jobs would be created during the construction phase and/or by the proposed occupiers, will be accompanied by an Employment and Skills Plan. It states the Employment and Skills Plans will be secured through a legal agreement. The explanatory text indicates that one of the objectives of the policy is to support the contribution to achieving net zero carbon development by reducing the need to travel for employment during the construction and occupancy stage of the development. It is unclear how the policy approach will secure this objective bearing in mind that if local people were employed during the construction phase of the development, once the development was completed they would either have no further employment or would need to travel further afield to another construction site. As a result, the contribution of this approach to achieving a zero-carbon economy must be doubtful. Richborough estates support the general principal of securing opportunities for local people during the construction phase of development but this needs to be realistic and practical bearing in mind most of those engaged in construction have to travel from construction site to construction site.
LPPO310	Richborough Estates (Land off Main Road, Breerton)	Pegasus Group - B, Cook	Policy SO4.5 deals with the provision of local employment and skills. This states that major development, where over 50 full-time equivalent jobs would be created during the construction phase and/or by the proposed occupiers, will be accompanied by an Employment and Skills Plan. It states the Employment and Skills Plans will be secured through a legal agreement. The explanatory text indicates that one of the objectives of the policy is to support the contribution to achieving net zero carbon development by reducing the need to travel for employment during the construction and occupancy stage of the development. It is unclear how the policy approach will secure this objective bearing in mind that if local people were employed during the construction phase of the development, once the development was completed they would either have no further employment or would need to travel further afield to another construction site. As a result, the contribution of this approach to achieving a zero-carbon economy must be doubtful. Richborough estates support the general principal of securing opportunities for local people during the construction phase of development but this needs to be realistic and practical bearing in mind most of those engaged in construction have to travel from construction site to construction site.
LPPO311	St Modwen Industrial & Logistics	RPS - J, Bonehill	RPS note proposed policy SO4.5 and are broadly supportive of it. However, while we note that the qualifying criteria for the application of the policy is the creation of over 50 full time equivalent jobs either during the construction phase or by proposed occupiers of the development, it appears from the third paragraph of the proposed policy that the requirement will apply to both temporary and permanent jobs. It should be noted that in the case of speculative development, wherein a development is built prior to an occupier being secured, that a developer cannot reasonably enter into obligations on behalf of an unidentified occupier. Should the policy apply to speculative development it is likely to reduce the appetite of the market in undertaking such schemes as they would have to predict what obligations under an Employment and Skills Plan a potential occupier would be prepared to sign up to. This creates a risk of getting it wrong and so putting off potential occupiers. This would make the local economy more fragile as a lack of suitable available space may put off new investment from locating in the District and also may restrict the ability of local businesses to grow. Furthermore, different occupiers will have different approaches to training and development. Requiring them to meet requirements determined without their involvement may result in the best outcomes not being achieved, as the Employment and Skills Plans would not be bespoke to the occupier. RPS recommend that the policy is redrafted to make clear it will only be applied to the operational phase if the end occupier is known. RPS also note from experience that a number of authorities with similar policies secure the delivery of Employment and Skills Plans, or similar, both by way of planning condition and legal agreement. Generally, legal agreements are only required when there are other matters the require a legal agreement. This provides a more proportionate approach and means that the cost of preparing legal agreements is only incurred when it is necessary. Accordingly, RPS recommend that the policy is redrafted to allow for Employment and Skills Plans to be secured by way of a planning condition where appropriate.

SO5.1: Accessible Development

Question 24: Do you support the preferred policy direction for Accessible Development?

LPPO312	Transport for West Midlands - H Davies	Concerning this policy on accessibility development, we strong support it but make the following points: Stronger consideration of the role of buses: Around 75% of public transport is made up of bus travel. In light of the National Bus Strategy and our regions investment in buses, as highlighted in TfWM's Bus Vision document, we believe a high-quality bus network is essential for promoting sustainable travel patterns, with bus infrastructure (including bus priority measures), improved frequencies, good accessibility standard requirements and increased capacity being key considerations in development plans. We also welcome good inter-modal connectivity and interchange facilities to ensure all modes including cycling and walking networks, the rail network as well as the wider bus network are joined up to create seamless journeys. We also recommend further joined-up, cross-boundary partnerships to enhance bus services, to ensure increased transport demand can be fully met within the metropolitan area and beyond, especially where cross boundary bus routes are in operation. Stronger consideration of active travel: While we fully praise all the preferred policy direction within this objective, TfWM however feels this could be strengthened even further. Firstly, consideration of connectivity and integration between the different modes, along with public transport interchanges and use of mobility hubs needs further exploration in the plan. The importance of public realm is also a fundamental instrument in delivering sustainable transport and needs exploration. With many visitors coming into our wider region each day, ensuring that our public realm environment is fully considered in all new developments is essential. Enhancing the public realm to key transport nodes, such a interchanges and bus shelters is also fundamental to new development and should be captured, as part of wider accessibility measures for new developments. Consideration of freight: With the growth in on-line retailing and 'just in time' approaches to manufacturing, this has resulted in a sharp increase in the numbers of deliveries being undertaken regionally, particularly by vans - in turn contributing to congestion and pollution. Whilst the local plan makes reference to sustainable freight distribution, TfWM feels it needs to note the sharp increase in freight levels and explore ways land use planning can help minimise the adverse impacts freight can bring to communities. Exploring ways deliveries can be consolidated, the use of low and zero emission vehicles including electric vehicles, cargo/E-cargo bikes and avoiding the need for repeat delivery attempts should all be explored as potential policies in the local plan
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Item No. 6.98

Consideration of the West Midlands Key Route Network: Through the creation of the WMCA in 2016, new powers and responsibilities were devolved to the Mayoral WMCA. These included responsibilities relating to monitoring traffic flows, congestion, permit schemes for road works, road safety and air quality and are to be acted on by the WMCA concurrently with Walsall and other constituent authorities. Sections of the West Midlands KRN may therefore need to be carefully assessed and mitigated at key junctions which are close to the Walsall and Cannock border, with detailed attention paid to the impacts of the existing public transport network. Henceforth, Cannock Chase should work closely with TfWM, to ensure any KRN route, close to the border is not subject to delays, and strategic movements are not significantly disrupted. Stronger links with WMRE: While the impact of Covid 19 on the rail industry has been dramatic with patronage dropping to as low as 5% of normal levels and income from fares declining as much as 91%, it is vital we support the rail industry and encourage public transport usage post Covid. We therefore strongly welcome reference made throughout the document concerning rail and the improvements made to the metropolitan region and beyond, and how recent rail services upgrades will help with the wider regeneration of Cannock Town Centre, especially in relation to the Cannock Station Upgrade project. Further improvements to Rugeley Train Station, Rugeley Trent Valley Train Station and its bus station will also bring benefits and we fully support these schemes. However, the local plan needs to acknowledge how the WMRE have been working in close collaboration with Cannock Chase and Staffordshire County Councils to develop such schemes, including the Cannock Station upgrade project, with this work due to progress into further design work shortly. In addition, the plan should highlight the impacts of the proposed new Walsall - Wolverhampton train service which will improve rail connectivity between Cannock Chase and Wolverhampton and provide direct train services from Wolverhampton to a range of regional and national destinations. Finally, projects connected to the wider Stations Alliance should also be noted in the plan.

LPPO313	Brindley Heath Parish Council		A sustainable transport plan is long overdue in the Rugeley and Chase area. It is little wonder that most residents take to their cars to go anywhere and there is such a great number of taxis operating in the area. Local bus services are almost non-existent and services to adjacent towns are very poor.
LPPO314	Norton Canes Councillors		Norton Canes is the closest settlement to Chasewater out of all the communities which surround it and we feel that, although the site technically sits outside the District, more emphasis should be placed on its relationship to the village. There are issues with access to Chasewater from Norton Canes, particularly for the disabled, and we feel it would be remiss for the Local Plan not to acknowledge that more formal cross-authority work needs to take place for the benefit of the residents of the village. To the north of the village lies No Man's Bank which is a constituent part of the Chasewater and Southern Staffordshire Coalfields Heaths SSSI. We note that currently Natural England list the site condition as declining unfavourable and its Threat Risk as High. The consultation document states that as part of the spatial strategy for Norton Canes "the Local Plan supports the enhancement of the biodiversity link between Sutton Park and Cannock Chase as well as areas further afield." Our concern is that the draft Local Plan does not specify how it will support the enhancement of this biodiversity link for specific sites, of which No Man's Bank is one integral part. The Cannock Extension Canal SAC is mentioned in the document and we note that Strategic Objective 7 states "to protect and enhance the natural environment development will ... avoid any impact on the integrity of ... the Cannock Extension Canal SAC." We welcome the new specific reference to this SAC on page 151. Finally, we note the creation of a country park within Norton Canes south of the proposed housing developments on Cannock Road. Whilst we welcome this proposal we feel that there is potential to be much more ambitious with the land between the Cannock/Hednesford/Heath Hayes urban area and Norton Canes through the creation of a bigger country / urban park. This could be achieved through utilising a mix of private and urban land already designated as Sites of Biological Interest, the parkland north of Washbrook Lane and East of Blakeney Way and the Poplars landfill (post-operation). We appreciate that the landfill is still in operation, but reference should be made to its potential use after it ceases operation as this creates a further significant opportunity to enhance green space provision within the Norton Canes ward.
LPPO315	Together Active - J, Brennan		Yes, welcome this policy but also need to include that whenever possible cycling infrastructure should be segregated from the highway to increase safety and uptake of Active travel (following DfT LTN 1/20 Cycle Infrastructure Design Guidance)
LPPO316	Natural England- G, Driver		We note the emphases on sustainable travel and creation of green infrastructure which links to the wider Green Space Network and welcome this.
LPPO317	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The test contained within the policy that developments which individually or cumulatively cause an unacceptable impact on the highway network is not consistent with the approach set out in the NPPF. The NPPF test is a severe impact and that is the test that should be used in the policy. Policy SO5.2 deals with communication technologies and states that all major development proposals will demonstrate how they will deliver digital connectivity. The policy refers to measures such as facilitating technologically advanced methods of communication, providing and future proofing infrastructure that is required to enable access to high quality and resilient digital connectivity and increasing the use of technology to established integrated journey planning and travel information.
LPPO318	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The test contained within the policy that developments which individually or cumulatively cause an unacceptable impact on the highway network is not consistent with the approach set out in the NPPF. The NPPF test is a severe impact and that is the test that should be used in the policy. Policy SO5.2 deals with communication technologies and states that all major development proposals will demonstrate how they will deliver digital connectivity. The policy refers to measures such as facilitating technologically advanced methods of communication, providing and future proofing infrastructure that is required to enable access to high quality and resilient digital connectivity and increasing the use of technology to established integrated journey planning and travel information.
LPPO319	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The test contained within the policy that developments which individually or cumulatively cause an unacceptable impact on the highway network is not consistent with the approach set out in the NPPF. The NPPF test is a severe impact and that is the test that should be used in the policy. Policy SO5.2 deals with communication technologies and states that all major development proposals will demonstrate how they will deliver digital connectivity. The policy refers to measures such as facilitating technologically advanced methods of communication, providing and future proofing infrastructure that is required to enable access to high quality and resilient digital connectivity and increasing the use of technology to established integrated journey planning and travel information.

SO5.2: Communication Technologies

Question 25: Do you support the preferred policy direction to improve communications technologies?

LPPO320	Transport for West Midlands - H Davies		Overall, we fully support this policy section in the local plan. The government's UK Digital Strategy sets out the importance of providing world class digital infrastructure, with £1 billion of investment planned to support the roll-out of next generation digital infrastructure. TfWM is benefitting from such investment, through being part of the Future Transport Zone, and is actively working with developers and transport providers to ensure that new developments are designed to enable the most up-to-date digital connectivity. We encourage reference to measures TfWM are undertaking in terms of transport schemes such as car clubs, shared taxi's, Demand Responsive Transport, and future micro mobility measures to aid such modes such as Mobility as a Service and mobility credits - all playing a key role and supporting enhanced connections into more traditional public transport routes. In addition, whilst the use of swift ticketing is used for some bus routes across Cannock Chase, a further roll out to other routes could be explored and we welcome further dialogue in this area. Access to TfWM's Transport Modelling and Data: TfWM are currently in the process of procuring transport ,modelling advisory services. As part of this process TfWM are beginning to explore how any new modelling and analytical tools could support the housing and growth agendas of its partners. As part of this process we would welcome continued engagement with both planning and transport authorities in order to understand where there are opportunities for further collaboration in this field.
LPPO321	Together Active - J, Brennan		Yes, and welcome use of technology to establish integrated journey planning
LPPO322	Home Builders Federation - S, Green		Under Policy SO5.2, all major development proposals will demonstrate delivery of digital connectivity by supporting the installation of new communications infrastructure that is required to serve the development at the point of first occupation and future proofing the infrastructure that is required to enable access to high quality resilient digital connectivity. The Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations. In the March 2020 Budget, the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The Government proposes to amend Part R "Physical Infrastructure for High-Speed Electronic Communications Networks" of the Building Regulations to place obligations on housing developers to work with network operators to install gigabit broadband, where this can be done within a commercial cost cap. The Department for Culture, Media and Sport (DCMS) has outlined its intentions on the practical workings of this policy, which will apply to all new builds. Any type of technology may be used, which is able to provide speeds of over 1000Mbps. All new build developments will be equipped with the physical infrastructure to support gigabit-capable connections from more than one network operator. Furthermore, the delivery of broadband service connections is reliant on a third-party contractor over which a developer is unlikely to have any control.
LPPO323	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates endorse the general approach but question whether this is an area where land use planning can assist in promoting the use of new and emerging technologies. Whilst new housing developments will incorporate fibre broadband connectivity, it is difficult to envisage how developers and housebuilders in particular will provide many of the aspects of Policy SO5.2. In particular how the proposal will increase the use of technology to establish integrated journey planning is difficult to reconcile. Similarly, how development will facilitate technologically advanced methods of communication to allow remote working is also nebulous. Policy SO5.3 deals with low and zero carbon transport. It states all major development proposals will contribute to the reduction in the reliance of carbon intensive modes of transport by supporting the take up of ultra-low emission vehicles, hydrogen vehicles, developing electric vehicle charging networks, accelerating the uptake of low emission taxis and buses, investing in cycling and walking and moving freight from road to rail.
LPPO324	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates endorse the general approach but question whether this is an area where land use planning can assist in promoting the use of new and emerging technologies. Whilst new housing developments will incorporate fibre broadband connectivity, it is difficult to envisage how developers and housebuilders in particular will provide many of the aspects of Policy SO5.2. In particular how the proposal will increase the use of technology to establish integrated journey planning is difficult to reconcile. Similarly, how development will facilitate technologically advanced methods of communication to allow remote working is also nebulous. Policy SO5.3 deals with low and zero carbon transport. It states all major development proposals will contribute to the reduction in the reliance of carbon intensive modes of transport by supporting the take up of ultra-low emission vehicles, hydrogen vehicles, developing electric vehicle charging networks, accelerating the uptake of low emission taxis and buses, investing in cycling and walking and moving freight from road to rail.
LPPO325	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates endorse the general approach but question whether this is an area where land use planning can assist in promoting the use of new and emerging technologies. Whilst new housing developments will incorporate fibre broadband connectivity, it is difficult to envisage how developers and housebuilders in particular will provide many of the aspects of Policy SO5.2. In particular how the proposal will increase the use of technology to establish integrated journey planning is difficult to reconcile. Similarly, how development will facilitate technologically advanced methods of communication to allow remote working is also nebulous. Policy SO5.3 deals with low and zero carbon transport. It states all major development proposals will contribute to the reduction in the reliance of carbon intensive modes of transport by supporting the take up of ultra-low emission vehicles, hydrogen vehicles, developing electric vehicle charging networks, accelerating the uptake of low emission taxis and buses, investing in cycling and walking and moving freight from road to rail.

SO5.3: Low and Zero Carbon Transport

Question 26: Do you support the preferred policy direction to deliver low and zero carbon transport?

LPPO326	G, Green		In the next few years I will be considering whether to buy an electric car or to rely on public transport. At the present time, the inadequate bus service would make me decide to buy a car. As an example, to go to Hednesford, my wife would have to catch a bus to Cannock, then another bus to Hednesford, and then the reverse of that to come home, so we take the car. I do not want to see the same number of private cars on the road, when we've gone electric, as there are now. I hope to see people of all ages using buses regularly instead of cars.
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Item No. 6.100

LPPO327	Transport for West Midlands - H Davies		TfWM fully support this policy. In our five motives for change for our new local transport plan (which are discussed below in more detail), we explicitly focus on how the majority of carbon emissions in the West Midlands are attributed to transport; especially car usage. And while we have been making good progress with building much of the infrastructure needed for a decarbonised transport system; through supporting better public transport services, creating safer routes for active travel and enabling a shift to an ultra-low emission fleet, our existing policies may not deliver on the scale and pace of behaviour change now needed to address the climate emergency. Therefore rapid decarbonisation of transport carbon emissions is vital and this policy is strongly welcomed.
LPPO328	Together Active - J, Brennan		Yes, but segregated cycle routes should always be the preferred option to increase safety and uptake of active travel (following DfT LTN 1/20 Cycle infrastructure Design guidance) and also provision of safe cycle storage facilities.
LPPO329	Natural England- G, Driver		We welcome this policy direction and advise looking more broadly at how zero carbon can be achieved. For example, healthy ecosystems, particularly forests, take up and store significant amounts of carbon in soils and trees. One hectare of natural woodland can take up carbon dioxide roughly equivalent to an average person's carbon dioxide emissions over the course of a whole year. Natural England has produced the Climate Change Adaptation Manual - Evidence to support nature conservation in a changing climate to help to make informed decisions about adaptation.
LPPO330	Home Builders Federation - S, Green		Under Policy SO5.3, all major development proposals will contribute to the reduction of the reliance on carbon-intensive modes of transport by supporting the take-up of ultra-low emission vehicles and developing electric vehicle charging networks. All major developments will include the provision of electric vehicle charge points (EVCPs) and other infrastructure required for alternative low & zero carbon transport options and designate parking spaces for low emission vehicles.
LPPO331	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates supports the objective to reduce reliance on carbon intensive modes of transport however again it is difficult to foresee how a Local Plan document and its implementation through the development management process will ultimately support the take up of ultra-low emission vehicles as described in the Policy. Similarly, other vehicles, such as hydrogen vehicles, have yet to be demonstrated as viable and in particular it is not evident that hydrogen vehicles will be the most sustainable future replacement for carbon-based vehicles. Other elements of the policy refer to supporting changes to the road network where they are related to the reduction in environmental impacts and the enhancement of public transport. Whilst such changes can be supported, they can result in other adverse impacts such as an increase in congestion and other associated negative air quality impacts. The policy needs review to address this potential conflict. Policy SO5.4 deals with maintaining and improving the transport system. It sets out various measures which will be promoted to achieve improvements in the existing transport network. One of the items detailed is enabling demand responsive transport services such as taxis to provide mobility at times and locations where timetabled public transports services are not sustainable.
LPPO332	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates supports the objective to reduce reliance on carbon intensive modes of transport however again it is difficult to foresee how a Local Plan document and its implementation through the development management process will ultimately support the take up of ultra-low emission vehicles as described in the Policy. Similarly, other vehicles, such as hydrogen vehicles, have yet to be demonstrated as viable and in particular it is not evident that hydrogen vehicles will be the most sustainable future replacement for carbon-based vehicles. Other elements of the policy refer to supporting changes to the road network where they are related to the reduction in environmental impacts and the enhancement of public transport. Whilst such changes can be supported, they can result in other adverse impacts such as an increase in congestion and other associated negative air quality impacts. The policy needs review to address this potential conflict. Policy SO5.4 deals with maintaining and improving the transport system. It sets out various measures which will be promoted to achieve improvements in the existing transport network. One of the items detailed is enabling demand responsive transport services such as taxis to provide mobility at times and locations where timetabled public transports services are not sustainable.
LPPO333	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates supports the objective to reduce reliance on carbon intensive modes of transport however again it is difficult to foresee how a Local Plan document and its implementation through the development management process will ultimately support the take up of ultra-low emission vehicles as described in the Policy. Similarly, other vehicles, such as hydrogen vehicles, have yet to be demonstrated as viable and in particular it is not evident that hydrogen vehicles will be the most sustainable future replacement for carbon-based vehicles. Other elements of the policy refer to supporting changes to the road network where they are related to the reduction in environmental impacts and the enhancement of public transport. Whilst such changes can be supported, they can result in other adverse impacts such as an increase in congestion and other associated negative air quality impacts. The policy needs review to address this potential conflict. Policy SO5.4 deals with maintaining and improving the transport system. It sets out various measures which will be promoted to achieve improvements in the existing transport network. One of the items detailed is enabling demand responsive transport services such as taxis to provide mobility at times and locations where timetabled public transports services are not sustainable.
LPPO334	Cannock Designer Outlet (GP)Ltd o/b Cannock Designer Outlet Ltd Partnership	Carter Jonas - K, Gregson	Whilst we support the general principles of the Policy and the need to promote low and zero carbon transport, the provision of necessary infrastructure should be proportionate to the level and type of development. This will ensure development is not impacted upon in respect of either design or financial viability. We therefore suggest the following text is added to the draft policy (in bold): Subject to design and financial feasibility, all major developments will set out as part of the Design and Access Statement how they will: [...] • Include the provision of electric vehicle charge points, and other infrastructure proportionate to the type of development that may be required for alternative low and zero carbon transport options, designate parking spaces for low emission vehicles, and facilitate low emission bus service operations;

SO5.4: Maintaining and Improving the Transport System

Question 27: Do you support the preferred policy direction to maintain and improve to transport system?

LPPO335	Inland Waterways Association, P, Sharpe		IWA supports policy SO5.4 on the transport system, including increased use of the canal network and towpaths.
LPPO336	L, Guy		The train that runs through Hednesford, Cannock etc. to Birmingham an back has so few carriages that at times its full to the extreme. I have seen people push into the smallest spaces, its extremely dangerous! The more people that come to this area whether that's to live here or to the new shopping centre, the train situation needs to be addressed! Its such a massive issue and I can only see this getting worse. Why has this not been looked into and solved sooner? There's so much that could be done to make our area better with much needed improvements it doesn't make sense to add more houses when the area can barely cope with the capacity of people already living here.
LPPO337	Cannock Chase AONB Partnership		The AONB supports this policy direction and would welcome measures to enhance access to the AONB by cycleways and footpaths, and provision of public transport services serving AONB, to help reduce visitor reliance on their own vehicles.
LPPO338	G, Green		In the next few years I will be considering whether to buy an electric car or to rely on public transport. At the present time, the inadequate bus service would make me decide to buy a car. As an example, to go to Hednesford, my wife would have to catch a bus to Cannock, then another bus to Hednesford, and then the reverse of that to come home, so we take the car. I do not want to see the same number of private cars on the road, when we've gone electric, as there are now. I hope to see people of all ages using buses regularly instead of cars..
LPPO339	Transport for West Midlands - H Davies		TfWM are fully supportive of policy SO5.4, as these areas are all captured in our current development work of the West Midlands new statutory Local Transport Plan to create a fairer, healthier and greener West Midlands. We have adopted five 'Motives for Change' to both frame and set out a new direction for transport in the region, which covers decarbonising transport, equalising access to opportunities, supporting local communities, encouraging the uptake of more active travel options and ensuring transport plays a vital role in our region's wider economic recovery and rebalancing. These five motives for change include. 1. Tackling the Climate Emergency; 2. Creating a Fairer Society; 3. Supporting Local Communities and Places; 4. Becoming More Active; 5. Sustaining Economic Success. The WMCA has set ambitious aims to be carbon neutral by 2041. This will require significant shifts in travel patterns and behaviour. Post pandemic we will likely see some changes with increased levels of working from home. To release the reductions in transport's contributions we will need to see unprecedented changes to travel behaviours. The role of spatial planning and digital connectivity will be evermore important in helping to deliver accessibility in lieu of mobility. Therefore in Cannock Chases local plan, TfWM would welcome a link to the importance of wider regional partnerships, as set out in our 'motives for change' and how one voice on issues such as rail, bus and highways issues, across the wider region are important to securing key investment.
LPPO340	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We support policy option SO5.4 regarding sustainable transport, particularly in respect of the Hatherton canal and its towpath in the District.
LPPO341	Canal & River Trust - H, Smith		The policy is key to achieving the aims of Strategic Objective 5 and we support the inclusion of the canal network and towpaths as part of the integrated transport network.
LPPO342	Norton Canes Councillors		We welcome policy SO5.4 on public transport, particularly building strategic partnerships with bus companies to deliver high frequency bus services. We would like to stress, however, that our location on the border with the West Midlands means that more residents would prefer, or need to, travel to places like Brownhills and Walsall for shopping, hospital appointments, school and college and these proposed partnerships therefore would need to recognise that. There is also the need for £500,000 from the Norton Hall Meadow development to be spent by the county council on local bus services; this funding could be used to enhance existing routes serving the Church Road and Norton Hall Lane area, or on completely different options for vulnerable residents, such as dial-a-ride type of service.
LPPO343	Together Active - J, Brennan		6.34 Yes and support the amendment to support Building Better, Building Beautiful Commissions recommendations on encouraging walking and cycling. I would also like to see reference to segregated cycle ways where feasible to increase safety and uptake of Active Travel following DfT LTN 1/20 Cycle Infrastructure Design guidance -especially making use of the canal network.
LPPO344	Natural England- G, Driver		We welcome this policy direction and advise looking more broadly at how zero carbon can be achieved. For example, healthy ecosystems, particularly forests, take up and store significant amounts of carbon in soils and trees. One hectare of natural woodland can take up carbon dioxide roughly equivalent to an average person's carbon dioxide emissions over the course of a whole year. Natural England has produced the Climate Change Adaptation Manual - Evidence to support nature conservation in a changing climate to help to make informed decisions about adaptation.
LPPO345	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Generally Richborough Estates supports the approach set out in the policy however it should be noted that taxis already provide mobility in lieu of public transport services. That is the type of service that taxis provide. Policy SO5.6 refers to safeguarding recreational footpath and cycle routes. The policy protects those routes shown on the proposal map from development.
LPPO346	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Generally Richborough Estates supports the approach set out in the policy however it should be noted that taxis already provide mobility in lieu of public transport services. That is the type of service that taxis provide. Policy SO5.6 refers to safeguarding recreational footpath and cycle routes. The policy protects those routes shown on the proposal map from development.
LPPO347	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Generally Richborough Estates supports the approach set out in the policy however it should be noted that taxis already provide mobility in lieu of public transport services. That is the type of service that taxis provide. Policy SO5.6 refers to safeguarding recreational footpath and cycle routes. The policy protects those routes shown on the proposal map from development.

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LPPO348	Cannock Designer Outlet (GP)Ltd o/b Cannock Designer Outlet Ltd Partnership	Carter Jonas - K, Gregson	We support the Council's preferred policy direction to maintain and improve the transport system. As mentioned in our response to 'Transport & Infrastructure' above, the upgrade of Cannock train station is vital to support MCDOWN - one of the Council's strategic objectives - and to ensure that it is as easy as possible for customers to visit MGDOWM by train.
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SO5.5 Hatherton Canal Restoration Corridor

Question 28: Do you support the preferred policy direction to safeguard the route of the Hatherton Canal?

LPPO349	Inland Waterways Association, P, Sharpe		IWA supports policy SO5.5 Hatherton Canal Restoration Corridor. Although the greater part of the route lies in South Staffordshire, the continued safeguarding sections in Cannock Chase provides the essential continuity to allow this long-term restoration project to progress.
LPPO350	Walsall Council - N, Ball		We support proposed policy SO5.5 about the Hatherton Canal Restoration Corridor. The route extends into Walsall and would be supplied primarily by water from Chasewater through the Wyrley and Essington Canal. The policy wording needs to show that the implications the proposal could have on the Cannock Extension Canal SAC (see also question 42) have been addressed. The same approach to the route of the proposal should be taken as for Walsall, i.e. not joining into the Cannock Extension Canal and requirements for a HRA including in combination effects with any potential mineral workings. One option could be to include the wording use in policy ENV4(b) of Walsall's Site Allocation Document (see SAD Adoption January 2019 Final for Printing.pdf (walsall.gov.uk) which states: The project for the restoration of the Hatherton Canal will be required to demonstrate that it will have no adverse effects on the Cannock Extension Canal SAC/SSSI. A detailed Habitats Regulations Appropriate Assessment will be required to evaluate all relevant implications of the project for the site in view of its conservation objectives, to ascertain that the project would not adversely affect the integrity of the SAC contrary to the Habitats Regulations, and must also take into account in-combination effects. Proposals to designate the line of the restoration project as a heritage trail and /or green corridor will be supported provided that doing so would not preclude future proposals to restore the canal network.
LPPO351	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We support and welcome policy option SO5.5 to safeguard those sections of the proposed through-route for the restored Hatherton Canal which are within the District. Maintaining protection of the through route is vital for the continuation work to restore this canal for the benefit of the public.
LPPO352	Canal & River Trust		The Lichfield and Hatherton Canals Restoration Trust (LHCRT) is actively working towards the restoration of the former Lichfield Canal to navigable status. We are supportive of the work of the LHCRT in restoring the canal, which is likely to progress during the Local Plan Period. Canal restoration projects provide for a number of benefits for a local community and can be a catalyst for redevelopment and regeneration. In addition to environmental benefits canal restoration can also have positive economic and social impacts and the protection and enhancement required by this policy will aid in achieving other key objectives of the Plan.
LPPO353	Together Active - J, Brennan		Yes, I support the preferred policy direction including the emphasis on reducing fear of crime and good design for an attractive and safe environment to encourage more women, older people and vulnerable people to cycle and walk.
LPPO354	Natural England- G, Driver		We support the safeguarding of the canal as an opportunity area for wetland habitat as identified through the Cannock Chase District Nature Recovery Network Mapping Report.
LPPO355	Staffordshire County Council - J, Chadwick		Yes, this proposal is very much supported.

SO5.6: Safeguarding Proposed Recreational Footpath and Cycle Routes

Question 29: Do you support the preferred policy direction to safeguard the proposed routes of recreational footpath and cycleways?

LPPO356	G, Green		Many more people would take up cycling, not just as recreation but to get to work or to go to the shops but are put off by the perceived hazards of traffic. We need as many off-road cycle-ways as possible to give people confidence. I have visited our twin town of Datteln in Germany and was impressed to see that almost all high school children cycled to and from school, with the respect of car drivers. Parked cars in narrow roads are a danger for children which prevents regular cycling. Also, parking on footpaths is causing people with pushchairs and disabled buggies to pass in the roadway.
LPPO357	Together Active - J, Brennan		Yes . I support and welcome this preferred policy direction.
LPPO358	Natural England- G, Driver		This preferred policy is complimentary to the Cannock Chase Sac project and crosses over with it. Mitigation for the Cannock Chase SAC is interlinked with any work to deliver recreational cycling route and walking routes which relieve pressure on the SAC and encourage people away from the SAC.
LPPO359	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates generally support the approach taken to new footpath and cycle ways. Policy SO5.7 deals with parking provision. It states all major development proposals will make appropriate off-street parking in accordance with the relevant local design code and an assessment of the anticipated demand arising, scope for encouraging alternative means of travel, provision that will be made for private and public transport charging points, impact that parking might have on road safety and residential amenity and provision of adequate and conveniently placed for parking for people who have a disability or restricted mobility.
LPPO360	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates generally support the approach taken to new footpath and cycle ways. Policy SO5.7 deals with parking provision. It states all major development proposals will make appropriate off-street parking in accordance with the relevant local design code and an assessment of the anticipated demand arising, scope for encouraging alternative means of travel, provision that will be made for private and public transport charging points, impact that parking might have on road safety and residential amenity and provision of adequate and conveniently placed for parking for people who have a disability or restricted mobility.

LPPO361	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates generally support the approach taken to new footpath and cycle ways. Policy SO5.7 deals with parking provision. It states all major development proposals will make appropriate off-street parking in accordance with the relevant local design code and an assessment of the anticipated demand arising, scope for encouraging alternative means of travel, provision that will be made for private and public transport charging points, impact that parking might have on road safety and residential amenity and provision of adequate and conveniently placed for parking for people who have a disability or restricted mobility.
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SO5.7: Parking Provision

Question 30: Do you support the preferred policy direction for parking provision?

LPPO362	G, Green		Many more people would take up cycling, not just as recreation but to get to work or to go to the shops but are put off by the perceived hazards of traffic. We need as many off-road cycle-ways as possible to give people confidence. I have visited our twin town of Datteln in Germany, and was impressed to see that almost all high school children cycled to and from school, with the respect of car drivers. Parked cars in narrow roads are a danger for children which prevents regular cycling. Also, parking on footpaths is causing people with push-chairs and disabled buggies to pass in the roadway.
LPPO363	Together Active - J, Brennan		Need to ensure that on street parking does not compromise safe walking and cycling networks and provide adequate access and spaces for secure cycle storage.
LPPO364	Home Builders Federation - S, Green		Under Policy SO5.7, all major development proposals will make appropriate off-street parking in accordance with the relevant Local Design Code and an assessment of the provision that will be made for private and public EVCPs. The HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. As set out in the 2019 NPPF for effectiveness, a policy should be clearly written and unambiguous so it is evident how a decision maker should react to development proposals (para 16d). The Council's policy approach to the provision of EVCPs should be clear. The Council should specify if provision means a cable and duct approach or installation of active EVCPs. The Council should also clarify the requirement for the provision of public and private EVCPs and off-street as opposed to within the curtilage of individual dwellings. The HBF consider that the physical installation of active EVCPs is unnecessary. The evolution of automotive technology is moving quickly therefore a passive cable and duct approach is a more sensible and future proofed solution, which negates the potential for obsolete technology being experienced by householders. A passive cable and duct approach means that the householder can later arrange and install a physical EVCP suitable for their vehicle and in line with the latest technologies. The Council should also acknowledge that this policy approach may be superseded by the Government's proposals to change Building Regulations. The Department of Transport consultation of Electric Vehicle Charging in Residential & Non-Residential Buildings (ended 7th October 2019) set out the Government's preferred option to introduce a new requirement for EVCPs under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country. The Council's preferred policy approach should not compromise the viability of development. The HBF and its Members have serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard (see HBF answer to Question 49 below). These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated an installation cost of approximately £976 per EVCP plus any costs for upgrading local electricity networks, which under the Government's proposal automatically levies a capped figure of £3,600 on developers. These costs should be included in the Council's <u>viability assessment</u> .
LPPO365	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The approach in the Local Plan is not consistent within the NPPF in that, as proposed, the parking standards would not be contained within the Local Plan document and therefore would not be subject to examination. In addition, paragraphs 105 and 106 of the NPPF states that maximum parking standards should only be set where there is a clear justification that they are necessary for managing the road safety network. Evidence should be included that demonstrates that parking standards are necessary, and these should be included within the Local Plan to provide certainty to developers upfront. Any standards that are developed should be clear and not onerous.
LPPO366	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The approach in the Local Plan is not consistent within the NPPF in that, as proposed, the parking standards would not be contained within the Local Plan document and therefore would not be subject to examination. In addition, paragraphs 105 and 106 of the NPPF states that maximum parking standards should only be set where there is a clear justification that they are necessary for managing the road safety network. Evidence should be included that demonstrates that parking standards are necessary, and these should be included within the Local Plan to provide certainty to developers upfront. Any standards that are developed should be clear and not onerous.
LPPO367	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The approach in the Local Plan is not consistent within the NPPF in that, as proposed, the parking standards would not be contained within the Local Plan document and therefore would not be subject to examination. In addition, paragraphs 105 and 106 of the NPPF states that maximum parking standards should only be set where there is a clear justification that they are necessary for managing the road safety network. Evidence should be included that demonstrates that parking standards are necessary, and these should be included within the Local Plan to provide certainty to developers upfront. Any standards that are developed should be clear and not onerous.
LPPO368	Cannock Designer Outlet (GP)Ltd o/b Cannock Designer Outlet Ltd Partnership	Carter Jonas - K, Gregson	We support the provision of electric charging points / spaces reserved for low emission vehicles. As a general comment to Policy SO5.7, it is vital that development has the required and correct level of parking spaces. This will reduce queueing on the local highway network and ensure highway safety is not impacted. We support the principles of the Council's preferred policy direction for parking provision subject to comments in response to Policy SO5.7 above.

SO6.1: Hierarchy of Town and Local Centres

Question 31: Is the proposed hierarchy of centres appropriate, and do you support the range of uses described in the Policy for each tier within the hierarchy?

LPPO369	Aldi Stores Ltd	Turley Associates - N, Denison	Proposed changes to the Rugeley Town Centre boundary: We object to the proposed changes to the Rugeley Town Centre Boundary, specifically the proposed shrinking of the extent of the boundary and the exclusion of the Tesco Store at Power Station Road from the town centre. Given that the Tesco store lies within the town centre as currently defined and is described in the Cannock Chase Retail and Town Centre Uses Study (Jan 2021) (Appendix G page 5) as being just outside the primary retail area, there would have to be some sound and clear cut reason to justify excluding the store from the defined town centre. The evidence
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SO6.2: Provision of Main Town Centre Uses and Town Centre Services

Question 32: Do you support the thresholds set within the policy?

LPPO370	G, Green		I have not been impressed with the design of recent retail area constructions with regard to environmental and sustainability issues. I would urge that there should be porous paving on car parking space, solar panels, wild flower planting, rainwater flushing in the buildings, and clearly signed disposal bins for recycling. I should not have to explain the various reasons why these features are important, and action to prevent climate change, loss of bio-diversity, and flooding is very urgent. There is a climate emergency which is more dangerous than Covid 19.
LPPO371	Historic England - E, Boden		Historic England notes that this policy direction is mainly focused on floorspace thresholds and impact tests for town centre services and suggests that the additional emphasis of the role of heritage assets in driving regeneration (as commented on previously) could also be included, so that local heritage opportunities to bring new life into towns centres and historic commercial buildings is supported.
LPPO372	Cannock Designer Outlet (GP)Ltd o/b Cannock Designer Outlet Ltd Partnership	Carter Jonas - K, Gregson	As written, the Policy will require impact assessments for development that creates new or additional floor space of 500sqm (gross) outside of the designated Primary Shopping Area within the Strategic Town Centre of Cannock and the Town Centres of Rugeley and Hednesford and development proposals creating new or additional floorspace greater than 200sqm (gross) outside of the Local Centres. MGDOWM functions as a specialist retailer - selling discounted comparison goods priced at least 30% below the normal price at which similar types of merchandise are or have been offered for sale at their usual place of sale. This is entirely different to the type of retail available in either the strategic town centre of Cannock and/or the town centres of Rugeley and Hednesford. Given the location of MGDOWM which is situated outside of the Local Centres, as drafted, there would be a requirement to undertake an impact assessment for any development (including the changes of use and variations of conditions) of more than 200sqm. Given the different retail offer, to ensure MGDOWM can respond the market conditions and remain attractive to leading brands that focus solely on retail outlets, we proposed that the larger threshold (500sqm) should be applicable and not the 200sqm threshold. We therefore proposed the following addition to Policy SO6.2 (in bold): [...] • Development proposals creating new or additional floorspace greater than 500 square metres (gross) outside of the designated Primary Shopping Areas within the Strategic Town Centre of Cannock and the Town Centres of Rugeley and Hednesford and within MGDOWM. [...].

SO6.3: Safeguarding Existing Town Centre Services

Question 33: Do you support the preferred policy direction safeguarding existing town centre services?

LPPO373	Historic England - E, Boden	Historic England is supportive of this policy direction and welcomes the various references to the historic environment and heritage assets. However, we recommend that 'preserved' is amended to 'conserved' in the first bullet point.
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SO6.4: Town Centre Design

SO6.5: Cannock Town Centre Redevelopment Areas

Question 34: Do you support the proposed redevelopment areas in Cannock Town Centre?

LPPO374	M, Stretton	I was impressed by the detail in the document, however, my only real concern is Cannock Town Centre. Now that major shopping has been transferred to out of town to the new complex, its time to renew the old town centre. In my view the centre is out of date, old fashioned and looks like a collection of Lego Bricks. all the character has been removed, its obvious shopping on a large scale has gone, therefore we need to make it more attractive. Lichfield has a Cathedral to attract people. We need a centre of entertainment, attractive buildings, cafes, walk in shops for entertainment. Kids and families enjoying games. An up to date cinema and theatre. Pubs - it's a pity Weatherspoon's didn't by the old Council House over looking the bowling green., central play area in the centre for town kids. I'm not against monthly markets but we need better than a mini version of Penkridge. Converting some of the existing shops into housing accommodation guarantees people stay local.
LPPO375	Historic England - E, Boden	Historic England notes that through the Local Plan there are opportunities to enhance or better reveal the significance of heritage assets and Conservation Areas within the town centres of both Cannock and Rugeley. Historic England notes and welcomes that the majority of the proposed town centre/mixed-use allocations have been assessed within the HIA and our detailed comments on these sites can be found at Appendix A to this letter. However, we advise that proposed sites M4 and M8 should also be assessed for their potential impacts on the significance of nearby heritage assets, prior to their allocation.
LPPO376	Together Active - J, Brennan	Need to prioritise active travel through safe, integrated walking and cycling routes (SE Active Design) and follow DfT LTN 1/20 Cycle Infrastructure Design. Retailers report an increase in trade of 40% when places are made more attractive for walking (Planning and Healthy Weight TCPA & PHE 2014)
LPPO377	Staffordshire County Council - J, Chadwick	The County Council is concerned that Policy SO6.5 Town Centre Redevelopment Areas includes a proposal to redevelop the Cannock bus station. However, no alternative well located site for this facility has been identified. • Bus Station (0.11ha) - hotel and conferencing facilities or residential uses and supporting an improved intermodal interchange. Site ref M2. There has been previous dialogue concerning this proposal and Consultants have looked at site options. Beecroft Road, church Street and reconfiguration of the existing bus station site to accommodate development but with less capacity for buses, were all considered but no suitable alternative option for the bus station emerged. SCC considered that reconfiguration would negatively affect capacity and therefore service provisions locally. The issue of layover was also a problem when considering alternative sites and reducing capacity at the current location. The suggestion of Church Street as an alternative location cannot be supported as the road isn't that wide; there is very little space for pedestrians let alone bus shelters and stops etc. There are currently 10 bus stands in the bus station, 4 or 5 maximum would only have been available with this option and no layover space. There are very few options in Cannock Town Centre otherwise, and there are no other stopping locations within the town centre, unlike Stafford for example, most passengers board/alight in Cannock bus station due to no other options.

Question 35: Are there aspects of design you think should be included in a design guides/design code?

LPPO378	Historic England - E, Boden	Historic England is supportive of this policy direction which seeks to regenerate Cannock Town centre. We suggest that rather than just protecting the Conservation Areas from development, reference should be made to maximising opportunities to enhance and better reveal the significance of the Cannock Town Centre Conservation Area through the sites proposed as allocations.
LPPO379	Natural England- G, Driver	There is an opportunity to enhance and create green and blue infrastructure within town centres through retrofitting SuDS which can help with water management, planting trees which can provide shading and cooling - an important climate change adaptation and designing in green and blue infrastructure into redevelopment. For information opportunities please see below: Greening the Grey: a framework for integrated green grey infrastructure; Designing Blue Green Infrastructure (BGI) for water management, human health, and wellbeing: summary of evidence and principles for design; Introducing England's urban forests ; and Forest Research- Urban Tree Manual
LPPO380	Severn Trent	Our key focus/ask is around surface water management and we would really support any effort the local plan and its policies could make on this front. As we touched on in the section above "Strategic Objective 8: Supporting a Greener Future", adherence to the drainage hierarchy is a great step to helping drain new development sustainably. The use of SuDS does not negate the impact of making surface water connections to the combined sewerage system. Other design/policy ideas which may help to ensure surface water is managed sustainably: • Ensuring developments have sufficient onsite storage to accommodate run-off for rainfall events up to 100-year return period. • Limiting the sites surface water discharge rate to greenfield run-off rates or lower. • Utilising brownfield redevelopment as opportunity to reduce existing surface water discharge rates and storage provision, helping to add resilience to future climate change. Ultimately the best way to manage surface water is upfront planning and not allocating sites which have a reduced number of sustainable options. Where allocated sites pose a surface water risk then site specific policy or master-planning will be beneficial and we are happy to consult with you on this.

SO6.6: Rugeley Town Centre Redevelopment Areas

Question 36: Do you support the proposed Local Plan annotations of Renewal areas and Protection areas in Rugeley Town Centre? If not, what amendments would you like to see?

LPPO381	Inland Waterways Association, P, Sharpe	IWA supports policy SO6.6, in particular for the mixed use development site ref M8, including repair and re-use of the Steam Mill as identified in the HIA (RE18).
LPPO382	Historic England - E, Boden	Historic England is supportive of this policy direction which seeks to regenerate Rugeley Town Centre. We suggest that rather than just protecting the Conservation Area from development, reference should be made to maximising opportunities to enhance and better reveal the significance of the Rugeley Town Centre Conservation Area through the sites proposed as allocations.
LPPO383	Historic England - E, Boden	Historic England notes that through the Local Plan there are opportunities to enhance or better reveal the significance of heritage assets and Conservation Areas within the town centres of both Cannock and Rugeley. Historic England notes and welcomes that the majority of the proposed town centre/mixed-use allocations have been assessed within the HIA and our detailed comments on these sites can be found at Appendix A to this letter. However, we advise that proposed sites M4 and M8 should also be assessed for their potential impacts on the significance of nearby heritage assets, prior to their allocation.
LPPO384	Canal & River Trust - H, Smith	The Trust recognises that the towpath north of Leathermill Lane requires improvement in order to secure its long term ability to handle pedestrian and cycle traffic. This would include works to improve the mooring facilities. Subject to funding, this scheme of improvements would likely occur during the Local Plan period. The total works would likely cost up to £500,000. When complete, this would allow for improved facilities for boaters to visit the area, and improve access to the Haywood and Shugborough Estate, with benefits for both tourism and for wellbeing (by promoting walking and cycling). We request that improvements to the towpath north of Leathermill Lane (to Etchinghill) should be included in the Infrastructure Delivery Plan so that these improvements can be actively planned for during the Plan Period. We would welcome the potential to discuss any issues with the Local Authority, and the ability to comment on any updates to the Infrastructure Delivery Plan. We believe that one-to-one meetings offer the most appropriate route of engagement, as it would allow both parties to talk about specific matters related to our infrastructure.
LPPO385	Bridley Heath Parish Council	These plans must be given top priority in any final plan. Cannock is looking poorer but Rugeley, after Covid, is like a ghost town and urgently needs upgrading and a serious injection of funding. Incentives to attract new businesses to the town and surrounding areas.
LPPO386	Together Active - J, Brennan	Agree the Conservation Areas and important green spaces within Rugeley Town Centre need to be protected from redevelopment. Active travel needs more than promotion it needs to be prioritise through safe, integrated walking and cycling routes (SE Active Design) and follow DfT TLN 1/20 Cycle Infrastructure Design utilising segregated cycle routes to increase the uptake of active travel.

Question 37: Are there aspects of design you think should be included in a design guides/design code?

LPPO387	Together Active - J, Brennan	Design codes should incorporate SE Active Design Principles
LPPO388	Natural England- G, Driver	There is an opportunity to enhance and create green and blue infrastructure within town centres through retrofitting SuDS which can help with water management, planting trees which can provide shading and cooling - an important climate change adaptation and designing in green and blue infrastructure into redevelopment. For information opportunities please see below: Greening the Grey: a framework for integrated green grey infrastructure; Designing Blue Green Infrastructure (BGI) for water management, human health, and wellbeing; summary of evidence and principles for design; Introducing England's urban forests ; and Forest Research- Urban Tree Manual

SO6.7: Hednesford Town Centre Redevelopment Areas

Question 38: Do you support the proposed redevelopment areas in Hednesford Town Centre? If not, what amendments would you like to see?

LPPO389	Beau Desert Golf Club - P, Benbow	BDGC strongly approve of development in the vicinity of Hednesford Town Centre, being an essential element of a flourishing town.
LPPO390	Historic England - E, Boden	Historic England is supportive of this policy direction which seeks to regenerate Hednesford Town Centre. We suggest that reference should be made within the policy to conserving and enhancing heritage assets within the town centre through the sites proposed as allocations.
LPPO391	Hazel Slade & Rawnsley Community Association - D, Williams	Development in and around Hednesford Town Centre is an essential element of a thriving town, and it is supported.
LPPO392	Together Active - J, Brennan	Agree with this and support it especially that the important green spaces within Hednesford Town Centre will be protected from redevelopment.

Question 39: Are there aspects of design you think should be included in a design guides/design code?

LPPO393	Together Active - J, Brennan	Design codes should incorporate SE Active Design Principles
LPPO394	Natural England- G, Driver	There is an opportunity to enhance and create green and blue infrastructure within town centres through retrofitting SuDS which can help with water management, planting trees which can provide shading and cooling - an important climate change adaptation and designing in green and blue infrastructure into redevelopment. For information opportunities please see below: Greening the Grey: a framework for integrated green grey infrastructure; Designing Blue Green Infrastructure (BGI) for water management, human health, and wellbeing; summary of evidence and principles for design; Introducing England's urban forests ; and Forest Research- Urban Tree Manual

LPPO395	Severn Trent	<p>Our key focus/ask is around surface water management and we would really support any effort the local plan and its policies could make on this front. As we touched on in the section above "Strategic Objective 8: Supporting a Greener Future", adherence to the drainage hierarchy is a great step to helping drain new development sustainably. The use of SuDS does not negate the impact of making surface water connections to the combined sewerage system. Other design/policy ideas which may help to ensure surface water is managed sustainably: • Ensuring developments have sufficient onsite storage to accommodate run-off for rainfall events up to 100-year return period. • Limiting the sites surface water discharge rate to greenfield run-off rates or lower. • Utilising brownfield redevelopment as opportunity to reduce existing surface water discharge rates and storage provision, helping to add resilience to future climate change. Ultimately the best way to manage surface water is upfront planning and not allocating sites which have a reduced number of sustainable options. Where allocated sites pose a surface water risk then site specific policy or master-planning will be beneficial and we are happy to consult with you on this.</p>
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SO7.1: Protecting, Conserving and Enhancing Biodiversity and Geodiversity

Question 40: Do you support the preferred policy direction to protect, conserve and enhance biodiversity and geodiversity?

LPPO396	Cannock Chase AONB Partnership	<p>These preferred policies are warmly welcomed. Cannock Chase SAC is an integral part of the AONB's special qualities and natural beauty, therefore policy to ensure its conservation along with that of ancient woodland and veteran trees is essential. The requirements for restoration and creation of wildlife corridors is also welcomed to enhance habitat connectivity across the wider landscape.</p>
LPPO397	G, Green	<p>I have known a local hedgerow in Brickworks Rd Heath Hayes, since the 1970s, before the road and houses were built. After their construction, the hedge still had a variety of species and was a continuous corridor for hedgehogs, squirrels and birds. The footpath/bridleway ran close beside it. Some householders have built a wall or fence outside the hedge, enclosing it in their garden, and then demolished it to increase the size of their garden. One property owner at the junction of Wimblebury Road removed all trace of the hedge and replaced it with 'neat and tidy' laurel. At around the same time, I discovered a heap of almost tree-sized pieces of hawthorn obstructing a local footpath. This I cleared myself with difficulty. I have great concerns for the preservation of small pockets of 'wild' corridors for wildlife. I am active in keeping open local footpaths and maintaining a local nature reserve, as I want as many people as possible to enjoy and be 'recreated' by enjoying wildlife within walking distance of home, as I do; to see and hear wild creatures without having to drive anywhere. Many people are not as mobile as I am, and they need 'Nature' as much as I do. It is not just Green Belt that must be protected, but also small pockets of 'wild' and the old hedgerows which help maintain biodiversity and human health.</p>
LPPO398	Lichfield & Hatherton Canals Restoration Trust - L, Walker	<p>We are pleased to note the inclusion, within policy option SO7.1, of reference to the creation and restoration of wildlife corridors being beneficial for biodiversity. The restored Hatherton Canal and its towpath will provide such valuable connectivity for wildlife.</p>
LPPO399	Natural England- G, Driver	<p>We have some concerns regarding the wording in this preferred policy. We would remind you of the hierarchy of designated sites and in particular NPPF paragraph 171. We would advise that the order of the list of designated sites is changed, so that SSSIs come before ancient woodland. We have concerns regarding the following paragraph: "Development which results in loss of harm to SAC, Ancient Woodland, Ancient Trees or Veteran trees will need to demonstrate there are 'imperative reasons for overriding public interest'." This oversimplifies the issues and we would advise that you review and check your wording. Footnote 58 of the NPPF on ancient woodlands expands on the "wholly exceptional reasons" test and mentions "public benefit" but it is not the same as the Habitats Regulations article 6(4) derogation Test 2(IROPI - imperative reasons of overriding public interest). We welcome the commitment to biodiversity net gain but would advise that the last paragraph on net gains should be revised to reflect the preference for on-site habitat provision/enhancement first wherever practicable followed by offsite where not.</p>
LPPO400	Severn Trent	<p>We support this policy and wish to be approached by yourselves or partners for discussions on potential biodiversity enhancement or green infrastructure projects. This could be tree planting initiatives, sustainable urban drainage schemes or urban greening and regeneration, we would love to hear from you. We believe that through collaboration there may be opportunities to maximise wider benefits. Please see our website for more information on "Our Great Big Nature Boost" or feel free to get in touch.</p>

LPPO401	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough estates supports the general principles set out in Policy SO7.1. However, there is a typographical error in defining "imperative reason for of overriding public interest". In addition, the approach of utilising "imperative reasons of overriding public interest" is inconsistent with the guidance in the NPPF. Para 172 of the NPPF sets out this test against conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs. It does not extend to veteran and ancient trees on sites located beyond these areas. It is unreasonable to conclude that the removal of, for instance, a single veteran tree would potentially need to be supported by the same evidence as requirement to maintain the nation's healthy, safety, education or environment or to be associated with the economic or social benefits on a nationally significant infrastructure project. This approach is disproportionate. The Local Plan should be amended accordingly. Policy SO7.2 deals with biodiversity net gain. It states that major development proposals will provide a net gain in biodiversity, the net gains in biodiversity will be designed to support the delivery of a district wide biodiversity network and the level of biodiversity net gain will be proportionate to the type, scale and impact of development.
LPPO402	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough estates supports the general principles set out in Policy SO7.1. However, there is a typographical error in defining "imperative reason for of overriding public interest". In addition, the approach of utilising "imperative reasons of overriding public interest" is inconsistent with the guidance in the NPPF. Para 172 of the NPPF sets out this test against conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs. It does not extend to veteran and ancient trees on sites located beyond these areas. It is unreasonable to conclude that the removal of, for instance, a single veteran tree would potentially need to be supported by the same evidence as requirement to maintain the nation's healthy, safety, education or environment or to be associated with the economic or social benefits on a nationally significant infrastructure project. This approach is disproportionate. The Local Plan should be amended accordingly. Policy SO7.2 deals with biodiversity net gain. It states that major development proposals will provide a net gain in biodiversity, the net gains in biodiversity will be designed to support the delivery of a district wide biodiversity network and the level of biodiversity net gain will be proportionate to the type, scale and impact of development.
LPPO403	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough estates supports the general principles set out in Policy SO7.1. However, there is a typographical error in defining "imperative reason for of overriding public interest". In addition, the approach of utilising "imperative reasons of overriding public interest" is inconsistent with the guidance in the NPPF. Para 172 of the NPPF sets out this test against conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs. It does not extend to veteran and ancient trees on sites located beyond these areas. It is unreasonable to conclude that the removal of, for instance, a single veteran tree would potentially need to be supported by the same evidence as requirement to maintain the nation's healthy, safety, education or environment or to be associated with the economic or social benefits on a nationally significant infrastructure project. This approach is disproportionate. The Local Plan should be amended accordingly. Policy SO7.2 deals with biodiversity net gain. It states that major development proposals will provide a net gain in biodiversity, the net gains in biodiversity will be designed to support the delivery of a district wide biodiversity network and the level of biodiversity net gain will be proportionate to the type, scale and impact of development.
LPPO404	Staffordshire County Council - J, Chadwick		Yes, this is welcomed. It may be that greater clarity around the avoid - mitigate - compensate hierarchy described in NPPF would be helpful here.

SO7.2: Biodiversity Net Gain

Question 41: Do you support the preferred policy direction to achieve net gains in biodiversity through development?

LPPO405	G, Green		I have known a local hedgerow in Brickworks Rd Heath Hayes, since the 1970s, before the road and houses were built. After their construction, the hedge still had a variety of species and was a continuous corridor for hedgehogs, squirrels and birds. The footpath/bridleway ran close beside it. Some householders have built a wall or fence outside the hedge, enclosing it in their garden, and then demolished it to increase the size of their garden. One property owner at the junction of Wimblebury Road removed all trace of the hedge and replaced it with 'neat and tidy' laurel. At around the same time, I discovered a heap of almost tree-sized pieces of hawthorn obstructing a local footpath. This I cleared myself with difficulty. I have great concerns for the preservation of small pockets of 'wild' corridors for wildlife. I am active in keeping open local footpaths and maintaining a local nature reserve, as I want as many people as possible to enjoy and be 'recreated' by enjoying wildlife within walking distance of home, as I do; to see and hear wild creatures without having to drive anywhere. Many people are not as mobile as I am, and they need 'Nature' as much as I do. It is not just Green Belt that must be protected, but also small pockets of 'wild' and the old hedgerows which help maintain biodiversity and human health.
LPPO406	Bromford Housing Group	PlanIt Planning and Development - J, Williams	Policy SO7.2 - Biodiversity and Net Gain, is unnecessary, This matter is covered by the NPPF in more detail than the proposed policy and is soon to be enshrined in law. The policy in the Plan it is less specific than the actual biodiversity and net gain requirements set out in National Planning Policy and does not actually reflect the requirements of biodiversity net gain. The policy should be removed.
LPPO407	Hazel Slade & Rawnsley Community Association - D, Williams		We support the concept of net gains to biodiversity through development, but not at the expense of our visual landscape, which we regard as sacrosanct.
LPPO408	West Midlands Housing Association Planning Consortium	Tetlow King Planning - L, Stoate	We note that the policy direction states that the level of biodiversity net gain required by any one development will be proportionate to the type, scale and impact of that development. The requirement for 10% biodiversity net gain is expected to be a mandatory requirement once the Environment Bill is enacted. However, if the Council is looking to introduce a higher threshold than 10%, this must be robustly viability tested to show that it will be viable for applicants to provide such biodiversity net gains alongside development. Guidance must be provided (or signposted) on how to practically achieve a higher net gain in development. This would allow for net gain to be designed into processes at early stages and for any design issues to be detected and resolved without causing delay to development.
LPPO409	Natural England- G, Driver		We welcome the preferred policy direction which encourages linkages with District wide ecological networks. We would advise that you define what is a major development. We would advise that the approach to biodiversity net gain should be in conformity with the mitigation hierarchy and this should be clear in the plan. We would expect the plan to either outline or direct to a SPD, the need for a quantitative approach and a consistent means of calculating gains. We would also advise that the plan should be clear about how management will be secured. CIRIA/CIEEM/IEMA have produced Biodiversity Net Gain: Good practice principles for development which the council might find helpful to refer to.
LPPO410	Home Builders Federation - S, Green		Under Policy SO7.2, major development proposals will provide a net gain in biodiversity, The delivery of net gains in biodiversity will be designed to support the delivery of a District-wide biodiversity network based on the designated biodiversity sites. The level of biodiversity net gain required will be proportionate to the type, scale and impact of development. Major development schemes will provide for the long-term management of biodiversity features retained and enhanced within the development site and of those features created off site to compensate for development impacts. The Council's policy approach to biodiversity net gain should not deviate from the Government's proposals as set out in the Environment Bill including transitional arrangement. The Government intends to make provision for a transition period of two years. The Government will work with stakeholders on the specifics of this transition period including accounting for sites with outline planning permission, and will provide clear and timely guidance on understanding what will be required and when. Furthermore, the Council's preferred policy approach should not compromise viability. There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that biodiversity net gain does not prevent, delay or reduce housing delivery. The DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies: Impact Assessment Table 14: Net Gain Delivery Costs (Residential) sets out regional costs (based on 2017 prices) in West Midlands of £18,527/ha of development based on a central estimate but there are significant increases in costs to £63, 725/ha for off-site delivery under Scenario C. There may also be an impact on the ratio of gross to net site acreage, which should be considered by the Council.
LPPO411	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates supports the general principles set out in Policy SO7.2, however the policy refers to the level of net gain being proportionate to the type, scale and impact of the development. This approach is unsatisfactory in being too vague to provide developers with certainty as to what their proposal must deliver in regard to biodiversity. In particular, how each of the specified criteria (type, scale and impact) will influence the level of biodiversity net gain is unclear. Should the proposal have a significant impact on road congestion would it need to deliver a significant improvement in biodiversity. The policy is unclear as drafted and needs to be limited to the biodiversity net gains associated with the proposal. As drafted a proposal which, within extent of a site delivered biodiversity net gain would still have to contribute to other aspects of biodiversity which were off-site. The Council's policy approach to biodiversity net gain should not deviate from the Government's proposals as set out in the Environment Bill. Policy SO7.3 deals with SAC. It states development will not be permitted where it would lead directly or indirectly to an adverse impact upon a SAC and the effects should be mitigated. The policy goes on to indicate that to ensure that the Cannock Chase SAC is not harmed all development that results in a net increase in dwellings within a 15km radius must take all necessary steps to avoid or mitigate any adverse effects upon the SACs integrity.

LPPO412	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates supports the general principles set out in Policy SO7.2, however the policy refers to the level of net gain being proportionate to the type, scale and impact of the development. This approach is unsatisfactory in being too vague to provide developers with certainty as to what their proposal must deliver in regard to biodiversity. In particular, how each of the specified criteria (type, scale and impact) will influence the level of biodiversity net gain is unclear. Should the proposal have a significant impact on road congestion would it need to deliver a significant improvement in biodiversity. The policy is unclear as drafted and needs to be limited to the biodiversity net gains associated with the proposal. As drafted a proposal which, within extent of a site delivered biodiversity net gain would still have to contribute to other aspects of biodiversity which were off-site. The Council's policy approach to biodiversity net gain should not deviate from the Government's proposals as set out in the Environment Bill. Policy SO7.3 deals with SAC. It states development will not be permitted where it would lead directly or indirectly to an adverse impact upon a SAC and the effects should be mitigated. The policy goes on to indicate that to ensure that the Cannock Chase SAC is not harmed all development that results in a net increase in dwellings within a 15km radius must take all necessary steps to avoid or mitigate any adverse effects upon the SACs integrity.
LPPO413	Richborough Estates (Land off Main Road, Breerton)	Pegasus Group - B, Cook	Richborough Estates supports the general principles set out in Policy SO7.2, however the policy refers to the level of net gain being proportionate to the type, scale and impact of the development. This approach is unsatisfactory in being too vague to provide developers with certainty as to what their proposal must deliver in regard to biodiversity. In particular, how each of the specified criteria (type, scale and impact) will influence the level of biodiversity net gain is unclear. Should the proposal have a significant impact on road congestion would it need to deliver a significant improvement in biodiversity. The policy is unclear as drafted and needs to be limited to the biodiversity net gains associated with the proposal. As drafted a proposal which, within extent of a site delivered biodiversity net gain would still have to contribute to other aspects of biodiversity which were off-site. The Council's policy approach to biodiversity net gain should not deviate from the Government's proposals as set out in the Environment Bill. Policy SO7.3 deals with SAC. It states development will not be permitted where it would lead directly or indirectly to an adverse impact upon a SAC and the effects should be mitigated. The policy goes on to indicate that to ensure that the Cannock Chase SAC is not harmed all development that results in a net increase in dwellings within a 15km radius must take all necessary steps to avoid or mitigate any adverse effects upon the SACs integrity.
LPPO414	Wyrley Estates	Fisher German LLP - N, Borsey	Recognition should be given to the role that sensitive development schemes, such as the Grove Colliery site have to play in supporting these aims to enhance the natural environment. The Estate supports Policies SO7.3, SO7.2 and SO7.1. The Estate is a significant landowner within the District, this would present an excellent opportunity to provide tangible benefits through development, which could also include upgrading and improving public access to areas such as Wyrley Common.
LPPO415	Staffordshire County Council - J, Chadwick		Yes, this is welcomed. It is noted that there is an intention to amend the Local Plan to conform with changes to NPPF (6.472). Review of the Local Plan is, however, a time-consuming task and it would be helpful if policy paved the way for likely forthcoming changes. The policy (and the one above) should refer to 'measurable net-gain', ideally with a specific requirement for 10% net gain as is becoming standard. The policy states that 'The level of biodiversity net gain required will be proportionate to the type scale and impact of development', however using a percentage ensures proportionality. The policy should also refer to the use of Defra metrics to demonstrate that gain can be achieved (a metric specifically for small sites expected soon to complement the current one which works better on areas that can be measured in units no smaller than 0.1ha.)

SO7.3: Special Areas of Conservation

Question 42: Do you support the preferred policy direction for the Special Areas of Conservation?

LPPO416	Cannock Chase AONB Partnership		These preferred policies are warmly welcomed. Cannock Chase SAC is an integral part of the AONB's special qualities and natural beauty, therefore policy to ensure its conservation along with that of ancient woodland and veteran trees is essential. The requirements for restoration and creation of wildlife corridors is also welcomed to enhance habitat connectivity across the wider landscape.
LPPO417	G, Green		I have known a local hedgerow in Brickworks Rd Heath Hayes, since the 1970s, before the road and houses were built. After their construction, the hedge still had a variety of species and was a continuous corridor for hedgehogs, squirrels and birds. The footpath/bridleway ran close beside it. Some householders have built a wall or fence outside the hedge, enclosing it in their garden, and then demolished it to increase the size of their garden. One property owner at the junction of Wimblebury Road removed all trace of the hedge, and replaced it with 'neat and tidy' laurel. At around the same time, I discovered a heap of almost tree-sized pieces of hawthorn obstructing a local footpath. This I cleared myself with difficulty. I have great concerns for the preservation of small pockets of 'wild' corridors for wildlife. I am active in keeping open local footpaths and maintaining a local nature reserve, as I want as many people as possible to enjoy and be 'recreated' by enjoying wildlife within walking distance of home, as I do; to see and hear wild creatures without having to drive anywhere. Many people are not as mobile as I am, and they need 'Nature' as much as I do. It is not just Green Belt that must be protected, but also small pockets of 'wild' and the old hedgerows which help maintain biodiversity and human health.

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LPPO418	Walsall Council - N, Ball		Policy SO7.3 refers to both Cannock Chase and Cannock Extension Canal SACs. Walsall and Wolverhampton officers are in ongoing discussions with Staffordshire officers and Natural England in relation to the former and possible mitigation measures that developments in the Black Country may be required to contribute towards, whilst the latter extends into Walsall. We would question the need for an explicit reference to a 15km radius of Cannock Chase SAC, given that the whole of Cannock Chase district lies within this and nearly all lies within an 8km zone. However, we support the statement that any subsequent distance may be agreed by the authorities. On this basis, we can support the policy. The policy refers to developments in the water catchment area of the Cannock Extension Canal. However, it is our understanding that the water supply to the canal comes entirely from Chasewater along the Wyrley and Essington Canal. The extent of the water catchment area referred to in the policy, or potential hydrological pathways, should therefore be clarified in the Plan's supporting text. The qualifying feature of the SAC is the floating water-plantain (<i>Luronium natans</i>) that the Canal supports. It is understood the main issue affecting the nature conservation value of the canal is related to the frequency of boat movements along it. The Natural England citation and supplementary note for the SAC advises that the low volume of boat traffic on this terminal branch of the Wyrley and Essington Canal has allowed open-water plants, including floating water-plantain, to flourish while depressing extensive reed swamp growth. However, poor water quality and inadequate quantities of water can adversely affect the habitat on which the SAC features depend. The Cannock Chase Local Plan HRA Appropriate Assessment (March 2021) found that it is not currently possible to rule out adverse effects on the integrity of Cannock Extension Canal SAC from air pollution due to a lack of traffic and emissions data. Of particular concern will be the effects of atmospheric nitrogen deposition and ground level ozone on the SAC which the HRA process should consider when the assessment data becomes available.
LPPO419	Hazel Slade & Rawnsley Community Association - D, Williams		We strongly support your proposals for protecting, conserving and enhancing biodiversity, and also the policies in regard to SACs. We would prefer to see the language of protection and conservation more robustly and unambiguously stated for the clearer understanding of what is and is not permissible for potential developers wherever that is possible.
LPPO420	Canal & River Trust - H, Smith		The Trust welcomes the inclusion of this policy regarding the Cannock Extension Canal. Please note that we have also commented on the Habitat Regulations Assessment Report (March 2021) regarding the lack of recognition that the Chasewater Reservoir SSSI is given as being integral to the water supply of the Cannock Extension Canal SAC.
LPPO421	Natural England- G, Driver		We would advise that this policy title and first paragraph should refer to European sites and Wetlands of International Importance ('Ramsar sites'), rather than solely SAC. We would advise that the paragraph on Cannock Chase SAC needs to be revised to be clear that there are other impacts other than recreational impacts for examples, air quality, water quality direct impacts. We would welcome a conversation with the LPA to understand their concerns about impacts from the water catchment area of Cannock Extension Canal SAC. Is there a particular ecological pathway of concern?
LPPO422	Lichfield District Council - S, Stray		Lichfield DC are broadly supportive of Policy SO7.3 and SO7.5 and their supporting text related to the CCSAC and AONB and acknowledge both authorities membership and commitment to the Partnerships of both organisations.
LPPO423	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	In general terms, the Richborough Estates support the general approach however recognition could be given within the policy to the mitigation measures which can be delivered through Local Plans proposals. Policy SO7.4 with protecting and enhancing landscape character by, amongst other things, protecting and conserving local distinctiveness, scenic qualities, rural openness and sense of place. It also refers to protecting, conserving and enhancing the Cannock Chase AONB and the Green Belt. The policy states all major development proposals must be supported by a landscape and visual assessment.
LPPO424	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	In general terms, the Richborough Estates support the general approach however recognition could be given within the policy to the mitigation measures which can be delivered through Local Plans proposals. Policy SO7.4 with protecting and enhancing landscape character by, amongst other things, protecting and conserving local distinctiveness, scenic qualities, rural openness and sense of place. It also refers to protecting, conserving and enhancing the Cannock Chase AONB and the Green Belt. The policy states all major development proposals must be supported by a landscape and visual assessment.
LPPO425	Richborough Estates (Land off Main Road, Breerton)	Pegasus Group - B, Cook	In general terms, the Richborough Estates support the general approach however recognition could be given within the policy to the mitigation measures which can be delivered through Local Plans proposals. Policy SO7.4 with protecting and enhancing landscape character by, amongst other things, protecting and conserving local distinctiveness, scenic qualities, rural openness and sense of place. It also refers to protecting, conserving and enhancing the Cannock Chase AONB and the Green Belt. The policy states all major development proposals must be supported by a landscape and visual assessment.
LPPO426	Wyrley Estates	Fisher German LLP - N, Borseley	Recognition should be given to the role that sensitive development schemes, such as the Grove Colliery site have to play in supporting these aims to enhance the natural environment. The Estate supports Policies SO7.3, SO7.2 and SO7.1. The Estate is a significant landowner within the District, this would present an excellent opportunity to provide tangible benefits through development, which could also include upgrading and improving public access to areas such as Wyrley Common.
LPPO427	Staffordshire County Council - J, Chadwick		Yes, this is welcomed. A minor point - in 6.489 industrial emissions are mentioned as a source of pollutants; agricultural emissions are also relevant. Specific allocations - section 6 at Norton Pools it should be noted that there is a Local Wildlife Site (LWS) which adjoins the northern edge of the housing site. Impacts (especially those from dog walking) on the LWS, which comprises heathland and grassland habitats, will therefore need to be carefully mitigated. The Pye Green Valley allocation is also in close proximity to a LWS and mitigation will need to be thought through if damage to the LWS is to be avoided. [See submission for maps].

SO7.4: Protecting, Conserving and Enhancing Landscape Character

Question 43: Do you support the preferred policy direction to protect, conserve and enhance landscape character?

LPPO428	Cannock Chase AONB Partnership		This policy is warmly welcomed. Reference within this overarching policy to conserving and enhancing the AONB, and respecting sensitive edges is supported. We also welcome reference to locating and designing development to avoid impacts on tranquillity and dark landscapes. Cannock Chase is the least dark of all 34 AONBs in England, in part due to light spillage from nearby towns. However, the central core of the Chase is still a relative oasis of darkness for people to enjoy compared to the surrounding conurbations. The AONB is engaged in a Dark Skies Project that seeks to foster a sense of responsibility towards protecting and enhancing dark skies and reducing light pollution in the area, the outcomes of which we hope will support this policy.
LPPO429	Historic England - E, Boden		Historic England welcomes the references in this policy direction to local distinctiveness and character and also suggest that the policy specifically references the historic environment.
LPPO430	Hazel Slade & Rawnsley Community Association - D, Williams		It is clear that for any development proposal to respect the surrounding scenic quality of the AONB along its sensitive edges, there must be a vigorous defence of its value to the environment and the community. Dense development up to the boundary of the AONB does not meet this objective by some way. Minimal and transient tree screening does not deal with the visual imposition in any meaningful or permanent way. The wording of the constraints place on such development should be unambiguous and provide clear guidance and deterrence to any developer wishing to encroach on the margins of this protected landscape. The boundary of the AONB lies in the valley between the communities of Hazel Slade and Rawnsley. The southern boundary of the AONB therefore represents a very visible and relevant connection to the rural environment that both communities cherish. We cannot support any development that seeks to minimise the significance of this important community and national asset by placing any further development (designated H30 in the draft LP) alongside its boundary. Screening is not the answer here. Redesignating the status of H30 to protect it for all time is the answer, and the Local Plan should seek to meet that need. A CCDC study of Green Belt areas in March 2021 identified the land adjacent to H30, designated HE19 and running down the right hand side of Rawnsley Road toward Hednesford, as at "High" degree of environmental harm should any development be permitted. Although H30 was not included in the study protection from development of this land would be in agreement with the assessment of HE19. We whole heartedly support the preferred policy direction to protect, conserve and enhance landscape character. We hope and trust that the Council will defend this objective with rigor and determination.
LPPO431	C, Downes		I consider that site C64 admirably fulfils the criteria for inclusion in Policy SO7.4. It also meets the requirement of Cannock Chase AONB Management Plan 2019 section 4.14. Further cementing the argument for re-designation as permanent local green space.
LPPO432	Natural England- G, Driver		We support the direction of the preferred policy.
LPPO433	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates have no comment to make on this policy area. Policy SO7.6 deals with protecting, conserving and enhancing the Green Belt. It states that development will protect the character and openness of the Green Belt. It also states in association with the large strategic site allocations at south of Lichfield Road, Cannock, land indicated in the proposal map will be safeguarded to allow for the delivery of a country park.
LPPO434	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates have no comment to make on this policy area. Policy SO7.6 deals with protecting, conserving and enhancing the Green Belt. It states that development will protect the character and openness of the Green Belt. It also states in association with the large strategic site allocations at south of Lichfield Road, Cannock, land indicated in the proposal map will be safeguarded to allow for the delivery of a country park.
LPPO435	Richborough Estates (Land off Main Road, Breerton)	Pegasus Group - B, Cook	Richborough Estates have no comment to make on this policy area. Policy SO7.6 deals with protecting, conserving and enhancing the Green Belt. It states that development will protect the character and openness of the Green Belt. It also states in association with the large strategic site allocations at south of Lichfield Road, Cannock, land indicated in the proposal map will be safeguarded to allow for the delivery of a country park.
LPPO436	Wyrley Estates	Fisher German LLP - N, Borseley	Recognition should be given to the role that sensitive development schemes, such as the Grove Colliery site have to play in supporting these aims to enhance the natural environment. The Estate supports Policies SO7.3, SO7.2 and SO7.1. The Estate is a significant landowner within the District, this would present an excellent opportunity to provide tangible benefits through development, which could also include upgrading and improving public access to areas such as Wyrley Common.

SO7.5: Protecting, Conserving and Enhancing the Cannock Chase Area of Outstanding Natural Beauty

Question 44: Do you support the preferred policy direction to protect, conserve and enhance the Cannock Chase Area of Outstanding Natural Beauty?

LPPO437	Cannock Chase AONB Partnership	This policy is warmly welcomed. In addition to reference to Cannock Chase AONB Management Plan 2019-2024 the AONB would welcome reference to the recently published AONB Views and Setting Guide. This document will assist in informing landscape and visual impact assessments and provides advice to help ensure that the surroundings of the AONB are conserved and enhanced. Cannock Chase AONBs domed plateau landform has a strong influence on the landscape character and special qualities of the AONB due to its visual prominence and wide-ranging uninterrupted views outward, which are recognised in the AONB Management Plan. Views towards the distinctive profile of Cannock Chase are also an important attribute within the surrounding area. The AONB Views and Setting Guide describes representative views from and towards the AONB, and offers viewpoint specific advice and spatial advice to help ensure that the surroundings of the AONB are developed and managed in ways that conserve and enhance the AONBs significance and special qualities.
LPPO438	Beau Desert Golf Club - P, Benbow	BDGC strongly endorse the aims of the Local Plan in supporting the special natural characteristics that define the Green Belt and the Chase AONB in particular. Provision is made within the plan for enhancements to these protected areas where opportunity arises. BDGC see potential for the former quarry in Rugeley Road (C375) to be more effectively integrated into the AONB by careful blending of a peripheral development into a much larger area of land. In this way BDGC see access to the Chase through the recognised Bridleways to be more formally identified incorporating discrete areas of grassland within a largely deciduous area of reforested land. Development would be subject to rigorous viability tests from adjacent locations within and adjacent to the AONB.
LPPO439	Historic England - E, Boden	We welcome the inclusion of the historic environment and culture as considerations for development within the AONB. However, as we stated at the last consultation, we would be supportive of inclusion of text within this policy direction to reference the role of heritage within the AONB. Reference heritage such as the World War trenches and cemeteries, as well as research such as 'Chase Through Time', will assist in reflecting this important asset as a heritage landscape and we also recommend that links are made to the Cannock Chase AONB Management Plan, as reference earlier in this letter.
LPPO440	Brindley Heath Parish Council	The AONB is fast being destroyed by overuse and immediate action is required to save what is left. The Pandemic has seen the area swamped with visitors especially bike riders who have badly damaged most of the paths and much of the most sensitive areas of habitat. The area cannot support such large numbers and any thought of developing tourism in the area is nonsense. Residents have been plagued with inconvenient and dangerous parking and litter and worse - abuse. The Council must focus on providing alternative areas for recreation and pastimes such as mountain biking which could be located elsewhere in the County or adjacent Counties.
LPPO441	Natural England- G, Driver	We support the direction of this policy. However, the beginning of the second paragraph needs rewording, we would suggest the following: "Development proposals within or on land forming the setting of the AONB will be expected to positively contribute to the special qualities of the AONB." We suggest that you make reference to the Cannock Chase AONB Design Guide within the plan.
LPPO442	Lichfield District Council - S, Stray	Lichfield DC are broadly supportive of Policy SO7.3 and SO7.5 and their supporting text related to the CCSAC and AONB and acknowledge both authorities membership and commitment to the Partnerships of both organisations.

SO7.6: Protecting, Conserving and Enhancing the Green Belt

Question 45: Do you support the preferred policy direction for protecting, conserving and enhancing the Green Belt?

LPPO443	S Grigg		Preserve the Green Belt, including the old mining land in Wimblebury across to Prospect village and to Norton Canes. We are losing so many green spaces and this area acts as a buffer zone surrounding Cannock Chase AONB.
LPPO444	Cannock Chase AONB Partnership		This policy and the proposed Green Belt amendments as shown on the proposed Policies Map are supported.
LPPO445	Severn Trent		We would encourage green belt protection and the re-use of brownfield wherever possible. Greenbelt development is by nature greenfield development and when land is newly designated for development is it imperative that a sustainable drainage option from the drainage hierarchy exists. Green belt development should not discharge surface water flows to the combined or foul sewerage network.
LPPO446	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates support the recognition of the country park associated with the site allocation of land south of Lichfield Road, Cannock. The policy should make clear that the country park will deliver significant benefits which will mitigate the impact resulting from the loss of Green Belt via the housing allocation.
LPPO447	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates support the recognition of the country park associated with the site allocation of land south of Lichfield Road, Cannock. The policy should make clear that the country park will deliver significant benefits which will mitigate the impact resulting from the loss of Green Belt via the housing allocation.
LPPO448	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates support the recognition of the country park associated with the site allocation of land south of Lichfield Road, Cannock. The policy should make clear that the country park will deliver significant benefits which will mitigate the impact resulting from the loss of Green Belt via the housing allocation.
LPPO449	St Modwens (Land at York's Bridge, Pelsall)	RPS - P, Hill	The site is included within Green Belt Parcel OA14. The Assessment of OA14 is set out below at Fig 7. The site has not been subject to a site-specific assessment as part of the Green Belt Harm Assessment. We have however undertaken a site-specific review of the Site which includes a high-level consideration to the contribution of the Site against each of the NPPFs five purposes and its suitability for release from the Green Belt. This high-level consideration is set out below. To Check Unrestricted Sprawl: The principal consideration in respect of this objective is the sprawl of the existing settlement edge of Pelsall, Walsall. A key consideration is the strength and permanence of existing boundaries. The site is physically contained by Wyrley and Essington Canal to the south, Lime Lane to the West and Lichfield Road to the East. This existing settlement edge and a strong treelined hedgerow boundary to the north of the site creating a strong boundary which prevents the unrestricted sprawl of development into the Green Belt. This hedgerow will be retained, and further structured landscaping will enhance this buffer. To Prevent Neighbouring Towns from Merging into one Another: The principal consideration in respect of this objective is the potential for physical coalescence of towns. There are no settlements to the immediate north of the site. The existing built edge of Norton Canes lies approx. 2.5km to north of Pelsall, Walsall, with the Brownhills West 1.8km to the north. The A5 (and M6 Toll for Norton Canes) also exists within the intervening land with no intervisibility between the two areas due to the landform and existing substantial woodland to the south of Watling Street. The site is therefore physically and visually separated from settlements which prevents coalescence to the north. Safeguarding the Countryside from Encroachment: The physical and visual containment of the site limits the contribution that the land makes to safeguarding the effect of countryside encroachment. Preserve the Setting and Special Character of Historic Towns: The site does not fall within or adjacent to any Conservation Areas and does not have direct views into a historic town. As indicated in the heritage section of this Vision Document, Pelsall Bridge is a locally listed building, but the development is largely set in the context of modern housing development to its south and the visual influences of Coppice Industrial Estate to its North East. It therefore has very limited impact on the setting of any historic towns. To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict Land and other Urban Land: This objective will conflict with any green field site within the Green Belt and will need to be weighed up in the planning balance. To accommodate the intended level of housing growth, it has been acknowledged there exists a need to release Green Belt land within the local authority through the Joint Core Strategy Review process. Overall, as demonstrated in the site-specific assessment set out above, it is apparent that the release of the Site from Green Belt will not compromise the five purposes of the Green Belt and is entirely in accordance with the NPPF in relation to sustainable Green Belt land release. We request that Council take account of the site-specific assessment we have undertaken and include within the Local Plan evidence base.
LPPO450	Wyrley Estates	Fisher German LLP - N, Borseley	Broadly Policy SO7.6 states how the Green Belt will be protected, however the Green Belt is also there for enjoyment through appropriate uses which do not conflict Green Belt policy and principles. As stated earlier in Question 1, provision should be made for the enjoyment of leisure and recreational activities. The Grove Colliery site offers a perfect opportunity for a regeneration site; however, the policy does not go far enough in encouraging new facilities in the Green Belt which can be developed and enjoyed in a sustainable manner. The risk is that non-sympathetic uses creep into the area and confine the site to a future of making very little positive contribution to the Green Belt and failing to maximise the potential of heritage assets, such as Grove Colliery heritage. The policy is quite restrictive and needs to elaborate on wider principles which can provide appropriate opportunities within the Green Belt and avoid hampering the longer-term aspirations.

LPP0451	The Church Commissioners for England	Barton Willmore - A, Bird	We consider that preferred Policy SO7.6 largely repeats national planning policy on the Green Belt, which it is not necessary to duplicate within the draft Plan policies. Reference should instead be made to the NPPF and the application of national Green Belt policy in the local context in accordance with this. We note that this draft Policy identifies compensatory improvements to the Green Belt in association with the proposed strategic housing allocation South of Lichfield (SH1) only. It is noted that further mitigation and compensatory improvements are to be considered and included in the more detailed site policies for all of the proposed allocations (to be removed from the Green Belt) within the next iteration of the plan. We would welcome the opportunity to explore the potential for such compensatory improvements at our Client's site, recognising that the Commissioners also have wider landholdings within the vicinity of the Bleak House site that lie within the Green Belt.
LPP0452	St Modwen Industrial & Logistics	RPS - J, Bonehill	RPS note the findings of the Cannock Chase Green Belt Harm Assessment February 2021 (the 2021 LUC Assessment). However, we strongly disagree with the inclusion of the site within OA14 for a number of reasons as set out in the Site Specific Green Belt Assessment (the Assessment) for the Site included as Appendix C. The Assessment has generally been undertaken in accordance with the methodology of the 2020 LUC assessment to aid the comparison of the results between the two. We have also drawn upon the findings of the Cannock Chase Green Belt Study (the 2016 LUC Assessment) as this did assess the undeveloped part of the Site in detail as part of a wider parcel. It should be noted that while we have followed the methodology of the 2021 LUC Assessment that this should not be interpreted as RPS endorsing this approach. In particular as noted in the Assessment there are aspects of the approach taken in the LUC 2021 Assessment which are inconsistent with RPS's considerable experience of Green Belt Assessments undertaken elsewhere. We also note that while this methodology has been utilised by LUC in undertaking assessments for other Local Authorities, we are not aware that this particular approach has yet been subject to examination and found as being robust. Distinction: As set out in paragraphs 3.2 to 3.8 of Appendix C RPS disagree that the features identified for parcel BW1 amount to a strong distinction from the urban area. In particular we note that linear tree cover is given as an example of a moderate boundary feature on page 53 of the 2021 LUC Assessment. We also note that washed-over development to the north and south of the parcel contribute to containment which reduces distinction as per paragraph 3.78 of the assessment. In relation to views paragraph 3.76 of the 2021 LUC Assessment states that caution should be used when considering views, on the basis that seasonal variations and boundary maintenance regimes can have a significant impact. Given this we question the degree to which the hedgerow structure within the parcel prevents views of the urban area and washed over development during the winter. Given the points above RPS consider that parcel BW1 to only be of moderate distinction between the parcel and urban area. Accordingly, parcels beyond this including the Site should not be considered as outer areas and should be subject to more detailed site specific assessment than was undertaken as part of the 2021 LUC Green Belt Assessment. Inspector's Letter to Welwyn Hatfield BC Dec 2019: Paragraphs 3.9 to 3.15 of Appendix C set out our concerns that the 2021 LUC Assessment does not follow the guidance set out in the Inspector's letter to Welwyn Hatfield BC (Dec 2017), despite referring to it. In summary we consider the assessment of outer areas to be subject to the same criticism that the Inspector raised of the phase 1 Welwyn Hatfield Green Belt Review, which is that the strategic assessment of large parcels cannot necessarily be relied upon to apply to smaller areas within large parcels. This indicates that the assessment of OA14, which was strategic in nature, should not be relied upon when considering the potential harm to the Green Belt of the release of the Site. Furthermore, RPS contend that LUC have misinterpreted the Inspector's comments on the phase 2 Green Belt Review.

In particular we consider that the LUC 2021 Assessment, like the Welwyn Hatfield phase 2 Green Belt Review which the Inspector was commenting on, has failed to examine all of the potential development sites adjacent to the urban areas. We suggest that this is a result of LUC misinterpreting the meaning of urban areas to mean inset areas, rather than also considering urban areas that are currently washed over by the Green Belt, such as Watling Street Business Park. This is a fundamental point of principle. We also contend that LUC appear to have interpreted this as meaning immediately adjacent when considering distinction. This would mean only development parcels separated from urban areas would be assessed. This would exclude parcels separated from urban areas by any features such as woodland, rivers, roads etc. which would be contrary to established practice. Furthermore, this is inconsistent with how adjacent is defined by paragraph 3.93 of the 2021 LUC Assessment which defines adjacent Green Belt land as the land that lies next to and/or in close proximity to land/parcels being assessed for potential release. This is contradictory to the approach taken to distinction wherein the 2021 LUC Assessment has used the presence of a parcel that they have assessed as being strongly distinct to mean that all parcels beyond this should not be assessed as more than a high level as an outer area. Parcels such as the Site can still be in close proximity to the urban areas while not being immediately next to said urban areas. As such RPS consider that the approach taken by LUC in the 2020 LUC Assessment does not reflect the approach advocated by the Inspector's Letter to Welwyn Hatfield BC (Dec 2017). RPS contend that to be in accordance with this approach the assessment should consider all potential development sites adjacent to urban areas, such as the Site. Site specific Green Belt Assessment: In undertaking the Assessment for the Site (Appendix C) we have subdivided the Site into two parcels based on clear differences in terms of land use and the presence of boundary features consistent with the approach taken in the LUC 2021 Assessment. The following sections summarise the findings for these two parcels. Business Park Parcel: [See Fig.1 in document] In coming to a conclusion on the assessment of harm of releasing the Business Park Parcel from the Green Belt the Assessment notes that all parcels considered by the 2021 LUC Assessment were considered to make a strong contribution to Purpose 5. Although it is not expressly stated in the 2021 LUC Assessment it is clear that the contribution made to Purpose 5 has not informed the final assessment of harm for the potential release of individual parcels. This is because the potential release of a number of parcels have been assessed as only resulting in levels of harm at the level of moderate - low harm which can only be achieved by the loss of a contribution assessed as being moderate or lower. RPS consider the Business Park Parcel to make no contributions to Purposes 1 to 4 of the Green Belt. Its release would constitute a negligible impact on adjacent Green Belt land therefore the level of harm that would be caused by its release is very low harm, as per the benchmarks set out on pages 79 to 80 of the 2021 LUC Assessment. It is considered that the Business Park Parcel makes a strong contribution to Purpose 5 and this is included in the assessment of harm, which is contrary to the approach taken for a number of other sites, then at most the release of the Business Park Parcel would result in moderate harm. [See Table 4.1 in the document]. Expansion Land Parcel: [see Fig 4.2 in document]: As set out above in coming to a conclusion on the assessment of harm of releasing the Expansion Land Parcel from the Green Belt the Assessment notes that all parcels considered by the 2021 LUC Assessment were considered to make a strong contribution to Purpose 5.

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Although it is not expressly stated in the 2021 LUC Assessment it is clear that the contribution made to Purpose 5 has not informed the final assessment of harm for the potential release of individual parcels. This is because the potential release of a number of parcels has been assessed as only resulting in levels of harm at the level of moderate - low harm which can only be achieved by the loss of a contribution assessed as being moderate or lower. RPS consider the Expansion Land Parcel to make a relatively weak contribution to Purpose 3 and no contribution to purposes 1, 2, and 4 of the Green Belt. Its release would constitute a negligible impact on adjacent Green Belt land therefore the level of harm that would be caused by its release is very low harm, as per the benchmarks set out on pages 79 to 80 of the 2021 LUC Assessment. As noted above RPS consider the Expansion Land Parcel to only make a weak contribution to Purpose 5. If Purpose 5 is considered as part of the assessment of harm then this would still result in an overall assessment of very low harm. It is considered that the Expansion Land Parcel makes a strong contribution to Purpose 5 and this is included in the assessment of harm, which is contrary to the approach taken for a number of other sites, then at most the release of the release of the Expansion Land Parcel would result in moderate harm. [See Table 4.2 in the document].

Conclusions: The Assessment undertaken by RPS of the level of harm of the release of both the Business Park Parcel and Expansion Land Parcel would be very low harm. As such RPS consider that, in conjunction with the exceptional circumstances associated with the need to allocate sufficient employment land, the Site should be released from the Green Belt through the Cannock Chase Local Plan. RPS note that the Business Park Parcel makes no contribution to Purposes 1 to 4 of the Green Belt and only a very weak contribution to Purpose 5. On this basis even if the Expansion Land Parcel were not released from the Green Belt there is a compelling case to release the Business Park Parcel. RPS also note that site NE5 Turf Field is proposed for release from the Green Belt for development, although surrounding Green Belt land is not proposed for release. This would result in it forming an isolated employment development inset from the Green Belt. RPS consider that this provides further justification for the release of the already developed Business Park Parcel from the Green Belt.

SO7.7: Amendments to the Green Belt

Question 46: Do you support the preferred policy direction to amendments to the Green Belt?

LPPO453	Holford Farm Partnership - P, Holford	Hawksmoor - T, Bathurst	My clients fully support the removal of employment Land Site E10 from the Green Belt to enable it to come forward for development. Given the site's boundaries are closely formed by the A5 Watling Street, the M6 Toll Motorway, the B4154 Walsall Road and the Toby Carvery premises it contributes little in respect of the five Green Belt purposes cited at para.134 of the NPPF, namely the checking of the unrestricted sprawl of large built-up areas and prevention of neighbouring towns from merging into one another. Further to the above, my clients would also support further amendments to the Green Belt to provide for additional employment land supply to assist in meeting the potential shortfall from surrounding Black Country authorities, particularly in regard to the land at Jubilee Field, Watling Street.
LPPO454	West Midlands Housing Association Planning Consortium	Tetlow King Planning - L, Stoate	We support the Council's proposals to amend the Green Belt boundary through a formal review of the local plan policies or through a Neighbourhood plan, as permitted by the NPPF, in order to accommodate the growth requirements of the District. The NPPF states at paragraph 136 that Green Belt boundaries can be altered where exceptional circumstances are fully evidenced and justified. We understand that the Council has produced the Cannock Chase Green Belt Harm Assessment (2020), a detailed Green Belt study that was undertaken to inform the preparation of the Plan, and that a further Green Belt Part 2 Assessment study will also feed into the further development of Local Plan policy. We are pleased to see that the Council has approached the topic of the Green Belt with a balanced and objective perspective. While the Council recognise the important role of the Green Belt, it has also realised its restrictive characteristics when it comes to development. The Local Plan is to provide for a minimum of 5,516 dwellings to meet local housing needs, and an additional 500 dwellings to meet unmet needs of neighbouring areas. As mentioned in the preferred options document, 60% of the District is designated Green Belt. This presents a significant barrier with regard to identifying suitable sites for the delivery of much needed housing development in the authority area. Amending the Green Belt will help to ensure that a sufficient supply of deliverable and developable land is available.
LPPO455	Brindley Heath Parish Council		Too much of the Green Belt has already been developed and the Council must ask itself just how much more they are prepared to lose before there is no longer such a barrier. This is becoming a major problem in the West Midlands with Lichfield now only a field away from Shenstone and Cannock now joined to South Staffs, Walsall and thus Birmingham.
LPPO456	Severn Trent		Following comments above to question 45 we strongly discourage new development on the green belt should it entail disposing of surface water to the combined or foul sewerage network. Every opportunity to ensure greenbelt developments are to an exemplar environmental standard should be made. We recognise that the plan looks to offset and compensate any impact which we strongly support. Reiterating our comments to previous questions we wish to approachable for any collaboration projects involving green infrastructure and or biodiversity net gain.
LPPO457	Home Builders Federation - S, Green		The HBF agree that as set out in Policy SO7.7, there is a need to amend Green Belt boundaries to accommodate growth in the District. As set out in 2019 NPPF, where fully evidenced and justified Green Belt boundaries can be altered in "exceptional circumstances" through the preparation or updating of Local Plans (para 136 & 137). The HBF would not wish to comment on the 7 sites selected for release from the Green Belt. The preferred policy approach does not demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period by the identification of areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period as set out in the 2019 NPPF (para 139c & 139e). The Council proposes that if required, further changes to the Green Belt boundary will be made through a formal review of the Local Plan policies, or through a Neighbourhood Plan, which potentially undermines the permanence of these boundaries in the long-term contrary to national policy.

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LPPO458	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The policy indicates that further amendments to the Green Belt could be required in the future and this would be achieved through another review of the Local Plan or through a neighbourhood plan. The NPPF establishes that Green Belt boundaries should only be altered in exceptional circumstances and that wherever a need for change to Green Belt boundaries has been established through strategic policies, detailed amendment to those boundaries may be made through non-strategic policies including neighbourhood plans. Reference has been made in these representations that there may be need for additional Green Belt boundary revision to accommodate the levels of growth commensurate with the District's position in the HMA and to meet enhanced levels of housing provision associated with additional growth in employment, should the aspirational strategies set out by the LEPs and the District Council's own employment strategy be fulfilled. On this basis Policy SO7.7 should include a strategic component to demonstrate that in certain key locations associated with the most sustainable settlements Green Belt, boundaries can be amended to allow for additional growth, such as at Brereton. In addition further consideration should be given to the Council's economic and employment objectives and whether further Green Belt release should be required to facilitate these aspirations. This could include land associated with the Lakeside employment area.
LPPO459	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The policy indicates that further amendments to the Green Belt could be required in the future and this would be achieved through another review of the Local Plan or through a neighbourhood plan. The NPPF establishes that Green Belt boundaries should only be altered in exceptional circumstances and that wherever a need for change to Green Belt boundaries has been established through strategic policies, detailed amendment to those boundaries may be made through non-strategic policies including neighbourhood plans. Reference has been made in these representations that there may be need for additional Green Belt boundary revision to accommodate the levels of growth commensurate with the District's position in the HMA and to meet enhanced levels of housing provision associated with additional growth in employment, should the aspirational strategies set out by the LEPs and the District Council's own employment strategy be fulfilled. On this basis Policy SO7.7 should include a strategic component to demonstrate that in certain key locations associated with the most sustainable settlements Green Belt, boundaries can be amended to allow for additional growth, such as at Brereton. In addition further consideration should be given to the Council's economic and employment objectives and whether further Green Belt release should be required to facilitate these aspirations. This could include land associated with the Lakeside employment area.
LPPO460	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The policy indicates that further amendments to the Green Belt could be required in the future and this would be achieved through another review of the Local Plan or through a neighbourhood plan. The NPPF establishes that Green Belt boundaries should only be altered in exceptional circumstances and that wherever a need for change to Green Belt boundaries has been established through strategic policies, detailed amendment to those boundaries may be made through non-strategic policies including neighbourhood plans. Reference has been made in these representations that there may be need for additional Green Belt boundary revision to accommodate the levels of growth commensurate with the District's position in the HMA and to meet enhanced levels of housing provision associated with additional growth in employment, should the aspirational strategies set out by the LEPs and the District Council's own employment strategy be fulfilled. On this basis Policy SO7.7 should include a strategic component to demonstrate that in certain key locations associated with the most sustainable settlements Green Belt, boundaries can be amended to allow for additional growth, such as at Brereton. In addition further consideration should be given to the Council's economic and employment objectives and whether further Green Belt release should be required to facilitate these aspirations. This could include land associated with the Lakeside employment area.
LPPO461	Friel Homes Ltd	CT Planning - P, Kreuser	[...]. Support the deletion of the site (SH4) from the Green Belt and the allocation of the site as Strategic Housing Allocation SH4 for some 33 dwellings at Policy SO3.1. Land South of Armitage Lane is well located in size and scale to the existing built form of Brereton/Rugeley. The site is contained by existing urban development and infrastructure. The site can come forward as a discrete development without encroachment on the wider countryside/Green Belt. The site evidently forms a stronger relationship with the urban area than it does with the wider Green Belt. The presence of the A51 and A460 in effect act as clearly defined boundaries, preventing the urban sprawl of Rugeley eastwards and any potential merging with Armitage and Upper Longdon. Land South of Armitage Lane can come forward for development whilst retaining the majority gap between settlements, and safeguarding the countryside from encroachment. The release of Land South of Armitage Lane would therefore adversely impact on the 5 purposes of including land in the Green Belt. The proximity of the A51 and the A460 to the site clearly comprises those physical features that area readily recognisable and permanent which are required to clearly define a new Green Belt boundary in this location, as set out at paragraph 139 of the NPPF. There is no necessity to keep Land at Armitage Lane permanently open; it does not contribute strongly to the function of the Green Belt in this location. This is confirmed in the Green Belt Study Report 2021 prepared by Land Use Consultants as part of the Evidence Base to the Local Plan Preferred Options. Land South of Armitage Lane forms the majority part of the study parcel RU40. [...]. The NPPF at paragraph 138 and Local Plan Preferred Policy SO7.7 require the impact of the loss of Green Belt land to be off-set through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. In this location SH4 is relatively small site which as a consequence of its topography requires careful consideration when designing a layout. Limited opportunities exist to provide for any large scale compensatory improvements on any remaining Green Belt land. In this location where the site SH4 is small and is constrained to the west by Hob Hill Primary School and to the east by the A51, there is little opportunity available to Friel Homes to provide compensatory improvements to any remaining nearby Green Belt land. This position is recognised in the LUC Report which states on this site RU40 [...]. However, enhancements appropriate to the size of the site would be provided on-site in terms of maximising biodiversity, access and sustainable design to assist in achieving the Local Plan's aims for a greener future.

Whilst we support the principle of Green Belt release within the District and consider this is justified in terms of 'exceptional circumstances' (as per the NPPF paragraphs 136-137) we do not fully support the preferred policy direction. We consider that further evidence should be provided to demonstrate the proposed amendments in terms of the individual site allocations are justified. We also consider further amendments to the Green Belt are necessary in order for the draft Plan to be justified, effective and consistent with national planning policy. In terms of individual site allocations within the Green Belt, we note that the draft Plan is not accompanied by an specific documentation related to the site selection methodology and how the proposed allocations have been selected. The Integrated Impact Assessment (Sustainability Appraisal) (at paragraph 2.32) refers to the use of the site selection methodology contained within the previous Issues and Options Local Plan (2019). The Issues and Options Local Plan proposed the use of a 'RAG' site assessment matrix, however no further documentation detailing how sites have been selected or rejected for allocation has been made available as part of the consultation, and there is no commentary within the supporting Sustainability Appraisal with regards to why individual sites have been selected or rejected for allocation. Without this it is difficult to judge how justified the preferred site allocations are and how they have been considered objectively against other site options, particularly in the case of sites which do not currently benefit from planning permission and are currently within the Green Belt. For instance, within the Green Belt Part 2 Assessment (February 2021) we note that the potential release of our Client's site (covered by parcels WI2 -WI19) from the Green Belt is assessed as having a range of 'very high' to 'moderate' harm to the Green Belt purposes. For the largest Green Belt preferred site allocation of SH1: South of Lichfield Road (parcels WI21-W123, CA3 and CA5) the level of harm for all of the parcels is largely 'high', with one parcel of 'moderate' harm identified. We comment further on the appropriateness of the Council's assessment in relation to Bleak House below and within Section 4 of the Vision Document (Appendix 2) nothing that the update contribution ratings (which inform the assessment of harm) are considered excessive and that the piecemeal assessment of individual parcels does not reflect the strategically master planned nature of the Site overall. As per the High Court judgement (Comptom Parish Council & Ors v Buildford Borough Council & Anor [2019] EWHC 3242 (Admin) (04 December 2019)) in relation to the Guildford Local Plan (2019) the case for exceptional circumstances for individual sites can take into account the degree of impact upon the Green Belt alongside sustainable development considerations (our emphasis). In terms of these wider sustainable development considerations, we note that our Client's site (site reference C264, and individual parcels of C264 (a-e)) scores the same as the largest Green Belt preferred site allocation of SH1: South of Lichfield Road, Cannock (which contains parcels site reference C116(a), C489 and C352) for the majority of the SA Objectives within the Sustainability Appraisal. Our Client's Site scores slightly less favourably in terms SA Objective 1: Biodiversity and Geodiversity due to proximity to the SSSI the north; SA Objective 6 Landscape and Townscape due to its closer proximity to the AONB to the north; and SA Objective 8 Transport due to proximity to existing public transport services.

However, site allocation SH1 scores less favourably than our Client's site in relation to SA Objective 17 Historic Environment due to the proximity of heritage assets. In relation to SA Objectives SA1 Biodiversity and Geodiversity and Objective 6 Landscape and Townscape, the negative scores for our Client's site are associated with purely distance measurements to the nearest designated sites (SSSI and AONB respectively) which do not necessarily take into account the individual characteristics of the site and the nature of the proposed development. The nearby preferred site allocation of SH2: East of Wimblebury Road also scores similarly to our Client's site due to distance from a SSSI, suggesting that the Council considers such effects can be satisfactorily mitigated. We would note that the Sustainability Appraisal assessment of site options does not take into account mitigation measures which can address the negative affects identified (as stated at paragraphs 4.5 - 4.6 of the Sustainability Appraisals) e.g. the provision of additional and improved public transport connections. Where mitigation measures are available to address issues identified these should be considered as part of the site allocation selection process. As identified within the Vision Document (Appendix 2) we consider that once the nature of the proposed development, including a comprehensive landscaping framework, is taken into account a fuller picture of the sustainability credentials of our Client's site is apparent. Policy SO7.7 'Amendments to the Green Belt' recognises that the proposed site allocations are likely to require mitigation measures stating that 'suitable mitigation and detailed boundaries will be identified in further stages of the plan in detailed site-specific policies and master plans.' However, as outline above without this detail and transparency on the decision-making process which has informed the site allocations it is difficult to assess whether they are fully justified. We also note that the draft allocations and their supporting policies will be the subject of further detailed work, particularly related to transport and viability assessments. This forthcoming evidence base work should consider all the reasonable alternative sites that have been considered for future development to date (including our Client's site) so that fully informed judgements can be made on the preferred site allocations based on the complete evidence base. Overall the basis of the evidence provided alongside the draft plan to date the reasoning for the selection of the preferred site allocations is not fully clear and transparent in terms of why these have been selected and other sites have been rejected. Further evidence in this regard should be provided to ensure the draft Plan is fully justified, as per the NPPF paragraph 35b. In our comments on the Visions and Objectives above, we noted that the draft Plan does not provide for development beyond the plan period. In line with the NPPF (paragraph 139(e)) the draft Plan should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period. In view of the geography of the District (where 60% is designated Green Belt) it is considered unrealistic to assume that further Green Belt release will not be necessary beyond the plan period. This is also relevant given the level of flexibility in the housing land supply currently identified (see our response to Questions 10., 11 and 13). The draft Plan should therefore also seek to identify safeguarded land in the context of ensuring longer-term development needs are met and that the Green Belt boundaries will not need to be altered at the end of the plan period.

This safeguarded land in the context of ensuring longer-term development needs are met and that the Green Belt boundaries will not need to be altered at the end of the plan period. This safeguarded land should be identified in accordance with the spatial strategy. In the local context of 40% of the District being designated as an AONB (with the majority of this also lying within the Green Belt) and areas of the Green Belt also being covered by other designations (such as SACs and SSSIs) the availability of Green Belt sites which offer sustainable locations for development, free of significant landscape or environmental constraints is limited. We consider that our Client's site at Bleak House would represent a suitable site for a residential allocation (within and beyond the Plan Period) which can align with the spatial strategy for identifying sustainable extensions to the main urban area of Cannock/Hednesford/Heath Hayes. It is free from statutory and local designations, once the Green Belt boundary is amended and could assist the District in meeting its own and the wider GBBCHMA housing needs. The absence of any 'significant' constraints to the development of the site [see footnote 2] other than its Green Belt designation is reflected in the SHLAA commentary for the site (SHLAA Reference C264). Barton Willmore Landscape have undertaken a Landscape and Visual Appraisal and Green Belt Review (LVAGBR - enclosed at Appendix 3) of Bleak House to assess the site's contribution to the purposes of the Green Belt and any harm that may arise from future development of the site. The Vision Document (section 4) enclosed at Appendix 2 provides an update to the Green Belt review element of this work, reflecting the Council's updated evidence (Cannock Chase Green Belt Harm Assessment, prepared by LUC, February 2021). As detailed within the Vision Document (Section 4) the Green Belt Review has found that residential-led development at Bleak House, whilst resulting in loss of openness, would result in a limited perceived loss of countryside. This would only be perceived from the immediate vicinity due to the elevated landform and vegetation containing the Site which physically and visually separate its extent from the wider countryside and associate it closely with the existing urban area. Our review also identifies how the most recent Council assessment considers the parcels of land individually, rather than as a whole which would more accurately reflect the strategically and comprehensively master planned development of the site. As a result, the rating scores of the contribution to Green Belt purposes, and by consequence the degree of harm, are considered excessive for Bleak House. In terms of mitigating harm to the Green Belt, our review (as detailed at Section 4 of the Vision Document) identifies a series of measures that have the potential to be incorporated into the strategic design of the development, including tree planting, landscaping, density, building design and location, and improving access to open spaces and PRoW. As a result of these mitigating factors, it is considered that there is potential for harm resulting from the release of the land from the Green Belt for development to be minimised.

As detailed within the Vision Document (Section 5) the Landscape and Visual Appraisal identified that Bleak House has medium landscape sensitivity and medium visual sensitivity which is influenced by the scale of existing residential development surrounding the site. It also identifies the potential of the site to successfully accommodate residential development set within a new robust landscape framework, due to its proximity to existing dwellings; exhibiting flatter landform contained by existing vegetation; and surrounding rising landform and the established defined edge of the disused railway line. paragraph 138 of the NPPF advises that sustainable patterns of development should be taken into account when drawing up or reviewing Green Belt boundaries and that first consideration should be given to land which has been previously development and/or is well-served by public transport. Bleak House is in a sustainable location and is well-served by public transport (with the potential to enhance these connections) as demonstrated in our appended Vision Document. In addition, Bleak House adjoins the largest urban area within the District (Cannock/Hednesford/Heath Hayes), which provides the largest range of facilities and services available for future residents to access. The range of facilities and services include two town centres at Cannock and Hednesford, a number of local centres (including nearby Heath Hayes local centre) offering further shopping and service provision such as leisure centres and schools. In promoting sustainable patterns of development, it is recognised that the housing needs of the District, like the other authorities within the GBBCHMA, should ideally be met as close to the source if those needs as possible. In coming to conclusions on the 'Recommended Areas of Search for Strategic Development', paragraph 9.70 of the Greater Birmingham HMA Strategic Growth Study (2018) outlines that the geographic relationship of the conurbation and distance of locations from this is an important consideration in assessing whether areas of search would have the ability to meet the unmet housing needs of the HMA. The location of Bleak House, adjacent the urban area of Cannock can contribute to both the local housing need and that of the GBBCHMA. paragraph 72 of the NPPF states that: [...]. It is considered that a sustainable urban extension at Bleak House is the most appropriate and sustainable proposition, considering the constrained nature of the District. As seen from the Vision Document, the proposal seeks to deliver residential development alongside a new primary school, a new local centre, shops and community services. This holistic approach supports the necessary infrastructure and facilities required for residential dwellings and in so doing, accords with paragraph 72 of the NPPF. Development of Bleak House will also deliver several benefits to the local community through the provision of green spaces an equipped play area, pedestrian and cycle links connecting neighbouring areas, substantial tree planting and heathland creation, increased recreation and access via new green infrastructure and improved habitat connectivity. Our development proposals demonstrate how Bleak House will be contained by hedgerows and the existing PRoW and track along the southern boundary, which offer permanence and a defensible boundary. It is important to note that future development of Bleak House will retain a significant spatial gap. It is important to note that future development of Bleak House will retain a significant spatial gap between the existing settlements of Burntwood and Cannock/Hednesford/Heath Hayes. The Site Plan and Vision Document show that Bleak House is made up of five parcels of land and the Phasing Plan (at Figure 7) shows the four phases, which have the ability to deliver within the early part of the Plan period and be completed before the end of the Plan period. As shown on Figure 5: Concept Plan of the Vision Document, the Commissioners own additional land immediately north of Parcel 1A and west of Parcels 1B and 1C, which can be included as part of any allocation going forward.

SO7.8: Protecting, Conserving and Enhancing the Green Space Network

Question 47: Do you support the preferred policy direction to the Green Space Network?

LPPO463	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We support policy option SO7.8 in respect of the Green Space Network, particularly in respect of the restored Hatherton Canal and its towpath.
LPPO464	Canal & River Trust - H, Smith		As requested for inclusion within the Environment Section of the District Context we note that within this policy canals are referred to as Blue-Green Infrastructure. The Trust appreciate that this policy provides the necessary scope for works of repair to the network which may not be possible within the more restrictive Green Space Network Sites. It is important that policies do not restrict vital development that can be required to allow for safe navigation or water management along our network; giving suitable flexibility to allow for works to be designed that mitigate against any risk to biodiversity or water quality, whilst providing for the positive role our network can play as a resource for leisure, recreation, wellbeing and economic regeneration.
LPPO465	Together Active - J, Brennan		Yes, welcome this.
LPPO466	Natural England- G, Driver		We note that some development may be permitted in the green space network, we would advise that any development proposals that either directly or indirectly impact on a SSSI should be refused and that impacts on priority habitats should be avoided.
LPPO467	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates largely supports the strategy to provide for open space within the District however elements of the policy are not consistent with national policy and could hinder development opportunities. In particular, the policy suggests as a principle that new homes should contribute to the delivery of sports, physical activity and leisure. This blanket requirement is not supported in national policy where development proposals should only contribute towards improvements to green infrastructure and other sports related facilities if there is a lack of capacity to adequately cater for the demand resulting from the proposed development. The policy requires amendment to make clear that such contributions would only be necessary where justified and will be proportionate and reasonable in all respects. In addition, there may be occasions when development proposals are in locations some distance from the nearest part of the Green Space Network. In such circumstances contributions towards enhancements of a facility which would be a significant distance from the nearest part of the Green Space Network. In such circumstances contributions towards enhancements of a facility which would be a significant distance away from the development site, may be deemed to lack the direct relationship with the development proposed and therefore would fail the requirements of the CIL Regulations. Finally, the suggestion that new homes should contribute towards the delivery of sports, physical activity and leisure does not directly relate to the Green Space Network, as these elements could be indoor facilities. This requirement should be amended to make clear what contributions have been sought and the necessary caveats to them.
LPPO468	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates largely supports the strategy to provide for open space within the District however elements of the policy are not consistent with national policy and could hinder development opportunities. In particular, the policy suggests as a principle that new homes should contribute to the delivery of sports, physical activity and leisure. This blanket requirement is not supported in national policy where development proposals should only contribute towards improvements to green infrastructure and other sports related facilities if there is a lack of capacity to adequately cater for the demand resulting from the proposed development. The policy requires amendment to make clear that such contributions would only be necessary where justified and will be proportionate and reasonable in all respects. In addition, there may be occasions when development proposals are in locations some distance from the nearest part of the Green Space Network. In such circumstances contributions towards enhancements of a facility which would be a significant distance from the nearest part of the Green Space Network. In such circumstances contributions towards enhancements of a facility which would be a significant distance away from the development site, may be deemed to lack the direct relationship with the development proposed and therefore would fail the requirements of the CIL Regulations. Finally, the suggestion that new homes should contribute towards the delivery of sports, physical activity and leisure does not directly relate to the Green Space Network, as these elements could be indoor facilities. This requirement should be amended to make clear what contributions have been sought and the necessary caveats to them.
LPPO469	Richborough Estates (Land off Main Road, Breton)	Pegasus Group - B, Cook	Richborough Estates largely supports the strategy to provide for open space within the District however elements of the policy are not consistent with national policy and could hinder development opportunities. In particular, the policy suggests as a principle that new homes should contribute to the delivery of sports, physical activity and leisure. This blanket requirement is not supported in national policy where development proposals should only contribute towards improvements to green infrastructure and other sports related facilities if there is a lack of capacity to adequately cater for the demand resulting from the proposed development. The policy requires amendment to make clear that such contributions would only be necessary where justified and will be proportionate and reasonable in all respects. In addition, there may be occasions when development proposals are in locations some distance from the nearest part of the Green Space Network. In such circumstances contributions towards enhancements of a facility which would be a significant distance from the nearest part of the Green Space Network. In such circumstances contributions towards enhancements of a facility which would be a significant distance away from the development site, may be deemed to lack the direct relationship with the development proposed and therefore would fail the requirements of the CIL Regulations. Finally, the suggestion that new homes should contribute towards the delivery of sports, physical activity and leisure does not directly relate to the Green Space Network, as these elements could be indoor facilities. This requirement should be amended to make clear what contributions have been sought and the necessary caveats to them.
LPPO470	Staffordshire County Council - J, Chadwick		SCC supports the integration of both cycling and walking within the Green Space Network. At the last Local Plan consultation we advise that there is an existing shortage of lorry parking in Staffordshire as identified by DfT National Survey of Lorry Parking 2017, with existing facilities concentrated around the A5 and M6. The West Midlands region also has critically high usage of lorry parking facilities, but we note none are proposed in the Plan. In addition we recommended that any new development that would increase road-based freight should consider where vehicles will park overnight and provide suitable facilities to accommodate deliveries and distribution vehicles. However, no such provision has been made in the Plan for promoters of such sites to consider this issue.

SO8.1: Low and Zero Carbon Energy and Heat Production

Question 48: Do you support the preferred policy direction to low and zero carbon energy and heat production?

LPPO471	G, Green		The processing of water to the standard of drinking water takes a lot of energy. New buildings should be required to have rainwater flushing of toilets.
LPPO472	Historic England - E, Boden		Historic England supports the policy direction in seeking to achieve low and zero carbon emissions from energy generation and heat production. We welcome the reference to the requirement for the assessment of impacts on heritage assets and suggest that this should also reference the setting of heritage assets. We refer you to Historic England's Advice Note 15 (Feb 2021): Commercial Renewable Energy Development and the Historic Environment.
LPPO473	Canal & River Trust - H, Smith		The Trust wish to highlight the potential of the canal for heating & cooling for district heat network or individual schemes such as at allocated sites. The water flowing through our waterways contains enough thermal energy to produce approximately 640 MW of energy. Our waterway network is included in the National Heat Map produced by the Department of Energy & Climate Change (now Department for Business, Energy & Industrial Strategy). It provides an overview of the opportunity that exists across the country. We consider that heating and cooling schemes can be delivered without any adverse impact on biodiversity. As a low-cost energy source, utilising the heat from the canal could help with building resilience with other low carbon technologies such as CHP (combined heat and power) plants. If an energy centre is proposed, then utilising heat pump technology could supply building such as civic, educational or health care facilities where heat load demands are high. We believe that the Local Plan should include reference to the potential of the canal network and other waterbodies to contribute to low carbon technologies.
LPPO474	Natural England- G, Driver		We support and note the Council's ambition to be net zero carbon by 2030 and that this is reflected in the policies in the preferred options. A more robust response to climate change is to also look at ways to adapt and mitigate for the consequences of climate change. We note in the evidence base reports by Staffordshire County Council on Climate Change Adaptation & Mitigation and the Staffordshire Wildlife Trust Cannock Chase District Nature Recovery Network Mapping report and welcome this work. Natural England has been working on developing resources to help with climate change adaption and mitigation.
LPPO475	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates have no objection to the policy approach, but it should be noted that whilst the supporting text refers to the County Council's proposal to adopt a presumption in favour of low and zero carbon technologies, the policy introduces a number of tests which would potentially inhibit the delivery of such renewable energy facilities.
LPPO476	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates have no objection to the policy approach, but it should be noted that whilst the supporting text refers to the County Council's proposal to adopt a presumption in favour of low and zero carbon technologies, the policy introduces a number of tests which would potentially inhibit the delivery of such renewable energy facilities.
LPPO477	Richborough Estates (Land off Main Road, Breerton)	Pegasus Group - B, Cook	Richborough Estates have no objection to the policy approach, but it should be noted that whilst the supporting text refers to the County Council's proposal to adopt a presumption in favour of low and zero carbon technologies, the policy introduces a number of tests which would potentially inhibit the delivery of such renewable energy facilities.

SO8.2: Achieving Net Zero Carbon Development

Question 49: Do you support the preferred policy direction to achieve net-zero carbon development?

LPPO478	Historic England - E, Boden		Policy SO8.2 and SO8.3: Historic England supports these policy directions and is committed to the achievement of net zero carbon emissions from development. We recommend that a sustainable approach to climate change mitigation measures should aim to secure a balance between the benefits such development delivers and the environmental costs it incurs. The policies should seek to limit and mitigate any such cost to the historic environment and when considering energy efficiency measures and the benefits of alternative options should be weighed against the impact upon historic assets and their setting. Historic England have produced a list of technical guidance on energy efficiency and sustainable design, including research reports which could form a useful part of the plan's evidence base. These can be found in our publication directory.
LPPO479	West Midlands Housing Association Planning Consortium	Tetlow King Planning - L, Stoate	Mitigating and adapting to climate change is referred to by the NPPF in its key environmental objective to achieving sustainable development. It also mentions at paragraph 149 that plans should take a proactive approach to mitigating and adapting to climate change. The Council has announced its commitment to be carbon neutral by 2030, a goal that the HAPC fully supports. The HAPC recognises the critical role that housing associations each play in ensuring that residents have safe, secure and efficient homes that are future proof. Promoting sustainable development is the core objective of the plan system and it is important that all new developments continue to support this aim. We therefore support the Council's preferred policy direction for net-zero carbon development, although we ask that the Council be wary of the ways in which such policies could impact development viability which may restrict the provision of affordable housing in Cannock Chase.
LPPO480	Natural England- G, Driver		We support and note the Council's ambition to be net zero carbon by 2030 and that this is reflected in the policies in the preferred options. A more robust response to climate change is to also look at ways to adapt and mitigate for the consequences of climate change. We note in the evidence base reports by Staffordshire County Council on Climate Change Adaptation & Mitigation and the Staffordshire Wildlife Trust Cannock Chase District Nature Recovery Network Mapping report and welcome this work. Natural England has been working on developing resources to help with climate change adaption and mitigation.

LPPO481	Home Builders Federation - S, Green	<p>Under SO8.2, all development proposals should strive to achieve the highest level of building performance standards for energy use and achieve the lowest carbon emissions that can practically and viably be achieved. All major development proposals will deliver, in priority order: zero carbon emission development; low carbon emission development with on-site mitigation to achieve net-zero carbon emissions; low carbon emission development with off-site mitigation to achieve net-zero carbon emissions; low carbon emission development with compensatory contributions to an appropriate carbon offsetting fund to achieve net-zero carbon emissions. All major development proposals will include evidence in a sustainability Statement (part of the Design and Access Statement) that the development has achieved the lowest carbon emissions that can practically and viably be achieved. Today's new homes are already very energy efficient with lower heating bills for residents in comparison to older existing homes. Energy performance data has shown that 8 out of 10 new build buyer in England and Wales saves £442.32 every year on heating costs compared to owners of existing dwellings. Nevertheless, the HBF recognise the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. The Government Response to The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings dated January 2021 provides an implementation roadmap, the Government's aim is for the interim Part L , Part F & Overheating Regulations to be regulated for in late 2021 and to come into effect in 2022. The 2021 interim uplift will deliver homes that are expected to produce 31% less CO2 emissions compared to current standards. To ensure as many homes as possible are built in line with new energy efficiency standards. To ensure as many homes as possible are built in line with new energy efficiency standards, transitional arrangements will apply to individual homes rather than an entire development and the transitional period will be one year. This approach will support successful implementation of the 2021 interim uplift and the wider implementation timeline for the Future Homes Standard from 2025. The Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions than one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.</p> <p>The HBF support the Government's approach to the Future Homes Standards but there are difficulties and risks to housing delivery given the immaturity of the supply chain for the production/installation of heat pumps and the additional load that would be placed on local electricity networks in combination with Government proposals for the installation of EVCPs in new homes (see HBF answer to Question 30 above). In autumn 2020, the HBF established a Future Homes Task Force to develop workable solutions for the delivery of the home building industry's contribution to meeting national environmental targets and objectives on Net Zero. Early collaborative work is focussed on tackling the challenges of implementing the 2021 and 2025 changes to Building Regulations successfully and as cost-effectively as possible, in particular providing information, advice and support for SME developers and putting the customer at the centre of our thinking. The HBF note that for the moment in its Response to the Future Homes Standard consultation, the Government has confirmed that the Planning and Energy Act 2008 will not be amended, therefore the Council will retain powers to set local energy efficiency standards for new homes. However, the Government's Planning for the Future White Paper sets out that a simpler planning process improves certainty. The Government acknowledge the need to clarify the role of LPAs in setting energy efficiency requirements for new homes that go beyond the mandatory standards set out in the Building Regulations. The Housing, Communities & Local Government Committee have opened a new inquiry into Local Government and the path to net zero. The aim of the inquiry is to scrutinise the Government's plans to make all new homes "zero carbon ready" by 2025, through the introduction of the Future Homes Standard, and to explore how Local Government can help the UK to reduce its carbon emissions to "net zero" by 2050. This inquiry is currently accepting evidence on what role should LPAs play in determining local energy efficiency standards? The deadline for submissions is the 30th April 2021. The HBF consider that the Council should comply with the Government's intention of setting standards for energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Councils should not need to set local energy efficiency standards in order to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes proposed in the 2020 Part L uplift and the Future Homes Standard 2025. There are significant additional costs associated with the Council's preferred policy approach, which should be fully accounted for in the Council's viability assessment. Government's estimated cost of £4,847 per dwelling set out in The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings. The Council's preferred policy approach will have higher additional costs, which should be viability tested.</p>	
LPPO482	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	<p>The policy as drafted seeks to achieve zero carbon emissions in all major developments. This goes beyond any requirement set out in the NPPF or any other relevant policy guidance. There is no evidence that this approach has been subject to any form of viability appraisal and it could be a significant overwhelming burden to the delivery of development aspirations also set out in the plan. There is limited, if any, evidential basis that the circumstances in Cannock Chase District require all new developments to be carbon zero. On this basis the policy is objected to and should be deleted.</p>
LPPO483	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	<p>The policy as drafted seeks to achieve zero carbon emissions in all major developments. This goes beyond any requirement set out in the NPPF or any other relevant policy guidance. There is no evidence that this approach has been subject to any form of viability appraisal and it could be a significant overwhelming burden to the delivery of development aspirations also set out in the plan. There is limited, if any, evidential basis that the circumstances in Cannock Chase District require all new developments to be carbon zero. On this basis the policy is objected to and should be deleted.</p>
LPPO484	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	<p>The policy as drafted seeks to achieve zero carbon emissions in all major developments. This goes beyond any requirement set out in the NPPF or any other relevant policy guidance. There is no evidence that this approach has been subject to any form of viability appraisal and it could be a significant overwhelming burden to the delivery of development aspirations also set out in the plan. There is limited, if any, evidential basis that the circumstances in Cannock Chase District require all new developments to be carbon zero. On this basis the policy is objected to and should be deleted.</p>

LPPO485	ENGIE - D, Sager	Barton Willmore - J, Bonner	The draft policy sets out that all development proposals should strive to achieve the highest level of building performance standards for energy use and achieve the lowest carbon emissions that can practically and viably be achieved. The principle of the policy to address climate change via developments striving to achieve reduced carbon emissions is supported. Our client is keen to support the move towards low and zero carbon development. However in line with the NPPF (paragraph 34) and PPG ('Viability' Reference ID: 10-001-20190509 and 10-002-20190509) the requirements should be fully evidenced by supporting assessment work, including a Viability Assessment. The viability of achieving any standards that may be over and above Building Regulation requirements should be taken into consideration. This should also reflect the most up to date position in relation to Building Regulation requirements, which are the subject of a current consultation (The Future Homes Standard: changes to Part L and Part F of the Building Regulations for new dwellings (MHCLG, 2021)). In addition, the Council should not require all residential development proposals to meet or exceed the standards set out by the Home Quality Mark, or equivalent. This is because the Home Quality Mark is an example of a best practice guide and should not therefore become a statutory policy requirement through the adoption of the Local Plan. It is not reasonable or justified for residential development proposals to be required to meet or exceed these standards. We also consider that the requirements of SO8.2 and SO8.3 should not be required retrospectively for outline planning permissions that pre-date adoption of the draft Plan as the measures may affect deliverability.
LPPO486	The Church Commissioners for England	Barton Willmore - A, Bird	The principle of the policy to address climate change via developments striving to achieve reduced carbon emissions is supported. Nevertheless, in line with the NPPF (paragraph 34) and PPG ('Viability' see Paragraph 001 Reference ID: 10-001-20190509 and Paragraph 002 Reference ID: 10-002-20190509) the requirements should be fully evidence by supporting assessment work, including a Viability assessment. This should ensure the cumulative requirements of the draft Plan policies do not undermine the deliverability of the plan overall. We note that the draft Plan is not yet supported by an up-to-date Viability Assessment and therefore this policy should be kept under review in light of the emerging evidence base. In accordance with the PPG (paragraph: 010 Reference ID: 10-010-20180724) as part of the Viability Assessment the Council should look to engage with key stakeholders as part of the process, including developers and landowners.

SO8.3: Sustainable Design

Question 50: Do you support the preferred policy direction to secure Sustainable Design Development?

LPPO487	G, Green		The processing of water to the standard of drinking water takes a lot of energy. New buildings should be required to have rainwater flushing of toilets.
LPPO488	Together Active - J, Brennan		Yes, and particularly welcome "Protect, improve and enhance existing woodlands and habitats, and integrate new green and blue infrastructure with SuDS and pedestrian and cycle routes; and provide a contribution to the creation of urban forests, woodlands and street trees as an integral part of the development or as part of a linked off-site scheme."
LPPO489	Natural England- G, Driver		We support the policy direction with specific references to links to the natural environment with particular reference to the creation of urban forest, woodlands and street trees.
LPPO490	Home Builders Federation - S, Green		The HBF do not support the preferred policy direction set out in Policy SO8.3 (See HBF Answers to Questions 26, 30 and 49 above). Moreover, the Council should not require all residential development proposals to meet or exceed the standards set out by the Home Quality Mark, or equivalent. The Home Quality Mark has no status other than as an example of a best practice guide. The HBF is supportive of the use of best practice guidance however, the use of such guidance should remain voluntary rather than becoming a mandatory policy requirement, which would oblige developers to use this tool as a pre-condition for support from the Council. The reference to the Home Quality Mark in policy wording should not convey development plan status to a document, which has not been subject to the same process of preparation, consultation and Examination as the Local Plan. It is not reasonable or justified for residential development proposals to be required to meet or exceed these standards.
LPPO491	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The policy goes beyond any national or other relevant policy objective and is not supported by evidence. Reference to all development meeting the requirements of Policy SO8.2 is objected to. There is no evidence that the policy has been subject to any form of viability assessment to establish what impact it would have on potential development. As drafted the policy requires contributions which may not be justified such as providing contributions to the creation of urban forests, woodlands and street trees when a development may be providing elements on site. It includes reference to making effective use of previously developed land when not all sites will involve in previously developed land. As drafted the policy is unjustified, not supported by national or local policy and not supported by any evidence base.
LPPO492	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The policy goes beyond any national or other relevant policy objective and is not supported by evidence. Reference to all development meeting the requirements of Policy SO8.2 is objected to. There is no evidence that the policy has been subject to any form of viability assessment to establish what impact it would have on potential development. As drafted the policy requires contributions which may not be justified such as providing contributions to the creation of urban forests, woodlands and street trees when a development may be providing elements on site. It includes reference to making effective use of previously developed land when not all sites will involve in previously developed land. As drafted the policy is unjustified, not supported by national or local policy and not supported by any evidence base.
LPPO493	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The policy goes beyond any national or other relevant policy objective and is not supported by evidence. Reference to all development meeting the requirements of Policy SO8.2 is objected to. There is no evidence that the policy has been subject to any form of viability assessment to establish what impact it would have on potential development. As drafted the policy requires contributions which may not be justified such as providing contributions to the creation of urban forests, woodlands and street trees when a development may be providing elements on site. It includes reference to making effective use of previously developed land when not all sites will involve in previously developed land. As drafted the policy is unjustified, not supported by national or local policy and not supported by any evidence base.

LPPO494	Wyrley Estates	Fisher German LLP - N, Borsey	All future developments will be required to meet the requirements in Policy of achieving Net Zero development. Policy SO8.3 contains a number of aspirations to enable achievement of sustainable design. One of these is to make use of previously developed land, existing buildings, and infrastructure. The Grove Colliery site can help deliver an aspiration such as this, not only the brownfield element, but a redevelopment scheme could help to deliver a number of other policy aspirations to create sustainable design and help towards achieving Net Zero by 2050.
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SO8.4: Managing Flood Risk

Question 51: Do you support the preferred policy direction to managing flood risk and water quality impacts?

LPPO495	G, Green		Management of flood risk must include firm planning or bylaws which prevent the excessive, or total paving of the front gardens of properties, and ensure the use of porous pavement wherever possible. I have seen new paving of the whole frontage of homes at a rate of almost one per week during the last few months.
LPPO496	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We note policy option SO8.4 and would mention there may be opportunities for the restored Hatherton Canal to play a part in managing flood risk in the District.
LPPO497	Canal & River Trust - H, Smith		The policy refers to "integrating new green and blue infrastructure with sustainable drainage systems (SuDS)", but does not reference the existing canal network and other water bodies. We wish to highlight the potential for SuDS surface water drainage disposal to the canal network which could also be referenced in revised Policies.
LPPO498	Natural England- G, Driver		We support the policy direction in respect of the creation of green and blue infrastructure and their role in supporting and enhancing ecological networks. Features that reduce flood risk should share possible link in to the existing ecological networks.
LPPO499	Severn Trent		We are supportive of policy SO8.4 however feel it could be improved. In line with our comments above to Question 35.27.29; • The use of SuDS does not negate the importance of the drainage hierarchy. • Sites allocated that have limited surface water disposal options should be accompanied with site specific policy to reduce their impact. • Sites should ensure that they provide sufficient storage for runoff up to a 100-year rainfall event. • Surface water discharge rates should be limited to greenfield runoff rate or lower. • Brownfield redevelopment should look to provide betterment on surface water management to help provide resilience to the impact from future climate change.
LPPO500	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates have no further comment to make on this issue.
LPPO501	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates have no further comment to make on this issue.
LPPO502	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates have no further comment to make on this issue.

SO8.5: Avoiding Air, Water, Soil, Noise and Light Pollution

Question 52: Do you support the preferred policy direction to avoid air, water, soil, noise and light pollution?

LPPO503	Together Active - J, Brennan		I understand and support the need to reduce light pollution, but I have concerns where limiting public lighting may make places less safe or perceived as less safe for cycling and walking especially for women and vulnerable groups. I support air quality mitigation through supporting local and walking cycling initiatives, but this will only be achieved through good quality safe integrated and segregated walking and cycling routes using DfT LTN 1/20 Cycle Infrastructure Design.
LPPO504	Natural England- G, Driver		We support the direction of this policy, advise that some aspects need revising or clarifying. • We would advise that you define what is a major development. • Some developments that may not come under the definition of major can still cause pollution for example intensive pig and poultry units and we would advise that you may wish to consider whether you wish to address this within this policy. • Air Pollution. In the explanatory text , some possible air quality mitigation is noted. We would advise that electric vehicles will still emit particulate matter and therefore may still cause some air pollution. Furthermore petrol cars and therefore petrol hybrid cars will produce ammonia as well as nitrogen oxides and particulate matter, all of which can impact the natural environment. • The soils paragraph requires further work. > Soil is a finite resource, and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important soils are protected and used sustainably. Development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. We advise that the policy wording should be revised to ensure that soil is managed in a sustainable way. We advise that policies refer to the Defra's Code of practice for the sustainable use of soils on construction sites. It provides advice on the use and protection of soil in construction projects. > Best and most versatile (BMV) land is Grades 1, 2 and 3a in the Agricultural Land Classification and we would advise that this is clarified in the policy. Development can have irreversible adverse (cumulative) impact on the finite national and local stock of BMV land. Avoiding loss of BMV land is the priority as mitigation is rarely possible. Retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services. In the longer term, protection of BMV land may also reduce pressure for intensification of other land. We would advise that the plan include reference to the Guide to assessing development proposals on agricultural land.

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LPPO505	Severn Trent		We are supportive of the policy SO8.5, in particular the effort protects water quality and to ensure there is sufficient water treatment capacity before permitting new development. Whilst we have an obligation to provide or increase capacity to meet demand from new development, doing so can be a complex, costly and lengthy process and may take some time to deliver. The most efficient way forward is to allocate development where the most capacity exists utilising the outputs from the recent Water Cycle Study delivered in partnership with JBA Consulting. Ensuring developments use SuDS within a management train as opposed to "pipe to pond" will help ensure that the system can maximise its pollutant ability.
LPPO506	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The policy approach refers to development proposals which will cause unacceptable on-site or off-site risk or harm to human health or the natural environment, not being permitted. This requirement is difficult to establish. Any proposal can have some impact on the natural environment and the scale of this impact should be assessed rather than a blanket requirement that states any unacceptable impact will result in refusal. Provision of water and waste water facilities is subject to a separate legal framework and there is no need for the policy to refer to improved sewage and waste water treatment facilities.
LPPO507	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The policy approach refers to development proposals which will cause unacceptable on-site or off-site risk or harm to human health or the natural environment, not being permitted. This requirement is difficult to establish. Any proposal can have some impact on the natural environment and the scale of this impact should be assessed rather than a blanket requirement that states any unacceptable impact will result in refusal. Provision of water and waste water facilities is subject to a separate legal framework and there is no need for the policy to refer to improved sewage and waste water treatment facilities.
LPPO508	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The policy approach refers to development proposals which will cause unacceptable on-site or off-site risk or harm to human health or the natural environment, not being permitted. This requirement is difficult to establish. Any proposal can have some impact on the natural environment and the scale of this impact should be assessed rather than a blanket requirement that states any unacceptable impact will result in refusal. Provision of water and waste water facilities is subject to a separate legal framework and there is no need for the policy to refer to improved sewage and waste water treatment facilities.

SO8.6: Brownfield and Despoiled Land and Under-Utilised Buildings

Question 53: Do you support the preferred policy direction to brownfield and despoiled land and under-utilised buildings?

LPPO509	Cannock Chase AONB Partnership		This policy is warmly welcomed. Reference within this overarching policy to conserving and enhancing the AONB, and respecting sensitive edges is supported. We also welcome reference to locating and designing development to avoid impacts on tranquillity and dark landscapes. Cannock Chase is the least dark of all 34 AONBs in England, in part due to light spillage from nearby towns. However, the central core of the Chase is still a relative oasis of darkness for people to enjoy compared to the surrounding conurbations. The AONB is engaged in a Dark Skies Project that seeks to foster a sense of responsibility towards protecting and enhancing dark skies and reducing light pollution in the area, the outcomes of which we hope will support this policy.
LPPO510	Historic England - E, Boden		Historic England supports this policy direction and suggests that the policy makes specific reference to historic buildings, as they represent a significant investment of expended energy. Demolishing and replacing them requires a major reinvestment of embodied energy and other resources. The policy direction should therefore encourage & recognise the benefits of sympathetic restoration and retention of historic buildings, rather than their demolition and replacement.
LPPO511	Natural England- G, Driver		We support this policy but would advise that brownfield sites can have high ecological value, providing habitats for protected or priority species and other environmental and amenity benefits. When allocating land for development the biodiversity or geodiversity value of the land and its environmental sensitivity will need to be taken into account so that any harm can be avoided, mitigated or compensated for in a way which is appropriate given the site's identified value. Further guidance on the ecological value of brownfield land is listed.
LPPO512	Severn Trent		Redeveloping brownfield land is an approach we fully support. We see this as a fantastic opportunity to provide some betterment and help provide local resilience to the impacts of climate change. It would be great if some form of policy could secure this in practice. Requiring brownfield sites to achieve surface water disposal rates at or below those of greenfield runoff is one approach. Asking brownfield development to revisit drainage hierarchy options for a more sustainable solution could be another. Note that where new development utilises contaminated land that onsite surface water should be managed carefully as to ensure it does not spread pollutants beyond the site or leach into groundwater.

LPPO513	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates supports the use of brownfield land however the policy should be amended to make clear that it relates to developments of such sites and should not be applied against greenfield sites, whereby contributions could be sought to deliver improvements to other PDL sites. As drafted the policy could potentially be applied to any proposal rather than specifically applied to proposals involving the reuse of previously developed land.
LPPO514	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates supports the use of brownfield land however the policy should be amended to make clear that it relates to developments of such sites and should not be applied against greenfield sites, whereby contributions could be sought to deliver improvements to other PDL sites. As drafted the policy could potentially be applied to any proposal rather than specifically applied to proposals involving the reuse of previously developed land.
LPPO515	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates supports the use of brownfield land however the policy should be amended to make clear that it relates to developments of such sites and should not be applied against greenfield sites, whereby contributions could be sought to deliver improvements to other PDL sites. As drafted the policy could potentially be applied to any proposal rather than specifically applied to proposals involving the reuse of previously developed land.
LPPO516	Wyrley Estates	Fisher German LLP - N, Borseley	The Grove Colliery site fits well within Policy SO8.6 and The Estate actively encourages suitable brownfield land and buildings should be redeveloped and re-used for homes and other uses. However, the policy does state to make effective use of under-utilised land and buildings, particularly within designated settlement boundaries. The policy should expand further to encourage suitable previously developed land and buildings in rural areas to be included in the Policy. Especially when Green Belt allows re-use and redevelopment of brownfield sites, why should this policy not consider the wider rural area. There are many lost opportunities which the council could be disregarding by not including the rural area and therefore detracting away from sustainable development.
LPPO517	Staffordshire County Council - J, Chadwick		Yes, but with a reminder that an awareness needs to be had that brownfield sites can often retain evidence of historic industry above and below ground. Further archaeological evaluation and recording works may be required as per NPPF 189 and 199 for specific applications.

SO8.7: Safeguarding Mineral Reserves

Question 54: Do you support the preferred policy direction to safeguarding mineral reserves?

SO8.8: Managing Waste

Question 55: Do you support the preferred policy direction to manage waste?

LPPO518	G, Green		Large retail areas of 'outlets' must be required to provide a good number of differentiated waste bins for recyclable and other waste.
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