

<b>Report of:</b>	<b>Head of Economic Prosperity</b>
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<b>Portfolio Leader:</b>	<b>Economic Development and Planning</b>
<b>Key Decision:</b>	<b>Yes</b>
<b>Report Track:</b>	<b>Cabinet: 17/10/19</b>

**CABINET**  
**17 OCTOBER 2019**  
**LOCAL PLAN ISSUES AND OPTIONS CONSULTATION FEEDBACK**  
**AND NEXT STEPS**

**1 Purpose of Report**

- 1.1 To provide feedback on the Cannock Chase Local Plan Review Issues and Options Consultation, set out the next steps in the Local Plan Review and approve changes to the composition of the Local Plan Working Group.

**2 Recommendation(s)**

- 2.1 That Cabinet notes the feedback received on the Cannock Chase Local Plan Review Issues and Options Consultation.
- 2.2 That Cabinet notes the next steps in progressing the Local Plan Review, including resource implications associated with updating the evidence base as well as staffing impacts that have been reflected in the proposed timeframe for the Local Plan Review going forward.
- 2.3 That further to Minute 98 Cabinet Decisions 2015-2016, Cabinet approves to delegate authority to amend membership of the Local Plan Working Group to the Head of Economic Prosperity in consultation with the Group Leaders, to reflect the current political balance of the Council.

**3 Key Issues and Reasons for Recommendations**

Key Issues

- 3.1 This report provides feedback on the recent consultation on the Cannock Chase Local Plan Review Issues and Options that was carried out between 13 May 2019 and 8 July 2019. The Consultation included a number of supporting documents that were published at the same time. These documents included the non-technical summary, Strategic Environmental Assessment and

Sustainability Appraisal report (including Equality Impact Assessment and Health Impact Assessment reports), Habitats Regulation scoping report, updated Infrastructure Delivery Plan together with updated evidence base documents comprising Housing Needs Assessment, Economic Needs Assessment and Gypsy, Traveller and Travelling Showpeople Needs Assessment. This consultation was approved at Cabinet on 7 February 2019.

- 3.2 The first iteration of the Cannock Chase Local Plan Review Issues and Scope Consultation was undertaken between 2 July 2018 and 28 August 2018, and the outcome of the consultation was reported to Cabinet on 8 November 2018. The feedback received was used to refine and inform the Local Plan Review Issues and Options stage of the plan.
- 3.3 The Local Development Scheme (LDS) 21 February 2018, provides a timetable and work programme covering the Local Plan Review through to adoption of a new Local Plan. Planning Authorities are required to prepare an LDS and keep it up to date (Planning and Compulsory Purchase Act 2004). The current LDS is out of date and has therefore been revised. This is covered in a separate report to this Cabinet meeting that details the reasons for the changes required.

#### Reasons for Recommendations

- 3.4 A new National Planning Policy Framework (NPPF) was launched in 2018, replacing the 2012 Framework which introduced a number of significant changes to the planning system. These changes necessitated a review of strategic policies that were contained in Part 1 and which would need to be updated to comply with the new NPPF.
- 3.5 The current Local Plan (Part 1) was adopted in 2014, and following Council approval on 21 February 2018, work that had started on Part 2 of the Plan ceased and authority to commence a full review of the Local Plan was obtained. A new Local Development Scheme was adopted at the same time and a timetable for the Local Plan Review was approved.
- 3.6 In addition, the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) housing shortfall had emerged, requiring consideration across the entire Housing Market Area. In order to start to address the shortfall, Local Plans needed to align to a longer timeframe and test development scenarios that could potentially meet the shortfall over the plan period.
- 3.7 Minute 98 Cabinet Decisions 2015-2016, put in place a structure defining the composition of the Local Plan Working Group being 4 Labour members and 3 from the other Political Groups. The structure is not reflective of the Council's current political balance and therefore needs to be amended to be more representative.

## **4 Relationship to Corporate Priorities**

- 4.1 The Local Plan will help to deliver the Council's corporate objectives of Promoting Prosperity and Community Wellbeing.

- 4.2 In terms of promoting prosperity, the Local Plan will help deliver the strategic objectives by helping to create the conditions for economic growth and opportunity. It will ensure that sufficient land is allocated for a range of employment and housing uses, linking these to opportunities for developing skills and encouraging a balanced portfolio of employment opportunities. It will also include policies to support town centres to adapt to changing demands to ensure they are vibrant and diverse centres.
- 4.3 In terms of community wellbeing, the Local Plan will help ensure that people can lead healthy and active lifestyles within attractive, safe and healthy environments. It will consider a wide range of issues including, for example, open space, sport and recreation, walking, cycling and sustainable transport, improved air quality, and supporting opportunities for healthy lifestyle choices.

## **5 Report Detail**

- 5.1 The Local Plan (Part 1) was adopted in June 2014, spanning the period 2006 to 2028. It provided a strategy for growth and environmental protection in the District setting out the scale, quantum and distribution of development and policies for delivery. The Local Plan (Part 2) would have allocated sites for development of different types to provide a more detailed policy perspective.
- 5.2 Council resolved to cease work on the Local Plan (Part 2) to prioritise a review of the Local Plan (Part 1) that would need to reflect changing circumstances at a national level with a new National Planning Policy Framework, and also at a regional level with the shortfall in housing across the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). These changes were incorporated within the Local Development Scheme which forms the timetable for Local Plan production. This is a statutory requirement and is used by Government to measure the Council's performance in terms of Local Plan delivery.

### **Consultation**

- 5.3 Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), requires Local Planning Authorities to set out, at the outset of Local Plan preparation, the subject of a Local Plan which must be consulted on and representations invited on what the Plan should contain in relation to that subject. The Issues and Scope document and consultation fulfilled this requirement and consultation was undertaken in summer 2018 and feedback provided to Cabinet on 8 November 2018.
- 5.4 The same regulation applies to the second iteration of the Plan, namely the Issues and Options document, consultation for which was carried out between 13 May 2019 and 8 July 2019. Supporting documents were consulted on at the same time, including the Strategic Environmental Assessment and Sustainability Appraisal (Incorporating the Equalities Impact Assessment and Health Impact Assessment), the Habitats Regulations scoping report, updated Infrastructure Delivery Plan, and updated evidence base that included Economic Development needs Assessment, Housing Needs Assessment as the Gypsy, Traveller and Travelling Showpeople Needs Assessment.

- 5.5 Section 19(5) of The Planning and Compulsory Purchase Act 2004 (as amended) requires that a Sustainability Appraisal is undertaken to inform the development of the plan. This also incorporated an Equalities Impact Assessment and Health Impact Assessment. Consultation documents on these accompanied the Local Plan Issues and Options consultation document. The Habitats Regulations 2017 also require that a Habitats Regulations Assessment of the plan is needed and an initial scoping report was published for consultation.
- 5.6 Consultation took the form of meetings, consultation events, social media campaigns and targeted letters and emails. Community consultation took place throughout the consultation period at a number of community venues including evening events to maximise participation. Letters and emails were sent to those registered on the extensive Local Plan consultation database, as well as harder to reach groups that are not recorded on the database. Separate meetings were held with Parish Councils, Duty to Co-operate partners and the voluntary sector. The Council website hosted banners on the front page and press releases were issued at the start and halfway through the consultation. A social media campaign advertised the consultation and specific consultation events. Data indicates that the campaign reached 46,300 people, however very few linked through to the actual consultation pages.

### **Issues and Options Consultation – high level summary of representations**

- 5.7 Consultation on the Issues and Options document took place between 13 May 2019 and 8 July 2019. In total, 25 individual meetings were held during this period for consultation with Duty to Co-operate partners, Parish Councils, voluntary sector and community events. Meetings took place across the District and were held at different times of the day at various venues to reach as many people as possible and staff were in attendance to record comments. Of the 19 community events, 192 people attended which ranged from 0 people to 36 people at any one event. The 4 Parish Council meetings attracted 53 people.
- 5.8 There is a substantial body of representations submitted to the consultation that are summarised in Appendix 2. Representations were received from residents, neighbouring authorities, infrastructure providers, statutory consultees, community organisations, land and property agents/surveyors, charity organisations, developers, landowners or land promoters, Duty to Co-operate partners and public bodies or organisations. In total 107 representations were received, which when broken down into the corresponding Issues and Options questions provided 684 individual responses, plus another 16 separate representations on the Habitats Regulations Assessment and Sustainability Appraisal. The main issues picked out from the comments are included below.
- Concerns expressed about the level of housing growth and the potential impacts of new development on existing highway infrastructure. (Five Ways Island and A5190).
  - Green Belt should be protected and sites should not be considered for development where there is potential for sites beyond the Green Belt to accommodate development including sites in neighbouring authorities.
  - Conflict between farming activities and residential environments if in close proximity. Negative impacts of development on farming particularly environmental impacts.

- Capacity of train stations and facilities within them are limited. Additional growth may require upgrade.
- Green Belt Study of 2016 should be updated in view of revised NPPF.
- Development should be prioritised on non-Green Belt land.
- Development should be integrated with open space and green infrastructure.
- Developers, land owners and land promoters oppose adoption of National Space Standards that are seen to be onerous and potentially increase house prices. Clear need should be demonstrated and supported by viability appraisal. Similarly, opposition expressed to the Council setting higher energy efficiency standards.
- Future development should make a fair contribution to the provision of community infrastructure.
- Concerns raised in relation to the GL Hearn/Wood Strategic Growth Study and land supply.
- Prioritise affordable homes. Higher housing delivery would deliver and enhance viability of a higher number of affordable homes.
- Clear policies are necessary to support housing for older people. Specific sites for this purpose should be allocated.
- Further detail needed to justify proposed housing mix. Housing mix should not be defined in a Local Plan. Instead, provide routinely updated evidence to determine appropriate housing mix at the time.
- Highways England considered potential impacts of development and trip generation and distribution of development traffic on the strategic highway network. Concerns raised in relation to the A5 and M6 junctions 11 and 12.
- Local Plan should test potential development contributions required and set clear policies that are assessed for viability to assist developers in costing schemes and acquiring land.
- Additional safeguarded land and/or reserve sites should be considered in the Local Plan as well as definition of the circumstances for the release of these sites.
- Local Plan should provide a mechanism for early review.
- Alternative sites should be identified to provide flexibility and respond to development delays on allocated sites.
- Land should be identified for development 10 years beyond the plan period.
- Lack of local facilities in Rugeley and Brereton area.
- Flood risk, water resources and quality etc. may be a constraint to development. Development may need to contribute to improvements.
- Stronger commitment to addressing HMA shortfall needed, deliver housing in excess of local need and standard methodology requirement.
- Combined Authority and LEP housing delivery should be supported.
- Green Belt boundaries should be assessed to see if appropriate and sustainable sites can be released.
- Green Belt release is necessary to meet wider housing need.
- Consideration of all non Green Belt sites is necessary before exceptional circumstances apply.

- Develop Rugeley bus station and market hall.
- Enhance daytime and evening leisure opportunities in Rugeley.
- Clarity required around biodiversity offsetting.
- Protection of heritage assets important.
- Local Plan policy should provide a sustainable plan for protection of the SAC with an updated evidence base.
- AONB should not be considered for development.
- Some development in AONB is possible on brownfield sites if it enhances the AONB.
- There should be further employment site release.
- Employment land provision disputed and amount of employment land provided should be at the higher end of the range specified in the Economic Development Needs Assessment.
- Rugeley Power Station could make provision for more employment land.
- Historic assets should enhance development
- Electric Vehicle Charging – clear, unambiguous policy is required supported by a technical feasibility and financial viability report. An assessment of network capacity also needed if policy adopted.
- Air Quality standards require detailed evidence and robust policy setting out requirements.

### **Duty to Co-operate**

- 5.9 The Planning and Compulsory Purchase Act 2004 (as amended) provides the framework for the planning system, modified by the Localism Act 2011. The Duty to Co-operate is a key activity requiring councils to work together constructively, actively and on an ongoing basis in fulfilment of this Duty when preparing their plans.
- 5.10 Cannock Chase District forms part of the Greater Birmingham and Black Country Housing Market Area. Under the statutory Duty to Co-operate, the 14 Local Authorities within the GBBCHMA have been working together to address the issue of a housing shortfall. The Strategic Growth Study (SGS) produced by GL Hearn/Wood was published in February 2018, and provided an update on housing needs across the housing market area and the shortfall in supply, and then went on to analyse potential options for addressing the shortfall.
- 5.11 The study estimated a cumulative shortfall of 28,000 dwellings to 2031 and 60,900 dwellings up to 2036 after consideration of all evidence up to March 2017. The shortfall has been reducing as additional capacity is identified and a position statement will be prepared to provide an update to March 2019.
- 5.12 In order to address the housing supply shortfall, the SGS considered the following scenarios:
- Additional urban supply through increased densities and/or additional urban site opportunities

- Proportionate dispersal involving smaller urban extensions of 500-2,500 dwellings
  - Strategic options including larger urban extensions of 1,500 to 7,500 dwellings; employment-led strategic development of 1,500 to 7,500 dwellings adjacent to employment opportunities and new settlements of 10,000 units and more as well as increasing density and additional urban supply.
- 5.13 The SGS concluded that increasing density and reliance on smaller urban extensions would not be sufficient to deal with the shortfall and further options including Green Belt and non-Green Belt locations needed to be considered. Eleven options or “areas of search for strategic development” were identified for local authorities to test through their Local Plans. Cannock Chase District did not feature within this category.
- 5.14 The study identified an area of proportionate dispersal for Cannock Chase District in the vicinity of Cannock, Great Wyrley, Burntwood, Brownhills and Aldridge, comprising urban extensions of between 500 and 2,500 units. The SGS therefore implies a minimum of 500 dwellings over the plan period should be considered within Cannock Chase District as a minimum contribution to the shortfall. It will be necessary to test other options in excess of the minimum figure and therefore the Issues and Options consultation covered the minimum requirement of 500 units, 2,500 dwellings and also 1,500 dwellings as a mid-point.
- 5.15 These options will be analysed in more detail to consider deliverability, infrastructure capacity and the economic, social and environmental sustainability implications of each proposal. The application of a ‘brownfield first’ approach as advocated in the NPPF to site identification and development potential would be prioritised. Where these options are exhausted, there may need to be consideration of Green Belt options following a thorough consideration of non-Green Belt options within and outside of the District. Employment sites will also go through a similar process of consideration and analysis.
- 5.16 The revised NPPF embedded the Government’s new method of calculating housing need. The Standard Methodology provides the minimum annual figure (the local housing need assessment figure) for each local authority. For the District this is currently (as at April 2019) 277 dwellings per annum whereas the current adopted plan has an annual requirement to deliver 241 per annum.
- 5.17 The Housing Delivery Test results were published 19 February 2019 which indicated Cannock Chase District delivered 138% of its housing requirement over the measurement period. The implication for the 5 year housing land supply position being that a 5% buffer would be applied (as opposed to a 20% buffer if delivery was below 85%). The 5 year housing land supply position at 1 April 2019 shows that Cannock Chase District has 6.6 years supply.

### **Cannock and Rugeley Town Centre Area Action Plans**

- 5.18 Rugeley Town Centre Area Action Plan (AAP) was adopted as part of the Local Plan Part 1 which is now being reviewed. The Issues and Options Consultation raised two options for providing detailed policy on the larger town centres

through either separate Area Action Plans including the retention and updating of the Rugeley AAP or support the preparation of local policy and guidance to direct investment to centres/town centres via a range of means as most appropriate to the local context e.g. Masterplan, Prospectus, Supplementary Planning Documents, Neighbourhood Plans etc. Responses to the consultation showed greater support for a more flexible approach.

- 5.19 A Cannock Town Centre Area Action Plan has also been in preparation and a Regulation 18 consultation has been carried out with a view to adopting an AAP alongside the Local Plan Part 2. The changes taking place in the retail and leisure sectors where national brands and chains have contracted leading to many high street closures and the increase in online shopping has impacted significantly on town centres. The National Planning Policy Framework advocates a more flexible approach in order to consolidate and diversify town centres. Area Action Plans are not now considered appropriate for Cannock and Rugeley town centres due to their lack of flexibility and as a consequence new documents will be developed (such as the Cannock Town Centre Development Prospectus) to assist development and regeneration. These changes are included within a Local Development Scheme Revision report on this Cabinet Agenda.

#### Local Plan Review

- 5.20 The earlier Issues and Scope consultation feedback has fed into the Issues and Option stage of the Local Plan Review. The comments received during the Issues and Options consultation are attached in Appendix 2. These comments are being appraised and responses will be prepared as part of the development of the next stage of the plan being Preferred Options. This stage will involve a further refinement to the plan into a draft version reflecting previous consultation and consolidating the evidence available. Draft policies and site allocations will be identified at this time in order to inform the consultation. The LDS 2019 will define the programme for the new Local Plan going forward.

#### Local Plan Working Group

- 5.21 A Local Plan Working Group has been established to support the development of the Local Plan and supporting documents. The advisory group is formed of 7 nominated members and appropriate officers working on the production of the Local Plan. The group advises on matters in the Local Development Scheme as well as Duty to Co-operate matters and any changes to the LDS, compliance with statutory regulations and emerging legislation etc. Meetings of the group are scheduled at key times in the Local Plan process.
- 5.22 The current composition of the Local Plan Working Group does not reflect the political balance of the Council. This report seeks delegated authority for the Head of Economic Prosperity in liaison with Group Leaders to amend the membership of the group on an annual basis for the group to remain representative of the political balance of the Council.

#### Next steps

- 5.23 As detailed in the separate report to Cabinet on the revised Local Development Scheme (LDS), the overall timetable for the Local Plan Review has slipped. The



Issues and Options Consultation that the LDS 2018 identified to commence February 2019 took place in May 2019. The next stage of Preferred Option originally scheduled for October 2019 will now be rescheduled for spring/summer 2020. The slippage to the Local Plan has in part been due to recent changes to the Planning Policy team with two officers retiring and the previous Planning Policy Manager leaving in March 2019. The Planning Policy Manager role was filled in July 2019 and recruitment to the vacant posts will commence as soon as possible. There remains a risk that the team may continue to operate at reduced capacity as there is a known shortfall in professional planning staff at all levels.

## 6 Implications

### 6.1 Financial

The main costs associated with the Local Plan Review relate to the cost of the examination itself as well as compiling the evidence base. The Local Plan Review budget has been set to cover anticipated expenditure and whilst this can generally be predicted, there may be a need to consider further work should the need arise. In view of the emerging climate change agenda, new evidence will be compiled to inform the Local Plan Review and potential new policy. There is also the possibility that further updates to the evidence base may be needed as consultation progresses to respond to representations or changing circumstance

Costs associated with the Local Plan will need to be contained within the following existing approved budgets.

	<b>Approved 2019-20</b>	<b>Original 2020-21</b>	<b>Original 2021-22</b>	<b>TOTAL</b>
Original Budget	145,000	40,000	120,000	<b>305,000</b>
Open Space Funding	21,370	0	0	<b>21,370</b>
<b>Total Budget</b>	<b>166,370</b>	<b>40,000</b>	<b>120,000</b>	<b>326,370</b>
Spent / Committed	<b>54,332</b>	<b>0</b>	<b>0</b>	<b>54,332</b>
<b>Budget Remaining</b>	<b>112,038</b>	<b>40,000</b>	<b>120,000</b>	<b>272,038</b>

Central Government has introduced performance measures to assess Councils in meeting their housing targets. The Housing Delivery Test may potentially penalise Councils that do not deliver the required number of new homes in their District. Performance in housing delivery within Cannock Chase currently

identifies this as a lower risk at present but will escalate should delivery not be maintained.

Councils that are failing to maintain performance in respect of the Housing Delivery Test will be expected to redress shortcomings by preparing an action plan. This will divert staff resources into this area of work and will may also have an impact on income and generate a potential need for additional staff. Further financial penalties have been mooted including the reduction of the amount of New Homes Bonus paid to Councils.

Whilst there are no direct financial implications for the Council as a result of this report there are a number of elements that do have a financial impact on the Council. In ensuring that the Local Plan allocates sufficient land for a range of employment and housing uses will in turn generate income for the Authority by way of additional Business Rates and Council Tax. Similarly, the housing requirement for the District set out over the plan period will affect the level of New Homes Bonus receivable by the Council.

## **6.2 Legal**

Legal implications are set out throughout the report.

## **6.3 Human Resources**

Human resource implications are outlined in the report.

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

None

## **6.5 Human Rights Act**

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

## **6.6 Data Protection**

The Planning Policy Fair Processing Notice sets out how data is used in compliance with the GDPR.

## **6.7 Risk Management**

Potential legal challenge to the plan 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, that all interested parties are actively informed and engaged throughout the plans preparation and that the plan is based on sound, robust and up to date evidence.

Lesser risks that will primarily impact on costs and the timetable for the Local Plan Review are tied to recruitment activities to support the Planning Policy team.

## 6.8 Equality & Diversity

The Local Plan will be subject to an Equality Impact Assessment at appropriate stages in preparation.

## 6.9 Best Value

There are no Best Value principles arising directly from this report.

<b>7 Appendices to the Report</b>
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Appendix 1: Local Plan Issues and Options consultation document

Appendix 2: Issues and Options consultation summary of responses including Sustainability Appraisal and Habitats Regulation Assessment responses.

<b>Previous Consideration</b>
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Local Plan Review Issues and Options Consultation	Cabinet	7 February 2019
Local Plan Review Issues and Scope Consultation Feedback and Next Steps	Cabinet	8 November 2018
Revised Local Development Scheme and Local Plan Review	Cabinet	25 January 2018

<b>Background Papers</b>
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- Planning and Compulsory Purchase Act 2004 (as amended)
- Localism Act 2011
- The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)
- The Environmental Assessment of Plans and Programmes Regulations 2004
- The Habitats Regulations 2017
- The National Planning Policy Framework 2019
- Local Plan Part 1 including Rugeley Area Action Plan (adopted June 2014)
- Local Plan Part 2 Issues and Options Paper (January 2017)
- Cannock Town Centre Area Action Plan Issues and Options Paper (January 2017)
- Local Development Scheme 2018
- Statement of Community Involvement 2018

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# Local Plan Issues and Options Consultation

May 2019



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## 1. Introduction

### What is this document about?

- 1.1 We are consulting on a new Local Plan for Cannock Chase District. The Local Plan will help shape the way in which the physical, economic, social and environmental characteristics of Cannock Chase District will change until at least the year 2036.
- 1.2 It will need to ensure that we provide the right amount and types of homes, sufficient and appropriate land to provide a range of local employment opportunities as well as providing the right conditions for retail, leisure and other kinds of uses. It will need to ensure that the natural and built environment, especially the highest quality and most sensitive areas, are protected and enhanced.
- 1.3 The plan will also have to provide the right infrastructure including transport, open and green spaces, education and the health and wellbeing of our communities.
- 1.4 The Local Plan is a statutory document and is therefore important in informing decisions on planning applications.
- 1.5 The Local Plan we currently use (Local Plan (Part 1)) was adopted by the Council in 2014 and set the strategic policies to guide development in the District up to the year 2028 e.g. number of new homes and employment land required.
- 1.6 We originally intended to follow this with Local Plan (Part 2) which was considering how we might choose which sites were suitable for which uses (housing, employment and so on) and if any more detailed policies were needed.
- 1.7 However, changes to the planning system mean that we now need to review our plans every five years, which means that we would need to be reviewing Local Plan (Part 1) in 2019. The need for review requires a Council to consider if any of its policies need to be updated or not. Given the changes to several key policy areas at the national level, the Council considered that an update of some of the key Local Plan (Part 1) policies would be necessary. The Council therefore decided to cease work on Local Plan (Part 2) instead beginning work on a new Local Plan which will be able to take account of the changes to the planning system.
- 1.8 We started the process of developing the new Local Plan in February 2018, and published Issues and Scope paper in Summer 2018, to consider what matters a new local plan should be considering, and how the current Local Plan (Part 1), and work already undertaken on Part 2, should be incorporated, We consulted on this between July 2<sup>nd</sup> and 28<sup>th</sup> August 2018, alongside a Scoping report for the Sustainability Appraisal and a reviewed Statement of Community Involvement.
- 1.9 Consultation responses have been published on our website and we include a summary of these in the relevant sections of this document to show how these have been considered.

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- 1.10 This 'Issues and Options' consultation is focused upon considering the issues raised and the suggested scope of the new plan, and suggesting various options for dealing with these.

### What does preparing a Local Plan involve?

- 1.11 Preparing a Local Plan is complex, and we set the timescales out for its preparation in the Local Development Scheme. The table below sets out the key stages we will need in order to prepare the plan, and the timing of these. The Local Plan also has to be informed by a Sustainability Appraisal which is a legal requirement, and which ensures that we are taking 'reasonable alternatives' into account for delivering the development we need whilst ensuring that we do this in a balanced way taking account of environmental, economic and social considerations.

PREPERATION	DESCRIPTION	TARGET DATE
Commencement of work including evidence base updating	Evidence needs to inform the plan, we gather this at the early stages and update where needed.	February 2018
Regulation 18 Scoping and Issues Consultation	We are looking at the issues and scope which the plan needs to cover.	July 2018
Regulation 18 Issues & options consultation	<b>This is the stage we are currently consulting on.</b> At this stage we consider the feedback from the Issues and Scope consultation, look at any further issues, and then suggest options for dealing with these.	February 2019. (report to Cabinet to seek authority to consult)
Preferred Option Consultation	This is a non statutory stage where we refine the plan into a draft version, based on the feedback of the previous consultation and using the evidence available. The will contain draft policies and site allocations, for example.	October 2019
Pre-Submission (Regulation 19) consultation	Once we have considered the feedback from the previous consultation, this is the final draft, which we have to publish for comment before submitting the plan to the Secretary of State (Planning Inspectorate) for independent examination. Feedback at this stage will need to be focused very specifically on whether the plan is 'sound', which is currently defined as: Positively prepared – does the plan allocate enough land to meet all needs for the various uses where it is reasonable to do so and consistent with placing development in the right locations? Justified – is the plan the most appropriate strategy when considered against reasonable alternatives? Effective – can the proposals in the plan be	July 2020



## 1. Introduction

	delivered over its period? Consistent with national policy – is the plan in accordance with national policies?	
Submission	This is the stage where the plan is submitted to the Planning Inspectorate.	December 2020
Examination in Public	A planning inspector is assigned to examine the plan to see whether it can be found ‘sound’ (see above) and whether it is then capable of adoption by the Council. The examination will focus on the main areas of contention and will normally involve public hearings.	March 2021
Adoption	Once the plan has been confirmed as being sound then the Council can adopt it and it will set policy for making decisions on planning matters in the district.	September 2021

### How does the Local Plan fit with the rest of the planning process?

- 1.12 We have to prepare the Local Plan so that it is consistent with Government policy, which is set out within the National Planning Policy Framework (NPPF) and ministerial statements and supported by the National Planning Practice Guidance (NPPG). The Local Plan forms part of the Development Plan for the wider area. Staffordshire County Council prepare plans for minerals and waste, and Cannock Chase Council will prepare the Local Plan (as described above) for shaping development in its own District. We will also need to work alongside other Councils and agencies to ensure our plans align and deliver on the more strategic issues – even though the plans of other areas may be prepared at different times. We need to work together under the legal ‘Duty to Co-operate’.
- 1.13 Once we have adopted our new Local Plan we can also choose to provide more detail for our policies if we need to, by preparing ‘Supplementary Planning Documents’ (SPDs). For example our current Local Plan is supported by SPDs on Design, on Developer Contributions and on a development brief for the site of the closed Rugeley Power Station. As part of this process we may need to consider whether we will also need to make changes to any of our SPDs or whether we may need to add new ones.
- 1.14 Communities can also choose to prepare their own Neighbourhood Plans should they so wish. These set planning policies at a much more local (often Parish) level. They need to broadly conform to the Local Plan, are independently examined and then voted on by the community at referendum. If there is a majority vote in favour of the plan they are then ‘made’ (i.e. adopted) and become part of the Development Plan for the area. We currently have an adopted Neighbourhood Plan (Hednesford) and two designated areas (Brereton & Ravenhill and Norton Canes) where Neighbourhood Plans are in the early stages of preparation.

## 1. Introduction

- 1.15 All of the policies contained in these plans are then used in helping the Council to decide whether planning applications in the District should be approved or refused.

### Consultation Information

- 1.16 We will be consulting from **Monday 13<sup>th</sup> May until Monday 8<sup>th</sup> July 2019.**
- 1.17 We will be holding a series of drop in events around the District. We will publicise these on our website and social media pages, via the local press, and via leaflets and posters which we will leave at a range of venues in the District. We will also write to / email everyone who is registered on the Planning Policy consultation database.
- 1.18 Documents can be viewed at the following locations during normal office hours:
- Cannock Chase Council, Civic Centre, Beecroft Road, Cannock WS11 1BG
  - Cannock library, Manor Avenue, Cannock WS11 1AA
  - Rugeley library, Anson Street, Rugeley WS15 2BB
  - Hednesford library, Market Street, Hednesford WS12 1AD
  - Norton Canes library, Burntwood Road, Norton Canes WS11 9RF
  - Brereton library, Talbot Road, Brereton WS15 1AU
  - Heath Hayes library, Hednesford Road, Heath Hayes WS12 3EA
  - Burntwood Library, Sankeys Corner, Bridge Cross Road, Burntwood, WS7 2BX
- 1.19 All information is also on our website at [www.cannockchasedc.gov.uk/planningpolicy](http://www.cannockchasedc.gov.uk/planningpolicy).

### How to respond

- 1.20 Responses can either be submitted online via the web link above (social media pages will also link to this) or via hard copy forms which will be available at the venues listed above and at the drop in sessions. All information will be used in accordance with our Fair Processing procedures which can be seen via the above link and a summary of which will be reproduced on the response forms.

## 2. The District Context

- 2.1 It is important to include a profile of the District in the Local Plan as this sets the context for the plan and the issues it should be addressing in terms of town planning. The district profile asks: 'What are the key features of our District and what are the key issues it faces?' We consulted on an updated version of the profile which is included in Local Plan (Part 1), and the following paragraphs set out the comments received.
- 2.2 Some supported the profile as suggested (this had been updated from the version in the adopted Local Plan to take account of changing circumstances). The inclusion of Rugeley Power Station was welcomed, and suggestions were made as to the future of the site e.g. infrastructure needs, and the need to help businesses relocate to the site, especially where they want to relocate from residential areas. Infrastructure was also mentioned in wider terms, for example education. The potential role of Parish/Town councils in project management and delivery was also raised.
- 2.3 Some respondents (mainly statutory agencies and individuals/interest groups/organisations) wanted more emphasis on particular topics e.g. a dedicated section for the historic environment, more focus on the role of canals and waterways and their role in addressing a range of agendas such as health, the economy and tourism, and more specific reference to affordable housing, and healthy and active lifestyles.
- 2.4 The need for the profile to reflect current national policy, the need to address the housing market area shortfall and the need to take into account an up to date evidence base were recurrent themes. Those representing the development industry were keen to state that the housing need identified by the new standard methodology is a minimum figure, that housing should have more of an emphasis in the profile, that Cannock Chase District Council (CCDC) should play a role in addressing the shortfall and Green Belt release would need to be considered as part of this. Reference was made to the Council's own economic growth ambitions and the need to ensure sufficient sites were available to deliver this, but also that the area should be helping to deliver the wider growth aspirations of the region (e.g. the LEPs), and that this would have implications for the need for more housing and an integrated approach.
- 2.5 Some respondents then commented that employment land should not be lost to housing, and that environmental matters should be balanced with growth needs. Some felt there was a need to emphasise sustainability of communities; this varied from the need to identify the economic sustainability of towns (citing decline in Rugeley) to those representing some parts of the development industry stating that Cannock/Hednesford and Heath Hayes should be identified as the district's most sustainable settlement, along with the need to strengthen the sustainability of Norton Canes. Finally, some pointed out elements which need updating or correcting in terms of factual accuracy.
- 2.6 Consultation responses and other updated information have been included in an updated profile.

## 2. The District Context

### Updated District Profile

**What are the key features of our District and what are the key issues it faces?**

#### Sub-national Context

Cannock Chase District lies within Southern Staffordshire on the northern edge of the Black Country areas. At the heart of the District lies the nationally significant Cannock Chase Area of Outstanding Natural Beauty (AONB) and around 60% of the District is designated Green Belt, testament to its strategic role as part of the West Midlands rural-urban fringe. The District acts as a strategic link between wider Staffordshire and the West Midlands conurbation.

The strongest residential migration flows to and from the District have typically been with Lichfield, South Staffordshire, Stafford and Walsall<sup>1</sup>. There are strong two way flows of commuters between Lichfield and Cannock Chase. The most common commuter destinations for Cannock Chase residents are Lichfield, Walsall, Stafford, South Staffordshire and Birmingham<sup>2</sup>. The conurbation also offers larger-scale retail and leisure provision. In recognition of these key economic and social links the District Council is a member of both the Stoke on Trent and Staffordshire Local Enterprise Partnership (LEP) and the Greater Birmingham and Solihull LEP although it should be noted that the Government is currently undertaking a review of LEPs. The Council is also a non-constituent member of the West Midlands Combined Authority (LEP) which is a body that has developed powers from central Government to implement budgets and policy in relation to key areas such as transport and housing.

#### Population

The District has a growing population of 98,513 (mid-2016, an increase of 1.1% since the 2011 Census) which is estimated to increase to 104,100 in 2036. In the 2016 18.6% of Cannock Chase residents were aged 65 and over. The trend of an ageing population is evident with the proportion of residents aged over 65 in the District projected to rise faster than the National average – an increase of 23.1% by 2026. The proportion of Cannock Chase residents aged 85 and over is estimated to rise by 50% during the same period<sup>3</sup>. At the time of the 2011 Census 96.5% of residents described themselves as ‘White British’ – a smaller proportion than in the 2001 Census (97.5%). The District is becoming more ethnically diverse with the 2011 Census revealing a large number of residents identifying with a variety of ethnic groups (3.5% - around 3,400 people). The next largest ethnic group is of Indian origin at just over 1% of the population.

#### Health and Education

Cannock Chase suffers from a relatively poor health profile compared to the national picture on all indicators. The District has particular health related issues in the areas of life expectancy and infant mortality, obesity, alcohol-related conditions, early deaths from cardiovascular conditions and rates of diabetes. The early death rate from heart disease has fallen but still remains higher than the national average<sup>4</sup>. The 2011 Census indicates that 20.7% of residents in the District experienced a long-term

<sup>1</sup> Southern Staffordshire Strategic Housing Market Assessment (2012).

<sup>2</sup> NOMIS: Official Labour Market Statistics

<sup>3</sup> ONS Sub-national population projections

<sup>4</sup> Public Health England – Local Authority Health Profiles (2017)

## 2. The District Context

limiting illness which was above the England average of 17.6%. The prevalence of long-term limiting illness increased to 60.9% among residents aged 65 and over which was again higher than the England average of 51.5%.

Evidence and monitoring for Local Plan (Part 1) shows that access to indoor leisure facilities in the north of the District has improved with the completion of Rugeley Leisure Centre and swimming pool. In 2012/13 Cannock Leisure Centre's new facilities became available to the public after undergoing major modernisation (and further improvements are planned). However, the most recently produced evidence<sup>5</sup> and monitoring highlights further improvements are required to meet the recognised needs of the rest of the District in terms of both indoor and outdoor facilities and in terms of quantity, quality and accessibility e.g. there is a need to increase playing pitch provision across the District. The evidence base for indoor and outdoor sports facilities is currently in the process of being updated.

Whilst the AONB is a vital asset for outdoor leisure and recreation the most recently produced evidence<sup>6</sup> identified there are areas within the District deficient in access to alternative open spaces, particularly semi-natural sites. This evidence base is the process of being updated and will be available late 2019. Monitoring of the Local Plan (Part 1) identifies there have been a number of new open and play spaces provided alongside new developments but that deficiencies are likely to still remain. Work is continuing on former stadium site in Cannock to provide an adventure play area, green gym equipment, BMX track and more which will improve access to healthy living opportunities in this area<sup>7</sup>.

The District's educational performance has improved recently, however it continues to have lower levels of educational attainment compared to national and sub-national rates. The proportion of those achieving equivalent to NVQ Level 4 (equivalent to HND or Degree Level and above) remains below the national and West Midlands averages. GCSE attainment for Cannock Chase pupils is significantly worse than the England average. In addition there are inequalities within the district with achievement ranging from 25% in Cannock North ward to 59% in Hawks Green ward.<sup>8</sup>

### Community Deprivation

Cannock Chase District is the most deprived Local Authority in Staffordshire (excluding Stoke-on-Trent) and ranks 128<sup>th</sup> out of 326 local authority areas. Deprivation occurs mainly in Education Skills and Training, Employment, Health and Disability and Income<sup>9</sup>. Such deprivation can be attributed to the legacy of industrial decline in the Districts reducing access to employment, but can also be related to the need for appropriate social infrastructure. It is estimated that approximately 23% of children in Cannock Chase are classified as living in poverty<sup>10</sup>. Average gross weekly earnings for full time employees that are Cannock Chase District residents are around

<sup>5</sup> CCDC Indoor and Outdoor Sports Facilities Assessment (2010)

<sup>6</sup> CCDC Open Space Assessment (2009)

<sup>7</sup> CCDC Annual Report 2016/17

<sup>8</sup> NOMIS: Official Labour Market Statistics Cannock Chase Locality Profile (2016), Public Health England – Local Authority Health Profiles (2017)

<sup>9</sup> Index of Multiple Deprivation, 2015

<sup>10</sup> www.endchildpoverty.org.uk

## 2. The District Context

6% lower than the Great Britain average, increasing to around 15% for female full time workers<sup>11</sup>.

### Crime

Recorded crime in Cannock Chase has shown an increase over recent years. During 2016/17 there were 6,966 crimes recorded. This is an 18% increase (1085 crimes) when compared with the previous year and 14% higher than the number recorded in 2010/11. Key areas of concern include the levels of violent crime and increasing levels of domestic violence. Levels of anti-social behaviour have reduced.<sup>12</sup>

### Housing

Local Plan (Part 1) housing requirements were drawn from the Strategic Housing Market Assessment (SHMA, 2012) which tested a range of scenarios including 2008-based household projections (and updated 2011-based household projections) to recommend a range of provision for the District of 250 to 280 houses per annum.

From a detailed analysis of the market the SHMA identified a need for future provision to be smaller dwellings suited to younger people, whilst recognising the aspirations of people to live in larger properties (3 and 4 bedrooms). The SHMA report identified in Cannock Chase an annual need for 197 affordable dwellings.

The housing evidence base has been updated to reflect the most up to date situation and is published alongside this Issues and Options consultation. The most recent 2014-based household projections indicate an increase from 42,250 households (2016) to 46,739 households (2036), and these are the ones the Government has chosen to utilise for its draft standard housing methodology which indicates a housing requirement of 284 dwellings per annum (2016-2036) for the District.

Furthermore, there is a significant housing shortfall to the year 2036 across the Greater Birmingham and Black County Housing Market Area, and as one of the fourteen authorities in this area<sup>13</sup>, Cannock Chase Council will need to play a role in helping to address this.

### Employment

The local economic base has developed and diversified significantly from the mining heritage of the not too distant past with expansion of the tourism sector and growth arising from businesses locating near the strategic M6 Toll/A5 corridor. The District now has a more diverse employment structure with 42% of the District employed in Group 1-3 occupations (including Managers, Directors, Professional, Associate Professional and Technical occupations). However, there is still an over representation of manufacturing, skilled trades and elementary occupations in comparison to regional and national averages. Figures show that the District has an over reliance upon jobs in the distribution and construction sectors (with the proportion of employee jobs in these sectors being almost double the national and regional average) and that there is an under-representation of employee jobs in the service-based sectors such as professional services (including financial activities) and public administration.<sup>14</sup>

<sup>11</sup> NOMIS: Official Labour Market Statistics

<sup>12</sup> Office for National Statistics, www.police.uk, Public Health England – Local Authority Health Profiles (2017)

<sup>13</sup> Local Authority areas: Birmingham, Bromsgrove, Cannock Chase, Dudley, Lichfield, North Warwickshire, Redditch, Sandwell, Solihull, South Staffordshire, Stratford upon Avon, Tamworth, Walsall and Wolverhampton.

<sup>14</sup> NOMIS: Official Labour Market Statistics

## 2. The District Context

The Districts employment rate has increased over the past few years and remains higher than both the regional and national average. Youth unemployment has increased slightly but remains under the national average. Over the past 4 years enterprises within the District have increased by almost 10%.<sup>15</sup> Out commuting (largely within Staffordshire and the West Midlands conurbation) is an integral feature of the local labour market with commuting flows resulting in a population decrease of 8,655 in the District (i.e. the difference between those commuting in the District and those commuting out of the District).<sup>16</sup> Given the low levels of skills in the District (see Health and Education, above) there are also problems with linking residents to local jobs.

In an assessment Index of Resilience for Council's in England (Experian 2010) of resilience to economic changes, including public sector funding cuts, Cannock Chase was ranked 293<sup>rd</sup> from a total of 324 Council areas (with 1 being the most resilient). In the Business theme index, which assessed factors such as business density, business start-ups, and employment sectors, the District was ranked within the 10 least resilient areas in the Country. Key long standing economic structural weaknesses include the District being overly reliant on vulnerable traditional industry and manufacturing employment and the high proportion of young people in the area with poor skills and educational attainment levels.

It should be noted that this section has been produced in the light of evidence available at the time of writing. The employment evidence base has since been updated to reflect to most up to date situation and is published alongside this Issues and Options consultation. Future iterations of the district profile will be updated to reflect any changes contained therein.

### Town Centres and Shopping

Cannock Town Centre is ranked 508 against other town centres and retail parks for 2016/17. The data also shows that Rugeley is at rank 608 and Hednesford is ranked 2,815. This reflects their smaller settlement size on a national register of retail centres.<sup>17</sup> Cannock represents the largest town within the District's retail hierarchy and is suitable for larger scale retail and leisure developments. Hednesford town centre has undergone significant regeneration in recent years to deliver an improved retail and leisure offer for the area, as well as other public realm improvements e.g. at Hednesford Park. Rugeley town centre has also seen investment in terms of a new retail food store, improvements to the public realm and a flood alleviation scheme which will enable further redevelopment projects to be taken forward. There continue to be a number of local centres which serve local daily shopping needs in and around the District. The evidence base for retail needs will be updated. Since the Local Plan (Part 1) was adopted a retail designer outlet village has been approved and is now under construction at Mill Green (just outside Cannock town centre boundary) which the updated retail evidence will need to take account of.

### Transport and Infrastructure

The District is located at a strategic road/rail transport crossroads between the North West and South East via the M6T/M6 and West Coast Main Line railway and East-West A5/M54 corridor, and the West Midlands and wider Staffordshire. A new

<sup>15</sup> NOMIS: Official Labour Market Statistics

<sup>16</sup> NOMIS: 2011 Census- Location of usual residence and place of work

<sup>17</sup> Venuescore (Javelin Group)

## 2. The District Context

M6T/M6-M54 link road is also proposed as well as the long term upgrade of the A5 Trunk Road to 'Expressway' status. Rugeley benefits from the Rugeley Eastern Bypass and direct rail services to London on the West Coast Main Line.

The Rugeley-Hednesford-Cannock-Walsall-Birmingham, 'Chase Line' rail service continues to grow in its popularity and the three stations at Cannock, Hednesford and Rugeley Town carry over 700,000 passengers' per year. The £100m Chase Line electrification is expected to be in full use in Spring 2019 and will see 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 and London Euston. At the same time the line speed will be increased from 45mph to 60mph.

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 £120m, Mill Green retail designer outlet village, which will attract 3-4 million visitors per annum.

Rugeley has also benefited due to its position on the West Coast Main Line (WCML) including the introduction of hourly services to Crewe, Stafford, Milton Keynes and London. The High Speed 2 (HS2) railway from London to Crewe will not directly run through the District however the Council will need to be kept up to date on the latest information in terms of its power supply, which could have an impact locally depending on final details.

While there is a good core urban and inter urban bus service network from Cannock to Wolverhampton, Stafford, Lichfield, Walsall and Wolverhampton and from Rugeley to Stafford and Lichfield, these are not immune from the national trend in falling passenger numbers. Recent County Council budget cutbacks have led to the loss of evening services and there are no longer any Sunday bus services.

In terms of the road network the A5/M6T/A460/A34 Churchbridge Junction only has a design life to 2020 and much of the A5 in the District is also designated as an Air Quality Management Area, as is the area around Five Ways junction in Heath Hayes. Congestion along the A5 has been cited as an issue for road freight and the reliability of journey times, and there is an A5 Partnership which produces an Action Plan to address issues in this regard.

The historical development of the District has provided a wealth of canal network assets which provide connections to neighbouring areas and potentially offer opportunities for improved linkages including cycling and walking, contributing to sustainable communities and providing a wealth of other benefits (e.g. tourism, health and wellbeing, green infrastructure and biodiversity). Ongoing initiatives by the Lichfield and Hatherton Canal Restoration Trust, propose the phased restoration of the Hatherton Canal, partly on a new alignment.

### Environment

The District comprises land rising from the low lying, largely urbanised areas in the south-west and Green Belt area around Norton Canes in the south-east to the higher plateaux within the Cannock Chase AONB. These plateaux then fall to the wide valley of the River Trent with the urban area of Rugeley and Brereton bordered by Green



## 2. The District Context

Belt in the north. Cannock Chase AONB provides a strategic area of accessible countryside with conservation, recreation, economic and tourism benefits. The Green Belt is also important for recreation, maintaining the District's character and its wildlife and safeguarding the wider open countryside. The District supports 2 Special Areas of Conservation, 3 Sites of Special Scientific Interest, over 30 local Sites of Biological Interest, 3 Local Nature Reserves and 1 Local Geological Site. The southern part of the District also lies within the cross authority Community Forest of Mercia. However, some elements of the District's biodiversity assets are at potential risk of decline due to development and recreational pressures unless appropriate mitigation measures are put in place<sup>18</sup>. This natural environment gives the District a valuable semi-rural landscape, which combined with the historical influence of human activities results in a distinctive landscape character.

The District's medieval origins, mining legacy and industrial/agricultural heritage provide a wealth of valuable assets, which contribute to this distinctive character and provide a range of recreation and tourism benefits. There are 8 Conservation Areas within the District (primarily focused around Rugeley), 70 listed buildings and 5 Scheduled Ancient Monuments. There are also a range of non-designated heritage assets including archaeological features of interest, potential sites of national importance related to military activities and locally significant historic farmsteads. The canal network represents a key heritage asset that can contribute towards the natural and built environment including opportunities for heritage-led regeneration and high quality design. The central landscape areas of the District are in a fairly good and strong condition overall and are of high sensitivity to change; those in the weakest and poorest condition are primarily at southern and eastern parts (around Norton Canes), mainly due to the extent of change in this area; although some parts are still sensitive to further change<sup>19</sup>.

In addition, the District's mining legacy has resulted in a variety of issues and constraints. Surface hazards, such as mine entries and fissures, are present throughout the District and rising mine water is an issue that The Coal Authority is monitoring due to its potential pollution and flooding effects. Southern parts of the District are still classified as potential mineral resource areas for coal. Central and northern parts of the District are also classified as having potential mineral resources (sand and gravel).<sup>20</sup>

### Green Belt

Given that 60% of the District is designated Green Belt, it is a key feature of the District's overall character. It provides a range of multifunctional benefits (as outlined above) and serves to maintain the openness of the rural-urban fringe (with the West Midlands conurbation) as well as the District's separate urban areas and their identities. A Green Belt study (2016) provides an overview of the current condition of the Districts' Green Belt (in terms of how it performs against the nationally defined purposes of Green Belt).

### Climate Change

The District's per capita carbon emissions are below the national average and they are the second lowest in Staffordshire. There has been a general reduction in the

<sup>18</sup> CCDC Appropriate Assessments (2009 onwards) AND Cannock Chase SAC Guidance to Mitigate (2017)

<sup>19</sup> Landscape Character Assessment for Cannock Chase District (2016) and Addendum (2017)

<sup>20</sup> Staffordshire County Council Minerals Local Plan (2017)

## 2. The District Context

levels of CO2 emissions from all sectors within the District. The overall 'Per Capita Emissions' has fallen from 6.3 (2005) to 4.2 (2015). The domestic sector is the largest source accounting for 39% of all emissions<sup>21</sup>. There are currently four notable renewable/low carbon energy schemes running in the District<sup>22</sup>. In terms of the impacts of climate change middle estimates suggest a temperature rise of between 1.4- 3.4 degrees up to 2080, with decreases in summer rainfall, increases in winter rainfall and a potential increase in flood risk<sup>23</sup>.

### Key Issues

From the profile the following key issues for the District can be identified:

- Levels of crime, and perceptions of crime, remain a concern;
- Low standards of health and educational attainment require improvement;
- Future housing needs, particularly affordable housing requirements, have to be met including a contribution to the shortfall across the wider housing market area;
- Economic growth and regeneration needs have to be met and access to employment opportunities and local labour skills require improvement;
- The natural and built environment (inclusive of indoor, built and outdoor sports) should be planned effectively to encourage opportunities for healthy and active lifestyles amongst all sections of the community.
- Educational provision will need to be provided for including school expansions or new provision where applicable
- Provision of comprehensive transport networks need to be better supported to help reduce social exclusion and unsustainable development impacts;
- The town centres need to adapt and increase their competitiveness to maintain local shopping provision, be responsive to changing consumer needs and the role and function of centres, maximise opportunity, reverse decline and contribute to regeneration;
- The highly valuable and sensitive natural environment, historic environment and landscape character, green linkages and the canal network need to be protected and enhanced whilst meeting demands and providing opportunities for housing, recreation and economic activity including heritage-led regeneration;
- The natural and built environment including indoor, built and outdoor facilities and including the role of green infrastructure, the canal networks and linked cycleways and walkways should be planned effectively to encourage opportunities for healthy and active lifestyles amongst all sections of the community
- Potential challenges posed by the need to respond to climate change need to be tackled e.g. alternative forms of energy supply, addressing flood risk, helping local wildlife to adapt, along with wider sustainable development concerns. For example, air and water quality concerns as well as more specific local issues (such as those related to minerals and the coal mining legacy).

<sup>21</sup> Department for Business, Energy & Industrial Strategy

<sup>22</sup> CCDC Authority Monitoring Report 2016/17

<sup>23</sup> CCDC Strategic Flood Risk Assessment 2014

## 2. The District Context

These District-wide issues manifest in the localities of the District in different ways, reflecting local features. The key points are summarised below with brief profile characteristics.

### Cannock/Hednesford/Heath Hayes

- These areas are described together as they form a continuous urban area. The combined population is 65,423, 67% of the District total (2011 Census).
- Parts of Cannock, Heath Hayes, Hawks Green, Pye Green and Hednesford have seen reduced levels or even loss of their bus services and are now more isolated. Social isolation is an issue for many people who do not have access to cars. In contrast, rail services have seen significant improvements and continue to experience strong growth in passenger numbers.
- Housing provision is a mix of age, size and tenure. There have been a number of recent Council-led programmes to regenerate public housing estates which were of poor quality, being constructed from defective pre cast reinforced concrete.
- This urban area, particularly Cannock, provides the majority of employment opportunities for the District with particular concentrations along the A5/M6 Toll corridor, which links into the neighbouring West Midlands conurbation.
- Health provision is via small doctors' surgeries across the area rather than from larger health centres, with the exception of Hednesford. There are 14 primary and 4 secondary schools and a number of community facilities, including the Chase Leisure Centre.
- The area is served by a series of major open recreational spaces e.g. Hednesford Hills, a recently designated SSSI<sup>24</sup>, and major parks at Cannock, Hednesford and Heath Hayes. Improvements to the quality of play areas/hubs have occurred including a Cannock Stadium and ongoing maintenance/improvements to the District's parks which have achieved 'Green Flag' status.<sup>25</sup> However, some residential areas do not have good access to children's play facilities. Indoor leisure provision requires improvement, which is being partly addressed via modernisation of the Chase Leisure Centre.
- Since the sixteenth century, coal extraction has had a major impact on the landscape character, resulting in extensive industrialisation. Cannock Town Centre Conservation Area, with its 12 listed buildings, requires management and investment to enhance its character whilst North Street, Bridgtown Conservation Area, illustrative of the area's growth during the late Victorian period, has benefited from recent investment and major enhancements.

Hednesford Town Council recently produced a Neighbourhood Plan (adopted in 2018) which sets out local issues and aspirations in more detail including a particular focus upon local regeneration and the town centre area.

### Rugeley & Brereton

- The combined population of 24,650 is 25% of the District total (2011 Census).
- Rugeley town centre has had limited new investment since the mid 1980s and

<sup>24</sup> Included as part of the Chasewater and the Southern Staffordshire Coalfield Heaths SSSI

<sup>25</sup> CCDC Authority Monitoring Report 2016/17

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is in continued need of regeneration. However, more recent investment in the form of a new supermarket, public realm enhancements and a flood alleviation scheme have brought about new opportunities and improvements to the town. The Towers Business Park (developed on the former Lea Hall Colliery site) is now almost fully committed being home to major companies, such as Amazon. The now well established Eastern Bypass also provides links to nearby employment opportunities. However, some issues of out commuting and lack of access to local high quality employment opportunities remain.

- Rail services have seen significant improvements to Birmingham, London and the north-west. The off-peak Chase Line service frequency to Birmingham has been doubled to half hourly from May 2018, while the £100m electrification scheme was completed in December 2018, including the introduction of longer, faster services to Birmingham with direct services to Birmingham International (Airport/NEC) and hourly to London.
- Bus services have followed the national trend of gradual decline in passengers and a diminishing network. County Council budget cutbacks in April 2018, have led to the withdrawal of many evening services and there are no longer any Sunday bus services in the District.
- Apart from the Victorian residential streets around Rugeley Town Centre, the historic core of Brereton village and areas of north-west Ravenhill most housing is post 1945 with several estates of public housing including the former National Coal Board Pear Tree estate, which has environmental and infrastructure problems.
- There are two health centres, 9 primary schools, and 1 secondary school. There are also a number of community facilities including the recently developed Rugeley Leisure Centre and swimming pool. Despite being adjacent to the AONB, there is a lack of alternative recreational sites and deficiencies in access to play areas.
- There is a wealth of historic natural and built assets in the area e.g. 6 Conservation Areas in and around Rugeley Town Centre, along the Trent and Mersey Canal and at Main Road, Brereton. Rugeley's position alongside the strategic River Trent corridor has resulted in its development since early Domesday records and the layout of the town pattern is largely unchanged from the sixteenth century

### Norton Canes

- The population of 7,479 is almost 8% of the District total (2011 Census). Originating as a mining village it expanded to include estates of public and private housing during the 1960/70s. There have been more recent expansions in the form of housing developments to the south east of the urban area (at the former Greyhound Stadium) and there is a large housing development planned for the south east of the urban area (450 homes). There are 2 primary schools, a secondary school, new library and community centre together with a limited range of local shops. A new health centre opened in late 2007 and three GP surgeries operate from this, however concerns about local capacity have been raised (noting that there are cross boundary linkages with Great Wyrley in South Staffordshire in terms of the local catchment). The centre and east of the village has relatively good bus services, however the southern parts of Norton

## 2. The District Context

Canes have lost their services, and as with the rest of the District, no longer have any Sunday bus services.

- Access to recreational sites in the area is relatively good, particularly given the proximity to the Chasewater Country Park (in Lichfield District). Access to indoor leisure facilities is mainly outside the settlement at Cannock, Burntwood or Walsall.

### The Rural Areas

The Cannock Chase AONB contains one of the largest areas of readily accessible recreational land in the West Midlands, being a statutory designation under the Countryside and Rights of Way Act 2000. It is a significant asset for nearby communities as well as comprising important heathland areas covered by the European designated Special Area of Conservation (SAC). The landscape is dominated by forestry plantations, however within the AONB and around its fringes there have been, and continue to be, a number of influences on its landscape and heritage e.g. hunting and military activities, mining, agriculture, equestrian activity and recreation. Modern-day activities require careful management in view of the areas sensitivities.

- Slitting Mill, Prospect Village and Cannock Wood village are all situated in the northern area outside the Green Belt. All have village halls; however Prospect Village and Slitting Mill have no shops or schools. Cannock Wood has access to a local primary school and shop. Prospect Village, Rawnsley, Hazel Slade and Cannock Wood have a daytime and Saturday bus service to Cannock, Hednesford, Burntwood and Lichfield, albeit reduced in 2018. All Sunday bus services were withdrawn in April 2018 due to County Council budget cut backs. Slitting Mill has a limited demand responsive community bus service, the future of which is currently under review. Social isolation is now an issue.
- The rural area south of the M6 Toll contains the hamlet of Little Wyrley, scattered dwellings and farms, commercial developments at Watling Street, Lime Lane and a recently completed landfill site at the former Grove Colliery. It also contains the Cannock Extension Canal Special Area of Conservation (SAC). This area contains some of the most intact rural landscape character in the District, particularly south of the A5.
- The rural areas, by their largely undeveloped nature, have a unique character by virtue of the surviving historic farmsteads and field patterns, largely from the 18th and 19<sup>th</sup> centuries. However the District also retains wealth of late medieval and early post medieval industrial sites including glass working, mining and metal working. Such sites throughout the West Midlands represent the first stirrings of what was to become the Industrial Revolution during the 19th Century, though by this time much of the industrial focus had moved away from the District. These assets are sensitive to development pressures and require careful consideration.

### Questions on the District Profile

**Question 1.** Do you have any comments on the District Profile? Is there anything missing and if so what, and what source of information should we use?

### 3. How the Local Plan fits within the wider context

#### Cannock Chase Councils' Corporate Plan

- 3.1 The Council's Corporate Plan covers the period 2018 to 2023. This states that the Councils key priorities are Promoting Prosperity and Community Wellbeing.



- 3.2 In terms of Promoting Prosperity there are six strategic objectives:
- Establishing Mill Green Designer Outlet Village as a major visitor attraction and maximise the benefits it will bring to the District
  - Increased housing choice
  - Create a positive environment in which businesses in the District can thrive.
  - Increase the skill levels of residents and the amount of higher skilled jobs in the District
  - Create strong and diverse town centres to attract additional customers and visitors
  - Increase access to employment opportunities
  - Commencement of regeneration of the Rugeley Power Station site
- 3.3 For Community Wellbeing there are four strategic objectives
- Opportunities for healthy and active lifestyles
  - Sustaining safe and secure communities
  - Supporting vulnerable people
  - Promoting attractive and healthy environments
- 3.4 The new Local Plan will therefore need to help the Council to achieve its ambitions.

### 3. How the District Fits within the Wider Context

- 3.5 The geography of the West Midlands is complex and Cannock Chase Council is involved in a range of different partnerships and groups formed under the Duty to Co-operate delivering a range of different functions. Some key ones include:
- The Greater Birmingham and Solihull Local Economic Partnership (LEP)<sup>26</sup>
  - Staffordshire and Stoke LEP<sup>27</sup>
  - The West Midlands Combined Authority<sup>28</sup>
  - The 14 authorities comprising the Greater Birmingham and Black Country Housing Market Area<sup>29</sup>
  - The Cannock Chase AONB Partnership<sup>30</sup>
  - The Cannock Chase Special Area of Conservation Partnership (SAC)<sup>31</sup>
- 3.6 The Council will need to ensure that the new Local Plan helps these (and other) partnerships to deliver their ambitions and obligations. As the Local Plan develops we will need to ensure that the plan links to a range of strategies and plans, for example:
- The Government's Industrial Strategy
  - The Government's 25 Year Environment Plan
  - The West Midlands Engine Growth Strategy and Midlands Connect Strategy
  - Strategic Economic Plans
  - The West Midlands Combined Authority Spatial Investment and Delivery Plan
  - Transport Strategies
  - Various environmental strategies and management plans
  - Infrastructure and delivery strategies (these can cover a range of issues such as utilities, health, education, community infrastructure and so on)
- 3.7 The Council will also need to work with neighbouring authorities on a range of strategic issues as well as a number of organisations who are listed in the

<sup>26</sup> Local Authority areas: Birmingham, East Staffordshire, Lichfield, Tamworth, Bromsgrove, Cannock Chase, Redditch, Solihull, Wyre Forest

<sup>27</sup> Staffordshire and Stoke, list of partners at <https://www.stokestaffslep.org.uk/about-us/our-people-partners/>

<sup>28</sup> Constituent local authorities: Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall, Wolverhampton. Non constituent local authorities: Cannock Chase, North Warwickshire, Nuneaton & Bedworth, Redditch, Rugby, Shropshire, Stratford-upon-Avon, Tamworth, Telford & Wrekin

<sup>29</sup> Local Authority areas: Birmingham, Bromsgrove, Cannock Chase, Dudley, Lichfield, North Warwickshire, Redditch, Sandwell, Solihull, South Staffordshire, Stratford upon Avon, Tamworth, Walsall and Wolverhampton.

<sup>30</sup> Local Authorities involved: Cannock Chase, Lichfield, Stafford, South Staffordshire; Staffordshire County Council also working with a range of other organisations

<sup>31</sup> Local authorities: Cannock Chase, East Staffordshire, Lichfield, South Staffordshire, Stafford, Staffordshire County Council, Walsall, Wolverhampton also with a range of other organisations

### 3. How the District Fits within the Wider Context

National Planning Policy Framework as prescribed bodies under the statutory Duty to Co-operate. These are:

- Local Planning Authorities
- County Councils
- Local Enterprise Partnerships
- Environment Agency
- Historic England; Natural England
- Civil Aviation Authority
- Homes England
- Clinical Commissioning Groups
- Office of Rail and Road
- Local Integrated Transport Authority
- Highways Authorities
- Local Nature Partnerships

3.8 The new NPPF requires that Statements of Common Ground will need to be prepared to demonstrate how the Duty to Co-operate has been met. We will also need to be able to demonstrate how we are preparing the plan in the context of the most appropriate functional geographical/market areas for housing and the economy.

3.9 In terms of 'other cross boundary issues' which should be addressed, a range of issues were mentioned in the consultation responses including health linked to the protection and enhancement of landscape character, recreation and economic activity; housing needs; gypsy and traveller needs; employment; retail; Green Belt (including those for, and against its release); green infrastructure; green corridors/ecological links and networks; water supply and drainage; Cannock Extension Canal SAC; Cannock Chase Special Area of Conservation (SAC); transport links; mineral resources; air quality and water impacts under the Habitats Regulations 2017; protection of the route for the restored Hatherton Canal; Rugeley Power Station site; Rugeley having different needs to Cannock (i.e. Rugeley not getting economic benefits from the Midlands Conurbation due to geographical separation by Cannock Chase).

3.10 Taking the above into account, we think an updated list of key cross-boundary issues are likely to be:

- Housing growth
- Housing need (including Gypsy, Traveller and Travelling showpeople provision)
- Economic growth and activity
- Retail
- Transport
- Health
- Recreation



### 3. How the District Fits within the Wider Context

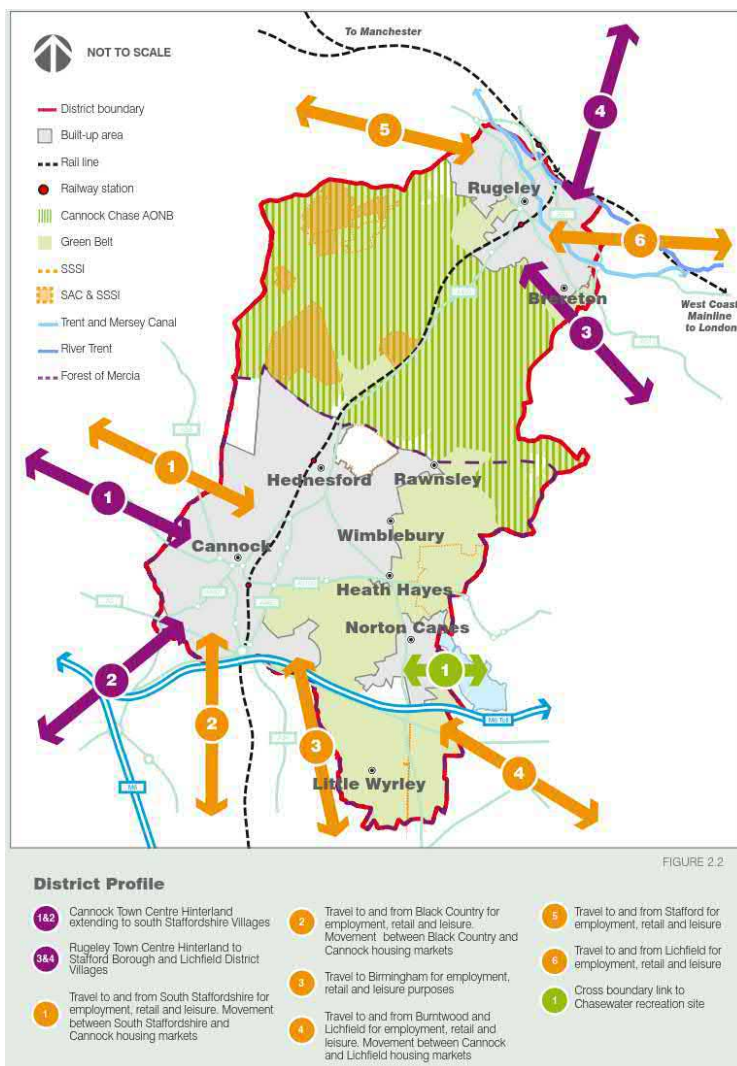
- Education
- Green Belt
- Environmental protection and enhancement including green infrastructure and ecological linkages, canals (including Cannock Extension Canal and the route for the restored Hatherton Canal), Cannock Chase SAC, air quality, water impacts, SAC
- Landscape
- Mineral resources
- Strategic sites such as Rugeley Power Station
- Differing needs of different communities including consideration of their geographical location

**Figures 1 and 2** provide an overview of the geography of the District and its wider context.



**Figure 1:** Location of Cannock Chase District in sub-regional setting

### 3. How the District Fits within the Wider Context



**Figure 2:** District Profile and key cross boundary linkages (extracted from Local Plan (Part 1))

#### Questions on the wider context

**Question 2.** We reference strategies and plans with which we think we need to align throughout the document, is there anything you need to be aware of in terms of the context within which we are preparing the new local plan?

**Question 3.** What do you think should be the key areas of focus for the preparation of Statements of Common Ground, and who should be involved in these?

**Question 4.** We think that the appropriate geography for housing issues is the area covered by the Greater Birmingham and Black Country Housing Market Area. Do you agree? If not what evidence is there for any alternative approach?

**Question 5.** What do you think is an appropriate geography for the consideration of economic issues? What evidence is there to support this?

**Question 6.** Do you have any other comments on the issues in this chapter?

## 4. Local Plan Vision and Objectives

- 4.1 We consulted on the vision and objectives contained in Local Plan (Part 1). In terms of the consultation responses, these were mostly supportive of the current vision and objectives. Two representations felt that the vision was too long and undeliverable, whereas others felt that more needed to be included, with more emphasis on housing delivery and meeting housing need; supporting the needs of neighbouring authorities via the Duty to Co-operate; supporting well designed and sustainable development close to/in the AONB including brownfield sites and linked opportunities to enhance the AONB; emphasising the importance of the canal network (and the need for a policy to substantiate this); the need to cross reference heritage to other areas of the vision; adding in reference to water quality/prevention of soil loss; reflecting the need to promote sustainable brownfield /urban sites; encouraging innovation e.g. in housing or new technologies for energy creation and storage; creative approaches to policy across boundaries to deal with cross boundary issues such as housing, open space, developer contributions etc.; more emphasis upon project delivery and partnership working; making reference to Active Travel; continuing to support Designing out Crime; protecting the Green Belt; referencing the need for high quality education. Stafford Borough Council also stated that it generally supported the vision and objectives as set out but would not be in a position to provide for any unmet Gypsy, Traveller and Travelling showpeople needs in the Borough.
- 4.2 The following section therefore contains an updated vision.

**The District will continue to be made up of distinct communities with strong local character. People will be safer and healthier and will be proud of the area in which they live and work.**

- People will be proud of where they live and work within Cannock Chase District and will take pride in encouraging others to visit the area. New developments will be designed to a high standard, carefully thought out to complement and enhance the surrounding area, minimise impact on existing residents and designed in such a way that opportunities for crime and anti-social behaviour are kept to a minimum. Appropriate redesign and uses will be promoted in places which are 'hot spots' for crime and anti-social behaviour as the opportunity arises, in order to reduce these problems. Partnership organisations and the local community will work together to ensure that local solutions are relevant to the different needs and aspirations of each community.
- People will be proud of their District's heritage, environment and town centres. They will have seen progress towards enhancement of the District's Conservation Areas in Rugeley, Brereton, Cannock town centre and Bridgtown, and safeguarding of other heritage assets across the District. They will continue to be proud of Cannock Chase Area of Outstanding Natural Beauty and the protected areas of open space and countryside.
- There will be plenty of choice and opportunity to live healthy lifestyles. The quality, quantity and range of accessible indoor and outdoor sport and recreation facilities will be improved, particularly leisure facilities around Cannock. Open spaces within the urban areas will be enhanced and local

## 4. Local Plan Vision and Objectives

needs in terms of play facilities for children and young people will be met. There will be better links between the town and countryside where appropriate, and between urban open spaces providing increased opportunities for active travel such as walking and cycling. People will have easy access to a range of services which are relevant to their needs. Primary health care provision, such as doctor's surgeries, will be available from modern accessible buildings within all the main urban areas. People living in rural communities will be able to access health services through good public transport links and, where possible, through services brought directly to the village where there is particular need. There will also be access to a range of other services such as local convenience stores and community centres. These will be relevant to local needs and flexible in order to be able to adapt to future changes within the community, for example as the population ages.

- Housing will be of a good quality and will suit peoples' circumstances so they will have a choice of where and how to live. New housing will be built to the highest possible sustainable standards to ensure it is environmentally friendly and flexible to be able to adapt to the changing needs of residents. There will be a range of affordable and market housing which provides for local needs, which makes an appropriate and sustainable contribution to the wider housing market area shortfall and which also encourages more people in managerial and professional jobs who work or invest in the District to live here. Estates of poor quality public housing will be redeveloped or redesigned to improve standards of living and the environment.

### **The potential of the District's accessible location along major transport routes will be maximised to achieve a thriving local economy.**

- The range of employment opportunities available in the District will be widened, and local people will have the education, skills and training to access these opportunities. There will be new investment in areas of growth, and the levels of commuting will be reduced.
- Cannock, as the District's main strategic centre, will have a wider choice of non-food shopping and commercial leisure facilities. Rugeley town centre will serve the north of the District and surrounding rural parts of Stafford Borough and Lichfield District. It will see new investment in food and non-food retail, commercial and leisure developments guided by an Area Action Plan. Hednesford will see new shopping development to re-establish its role as one of the District's three town centres. The district centre at Hawks Green and local centres of Norton Canes, Heath Hayes, Chads Moor, Bridgtown, Fernwood Drive and Brereton will have improved local facilities. In the rural areas, neighbourhood planning initiatives to retain or develop retail facilities will be supported as part of the Localism agenda.
- There will be more opportunities for sustainable transport across the District. Rail services will be faster and more frequent, including the introduction of new inter-regional services. There will be better integration between bus and rail services and improved services to the rural areas. A demand-responsive community transport system will have been introduced to reduce social isolation in those areas where conventional bus services are not appropriate.

## 4. Local Plan Vision and Objectives

- The cycle network will have been expanded and used for both work and leisure; routes will be attractive and link together more effectively.
- More people will want to stay in Cannock Chase District overnight or longer, taking advantage of the business and leisure opportunities available and the accessibility of appropriate areas of Cannock Chase, Chasewater and the open countryside.

### **People will lead greener, more environmentally friendly lifestyles, inspired by Cannock Chase Area of Outstanding Natural Beauty.**

- New development will provide high quality design of both individual buildings and public spaces using sustainable principles and methods of construction. It will incorporate renewable or low carbon energy, water conservation, flood prevention, waste reduction and material management features. Measures for adapting to climate change and reducing the severity of its effects will be developed and used. Brownfield land regeneration opportunities, including that of the former Rugeley Power Station, will be maximised and key pollution hazards in the District will be managed and reduced (e.g. Air Quality Management Areas).
- People will be proud of their local environment which will be well managed. All of the District's landscapes, habitats, heritage assets and cultural heritage will be conserved and enhanced in a way which protects local identity and distinctiveness. There will be no inappropriate development within or on the edge of the Cannock Chase Area of Outstanding Natural Beauty. The Green Belt will be protected from inappropriate development, will be well managed and will be linked to the Area of Outstanding Natural Beauty. There will be a 'green corridor' of restored lowland heathland habitat linking the Cannock Chase Area of Outstanding Natural Beauty to Sutton Park.
- Cannock Chase Area of Outstanding Natural Beauty will be better known as a place for day visits and also as a place for longer stays nearby, as guided by the AONB Management Plan and Cannock Chase SAC mitigation measures. There will be greater understanding of the area's heritage e.g. former military sites, canal networks. The network of open green space, including canals and the Forest of Mercia, will be strengthened and positively managed in the interests of recreation and biodiversity. Agriculture and forestry will continue to play major roles in managing the rural landscape. Good standards of water quality will be ensured and soil loss will be prevented.

## 4. Local Plan Vision and Objectives

### 4.3 Objective 1: Promote pride in attractive, safe local communities

- To ensure the highest standards of good design of buildings and spaces are achieved to help promote sustainable communities
- To retain and enhance the distinct and separate character of the District's settlements to ensure people have a sense of belonging and pride
- To work with the Police and the community in promoting better design and use of spaces to minimise opportunities for crime, improving environmental quality of spaces, adopting 'Secured by Design' principles (or similar), ensure the safety of pedestrians/cyclists and promoting health through 'active design,' (i.e. design that encourages people to walk / cycle).
- To promote appropriate design and uses in town centres with 'active' street frontages and high quality public space to ensure centres are well used and cared for and to maximise community interaction whilst minimising the opportunity for crime and anti-social behaviour.

### 4.4 Objective 2: Create healthy living opportunities across the District

- To support improved health care provision;
- To help developments which cater for longer, healthier, more active and more independent living;
- To facilitate provision of accessible, good quality, sustainably managed open space, sport, physical activity, leisure and entertainment and community facilities;
- To encourage the use of canals and other watercourses in providing sport and leisure opportunities including walking and cycling; and
- To help support measures which address issues of obesity
- To help support measures which contribute to good mental health.

### 4.5 Objective 3: Provide for housing choice

- To facilitate sustainable housing provision.
- To manage the release of sufficient land for housing to meet the district's own need and an appropriate and sustainable contribution to the wider housing market area shortfall in appropriate locations.
- To help meet local need for both affordable and aspirational housing.
- To provide housing choices for an ageing population
- To cater for the needs of different communities

## 4. Local Plan Vision and Objectives

### 4.6 Objective 4: Encourage a vibrant local economy and workforce

- To maximise the strategic location of the District and provide a continuous supply of good quality accessible employment land to attract more new businesses.
- To help support improvements in workforce skills, a broader economic base and training opportunities to enhance local recruitment.
- To provide for the employment needs of existing local businesses.
- To facilitate a range of sizes and types of employment sites to meet modern business needs.
- To provide employment opportunities in locations which best respond to market demands and which will attract inward investment (ensuring consistency with other sustainable development principles of the Local Plan).
- To ensure that business locations and centres are accessible by public transport from all areas of the District, reducing travel needs where possible.
- To ensure the land based economies of the District, including agriculture and forestry, can continue to operate, diversify and prosper.
- To enable the growth of sustainable tourism balanced with the protection of the AONB and the District's two SACs.

### 4.7 Objective 5: Encourage sustainable transport infrastructure

- Working in partnership, to implement a sustainable and integrated transport strategy that includes the continued development of the core strategic network.
- To reduce reliance on private cars for local journeys where possible, through spatial development choices and well designed layout of communities.
- To locate development in areas accessible by public transport, cycling and walking as well as reducing the need to travel.
- To achieve improvements to public transport, walking and cycling, including access for all sections of the community to work, shopping, health, education, leisure, valued environments and other facilities.
- To secure the continued development of the Chase Line rail services and infrastructure as the preferred means of transport to Walsall and Birmingham.
- To support the safe and efficient use of the highway network through traffic management schemes determined by local need.

## 4. Local Plan Vision and Objectives

- To support the construction of new roads only as a last resort and where they are related to environmental enhancement, public transport or road safety.
- To support sustainable freight distribution by road, rail and water.
- To safeguard land from prejudicial development required for new sustainable transport proposals, including road, rail, and water.

### 4.8 Objective 6: Create attractive town centres

- To ensure town centres maintain their positions within the retail hierarchy.
- To support growth of shops, offices, business, leisure, arts, cultural and tourism in town centres improving access to employment in order to achieve town centres with good vitality and viability.

### 4.9 Objective 7: Provide well managed and appreciated environments

- To protect, conserve and enhance the District's natural and historic environment assets, particularly the strategic Cannock Chase Area of Outstanding Natural Beauty, via the appropriate management of development pressures and maximise opportunities for access and enjoyment.
- To conserve, expand and link natural habitats through habitat creation and improvement to ensure a robust, coherent network of sites that provides wildlife with the opportunity to prosper.
- To conserve and enhance significant elements of cultural heritage including designated sites and important elements of historic landscape character.
- To achieve new development designed to provide a high quality of built form and public realm which enhances the District's distinct natural and historic environmental assets.

### 4.10 Objective 8: Support a greener future

- To position Cannock Chase District to face the future changes and challenges of climate change via strategic development location choices and design standards.
- To reduce carbon emissions in line with national targets.
- To ensure sustainable resource use by reducing waste, increasing recycling and safeguarding potential minerals reserves.
- To promote appropriate renewable energy and green technologies.
- To maximise flood protection and manage the effects of flooding.
- To promote sustainable construction methods/materials including 'climate proofed' developments to assist adaptation;



## **4. Local Plan Vision and Objectives**

- To reduce pollution and its impact on local communities and the environment, particularly to contribute in achieving good status in the local waterbodies as set out in the Water Framework Directive.

4.11 These objectives are monitored annually against a series of targets and indicators as reported in the annual Authority Monitoring Report. Information from these reports is drawn upon throughout this consultation document to identify what issues the District still needs to address, what progress has been made and any new issues arising.

### **Questions on the review of the Vision and Objectives**

**Question 7.** Do you have any comments on the updated Vision and Objectives?



## **Local Plan Policy Options**

### **Objective 1: Promote Pride in Attractive, Safe Local Communities**

#### Issues and Options for delivering Objective 1: Promote Pride in Attractive, Safe Local Communities

##### National policy

- 5.1 National policy relating to this objective is contained in the NPPF Chapter 12: achieving well designed places but also has particular links to Chapter 11: Making effective use of land and chapter 8: promoting healthy and safe communities.
- 5.2 NPPF Chapter 12 paragraph 127 states that. *‘Planning policies and decisions should ensure that developments:*
- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
  - *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
  - *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
  - *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
  - *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.’*
- 5.3 NPPF Chapter 11 paragraph 122 places emphasis on the importance of mixed use schemes, the different potential functions of undeveloped land (e.g. wildlife, recreation, managing flood risk, cooling/shading, carbon storage, food production). It also sets a framework for achieving appropriate densities having regard to the prevailing character of the area and securing well designed, attractive and healthy places.
- 5.4 NPPF Paragraph 123 emphasises the need to avoid building at low *densities ‘where there is an existing or anticipated shortage of land for meeting identified housing needs’* and states that minimum density standards should be set for *‘city and town centres that are well served by public transport which should ‘result in a significant uplift in the average density of residential development within these*



## Local Plan Policy Options

### Objective 1: Promote Pride in Attractive, Safe Local Communities

areas'. The NPPF also recommends that minimum density standards should be considered for other parts of the plan area, or a range of densities reflecting different areas.

5.5 Chapter 8 of the NPPF focuses on 'promoting healthy and safe communities'. Paragraph 91 states:

*'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*

- *promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
- *are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and*
- *enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'*

5.6 In terms of parking standards these are covered in more detail under Objectives 5 (Sustainable transport) and 6 (Create attractive town centres). Setting standards is optional but if pursued will need to be developed in accordance with the NPPF paragraphs 105, 106 and 105. Local justification for setting such standards will need to be '*clear and compelling*' (paragraph 106).

5.7 In terms of housing, the National Planning Practice Guidance states that:

*'Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.'*

5.8 Mandatory Building Regulations covering the physical security of new dwellings came into force on 1 October 2015 and planning authorities should no longer seek to impose any additional requirements for security of individual dwellings



## Local Plan Policy Options

### **Objective 1: Promote Pride in Attractive, Safe Local Communities**

through plan policies, though designing for security of site layout remains a valid planning consideration. (Paragraph: 002 Reference ID: 56-002-20160519)

- 5.9 It should be noted that, at the time of writing, National Planning Practice Guidance in relation to Design had not been updated to accord with the new NPPF and so regard will need to be had to any revised wording which may emerge.

#### Local policy

- 5.10 Local Plan Policy CP3 (Chase Shaping – Design) currently sets policy for design, including considering design in its context in terms of both the built and natural environment, the historic environment and encouraging reuse of buildings, including measures to design out crime, encouraging vibrant town centres with ‘active street frontages’, ensuring ease of access and mobility, promoting ‘active design’ (encouraging opportunities for physical activity), efficient resource use, appropriate use of the Green Belt and preserving and enhancing the scenic beauty of Cannock Chase AONB.
- 5.11 The policy is supported by a Supplementary Planning Document on Design which was adopted in April 2016. This provides further guidance on design principles for different types of development and in relation to different topics and provides details of Local Character Areas. It also makes reference to developing a Local List although this has not yet been progressed.

#### Consultation feedback/other issues

- 5.12 Some respondents felt that the policy needed bolstering in terms of active, high quality and innovative design. The main topic of the responses was concerned with densities and there was a strong feeling that a) this should be dealt with via the Local Plan rather than SPD because of its implications for viability and b) policy enforcing specific densities across all sites would not be appropriate as provision should be made for area character (including design guides / codes) and also the need to factor in other on site needs such as SUDS for example. Some felt that minimum density standards could work in town centres.
- 5.13 In terms of other issues, there were comments about the need for policy to link to good practice in terms of designing out crime and addressing matters of public safety. Other more specific matters were raised including the need for new standards for parking, site layout, servicing etc. However, whilst some respondents were supportive of further standards being introduced or older guidance (such as the parking standards SPD) amended and updated, others were concerned that such standards (e.g. densities, the nationally described space standard and so on) could be unduly restrictive. It is clear further consideration needs to be given to the matter in the light of new and emerging government guidance.



**Local Plan Policy Options**

**Objective 1: Promote Pride in Attractive, Safe Local Communities**

5.14 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 1: Promote pride in attractive, safe local communities

**DESIGN POLICY OPTIONS**

**Option A: Strengthen the current policy to address the range of issues raised and update the Design SPD to include more detail, which reflects the increased emphasis of the NPPF of design matters**

It is felt that the policy and SPD are already comprehensive and address many of the issues raised; however there is scope for an update and further elaboration of particular themes

**Option B: As Option A but set minimum density standards for key areas such as town centres in Local Plan Policy and provide further guidance on optimum densities for other areas including character areas via a revised SPD**

This would reflect the emphasis of the NPPF on density and minimum standards for town centres. It would help to achieve effective use of land, reducing the need for greenfield sites in other areas, and provided residential uses were balanced with other town centre uses, could help town centres become more vibrant places.

**Questions on Design Policy Options:**

**Question 8.** Is there any local evidence to support the need for the Council to adopt minimum internal space standards for new dwellings (the nationally described space standard)? If so, what?

**Question 9.** Are there other standards we should be including, and if so what evidence can you provide which would provide the local justification for this?

**Question 10.** Is the Local Plan still the right place to include a Local List, or would this be more appropriate to be developed by local communities (for example Hednesford Neighbourhood Plan has identified buildings of local significance which it wishes to protect).

**Question 11.** The NPPF (paragraph 70) states that ‘planning policies and decisions should avoid the development of isolated homes in the countryside’ but sets out exceptions to this. Should we be elaborating further to define local policy in this context and if so what should we focus on and what local evidence is there to support this?



## **Local Plan Policy Options**

### **Objective 2: Create Healthy Living Opportunities across the District**

#### Issues and Options for delivering Objective 2: Create Healthy Living Opportunities across the District

##### National Policy

- 6.1 Chapter 8 of the NPPF focuses on 'promoting healthy and safe communities'. Paragraph 91 states:

*'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and*
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'*

- 6.2 The NPPF then goes on to state (paras 92/93/94) that planning policy should plan positively for community facilities and shared spaces and other local facilities, support the delivery of other related strategies, guard against the loss of valued facilities and services, ensure that established shops, facilities and services can be modernised and be retained to benefit the community, and ensure that the location of housing, economic uses, facilities and services are properly coordinated. There is a specific focus on the need to provide adequate schools provision (Paragraph 94). Estate regeneration is encouraged. There is also emphasis on promoting public safety (paragraph 95).

- 6.3 Chapter 8 also sets out national policy in relation to open space and recreation, requiring up to date assessments for the need for open space, sport and recreation facilities to inform and develop 'access to a network of high quality open spaces and opportunities for sport and physical activity' (Paragraph 96). Paragraph 97 sets the national context for protecting open spaces, sports and recreational buildings. Paragraph 90 references the need to protect and enhance



## **Local Plan Policy Options**

### **Objective 2: Create Healthy Living Opportunities across the District**

public rights of way and access. Paragraphs 99 to 101 provide the framework for designating Local Green Space.

- 6.4 Air quality is another issue which can have a significant impact upon human health. This issue cross-cuts a number of objectives in particular Objective 5 (sustainable transport), Objective 7 (well managed and appreciated environments, in terms of the impact of air quality on habitats) and Objective 8 (in terms of wider pollution issues). NPPF paragraph 181 states:

*‘Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.’*

- 6.5 National Planning Practice Guidance (at the time of writing not yet updated to accord with the new NPPF) states:

*‘Local Plans can affect air quality in a number of ways, including through what development is proposed and where, and the encouragement given to sustainable transport. Therefore in plan making, it is important to take into account air quality management areas and other areas where there could be specific requirements or limitations on new development because of air quality. Air quality is a consideration in Strategic Environmental Assessment and sustainability appraisal can be used to shape an appropriate strategy, including through establishing the ‘baseline’, appropriate objectives for the assessment of impact and proposed monitoring.’*

- 6.6 Drawing on the review of air quality carried out for the local air quality management regime, the Local Plan may need to consider:

- the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments;
- the impact of point sources of air pollution (pollution that originates from one place); and,
- ways in which new development would be appropriate in locations where air quality is or likely to be a concern and not give rise to unacceptable risks from pollution. This could be through, for example, identifying



## Local Plan Policy Options

### **Objective 2: Create Healthy Living Opportunities across the District**

measures for offsetting the impact on air quality arising from new development including supporting measures in an air quality action plan or low emissions strategy where applicable. (Paragraph: 002 Reference ID: 32-002-20140306)

#### Local Policy

- 6.7 Local Plan Part 1 Policy CP5 Social Inclusion and Healthy Living focuses mainly on the delivery of infrastructure relating to health and wellbeing and securing developer contributions where it is appropriate to do so.
- 6.8 The policy lists a range of infrastructure types which will be supported (e.g. health and education facilities, parks, open spaces, play areas, sports, cultural, leisure and community facilities and so on) and, where appropriate, states that developers will need to contribute to facilities in line with needs assessments and standards as set out in the Developer Contributions Supplementary Planning Document.
- 6.9 The policy also sets out a presumption against the loss of Green Space Network sites and community buildings unless they are surplus to requirements or else if there are demonstrable wider community benefits to be gained or if an acceptable level of replacement facilities can be provided.
- 6.10 Air quality is currently referenced in Local Plan policies CP10 (sustainable transport), CP13 (Cannock Chase SAC) and CP16 (Climate Change and sustainable resource use).

#### Consultation feedback/other issues

- 6.11 From the representations received and from other issues raised it is clear that the policy needs both updating and its remit expanding although in general terms it is still NPPF compliant. The emphasis of adopted policy CP5 is mainly upon the provision of infrastructure in relation to health, and suggestions were made in terms of how this could be expanded for example the role of canals and other 'blue' (i.e. water) networks in contributing to health and wellbeing and the need to include more detail on health, education and other local services and being more specific in relation to particular communities. There were specific comments on the need to include the route of the Hatherton Branch canal which is part of a major canal restoration project linking cross boundary with Lichfield, Walsall and South Staffordshire.
- 6.12 It was considered that the evidence base needs to be updated in terms of open space, sport and recreation and standards set in policy where relevant<sup>32</sup>, with supplementary planning documents not being considered adequate for this

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<sup>32</sup> NB. Sport England do not want standards for playing pitches and sports provision in policy but think that policy should link at an up to date evidence base which sets out requirements





## Local Plan Policy Options

### Objective 2: Create Healthy Living Opportunities across the District

purpose given that clarity needs to be provided in Local Plan policy due to the increased emphasis upon viability and deliverability at the plan making stage. This would also include an update to the current mapped Green Space network and any approach to designating Local Green Spaces which would have to meet a stringent series of tests.

- 6.13 The issues consultation also asked for feedback on biodiversity offsetting: this is considered under Objective 7 (well managed and appreciated environments) as it is felt the 'fit' was better under that theme.
- 6.14 In terms of bolstering the policy it was felt that it needs to be stronger in terms of encouraging both active lifestyles and encouraging healthy eating habits to address the evidence showing that the district is experiencing particularly high levels of obesity and associated health related problems. It was also felt that there needs to be more emphasis on mental health and wellbeing and the role that services and facilities play in encouraging social contact and avoiding isolation and the adverse health consequences of this.
- 6.15 Air quality and impacts on health were also mentioned in representations to the Issues paper. Whilst previously these issues have been covered in policy relating to transport, biodiversity and climate change, it is felt that the section on health also needs to address air quality, particularly given that there are three designated Air Quality Management Areas (AQMAs) in the district (two along the A5 corridor and a third at Five Ways in Heath Hayes) and taking into account the fact that air quality is an issue rising rapidly up the national agenda.
- 6.16 Further evidence is underway to inform the development of policies in relation to social inclusion and healthy living including an updated Playing Pitch and Indoor Sports strategy, an updated Open Space assessment and strategy and joint working between Staffordshire Authorities on Green Infrastructure. Consideration is being given to evidence on air quality (including AQMA action plans) and how this should influence the development of local policy.
- 6.17 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 2: Create healthy living opportunities across the District.

#### SOCIAL INCLUSION AND HEALTHY LIVING POLICY OPTIONS

**Option A:** Update and bolster existing Policy CP5 to include more emphasis on providing linkages and opportunities for healthy lifestyles, healthy eating, and mental health and wellbeing including reducing isolation. It could also include more on public safety issues. This would also need to include a link to the most up to date playing pitch and indoor sports strategies to inform developments on a case by case basis depending on local need. Standards for open space assessment would need to be based on updated evidence and set in Local Plan policy, and this would also include



## Local Plan Policy Options

### **Objective 2: Create Healthy Living Opportunities across the District**

**allocation of the Greenspace network at a district-wide level and any Local Green Space if appropriate.**

This would ensure compliance with the NPPF and with Sport England's requirements as their representation stated that standards for sport should not be set in policy but should be informed by the latest evidence (which needs to be kept up to date on an annual basis). Detailed information on specific types of infrastructure required would be summarised via an updated Infrastructure Delivery Plan. This would include increased emphasis upon the network of green and blue (waterways etc.) infrastructure and the role it can play in encouraging people to get outside more and live healthier and more active lives, as well as stressing the importance of safety and accessibility

**Option B: As per Option A but with further policy elaboration via supplementary planning documents**

As per representations to the Issues consultation it is not felt appropriate to continue to set standards for open space in SPD (they are currently set via our developer contributions SPD) as they need to inform the evidence for Local Plan viability testing as required by the NPPF. This would also apply to other standards. However SPDs could provide further elaboration of policy in some instances should there be justification to do so.

**Option C: As per Option A but make clear that the role of the greenspace network would be to allocate green spaces of strategic significance on a district scale (i.e. significant sites and sites which are key to delivering and maintaining green linkages and corridors as per updated evidence) and that it would be for local communities, through local policy i.e. neighbourhood plans, to designate smaller areas of green space which are of particular importance at the community level.**

It would not be practical or manageable for the Local Plan to allocate every single green space in the district, however it is recognised that some spaces will be of significance to local communities so this supports mechanisms to consider such matters at the local scale.

**Option D: As per Option A and create separate policy for the Hatherton Branch canal restoration and seek to safeguard the canal route**

This would create a separate policy for the Hatherton Branch Canal. It would reflect updated policy wording in neighbouring local authority plans (given the cross boundary nature of the project) and would reflect the changed context since the Local Plan (Part 1) was adopted. The route for the canal would be safeguarded in line with neighbouring authorities, with any potential allocation needing further detailed evidence.

### **Questions on Social Inclusion and Healthy Living Policy Options**

**Question 12.** Which options or combinations of options do you support and why?

**Question 13.** Are there any other options we should be considering? What are these?

**Question 14.** How should we be seeking to develop local policy concerning air quality, and what evidence can we use to support this?



**Local Plan Policy Options**  
**Objective 3: Provide for Housing Choice**

Issues and Options for delivering Objective 3: Provide for Housing Choice

Overall Housing Growth

National policy

- 7.1 Local Plans must contain strategic policies that make sufficient provision for housing within the area (NPPF, para.20). Strategic policies should address the strategic priorities of the area, and any relevant cross boundary issues. Under the duty to cooperate, local authorities and other prescribed bodies must cooperate with each other on strategic matters that cross local authority boundaries (NPPF, para. 21 and 24).
- 7.2 National planning policy (NPPF, para. 60) sets out the starting point for local authorities in terms of identifying the local housing need. This is the 'local housing need assessment' figure which is calculated via a standard methodology (set out in detail in national guidance). The NPPF makes it clear that this is a minimum requirement and alternative approaches to calculating housing need should only be used in exceptional circumstances. It also states that any housing needs which can not be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for<sup>33</sup>.
- 7.3 Updated national guidance sets out that in relation to the evidence for housing needs, policy making authorities should work together to establish the housing market area, or geography which is the most appropriate for policies on housing need across local authority boundaries. This relates to the duty to cooperate requirements, as set out above.

Local policy

- 7.4 Local Plan (Part 1) Policy CP6 currently sets out the overall housing requirement for the District, but this needs to be updated to reflect the updated national policy context (particularly the standard methodology for calculating local housing needs). The Local Plan (Part 1) makes reference to the issue of a wider housing supply shortfall, arising primarily from Birmingham, and the need for this issue to be considered further, as appropriate. This reflects the fact that the evidence and discussions in relation to this issue were at an early stage in 2013/14.

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<sup>33</sup> The Government recently consulted upon an update to the standard methodology for calculating local housing needs (October-December 2018). The local housing need assessment for the District has been undertaken in line with this updated methodology.



**Local Plan Policy Options**  
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Consultation Feedback/Other Issues

- 7.5 In response to the Local Plan Review Issues and Scope consultation (2018) many respondents highlighted the need for the Council to consider the local housing needs arising from the new standard methodology. Responses highlighted that this should be considered a minimum figure, in line with national policy and that any needs in addition to this minimum should be informed by matters such as economic growth, affordable housing needs and unmet needs from neighbouring authorities. Many respondents stated that the Council should consider how it could help contribute to the housing shortfall within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) which would be in addition to local housing needs. One response suggested the GBBCHMA shortfall figure of 60,900 should be considered a minimum. One response suggested the adopted Birmingham Development Plan housing shortfall figure (of 37,900 dwellings) should be used and identified an option of circa 1,200 dwellings to be considered for Cannock Chase District's contribution to the housing market area shortfall (in addition to local housing needs).
- 7.6 In terms of key issues, the housing growth requirements will have to be set out within strategic policy in the Local Plan. The policy options to be considered need to take into account the updated local housing need assessment figure, as set out above under 'national policy and guidance', which will provide a housing need figure for the District only. This currently equates to **284 dwellings per annum**. This is based upon the amended standard methodology for calculating local housing need (see Appendix 1 for further details).
- 7.7 The policy options also need to take into account the fact that Cannock Chase District lies within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Under the duty to cooperate, the Council has been working with the other 13 local authorities in the GBBCHMA to address the strategic matter of housing supply across the market area. In February 2018, the Strategic Growth Study (GL Hearn/Wood) was published. This study provided an update on the overall housing needs across the housing market area and the shortfall in supply arising. It provided an analysis of the potential options for addressing this shortfall.
- 7.8 This study considered all evidence on housing need and supply as of 31st March 2017 and identified a cumulative total shortfall of around 60,900 dwellings across the HMA up to 2036. The study indicated that this shortfall largely arose from Birmingham and the Black Country authorities. A position statement (issued in September 2018) from the GBBCHMA authorities provided an update on housing supply which indicated some additional capacity may be available (circa 6,000 dwellings). However, a significant shortfall up to 2036 in particular still remains.



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- 7.9 In terms of options for addressing the housing supply shortfall, the Strategy Growth Study considered the following:
- Potential additional urban supply from increasing densities and/or identifying additional urban site opportunities;
  - Proportionate dispersal area options- this would involve smaller urban extensions (500-2,500 dwellings)
  - Strategic development area options including larger urban extensions (1,500-7,500 dwellings); employment-led strategic development (housing developments of 1,500-7,500 dwellings alongside employment developments); and new settlements (10,000+ dwellings).
- 7.10 The study identified that the potential additional urban supply would not be sufficient to address the shortfall. Therefore, consideration would need to be given to the other options, as outlined above. These options were considered across the GBBCHMA taking in Green Belt and non-Green Belt locations. The study applied a series of stages of analysis<sup>34</sup> to recommend a refined list of 11 options ('areas of search for strategic development') for local authorities to test through their Local Plans. It recommends that these should be considered in the first instance, alongside options for potential additional urban supply and proportionate dispersal, or smaller urban extensions (for the latter, 7 potential options for areas to accommodate such development were identified<sup>35</sup>).
- 7.11 For Cannock Chase District, the study identifies an area of 'proportionate dispersal' within which small urban extensions (500- 2,500 dwellings) could be considered. This is identified as being in 'the vicinity of Cannock, Great Wyrley, Burntwood, Brownhills and Aldridge'. As the study notes, further testing via Local Plans using more detailed evidence at the local level is required to determine if these options are feasible and appropriate e.g. local Green Belt assessment findings and local infrastructure assessments. The study does not identify any 'areas for strategic development' within Cannock Chase District (on the refined list of 11 options).
- 7.12 Despite the further testing required on its recommendations, the Strategic Growth Study offers a consistent independent assessment of the potential capacity of all fourteen authorities to accommodate the housing needs of the GBBCHMA. The Strategic Growth Study recommendations imply Cannock Chase District should consider accommodating a minimum of 500 dwellings to contribute to the GBBCHMA shortfall (minimum suggested capacity for the 'proportionate

<sup>34</sup> Taking into account for example a Green Belt assessment; strategic transport links; key development constraints such as environmental designations; overall sustainability; deliverability. Applied to an initial list of 25 options for 'areas of search for strategic development'.

<sup>35</sup> Identified as part of the wider search for areas for strategic development, taking into account key considerations such as a Green Belt assessment; public transport links; development constraints such as environmental designations. The 7 options for 'proportionate dispersal' are in addition to the 11 options for 'areas for strategic development'.



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dispersal' option). If other authorities in the GBBCHMA were to take the approach of seeking to accommodate the minimum capacity implied by the Strategic Growth Study 'areas for strategic development'<sup>36</sup> in their respective local areas, then the housing shortfall up to 2036 would be met. Existing information from the Birmingham Development Plan and the Black Country Core Strategy Review Issues and Options consultation indicates that the majority of this unmet need comes from Birmingham and the Black Country. Therefore, this contribution to unmet wider housing market area needs would be in addition to Cannock Chase District's own local housing need. The Council's suggested approach is consistent with the recent policy options that have been considered in the South Staffordshire Local Plan Review Issues and Options consultation (September- October 2018).

- 7.13 Whilst it is noted that the 'proportionate dispersal' option identified for Cannock Chase is potentially a cross boundary one with Walsall, South Staffordshire and Lichfield local authority areas (i.e. the area referred to includes Great Wyrley, Burntwood, Brownhills and Aldridge) it is assumed at this stage that these authorities will also be contributing to the housing shortfall by taking into account other options within their areas (e.g. South Staffordshire District Council is considering large urban extensions and smaller urban extensions). In addition, as one of the Black Country authorities from where the housing shortfall is arising, Walsall MBC will need to consider how it can meet its own needs as far as possible. It therefore seems reasonable at this stage for Cannock Chase District to consider the recommended area of proportionate dispersal on its own as basis for identifying the potential quantum of development for Cannock Chase District to help meet the housing shortfall (this is also aligned to the South Staffordshire District Council approach).
- 7.14 The policy options for overall housing growth will have to be further tested at the local level to determine the most appropriate figure. This will take into account matters such as deliverability, infrastructure considerations and overall sustainable development matters. As additional housing supply within Cannock Chase District could potentially require Green Belt release, any housing requirement set through the Local Plan will require thorough consideration of non-Green Belt options both within and outside Cannock Chase District before being finalised (see further detail under 'Strategy for meeting overall housing growth').
- 7.15 The policy options for overall housing growth have been put into context by reference to the extent of the uplift over and above the local housing need figure (284 dwellings per annum) and in relation to recent delivery rates in Cannock Chase. Whilst it is recognised that past delivery rates can be reflective of the

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<sup>36</sup> As per the refined list of 11 options of 'areas for strategic development', plus capacity from urban supply and the 7 options for 'proportionate dispersal'.



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planning polices that apply at the time, they also identify if current Local Plan targets are being met (providing an indication of market delivery) and they provide a useful ‘reality check’ when considering the implications of scales of development e.g. infrastructure implications. In the previous 12 years (going back to start of the current plan period at 2006) the average delivery rate has been **275 net dwellings per annum** with 2017/18 being the highest single year delivery rate (625 net dwellings- owing to a number of relatively larger development sites within the District being under construction at the same time). This contrasts with the lowest single year delivery rate of -6 dwellings in 2015/16 (owing to low gross completions and high number of demolitions from estate regeneration).

- 7.16 Based on the above information we think that the following policy options for housing growth need to be considered to help us deliver Objective 3: Provide for housing choice.

**OVERALL HOUSING GROWTH POLICY OPTIONS**

**Option A: Local Housing Need alone with no unmet need. Based upon current standard methodology the Districts’ local housing growth for the plan period of 2018-2036 would be 5,112 net dwellings (284 net dwellings per annum).**

This would represent 3% uplift above recent average delivery rates. It should be noted that the Council will need to assess this local housing need figure on an annual basis until the point at which the Local Plan is submitted for examination (when the local housing need figure is ‘fixed’ for two years- programmed to be 2020 for Cannock Chase District). The annual updates prior to this will be undertaken when new affordability ratios are published (in Spring) and when new population and household projections are released (in 2020).

**Option B: Local Housing Need figure plus unmet need of an additional 500 dwellings giving a total housing growth figure of 5,612 net dwellings for the District (2018-2036) or 312 net dwellings per annum.**

The additional 500 dwellings need is based upon the minimum capacity identified for the ‘proportionate dispersal’ option identified in the Strategic Growth Study. Cannock Chase District has one proportionate dispersal option to consider. It is an uplift of 10% over local housing needs. This annual housing growth rate represents an uplift of 13% above recent average delivery rates. See Option A commentary on local housing needs.

**Option C: Local Housing Need figure plus unmet need of an additional 1,500 dwellings giving a total housing growth figure of 6,612 net dwellings for the District (2018-2036) or 367 net dwellings per annum.**

The additional 1,500 dwellings need is based upon the median capacity identified for the ‘proportionate dispersal’ option identified in the Strategic Growth Study. Cannock Chase District has one proportionate dispersal option to consider. It is an uplift of 30% over local housing needs. This annual housing growth rate represents an uplift of 34% above recent average delivery rates. See Option A commentary on local housing needs. This option also covers the range of an option identified in response to the Issues and Scope consultation which suggested an additional 1,137 dwellings for unmet need (based upon an alternative apportionment approach).



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### Objective 3: Provide for Housing Choice

**Option D: Local Housing Need figure plus unmet need of an additional 2,500 dwellings giving a total housing growth figure of 7,612 net dwellings for the District (2018-2036) or 423 net dwellings per annum.**

The additional 2,500 dwellings need is based upon the maximum capacity identified for the 'proportionate dispersal' option identified in the Strategic Growth Study. Cannock Chase District has one proportionate dispersal option to consider. It is an uplift of 50% over local housing needs. This annual housing growth rate represents an uplift of 54% above recent average delivery rates. See Option A commentary on local housing needs.

#### **Questions on Overall Housing Growth Policy Options:**

**Question 15.** Which option do you support and why?

**Question 16.** Are there any further options to be considered? Please provide supporting evidence for any alternative options suggested.

#### Strategy for meeting overall housing growth

##### National Policy

- 7.17 Local Plans must contain strategic policies that make sufficient provision for housing within the area and set out an overall strategy for development (NPPF, para.20). Strategic policies should address the strategic priorities of the area, and any relevant cross boundary issues. Under the duty to cooperate, local authorities and other prescribed bodies must cooperate with each other on strategic matters that cross local authority boundaries (NPPF, para. 21 and 24).
- 7.18 National policy overall sets out a framework for sustainable development, which local plans must ensure is delivered (NPPF, Chapter 2). The three key objectives of sustainable development overall (economic, social and environmental objectives) must therefore underpin any strategy for development within the District. This includes considering matters such as appropriate levels of infrastructure provision to support future growth and the protection and enhancement of built and natural environmental assets.
- 7.19 Planning policies should identify a sufficient supply and mix of housing sites to deliver the levels of housing growth identified (NPPF, para.67). It needs to be shown that these sites have a realistic prospect of being developed when required (national guidance offers further detail on how to assess this). Updated national policy sets out the contribution that small and medium sized sites can make in terms of delivering housing more quickly; local planning authorities should identify a good mix of sites to meet their growth requirements (NPPF, para. 68). National policy also states that a supply of large numbers of new homes can often be best achieved by large scale developments, such as new settlements or large urban extensions. However, the importance of ensuring appropriate infrastructure and facilities provision is set out (NPPF, para. 72).





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- 7.20 Updated national policy emphasises the need for planning policies to promote an effective use of land. This includes making as much use as possible of brownfield land opportunities. An effective use of land can be promoted by achieving higher densities (particularly in areas where there is a shortage of land for meeting housing needs); promoting the development of under-utilised land and buildings such as spaces above shops; considering the reallocation of land uses e.g. employment to housing (NPPF, Chapter 11).
- 7.21 This relates to the updated national policy approach for Green Belt land. Before concluding that Green Belt boundary changes are justified (by exceptional circumstances) local authorities must demonstrate they have examined all other reasonable options for delivering development. This includes making as much use of brownfield and under-utilised land; considered increased densities of developments; and undertaken discussions with neighbouring authorities on whether or not they could accommodate additional development (NPPF, para. 137). Where Green Belt land release is justified, first priority should be given to brownfield sites and/or those that are well-served by public transport. Measures to off set the impact of the Green Belt release such as improvements to the environment and accessibility of the remaining Green Belt should also be considered (NPPF, para. 138).
- 7.22 Given the District context, national policy in relation to Areas of Outstanding Natural Beauty (AONBs) is also relevant to considering the development strategy. National policy gives great weight to the conservation and enhancement of AONBs. It states that the scale and extent of development within these designated areas should be limited; major development should not be allowed unless there are exceptional circumstances and where development is in the public interest (NPPF, para. 172). The scope for meeting development needs elsewhere i.e. outside of the AONB needs to be fully assessed (NPPF, para.172).

Local Policy

- 7.23 Local Plan (Part 1) Policy CP1 and CP6 set out the overall strategy for meeting housing growth requirements within the District. The current strategy focuses development, investment and regeneration mainly on the built up, urban areas, conserving and enhancing the landscape of the AONB, Hednesford Hills, Green Belt and the Green Infrastructure of the District. Housing growth is directed towards the main existing urban areas (Cannock/Hednesford/Heath Hayes, Rugeley/Brereton and Norton Canes) in a proportionate manner relative to their existing sizes, with urban extensions to each main urban area (including the Strategic Housing Site allocated for up to 750 homes (with potential capacity for 900 homes) at Land West of Pye Green Road, urban extensions for up to 670 homes south of Norton Canes, and 500 dwellings adjacent to Rugeley/Brereton within Lichfield District at the former power station site). Land east of Wimblebury Road is safeguarded land, which should be reviewed via a Local Plan review



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alongside the need for any Green Belt boundary amendments elsewhere in the District. Development within the identified villages is limited to infill sites only.

- 7.24 The Rugeley Power Station SPD provides detailed guidance on the development of this large site.

Consultation feedback/other issues

- 7.25 A number of site specific representations were received, with respective landowners/developers promoting individual sites and some parties raising concerns with specific sites. A number of responses suggested that the current strategy and approach of retaining Green Belt boundaries needs to be reviewed, particularly in light of the GBBCHMA housing shortfall issues. Extensions to existing urban areas were promoted as a suitable option to consider. A number of responses also supported the current strategy of retaining Green Belt boundaries and AONB protection, suggesting these designated areas shouldn't be considered for future development. The Districts environmental constraints (in terms of landscape and ecological designations) were widely recognised and the need for the strategy to continue to reflect these was highlighted. Some statutory consultees highlighted the need for key issues to be considered in the selection of housing sites, including highways matters and the protection of natural assets.
- 7.26 There was some support for retaining the current settlement hierarchy approach. Some responses supported the Cannock/Heath Hayes area being the principal focus for development going forward. Other responses suggested Rugeley/Brereton, Hednesford and some areas at Norton Canes should accommodate future development. Equally, some responses expressed concern about further developments around the respective urban areas of the District. Some responses expressed concern about developments close to the District boundary not being counted towards Cannock Chase Districts' housing requirements. Responses highlighted the need to have regard to where residents are accessing employment opportunities and where employment growth is forecast, taking account of existing and future transport networks. It was outlined that infrastructure capacity considerations should inform the preferred strategy e.g. education and transport capacity. A number of responses recognised the opportunity for redevelopment of the former Rugeley Power Station site and that it could contribute to housing needs. However some responses suggested a cautious approach was needed in terms of estimating how much this site could contribute to housing needs, taking into account the complexity of redeveloping it. Whilst the majority of relevant responses supported the principle of using brownfield land, some responses highlighted issues to consider in redeveloping brownfield sites e.g. viability. One response highlighted rural community issues in terms of allowing development adjacent to settlement boundaries. One response highlighted the issue of the proximity of livestock and residential dwellings.



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- 7.27 In terms of key issues, clearly the current Local Plan (Part 1) policies will need to be updated to reflect the overall levels of housing growth in the District for the plan period and the most appropriate strategy for delivering that growth. The Council needs to consider how the local context influences the choice of policy options for delivering housing growth. Given that all land outside of our existing urban areas is Green Belt (approximately 60% of the District overall) with a significant proportion of this also being designated as an Area of Outstanding Natural Beauty, the sequential approach set out in national policy for considering the release of Green Belt land needs to be considered i.e. other options have been exhausted. A similar approach is required in relation to any development sites within the AONB. The national policy requirements to maximise the use of under-used and particularly brownfield land influences the approach to be taken.
- 7.28 The Council undertakes its annual assessment of housing land availability (Strategic Housing Land Availability Assessment- SHLAA) to identify the amount of dwellings expected to be developed to meet local plan housing requirements.
- 7.29 The most recent assessment (August 2018) currently identifies capacity for a minimum of 3,200 dwellings (deliverable and developable) for the current plan period (up to 2028) which is primarily made up of the following:

AREA	0-5 YEAR DELIVERABLE SITES (NO OF DWELLINGS) (MAJOR AND MINOR SITES COMBINED)	6-15 YEAR DEVELOPABLE SITES (UP TO 2028) (NO OF DWELLINGS) (MAJOR AND MINOR SITES COMBINED)
Cannock, Hednesford and Heath Hayes	1,006	1,112
Rugeley and Brereton	148	242
Norton Canes	194	473
<b>TOTALS</b>	<b>1,348</b>	<b>1,827</b>

- 7.30 It is distributed across the main urban areas in the following proportions (includes a small proportion of limited infill developments in some of the Districts' villages):

AREA	PROPORTION OF DWELLINGS (AND DWELLING NO.)
Cannock, Hednesford and Heath Hayes	67% (2,100)
Rugeley and Brereton	12% (400)
Norton Canes	21% (700)



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- 7.31 This demonstrates that there is existing capacity from Brownfield and Greenfield sites focused around the District's urban areas (with approximately 75% of the supply identified being permissioned/under construction). This existing capacity can form the basis of the strategy for meeting housing needs. The assessment (SHLAA) also identifies the potential for further urban housing sites in the longer term, which could be explored further.
- 7.32 Taking into account this existing supply the Council needs to identify land for an **additional circa 1,900-4,400 dwellings** (dependent upon the final overall housing growth figure). The assessment (SHLAA) identifies that there are a number of options for additional housing land, including potential additional urban sites. However, a large proportion of the potential site options currently lie within the Green Belt (and some within the AONB too).
- 7.33 As set out above, the national policy approach requires the Council to consider a sequential approach to the release of Green Belt land for development. To justify Green Belt release the Council must demonstrate that the local plan:
- makes as much use as possible of suitable brownfield sites and underutilised land;
  - optimises the density of development, with significant uplift to be considered in town centres and other locations well served by public transport;
  - has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.
- 7.34 As a result, the Council will need to explore any opportunities for non-Green Belt site options both within the District and outside the District (in neighbouring authorities) before being able to justify the release of Green Belt sites within Cannock Chase District.
- 7.35 However, it is recognised that Cannock Chase District and the wider GBBCHMA housing needs should ideally be met as close to the source of those needs as possible. In reality the neighbouring Black Country authorities are already struggling to meet own needs from urban site capacity, and they are also Green Belt constrained. Other neighbours (South Staffordshire, Lichfield) whilst potentially having capacity (as set out in Strategic Growth Study) have also set out in their recent Local Plan Review consultations that they are considering Green Belt options given the characteristics of their Districts and the Strategic Growth Study 'areas of search' identified (however, this is subject to those authorities also confirming there is no non-Green Belt site capacity within their respective Districts and neighbouring authorities). Stafford Borough is not identified as part of the GBBCHMA and a significant part of the Borough which adjoins Cannock Chase District is also designated Green Belt. Therefore, whilst



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the need for any Green Belt land release within the District would need to be clearly justified and confirmed via further discussions with the District's neighbouring authorities, this wider current context is recognised.

- 7.36 In terms of maximising existing urban capacity, as set above there is an existing supply of sites available to meet needs of around 3,200 dwellings. In addition to this the Council is undertaking work to assess additional capacity which could be generated by increasing densities and identifying additional non-Green Belt sites.
- 7.37 In relation to density increases the Strategic Growth Study identified that requiring a minimum density of 30-40 dwellings per hectare could generate a maximum additional 20% dwellings on top of the existing supply within Cannock Chase District (from sites without planning permission at the time). This equated to a maximum of 200 dwellings from a supply of 1,000 dwellings. Given that 75% of the 3,200 dwellings identified within the urban supply already have planning consent/are under construction there is limited scope for increasing densities from the existing supply. Assuming a similar 20% uplift on the 800 dwellings with no consent would not meet the minimum needs of 1,900 additional dwellings alone (gives an additional 160 dwellings). However, the impact of increasing densities on future sites identified can be taken into account. Higher densities on new urban sites identified could yield further dwellings e.g. town centre sites in particular. The appropriateness of increased densities needs to be considered with regard to overall sustainable development considerations e.g. meeting range of housing needs identified within the District (such as different dwelling sizes) and open space provision.
- 7.38 In relation to additional non-Green Belt sites, given the District context the source of these would have to primarily come from the reallocation of existing land uses e.g. redeveloping employment sites or open spaces for housing. However, the implications of reallocating land uses in wider sustainable development terms need to be borne in mind e.g. loss of employment sites or open spaces. Any opportunities for the redevelopment of existing housing areas to provide higher density housing could also be assessed. Permitted development right extensions could provide encouragement to further supply from changes of use of retail and office premises; however monitoring indicates it is unlikely to offer a substantial increase in housing (particularly given that there have already been several of the larger potential sites developed in recent years e.g. office blocks in Cannock town centre). As part of the recent Strategic Growth Study, no further significant site opportunities for brownfield land supply were identified at that time. However, further local evidence which is now underway in relation to the assessment of existing employment areas and open spaces will help inform this understanding of any newly arising capacity.
- 7.39 There are already a number of existing employment sites (such as Gestamp, Cannock) which have been suggested for redevelopment for housing that are accounted for within the 3,200 dwelling urban supply. The Council's land availability assessments (for housing- SHLAA, employment-ELAA and the Brownfield Register) are considered to be as comprehensive as possible in terms of identifying potential sites for development. No additional methods for identifying further sites were suggested to the Council in response to the Local



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Plan Issues and Scope consultation and a small number of additional urban and brownfields sites were suggested for consideration. However, the Council is undertaking an 'urban capacity study' in order to bring the various pieces of existing evidence on urban capacity together for a comprehensive picture and to reflect any new evidence on additional sites, in line with the updated national planning policy context. This can take into account any relevant findings from other parts of the evidence base, including an assessment of the District's existing employment areas (to consider if any of these should be protected for employment use or if they could be redeveloped for other uses) and an open space assessment.

- 7.40 The former Rugeley Power Station is a large brownfield site, outside of the Green Belt. It offers a key opportunity for helping to meet the future development needs of the District on non-Green Belt land. The landowners of the site (Rugeley Power Ltd) outline that a housing-led scheme should be promoted. Whilst no firm dwelling numbers were suggested in response to the Local Plan Issues and Scope consultation, it has been suggested in recent announcements by the landowners that around 2,000 dwellings could be provided (total across the whole site which also crosses over into Lichfield District). The results of a recent 'community planning event' in December 2018 gave an indicative masterplan which suggested a mix of high-medium density housing, employment and live/work units, a primary school, sports pitches and retained battery storage facility on the part of the site within Cannock Chase District (but with no figures on quantity of development). Lichfield District Council has assumed that the part of the site within their District could provide around 800 dwellings up to 2029. Based on Cannock Chase Council's methodology for assessing site capacities, it is assumed for the purpose of the policy options at this stage that a housing-led development of the former Rugeley Power Station could generate a minimum of 800 dwellings (on the part of the site that lies within Cannock Chase District)<sup>37</sup>. This capacity could be increased with higher density developments such as apartments<sup>38</sup>, but the capacity will also depend on other land uses for the site e.g. employment.
- 7.41 The Rugeley Power Station Supplementary Planning Document (SPD) adopted 2018 sets out an indicative vision for the redevelopment of the site, produced jointly with Lichfield District Council. This currently identifies the part of the site within Cannock Chase District as appropriate for employment-led redevelopment. This is therefore also reflected within the policy options (and reflects consultation comments received regarding the future use of the site, as outlined above). An employment/mixed use led redevelopment of the site would still be likely to generate housing supply within the District; however it would obviously be at a lesser scale than a housing-led scheme on the site.

<sup>37</sup> Site area of approx.36 hectares (brownfield part of site which excludes the golf course/flood plain area). Assume 60% net developable area (as per CCDC SHLAA methodology, and consistent with Lichfield District assumption) which gives net site area of approx.22 hectares. Assume 35 dwellings per hectare, based on Strategic Growth Study recommendations for minimum densities in housing market area and CCDC/LDC SHLAA assumptions. Gives total site capacity of approximately 800 dwellings.

<sup>38</sup> As an example, based on current indicative density for town centre developments within the District of 50 dwellings per hectare, the site could deliver 1,100 dwellings.



## Local Plan Policy Options

### Objective 3: Provide for Housing Choice

- 7.42 **These options for additional urban capacity including the former Rugeley Power Station will be fully explored before any consideration of Green Belt sites for meeting housing needs (alongside discussions with neighbouring authorities for meeting needs on non-Green Belt sites). If there is a need for further land to deliver sustainable housing growth within the District then the development options for urban capacity and Rugeley Power Station will need to be considered in combination with options for the development of Green Belt sites.**
- 7.43 The policy options for Green Belt sites reflect the nature of site submissions received to date and consultation comments to the Local Plan Issues and Scope. Given the nature of the District, Green Belt options are limited to urban extensions i.e. there is no physical capacity for new settlements. Again, given the physical context of the District these sites are likely to be relatively smaller urban extensions (as also identified in the Strategic Growth Study under the 'proportionate dispersal' model, which suggested smaller urban extensions of 500-2,500 dwellings). As part of the 'long list' of 'areas of search for strategic development' recommended by the Strategic Growth Study, an area for a large urban extension (1,500-7,500 dwellings) was identified, known as 'North of Walsall, around Brownhills'. Such a scale of development would need to be considered on a cross-boundary basis with the relevant local authorities rather than just by Cannock Chase District alone. There is also a degree of overlap with the option of 'proportionate dispersal' in terms of the geographical area covered.
- 7.44 The strategy for future development in relation to Green Belt urban extensions could seek to focus on areas to the north of the District at Rugeley/Brereton. This could assist in reducing pressures upon infrastructure issues identified to the south of District, including the A5/A460/M6 Toll (Churchbridge) and Five Ways (Heath Hayes/Norton Canes) junctions, as well as air quality issues (there are 3 AQMAs in the District which are all located in the Cannock/Hednesford/Heath Hayes area). It could help to support the regeneration of Rugeley Town Centre by providing additional customers and investors to the town. As the second largest settlement area in the District, there are an existing range of facilities and services for future residents to access e.g. rail services, leisure centre, schools. However, there are also infrastructure capacity issues to consider in this area, such as school capacity and traffic e.g. that associated with the employment areas at Towers Business Park. It is recognised that the urban edge of Rugeley/Brereton largely directly abuts the AONB boundary (with some suggested site options for development lying within the AONB). In addition, if housing-led redevelopment of the former Rugeley Power Station is pursued in combination with this option it would mean the area of Rugeley/Brereton potentially accommodating a substantial proportion of the overall housing needs of the District.
- 7.45 The strategy for future development in relation to Green Belt urban extensions could seek to focus on areas to the south of the District at Cannock/Hednesford/Heath Hayes and Norton Canes. This is where the vast majority of potential housing supply from Green Belt sites has been promoted to date by landowners and developers so there is a wider range of sites to consider. As the largest urban area, Cannock/Hednesford/Heath Hayes provides the



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largest range of facilities and services available for future residents to access e.g. two town centres at Cannock and Hednesford, a number of local centres offering further shopping and services provision e.g. Heath Hayes, rail services, leisure centre, schools. Norton Canes has a range of facilities such as smaller scale shopping provision in the local centre, schools and a library; access to larger facilities (such as indoor leisure and larger shopping outlets) is mainly provided for in other nearby settlements (such as Cannock and Burntwood). However, the key issues identified above in relation to infrastructure and environmental issues would need to be considered (particularly those related to education and transport, as highlighted by statutory consultees previously). A substantial part of the urban area at Cannock/Hednesford lies adjacent to the AONB (with some suggested site options for development lying within the AONB) and there are a number of nationally and internationally protected ecological sites in the vicinity (e.g. Hednesford Hills, Bleak House, and Cannock Extension Canal).

- 7.46 The strategy for future development in relation to Green Belt urban extensions could consider all site options suggested to date across the District. This would include suggested sites which lie adjacent to the existing village boundaries e.g. at Cannock Wood and Slitting Mill. In relation to these options, it would need to be considered how sustainable such development could be, given the relatively limited services and facilities currently available at those villages and the fact that the majority of the site options at the village locations also lie within the AONB.
- 7.47 In relation to all of the policy options for development, the Council will need to demonstrate that the housing sites identified are realistic prospects for future development i.e. they will require more detailed assessment covering a range of issues including landownership and landowner intentions; viability of the development; any key constraints such as physical problems, environmental designations and impacts of the developments. The site selection methodology provides further detail on how sites will be assessed and this process will help inform the preferred spatial strategy.
- 7.48 In terms of safeguarded land and 'reserve sites' issues, these are discussed further under 'Other Policy Considerations' paragraph 13.14 – 13.19.
- 7.49 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 3: Provide housing choice in terms of how housing growth is distributed.

**STRATEGY FOR MEETING OVERALL HOUSING GROWTH POLICY OPTIONS**

**Option A: Urban Areas- use sites already identified for housing within the urban areas and explore opportunities for further housing on urban sites.**

There is currently a minimum of around 3,200 dwellings identified on brownfield and greenfield housing sites within the urban areas (including large sites to be developed at Land West of Pye Green Road and Norton Hall Lane/Butts Lane) distributed broadly as follows:





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AREA	PROPORTION OF DWELLINGS (AND DWELLING NO.)
Cannock, Hednesford and Heath Hayes	67% (2,100)
Rugeley and Brereton	12% (400)
Norton Canes	21% (700)

This means additional land would need to be identified to deliver a minimum of 1,900 dwellings (depending on the overall levels of housing growth). To identify further land for housing this option would include considering higher densities on new sites (i.e. those that do not already have planning permission) and identifying additional urban sites from sources such as employment land, open spaces, redeveloped housing areas. This could involve reassessing sites that are not considered appropriate for development at present and seeking to identify additional sites that are not currently being considered for housing development. This option would also allow for infill developments within the village settlement boundaries, as per the current policy approach but would not extend the village boundaries with any new development. It is unlikely that this option would meet the minimum additional levels of housing growth of 1,900 dwellings alone but it can be considered alongside other options.

**Option B: Rugeley Power Station**

**Option B1: Urban Areas and housing-led redevelopment of former Rugeley Power Station**

This combines Option A with the housing-led redevelopment of the former Rugeley Power Station. The part of the site within Cannock Chase District could potentially generate a minimum of 800 dwellings. This option may not provide for the additional levels of housing growth alone (minimum of 1,900 dwellings) but can be considered alongside other options, if necessary.

**Option B2: Urban Areas and employment-led/mixed use redevelopment of former Rugeley Power Station**

This combines Option A with an employment-led/mixed use redevelopment of the former Rugeley Power Station. The site would therefore generate less housing supply than Option B1. This option may not provide for the additional levels of housing growth alone (minimum of 1,900 dwellings) but can be considered alongside other options, if necessary.

**Option C: Green Belt Urban Extensions**

**Option C1: In combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extensions at Rugeley/Brereton urban edges**

This would include consideration of Green Belt urban extensions at Rugeley/Brereton, focusing additional housing growth towards that urban area. There are relatively fewer site options with less housing capacity to consider in order to meet the additional levels of housing growth (minimum of 1,900 dwellings) compared to the Cannock/Hednesford/Heath Hayes and Norton Canes areas. This does not allow for the testing of the Strategic Growth Study options which suggested exploring urban extensions in the southern part of the District. However, it reflects alternative site options which have been suggested to the Council. Site options within the District are focused around the southern and eastern edges of the urban area. This could also allow for testing of cross boundary/edge of settlement options with other local authorities. In line with the NPPF, first consideration to be given to *'land which has been previously-developed and/or is well-served by public transport'*. Consideration would also need to be given to ways in which the *'impact of removing land from the Green Belt can be offset through*



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*compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.* This option would also allow for infill developments within the village settlement boundaries, as per the current policy approach but would not extend the village boundaries with any new development.

**Option C2: In combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extensions at Cannock/Hednesford/Heath Hayes and Norton Canes urban edges**




This would include consideration of Green Belt urban extensions at Cannock/Hednesford/Heath Hayes and Norton Canes, focusing additional housing growth towards those urban areas. There is relatively a greater number of site options with greater housing capacity to consider in order to meet the additional levels of housing growth (minimum of 1,900 dwellings) compared to the Rugeley/Brereton urban area. This allows for the testing of the Strategic Growth Study options which suggested exploring urban extensions in the southern part of the District. This includes the 'proportionate dispersal' option and the 'urban extension' option for an area North of Walsall, around Brownhills. Site options within the District are focused around the southern and eastern urban edges of Cannock/Hednesford/Heath Hayes and the western and south-east edges of Norton Canes. This could also allow for testing of cross boundary/edge of settlement options with other local authorities (Lichfield, South Staffordshire and Walsall). In line with the NPPF, first consideration to be given to '*land which has been previously-developed and/or is well-served by public transport*'. Consideration would also need to be given to 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.*' This option would also allow for infill developments within the village settlement boundaries, as per the current policy approach but would not extend the village boundaries with any new development.

**Option C3: In combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extensions distributed across the District**


This would include testing all of the suggested urban extension site options across the District. This option could also consider the appropriateness of extending the current settlement boundaries of the Districts' villages (Cannock Wood, Hazelslade, Prospect Village and Slitting Mill) where sites beyond the current boundaries have been suggested. In line with the NPPF, first consideration to be given to '*land which has been previously-developed and/or is well-served by public transport*'. Consideration would also need to be given to 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.*'

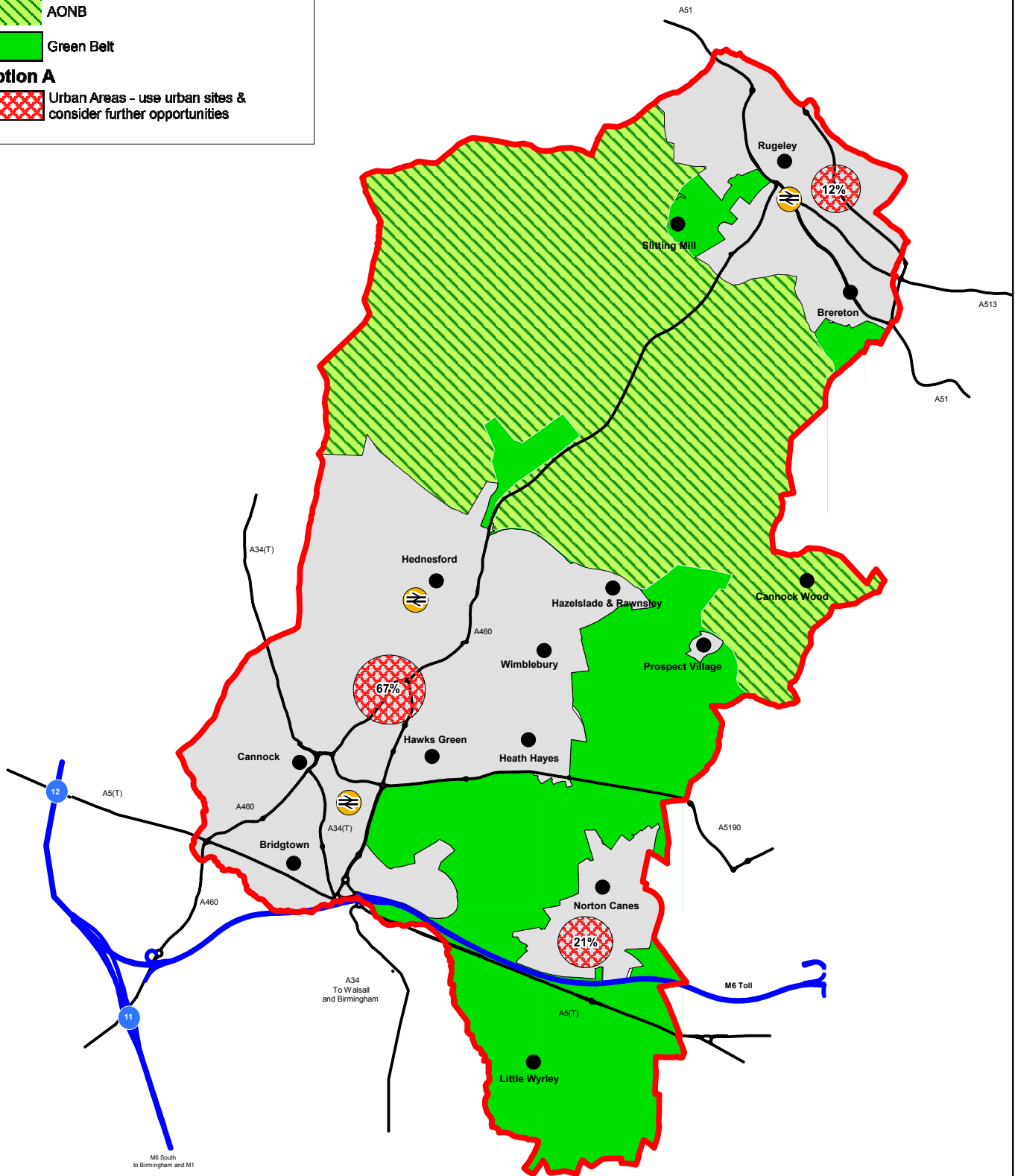


**Key**

-  Urban Areas
-  AONB
-  Green Belt

**Option A**

-  Urban Areas - use urban sites & consider further opportunities





**Key**

- Urban Areas
- AONB
- Green Belt

**Option A**

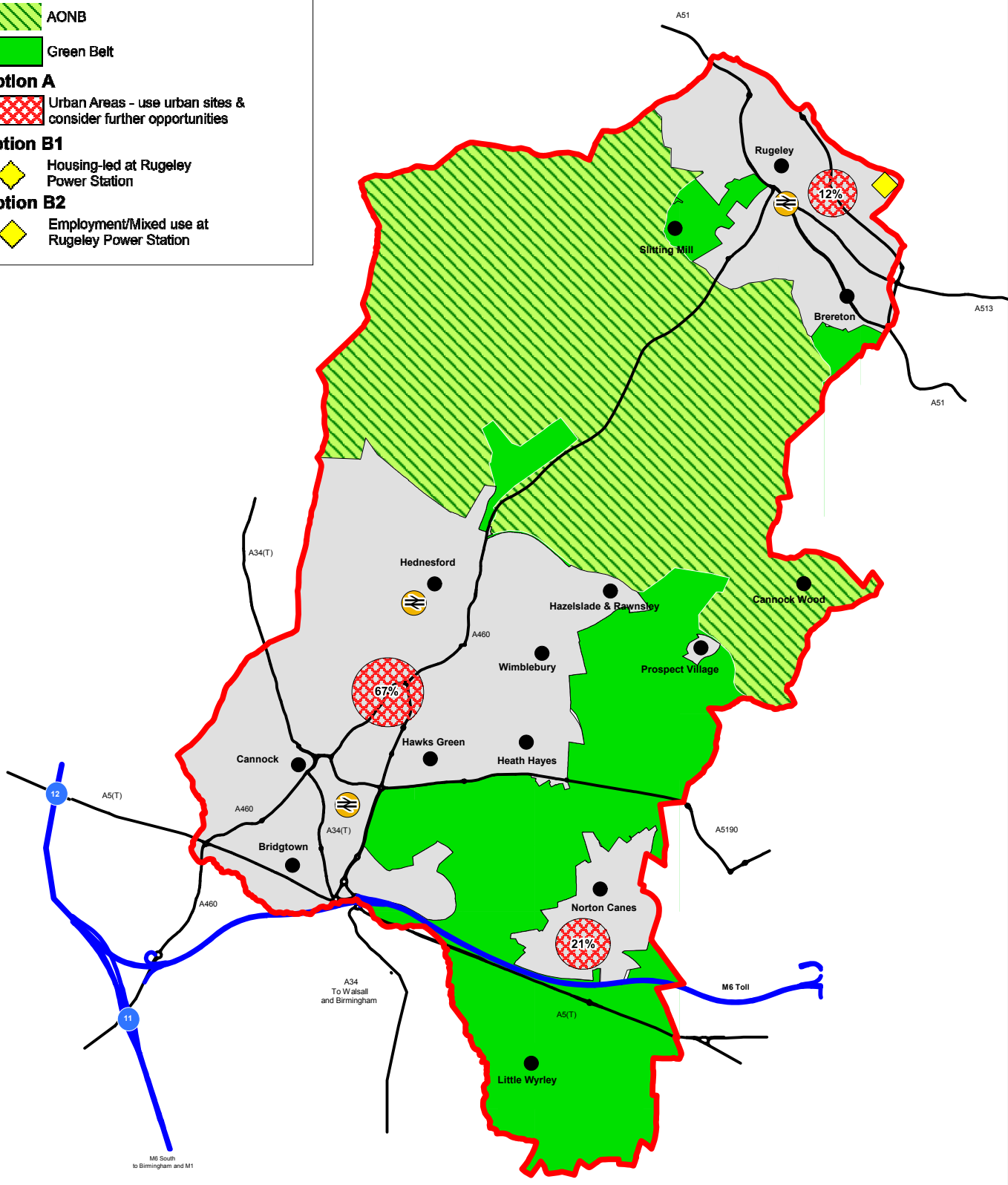
- Urban Areas - use urban sites & consider further opportunities

**Option B1**

- Housing-led at Rugeley Power Station




**Option B2**

- Employment/Mixed use at Rugeley Power Station







**Key**

-  Urban Areas
-  AONB
-  Green Belt


**Option A**

-  Urban Areas - use urban sites & consider further opportunities


**Option B1**

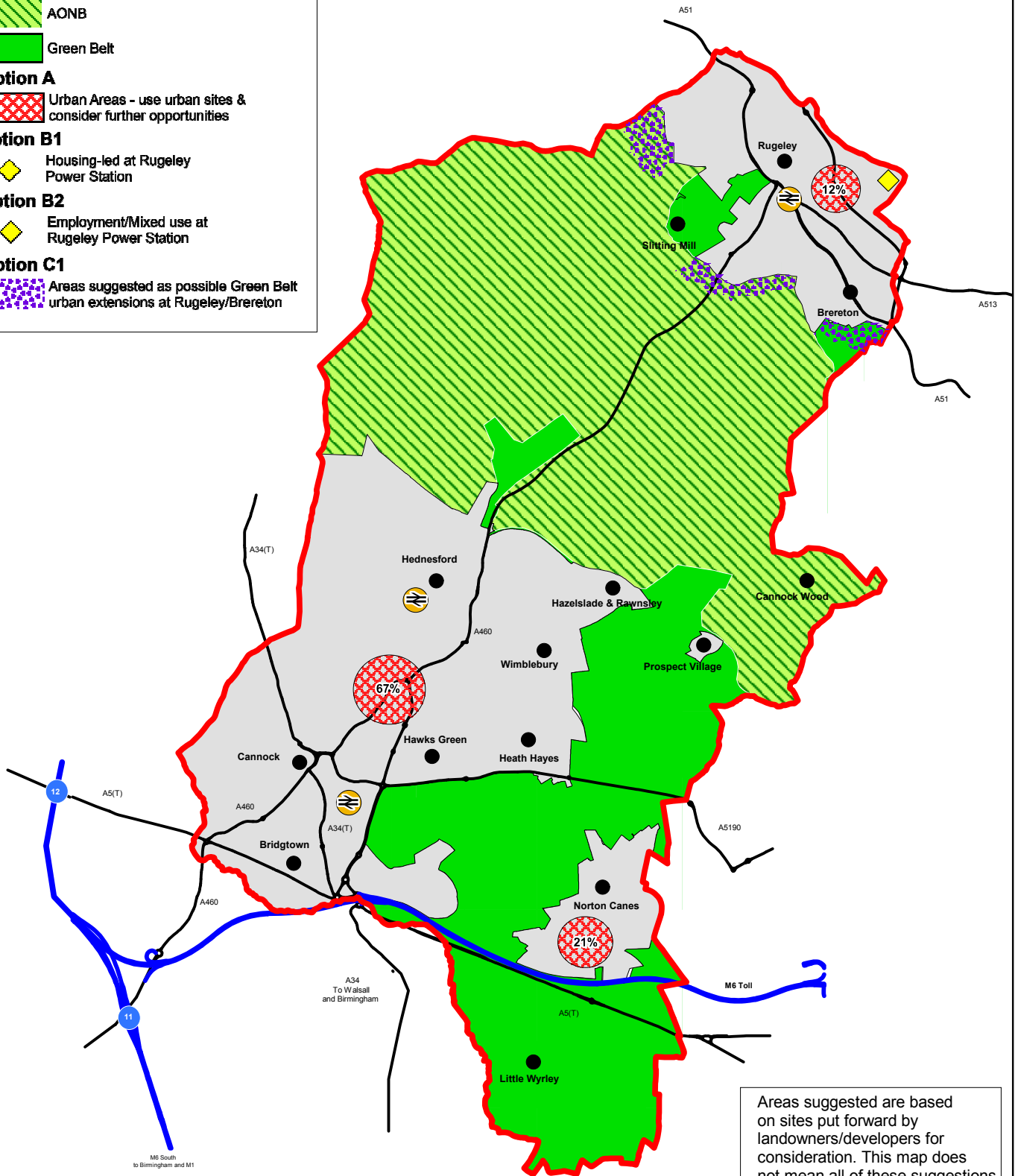
-  Housing-led at Rugeley Power Station

**Option B2**

-  Employment/Mixed use at Rugeley Power Station

**Option C1**




-  Areas suggested as possible Green Belt urban extensions at Rugeley/Brereton




Areas suggested are based on sites put forward by landowners/developers for consideration. This map does not mean all of these suggestions will be selected for development; these are only options we need to consider at this stage.




**Key**

-  Urban Areas
-  AONB
-  Green Belt


**Option A**

-  Urban Areas - use urban sites & consider further opportunities


**Option B1**

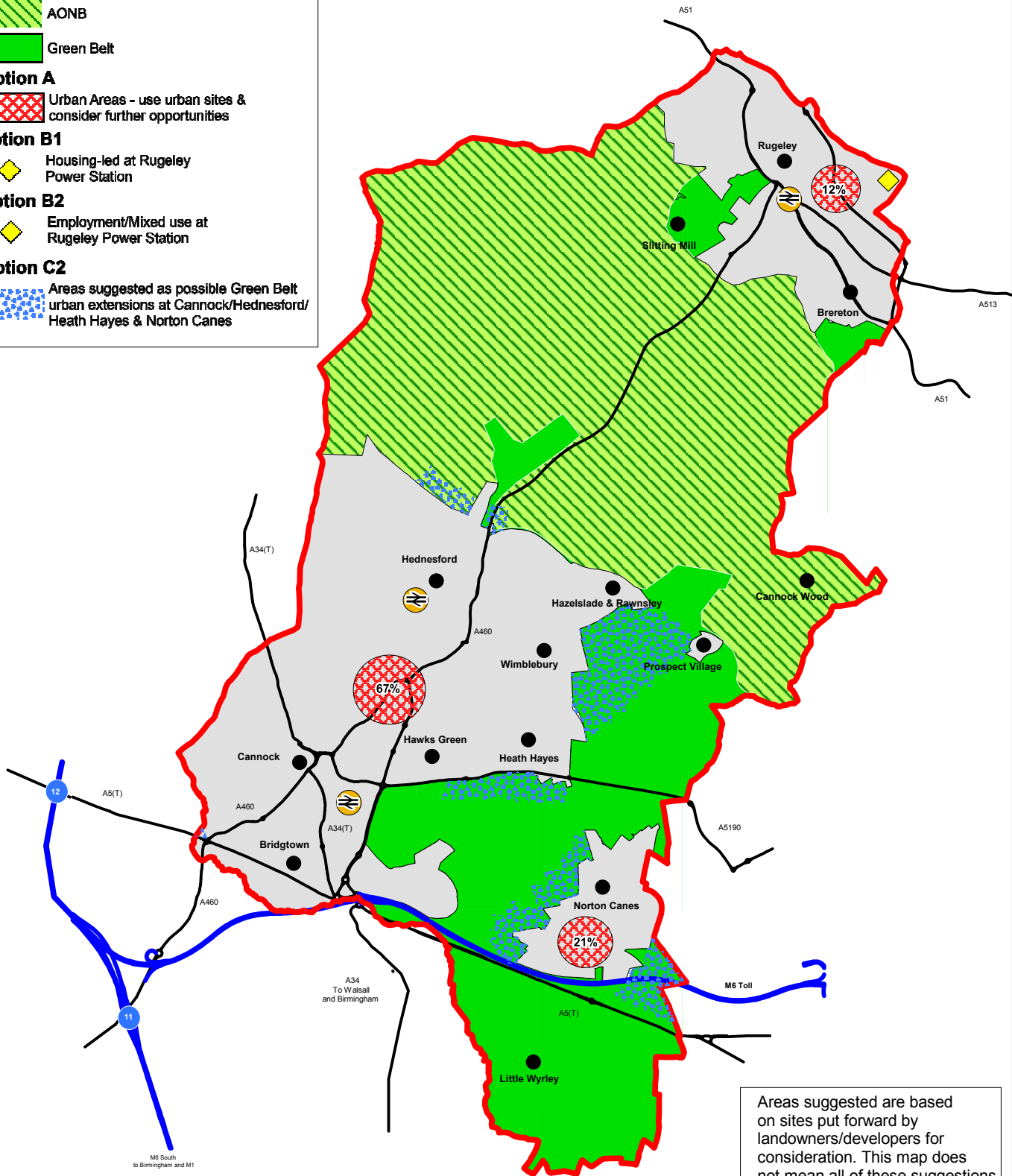
-  Housing-led at Rugeley Power Station

**Option B2**

-  Employment/Mixed use at Rugeley Power Station

**Option C2**

-  Areas suggested as possible Green Belt urban extensions at Cannock/Hednesford/Heath Hayes & Norton Canes



Areas suggested are based on sites put forward by landowners/developers for consideration. This map does not mean all of these suggestions will be selected for development; these are only options we need to consider at this stage.



**Key**

- Urban Areas
- AONB
- Green Belt

**Option A**

- Urban Areas - use urban sites & consider further opportunities

**Option B1**

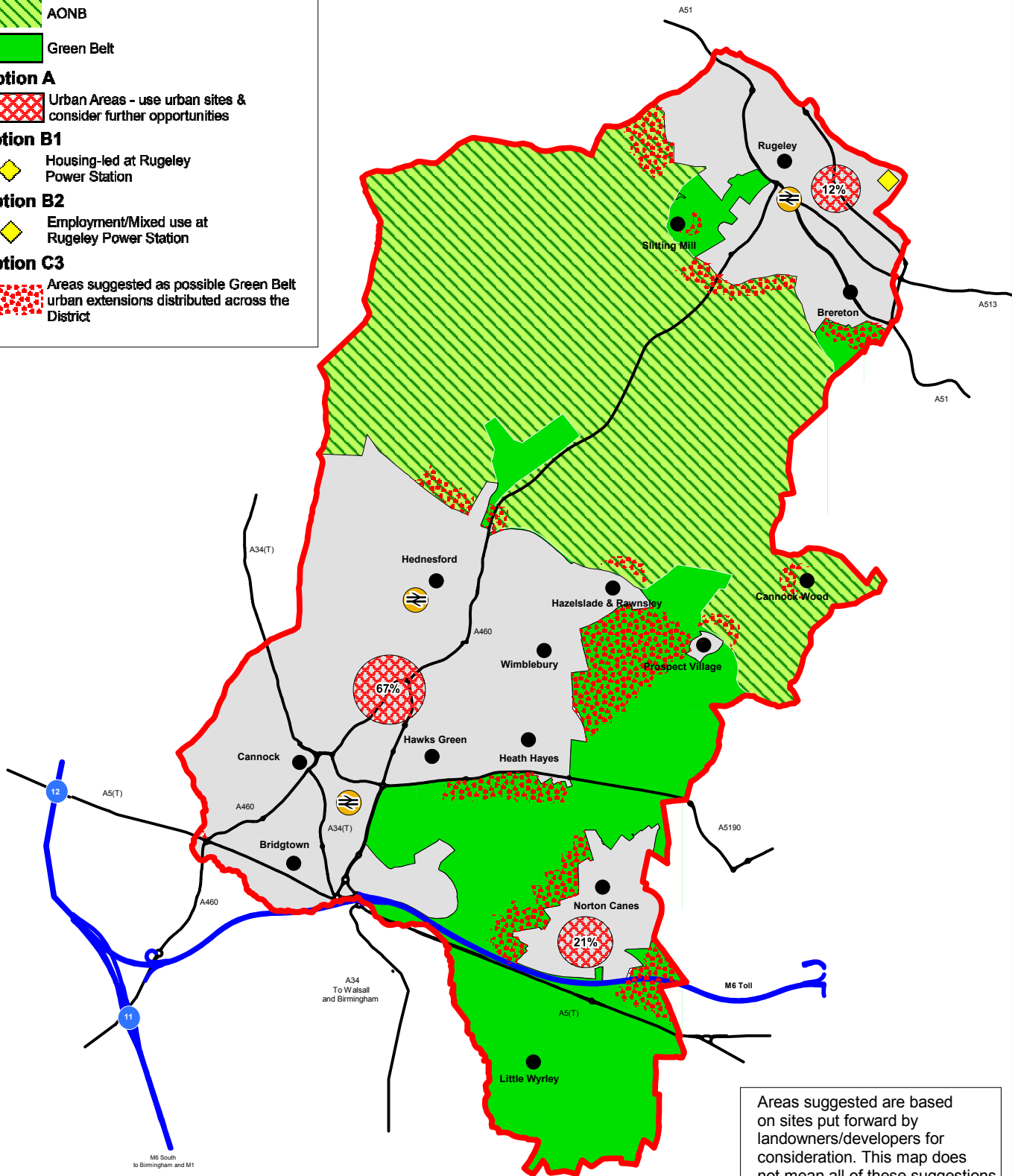
- Housing-led at Rugeley Power Station

**Option B2**

- Employment/Mixed use at Rugeley Power Station

**Option C3**

- Areas suggested as possible Green Belt urban extensions distributed across the District



Areas suggested are based on sites put forward by landowners/developers for consideration. This map does not mean all of these suggestions will be selected for development; these are only options we need to consider at this stage.



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**Questions on Strategy for Meeting Overall Housing Growth Policy Options:**

**Question 17.** Which combination of options do you support and why? Should any further options be considered?

**Question 18.** Are the current settlement boundaries for the District's villages appropriate? If not, how should they be amended and why?

Affordable Housing percentage requirements

National Policy

- 7.50 National policy sets out the requirement for planning policies to identify the level, size, type and tenure of homes required to meet the needs of those requiring affordable housing. Affordable housing contributions should only be sought on major developments i.e. sites of 10 or more dwellings, or with a site area of 0.5 hectares or more. In designated rural areas (including AONBs) consideration can be given to lowering the threshold to 5 dwellings. Provision should be on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified (NPPF, paras. 61-63). National guidance provides a methodology for assessing local affordable housing needs, drawing upon a range of data sources in order to inform specific policy requirements.
- 7.51 Updated national policy states local plans should set out the developer contributions expected from developments, including affordable housing. The contributions sought should not make developments unviable, therefore undermining the deliverability of the plan (NPPF, para. 34). National guidance provides detail on how to assess the viability of plan policies. It states that affordable housing requirements should be set as a single figure, rather than a range to provide certainty. Different requirements can be set for different sites, or types of development and the specific circumstances of strategic sites (those that are critical to delivery of the overall local plan) may need to be considered.

Local Policy

- 7.52 The current Local Plan (Part 1) Policy CP7 and the Developer Contributions and Housing Choices SPD (2015) require developments of 15 dwellings or more to provide 20% on-site affordable housing, with developments of 10-14 dwellings providing financial contributions towards off-site affordable housing provision (in exceptional cases, schemes of 15 dwellings or more may also make off site financial contributions). This approach has been informed by the feasibility of seeking on-site provision on sites of less than 15 dwellings. Registered Providers typically look to provide a minimum number of affordable houses on a site in order for a scheme to be feasible (this varies according to the provider and the local context). The set threshold of 15 dwellings for on site provision assumes that a minimum of 3 affordable dwellings on site is the typical number of units that





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a Registered Provider would consider acquiring. Below that minimum on-site provision of affordable housing may not be feasible.

Consultation feedback/other issues

- 7.53 The approach to updating the evidence base was generally supported. A number of responses suggested that a range of sites should be allocated to meet housing needs, including affordable, and some responses suggested larger sites provided the greatest opportunity for delivering a mix of housing. One respondent highlighted the need for viability assessments of sites to take into account cross boundary issues (Rugeley Power Ltd). One respondent referred to the issue of affordable housing in perpetuity and suggested that this should not be required in policy.
- 7.54 In terms of key issues, the current affordable housing percentage requirement is set on a District-wide basis as previous evidence did not identify any significant variations in affordable housing need or viability which would warrant different percentage requirements in different parts of the District. It is suggested this continues to be an appropriate approach given the District characteristics. The policy options suggested reflect the national policy and local issues context.
- 7.55 The policy updates will be supported by the updated Housing Needs Assessment, which identifies the overall levels of affordable housing needs within the District. The Council has updated its Housing Needs Assessment. This is available for comment as part of the Issues and Options consultation. A viability assessment of the affordable housing requirements (and other developer contributions) will be undertaken to inform the Preferred Options of the Local Plan Review. This will then determine the overall updated affordable housing requirement for the District. The viability assessment of the Local Plan will be undertaken in accordance with national policy and guidance. This suggests a 'typologies' based approach to assessing local plan viability e.g. assuming a series of 'typical' sites that are likely to come forward within the District such as small-sized greenfield developments or medium-sized brownfield developments.
- 7.56 The option for site specific affordable housing requirements is suggested to account for any site allocations which may not necessarily fit into one of these 'typologies' e.g. sites with more significant on-site infrastructure requirements (such as a school) or significant land remediation costs. It is also in line with national guidance on considering site specific circumstances of any strategic or large sites that are critical to the overall housing land supply for the local plan.
- 7.57 Whilst the AONB is technically a 'designated rural area' under the NPPF, the nature of the District means that much of the areas within the AONB are Green Belt and semi-rural (i.e. not remote from main urban areas). As outlined under 'Housing Mix' below, this has meant the District Council has not adopted a rural exceptions policy to date. Furthermore, the District is not entirely covered by the



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AONB as some local authorities elsewhere in the country may be. Given the availability of land for development outside of the AONB local housing needs, including affordable, have been met elsewhere in the District. This means a lower threshold of 5 dwellings within the AONB has not been applied to date. However, it is noted that some of the site options for future development within the District are within the AONB so the need for such a threshold will largely depend on the eventual preferred strategy for overall development (see ‘Strategy for meeting overall housing growth’). Given this local context we would welcome views on whether it would be appropriate to set a lower affordable housing requirement threshold in line with the NPPF for developments within the AONB.

7.58 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 3: Provide for housing choice in terms of how we address affordable housing percentage requirements.

**AFFORDABLE HOUSING PERCENTAGE REQUIREMENTS POLICY OPTIONS**

**Option A** Amend strategic policy to reflect updated overall affordable housing needs (based on Housing Needs Assessment) including updated District-wide affordable housing percentage requirement. Require affordable housing provision from schemes of 10 dwellings or more (percentage subject to overall Local Plan viability assessment) with presumption this is to be on site, unless circumstances justify off site financial contributions. Continue to allow off-site financial contributions in lieu of on site provision in exceptional circumstances. Continue to require review of viability on large sites over 2 year period. Subject to Local Plan viability assessment results, consider the need for a continuation of current policy approach i.e. sites of 10-14 dwellings making off-site financial contributions.

This option would mean that the policy is updated to reflect new national policy and the most current local context. It would provide some flexibility for off site provision, where justified. It could take into account any minimum levels of feasible on site affordable housing provision as per the current policy approach, if necessary.

**Option B:** In combination with Option A, implement specific affordable housing requirements for large site allocations.

This option would consider the need for any site specific affordable housing requirements on large site allocations that differ from the District wide requirements. It would focus specifically on sites that may not fit with the general ‘typologies’ of sites covered by the Local Plan viability assessment e.g. sites with more significant infrastructure requirements, and/or those which are critical to the overall housing land supply. Would require site specific viability assessments.

**Questions on Affordable Housing Percentage Requirements Policy Options:**

**Question 19.** Which option, or combination of options do you support and why? Should any further options be considered?

**Question 20.** Do you have any comments on the Housing Needs Assessment for the District?



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**Question 21.** Are there any other options for securing affordable housing supply that we should be considering?

**Question 21.** Should the Council consider a lower threshold of 5 dwellings for seeking affordable housing contributions from schemes within the AONB, taking into account the local context?

**Question 22.** Should affordable housing requirements for schemes be set higher than the needs identified in the Housing Needs Assessment to off set no contributions from schemes under 10 dwellings?

**Question 23.** Is there a minimum level of feasible on site affordable housing provision that the Council should take into account as part of its evidence base work e.g. currently assumed to be 3 affordable dwellings on site?

**Question 24.** Previous consultation responses suggest that affordable housing should not be retained 'in perpetuity'. In what other ways could the Council secure the affordable housing supply within the District if an 'in perpetuity' requirement is not included within policy i.e. so that any recycled funding from the sale of affordable housing is spent on replacement/new affordable housing supply within the District?

Housing Mix (including affordable housing and specialist housing)

National Policy

- 7.59 National policy requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and then reflect these needs in planning policies (NPPF, para.61). It outlines that the needs of those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes should all be considered (and other groups, where necessary). National guidance provides information on how to assess the local housing needs (including affordable housing).
- 7.60 The national policy definition of affordable housing has recently been widened to incorporate a number of home ownership options. Four categories now exist consisting of: affordable housing for rent, starter homes, discounted market sales housing, and other affordable routes to home ownership. On major developments (10 dwellings or more) 10% of homes should be provided as affordable home ownership as part of the overall affordable requirement, unless local needs justify otherwise (NPPF, para. 64).
- 7.61 Local authorities can consider adopting optional standards related to specific elements of building design, including standards set out in Part M4 of the Building Regulations relating to accessibility, adaptability and wheelchair users. National policy confirms that local authorities should make use of the optional technical standards where this would address an identified need for such properties (see also discussion under Objective 1). Any additional standards need to be the



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subject of viability testing, alongside other policy requirements (NPPF, paras.34 and 127).

- 7.62 National policy encourages local authorities to support the development of entry-level exception sites which are those that are suitable for first time buyers and are not already allocated for housing. They must provide for affordable housing only and meet other criteria in terms of their location and scale (NPPF, para.71). Rural exception sites are also supported by national policy, where these respond to local circumstances. Such small sites must provide for those that have a local connection to the specific local community and are typically affordable housing-led (NPPF, para. 77).
- 7.63 The 'Independent Review of Build Out' (Oct 2018, also known as 'the Letwin Review')<sup>39</sup> was commissioned by the Government to consider how to close the significant gap between housing completions and the amount of land allocated or permissioned. It makes recommendations to boost the delivery rates of large housing sites in particular. This suggests that diversifying the housing mix on these sites would aid delivery and increase build out rates.

Local Policy

- 7.64 Local Plan (Part 1) Policy CP7 and the Developer Contributions and Housing Choices SPD (2015) set the current context for the local housing mix. Policy CP7 aims to achieve a balanced housing market by requiring new housing developments to provide for a mix of housing sizes, types and tenure which meet the needs and aspirations of the current and future population, informed by the Strategic Housing Market Assessment. Particular encouragement is given to increases in particular types of provision including smaller dwellings suited to younger people and larger 3 and 4 bedroom houses for aspirational needs. There is also specific support for meeting the needs of an ageing population via encouragement for new schemes catering specifically for this group and developments achieving 'lifetime homes' standards.
- 7.65 No specific proportions for any housing sizes, types and tenures are specified in the policy itself. The Developer Contributions and Housing Choices SPD (2015) provides further detail on the expectations for the affordable housing element of schemes including the Council's preferred tenure split and house sizes. This is still subject to site by site negotiation, where necessary.
- 7.66 There are no policies for rural exception or entry-level exception sites within the Local Plan (Part 1).

Consultation feedback/other issues

- 7.67 The approach to updating the evidence base was generally supported. It was suggested that the Council should consider not setting housing mix for individual

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**Local Plan Policy Options**  
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sites within a Local Plan policy. Some responses suggested policies direct to the latest available evidence on housing needs in order to inform the housing mix on new schemes. Some respondents suggested specific policies and/or site allocations were necessary to meet specific housing requirements, namely housing for older people. Responses outlined the need for specific evidence to support any additional policy requirements such as higher optional technical standards, including local needs and viability testing (issues arising in relation to cross boundary sites should be considered too). Some responses suggested larger sites offered the greatest opportunity for meeting housing mix needs. One respondent suggested locating housing for older people nearest to town centres or good transport links to access services. One respondent suggested more consideration needed to be given to the housing needs of rural or agricultural workers. One respondent suggested the importance of discounted housing should be recognised as part of the housing mix.

- 7.68 In terms of key issues, the local policy will be updated to reflect the most recent evidence on housing needs. The Council has updated its Housing Needs Assessment. This is available for comment as part of the Issues and Options consultation. A viability assessment of any housing mix policy requirements (and other developer contributions) will be undertaken to inform the Preferred Options of the Local Plan Review.
- 7.69 The current approach sets out the key District wide expectations of developments based upon evidence of local needs and viability. However, it then provides flexibility for site specific solutions (following negotiations between the Council and the developer). For instance, on smaller sites in particular it may not be feasible to provide for the range of local housing needs as a larger site could. The local context e.g. existing provision in the vicinity may also influence the optimum housing mix of the development site. However, the approach also does not guarantee that the housing mix required will be delivered e.g. by setting specific percentages.
- 7.70 The current policy does not include any reference to rural or entry level exception sites. There have been no such sites in the District delivered to date (or actively promoted by local communities). The Local Plan (Part 1) outlines that context of the Districts main villages and hamlets has not warranted any local policy coverage of these sites to date i.e. these settlements are primarily within semi-rural areas (which are not considered to be 'remote' from the main urban areas) and are largely covered by both Green Belt and/or AONB designations. Accessible, affordable housing provision can be provided for within the urban areas. In addition, in relation to entry level exception sites, the vast majority of the District's urban areas are built up to Green Belt and/or AONB designations which national policy identifies as constraints to the development of such sites.
- 7.71 As such no specific policy options are suggested at this stage in relation to this matter, but further views would be welcomed (however Option D below does consider the allocation of sites to meet a range of housing needs). There is no



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specific policy coverage related to rural/agricultural workers dwellings for similar reasons, and due to the fact that there is a very limited number of people employed in this sector in the District. Given that all the land outside the urban areas is designated Green Belt, the position in relation to any such schemes would be considered in line with the relevant national planning policy.

- 7.72 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 3: Provide for housing choice by delivering an appropriate housing mix.

**HOUSING MIX POLICY OPTIONS**

**Option A: Continue with current policy approach of encouraging appropriate mix of housing sizes, types and tenures for different groups in the community on a District wide basis, informed by the Housing Needs Assessment.**

Policy based on current evidence, with link to take into account any updated evidence (further detail could be elaborated in non-strategic policy to provide more detailed guidance e.g. Development Management Policy or SPD). Precise housing mix on individual sites would continue to be determined via negotiation. Developers to demonstrate how their proposed mix provides for the range of District housing needs on a site by site basis e.g. housing for older people: adopting additional technical standards or by the type of dwellings to be provided (such as bungalows). For example, policy may read: *'Affordable and market housing schemes should seek to provide for range of housing needs as evidenced in the local Housing Needs Assessment. Affordable housing- current evidence identifies the need for a higher proportion of x tenure and a lower proportion of x tenure. Of this there is a need for a higher proportion of x bedroom properties and lower proportion of x bedroom properties.'* This option would mean that the policy is updated to reflect new national policy and the most current local context.

**Option B: Require specific percentages for mix of housing sizes, types and tenures for different groups in the community on individual sites, informed by the Housing Needs Assessment.**

Precise housing mix to be set as a requirement for individual sites to comply with. Set within strategic policy and not non-strategic policy. This could include a percentage requirement of homes to be built to the optional higher technical standards and a percentage requirement for self build plots. Any requirements for specific groups would have to be justified by local evidence of needs. Would need to be tailored to reflect the ability of different schemes to deliver housing mix e.g. smaller sites will have less potential to deliver the whole range of required housing mix. For example, policy may read: *'Affordable and market housing schemes should seek to provide for range of housing needs as evidenced in the local Housing Needs Assessment. Affordable housing- the Council will require x% to be social rented and x% to be affordable home ownership. Of this x% should be 2 bedroom, x% should be 3 bedroom.'* This option would mean that the policy is updated to reflect new national policy and the most current local context.

**Option C: In combination with Option A, require specific percentages for mix of housing sizes, types and tenures for different groups in the community on large site allocations only.**

Precise housing mix to be set as a requirement for individual sites to comply with on large site allocations only. This could include a percentage requirement of homes to be built to the optional higher technical standards and a percentage requirement for self build plots. Any requirements for specific groups would have to be justified by local evidence of needs. This



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would reflect the ability of larger sites to accommodate a greater range of housing mix and could provide more certainty in providing for the housing mix needs in the District. This option would mean that the policy is updated to reflect new national policy and the most current local context.

**Option D: In combination with other Options, allocate specific sites for different housing needs e.g. 100% affordable housing sites, sites for care homes, self build sites.**

This could take into account any appropriate specific site criteria e.g. locating housing for older people nearer to town centres for accessibility of services.

**Questions on Housing Mix Policy Options:**

**Question 25.** Which option, or combination of options do you support and why? Should any further options be considered?

**Question 26.** Do you have any comments on the Housing Needs Assessment for the District?

**Question 27.** Should there be different approaches to the affordable housing tenure mix/bedroom mix and the market housing bedroom size mix i.e. affordable housing tenure percentage requirements specified in policy only? Should this be strategic or non-strategic policy?

**Question 28.** Should there be a separate policy for meeting the needs of an ageing population?

**Question 29.** Are there any sites that should be considered for specific housing needs allocations? Are there any site specific criteria that should be considered in allocating sites for meeting specific housing needs?

**Question 30.** Do you have any other comments on the suggested housing mix policies, taking account of recent Letwin Review and NPPF requirement for 10% affordable homeownership?

**Question 31.** Do you agree that the local context does not justify the need for further local policies on rural exception or entry level exception sites over and above existing national policy?

**Question 32.** Do you agree that the local context does not justify the need for further local policies on rural or agricultural workers dwellings, over and above national policy?

Gypsy, Traveller and Travelling Showpeople  
National Policy

- 7.73 National policy requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and then reflect these needs in planning policies (NPPF, para.61). This includes the needs of travellers. There is a specific guidance on the definition of travellers and how to consider their needs within the national Planning Policy for Travellers (2015). The



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requirement within the Housing Act (1985, as amended) to assess the needs of caravan and boat dwellers is also relevant.

Local Policy

- 7.74 Local Plan (Part 1) Policy CP7 sets out the level of need for additional gypsy and traveller pitches and travelling showpeople plots within the District based upon an assessment produced in 2012. It identifies an ‘area of search’ for sites to meet the needs identified, which is located around the A5 corridor (mainly the part of the District which lies to the south of the Cannock/Lichfield Road). It was noted that this area is almost entirely covered by Green Belt land. However, the local context warranted the ‘exceptional circumstances’ to consider sites within this area i.e. the A5 corridor represents a main travelling route and the vast majority of the District’s existing gypsy, travelling and travelling showpeople sites are located within the area already. The policy sets out a number of criteria for assessing the suitability of sites. The allocation of sites was to be considered via the Local Plan (Part 2). The Design SPD (2015) provides guidance on the design and layout of new gypsy and traveller sites.

Consultation feedback/other issues

- 7.75 One respondent outlined that the needs assessment should take into account the updated definition of travellers and should also assess needs for caravan & houseboat accommodation. There is likely to be a considerable overlap between the accommodation required for Gypsies and Travellers who meet the definition, and those who fall outside it; sites should be allocated as suitable for both groups of travellers. The response suggested that appropriate sites outside the current area of search should be considered and that policies should require the provision of pitches through the largest housing development sites. The response outlined that much of the demand from Gypsies & Travellers is for small, extended family sites (up to 5 or 6 pitches). One response suggested that additional provision should not be met simply by increasing the size of existing sites, but by increasing the number of sites themselves. This response also suggested that sites should generally be small (five to ten pitches) and, where possible occupied by one extended family group. This response highlighted the issue of transit sites. It stated that these should be provided but not situated near existing Gypsy and Traveller sites. Stafford Borough Council stated they were not in a position to assist with any unmet needs.
- 7.76 In terms of key issues, the Local Plan Review will need to reflect the updated evidence on needs for new pitches and plots within the District. The updated Gypsy, Travelling and Travelling Showpeople Accommodation Assessment is available for comment alongside the Issues and Options consultation. The Local Plan Review will need to take forward the work that had been undertaken on the consideration of site allocations via the Local Plan (Part 2).





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- 7.77 The previous Issues and Scope consultation highlighted the difficulties the Council had faced to date in allocating sites to meet the needs identified. There still remains a significant issue with identifying land available for gypsy, travelling and travelling showpeople accommodation, particularly when landowners are seeking to promote potentially higher land value options on their sites e.g. housing and employment uses. As part of the options for meeting needs, if the allocation of sites remains problematic going forward the Local Plan could consider setting out specific policies for determining planning applications for such developments which reflect the local context (taking forward and adding to the existing Policy CP7 criteria, as appropriate). However, the degree to which this will actually secure new accommodation is less certain. Monitoring indicates that there have been very few planning applications for such uses in recent years, which is perhaps reflective of the difficulties the local community is also facing in identifying sites for additional accommodation.
- 7.78 In line with the Local Plan (Part 1) adopted policy, the search for sites has predominately been focused upon areas of Green Belt land to date (and particularly given that many available sites within the urban areas are also being developed and/or promoted for alternative uses, such as housing). As with the housing growth strategy issues, national Green Belt policy makes clear that before we release Green Belt land we must demonstrate that the local plan makes as much use as possible of suitable brownfield sites and underutilised land; optimises the density of development; and has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development. However, it is recognised that there is pressure upon sites within the urban areas for alternative uses (namely housing and employment) and that a number of neighbouring local authorities have already stated that they would be unable to help meet such needs (as they too are either unable to meet their own current needs or have an existing need of their own to meet which already requires Green Belt site options to be considered).
- 7.79 The policy options on how to meet accommodation needs reflect the consultation comments received and the work that has been progressed to date on identifying appropriate sites.

**GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE HOUSING NEEDS POLICY OPTIONS**

**Option A: Seek to provide for the needs identified in the updated Gypsy, Traveller and Travelling Showpeople Accommodation Assessment within the District via a criteria-based approach to determining planning applications- do not allocate specific sites via the Local Plan.**

This option would mean that the policy is updated to reflect new national policy and the most current local context. This could reflect some of the existing criteria for new sites within current Local Plan (Part 1) Policy CP7.



## Local Plan Policy Options

### Objective 3: Provide for Housing Choice

**Option B:** Seek to provide for the needs identified in the updated Gypsy, Traveller and Travelling Showpeople Accommodation Assessment within the District via the allocating of sites within current 'Area of Search' identified in Local Plan (Part 1) (an area currently designated as Green Belt land in the main). Work with neighbouring authorities to identify any opportunities for meeting needs.

This option would mean that the policy is updated to reflect new national policy and the most current local context. This could utilise some of the existing criteria for new sites within current Local Plan (Part 1) Policy CP7 for identifying suitable allocations. It would involve considering new sites and any feasible extensions to existing gypsy, traveller and travelling showpeople sites. In line with the NPPF, first consideration to be given to '*land which has been previously-developed and/or is well-served by public transport*'. Consideration would also need to be given to 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*.' Some neighbouring local authorities have also identified exporting their needs to other local authorities as a potential option.

**Option C:** Seek to provide for the needs identified in the updated Gypsy, Traveller and Travelling Showpeople Accommodation Assessment within the District via the allocating of sites and expanding the current 'Area of Search' to a District wide search for sites (still likely to include consideration of Green Belt sites). Work with neighbouring authorities to identify any opportunities for meeting needs.

This option would mean that the policy is updated to reflect new national policy and the most current local context. This could utilise some of the existing criteria for new sites within current Local Plan (Part 1) Policy CP7 for identifying suitable allocations. It would involve considering new sites and any feasible extensions to existing gypsy, traveller and travelling showpeople sites. In line with the NPPF, first consideration to be given to '*land which has been previously-developed and/or is well-served by public transport*'. Consideration would also need to be given to 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*.' Some neighbouring local authorities have also identified exporting their needs to other local authorities as a potential option.

**Option D:** In combination with other Options, require new large housing sites to provide for gypsy, traveller and travelling showpeople accommodation needs.

This could be required as part of the planning application or Local Plan site allocations processes.

### **Questions on Gypsy, Traveller and Travelling Showpeople Housing Needs Policy Options:**

**Question 33.** Do you have any comments on the Gypsy, Traveller and Travelling Showpeople Assessment for the District?

**Question 34.** Do you have any comments on how sites could be secured for gypsy, traveller and travelling showpeople accommodation given the difficulties faced to date e.g. is there a need to consider the provision of public sites?



## **Local Plan Policy Options**

### **Objective 4: Encourage a Vibrant Local Economy and Workforce**

#### Issues and Options for delivering Objective 4: Encourage a Vibrant and Local Economy and Workforce

##### Overall Employment Land Needs and Strategy National Policy

- 8.1 Local Plans must contain strategic policies that make sufficient provision for employment development within the area and set out an overall strategy for that development (NPPF, para.20). Strategic policies should address the strategic priorities of the area, and any relevant cross boundary issues. Under the duty to cooperate, local authorities and other prescribed bodies must cooperate with each other on strategic matters that cross local authority boundaries (NPPF, para. 21 and 24).
- 8.2 National policy overall sets out a framework for sustainable development, which local plans must ensure is delivered (NPPF, Chapter 2). The three key objectives of sustainable development overall (economic, social and environmental objectives) must therefore underpin any strategy for development within the District. This includes considering matters such as appropriate levels of infrastructure provision to support future growth and the protection and enhancement of built and natural environmental assets.
- 8.3 Planning policies should give significant weight to the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development (NPPF, para. 80). Planning policies should set out a clear economic vision and strategy which encourages sustainable economic growth; set criteria, or identify strategic sites, to match the strategy; seek to address potential barriers to investment, such as inadequate infrastructure; and be flexible enough to accommodate needs not anticipated in the plan (NPPF, para. 81). Within this, the specific locational requirements of different sectors should be taken into account, such as making provision for storage and distribution operations in suitably accessible locations (NPPF, para. 82). National policy also provides support for enabling the rural economy to prosper; accounting for specific issues in rural contexts e.g. the retention and development of key local services (NPPF, paras. 83-84).
- 8.4 National guidance provides detail on the methodologies to be used for assessing employment growth and land requirements for the plan period. There is no standard methodology for assessing employment needs (unlike housing needs).
- 8.5 National policy highlights the importance of supporting high quality communications, including high quality digital infrastructure (NPPF, Chapter 10).
- 8.6 Updated national policy emphasises the need for planning policies to promote an effective use of land. This includes making as much use as possible of brownfield land opportunities. An effective use of land can be promoted by



## Local Plan Policy Options

### Objective 4: Encourage a Vibrant Local Economy and Workforce

achieving higher densities; promoting the development of under-utilised land and buildings; considering the reallocation of land uses e.g. employment to housing (NPPF, Chapter 11). Whilst there is an emphasis upon meeting housing needs within this Chapter, the needs of other land uses are referenced. In addition, the implications of potentially using existing employment land to meeting housing needs have to be considered in the context of the overall economic strategy (NPPF, para.121).

- 8.7 This effective use of land also relates to the updated national policy approach for Green Belt land. Before concluding that Green Belt boundary changes are justified (by exceptional circumstances) local authorities must demonstrate they have examined all other reasonable options for delivering development. This includes making as much use of brownfield and under-utilised land; considered increased densities of developments; and undertaken discussions with neighbouring authorities on whether or not they could accommodate additional development (NPPF, para. 137). Where Green Belt land release is justified, first priority should be given to brownfield sites and/or those that are well-served by public transport. Measures to off set the impact of the Green Belt release such as improvements to the environment and accessibility of the remaining Green Belt should also be considered (NPPF, para. 138).
- 8.8 Given the District context, national policy in relation to Areas of Outstanding Natural Beauty (AONBs) is also relevant to considering the development strategy. National policy gives great weight to the conservation and enhancement of AONBs. It states that the scale and extent of development within these designated areas should be limited; major development should not be allowed unless there are exceptional circumstances and where development is in the public interest (NPPF, para. 172). The scope for meeting development needs elsewhere i.e. outside of the AONB needs to be fully assessed (NPPF, para.172).

#### Local Policy

- 8.9 Local Plan (Part 1) Policy CP1, CP8 and CP9 provide the current policy context for supporting economic growth within the District. Policy CP1 and CP8 set out the overall strategy for meeting employment land requirements and the amount of employment land that is required. The current strategy focuses development, investment and regeneration mainly on the built up, urban areas, conserving and enhancing the landscape of the AONB, Hednesford Hills, Green Belt and the Green Infrastructure of the District. Employment growth is directed towards the main existing urban areas (Cannock/Hednesford/Heath Hayes, Rugeley/Brereton and Norton Canes) in a proportionate manner relative to their existing sizes, but with a focus upon the high quality employment sites of Kingswood Lakeside (Cannock) and Towers Business Park (Rugeley/Brereton) which are capable of accommodating priority sectors for growth within the District.



## **Local Plan Policy Options**

### **Objective 4: Encourage a Vibrant Local Economy and Workforce**

- 8.10 Policy CP9 provides further support for delivering the overall economic vision for the District setting out key sectors that are important for continued regeneration. Support is provided for proposals that increase access to local employment opportunities, such as skills initiatives and improved broadband connectivity. Support is also provided to the visitor economy.
- 8.11 Other local issues are also reflected within the policies, including existing employment sites within the Green Belt and out of town office developments. A criteria-based approach is used to determine whether or not existing employment sites should be redeveloped for other uses. The Design SPD provides further guidance on improvements to existing employment areas, including those within the Green Belt. The Rugeley Power Station SPD provides detailed guidance on the development of this large site.

#### Consultation feedback/other issues

- 8.12 There was general support for the evidence base updates with some further recommendations on how assessment was carried out and how the wider policy context was taken into account.
- 8.13 In relation to the overall strategy, there was some support for considering Green Belt sites and some support for the continued approach of retaining Green Belt and AONB boundaries. Some responses referred to specific sites suggesting they were appropriate for meeting future employment development needs. In relation to the former Rugeley Power Station, the landowner (Rugeley Power Ltd) stated there was a need to consider the employment generating potential of non-B class uses too. The response also outlined that the site should be considered for housing-led regeneration, not employment-led and that a specific level of employment land should not be allocated on the site; a more flexible approach should be taken that allows a range of employment uses. One respondent suggested the timescale for the delivery of any employment land at the Rugeley Power Station needed to be considered carefully (i.e. if it would be within the plan period). One respondent highlighted the Green Belt Review scorings that related to the employment site options previously considered and suggested these should be used to determine the most appropriate future employment land allocations.
- 8.14 There was support for extending existing employment sites rather than developing wholly new sites in terms of infrastructure benefits. There was support for allocating employment sites to ensure they are not lost to residential development in the future. However, other respondents stated the potential for redeveloping unviable/lower quality employment for other uses should be considered.



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### Objective 4: Encourage a Vibrant Local Economy and Workforce

- 8.15 Issues related to Heavy Goods Vehicles/lorry parking were highlighted by some responses (this issue is addressed under Objective 5 'Sustainable Transport'). Some responses stated there was a need for a balance between jobs and homes in the District. Some statutory consultees highlighted the need for key issues to be considered in the selection of employment sites, including highways matters and the protection of natural assets. One response highlighted greater reference could be made to the M54/M6/M6 Toll link road and its potential to support local economic growth.
- 8.16 In terms of key issues to consider, the current local plan policies will need to be updated to reflect the overall levels of employment land required in the District for the plan period and the most appropriate strategy for delivering that growth. Updated employment land requirements for the Local Plan Review will be informed by the updated Economic Development Needs Assessment. This is available for comment alongside the Issues and Options consultation. It takes into account the wider context, such as the strategies of the economic partnerships covering the District. An assessment of the Districts existing employment areas and an updated land availability assessment (ELAA) will be produced to inform the Preferred Options Stage of the Local Plan.
- 8.17 The overall quantum of employment land development required for the plan period will inform the strategy for delivering that growth. This strategy could require a combination of protecting key existing employment locations from redevelopment for other uses as well as the provision of new, additional employment land. Employment land delivers a mix of use classes, particularly B1 office, research and design and light industrial uses; B2 Industrial and B8 logistics and distribution uses and these can have specific locational requirements e.g. access to the strategic highway network is of particular importance to the distribution sector. Therefore the type of employment land required to deliver the Districts economic growth will also influence the strategy and selection of the most appropriate site options for employment developments.
- 8.18 The strategy for employment land within the District will need to have regard to the wider context too and any medium-longer term factors that may influence it e.g. the recently announced M6/M54/M6 Toll link (see Objective 5) and the Strategic Rail Freight Interchange (known as West Midlands Interchange) proposal within South Staffordshire District (north of Four Ashes industrial estate) which was submitted directly to the Secretary of State in August 2018 (however as the planning application is unlikely to be determined before 2020 the implications of this will not be clear until late in the plan-making process).
- 8.19 The Council needs to consider how the local context influences the choice of policy options for the employment growth strategy. Given that all land outside of our existing urban areas is Green Belt (approximately 60% of the District overall)



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with a significant proportion of this also being designated as an Area of Outstanding Natural Beauty, the sequential approach set out in national policy for considering the release of Green Belt land needs to be considered i.e. other options have been exhausted. A similar approach is required in relation to any development sites within the AONB. In addition, the national policy requirements to maximise the use of under-used and particularly brownfield land influences the approach to be taken.

- 8.20 The Council undertakes its annual assessment of employment land availability (Employment Land Availability Assessment- ELAA) to identify the amount of employment land expected, or available to be developed to meet local plan requirements.
- 8.21 The most recent assessment (August 2018) identifies that there is around 25hectares of land available for employment development, split across the District as follows:

AREA	PROPORTION OF CAPACITY (AND QUANTITY) (UP TO 2028)
Cannock, Hednesford and Heath Hayes	<b>72% (18ha)</b>
Rugeley and Brereton	<b>16% (4ha)</b>
Norton Canes	<b>12% (3ha)</b>

- 8.22 This demonstrates that there is existing urban capacity to help employment development needs going forward. However, it should be noted that the latest assessment (ELAA) does identify some potential for a reduction in this supply with sites at Norton Canes and Rugeley potentially being considered for other uses more recently. So this 25ha is treated as a maximum at present. As noted above, the suitability of these sites for meeting the employment land requirements of the District will also need to be considered via an updated land availability assessment (ELAA) in 2019, taking account of the Economic Development Needs Assessment findings.
- 8.23 The vast majority of the suggested site options for additional new employment land (over and above the existing urban capacity of 25 hectares) lie within the Green Belt. As set out above, the national policy approach requires the Council to consider a sequential approach to the release of Green Belt land for development. To justify Green Belt release the Council must demonstrate that the local plan:
  - makes as much use as possible of suitable brownfield sites and underutilised land;



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- optimises the density of development, with significant uplift to be considered in town centres and other locations well served by public transport;
- has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.

8.24 As a result, the Council will need to explore any opportunities for non-Green Belt site options both within the District and outside the District (in neighbouring authorities) before being able to justify the release of Green Belt sites within Cannock Chase District.

8.25 However, in relation these issues it is noted that there are already potential pressures upon the existing employment land supply within the District in terms of helping to meet housing needs. Given the wider housing market shortfall, there will be pressure to utilise additional land for housing needs. In relation to the potential for neighbouring authorities to accommodate needs, South Staffordshire Council has recently identified a potential oversupply of employment land within their District (as part of their Issues and Options consultation 2018) and that they shared a 'functional economic market area' with Cannock Chase, Dudley, Walsall and Wolverhampton. However, it was noted that the Black Country authorities have recently identified a significant potential gap in their employment land supply (the Black Country Local Plan Review Issues and Options suggested this was around 400hectares taking into account land supply available within the Black Country only). Further work is being undertaken on this to establish what the eventual 'gap' may be and implications for neighbouring authorities, particularly South Staffordshire District. Cannock Chase District's neighbouring authorities are also Green Belt constrained (particularly the areas of those authorities that adjoin Cannock Chase District). Therefore whilst the need for any Green Belt land release within the District would need to be clearly justified and confirmed via further discussions with the District's neighbouring authorities, this wider current context is recognised.

8.26 In relation to additional urban capacity one key potential source of further land supply is the former Rugeley Power Station (a large brownfield site, outside of the Green Belt). It offers a key opportunity for helping to meet the future development needs of the District on non-Green Belt land. As detailed under the section on the housing growth strategy, the landowners of the site (Rugeley Power Ltd) outline that a housing-led scheme should be promoted. The results of a recent 'community planning event' in December 2018 gave an indicative masterplan which suggested a mix of high-medium density housing, employment and live/work units, a primary school, sports pitches and retained battery storage facility on the part of the site within Cannock Chase District (but with no figures on quantity of development).





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### Objective 4: Encourage a Vibrant Local Economy and Workforce

- 8.27 The Rugeley Power Station Supplementary Planning Document (SPD) adopted 2018 sets out an indicative vision for the redevelopment of the site, produced jointly with Lichfield District Council. This currently identifies the part of the site within Cannock Chase District as appropriate for employment-led redevelopment. This is therefore also reflected within the policy options (and reflects consultation comments received regarding the future use of the site, as outlined above).
- 8.28 Clearly, the quantum of employment land that can be delivered on the former Rugeley Power Station site will inform the need for additional employment land sites within the District.
- 8.29 **These options for additional urban capacity including the former Rugeley Power Station will be fully explored before any consideration of Green Belt sites for meeting employment land needs (alongside discussions with neighbouring authorities for meeting needs on non-Green Belt sites). If there is a need for further land to deliver sustainable employment growth within the District then the development options for urban capacity and Rugeley Power Station will need to be considered in combination with options for the development of Green Belt sites.**
- 8.30 As per national planning policy, where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. All of the suggested site options for new employment land within the Green Belt are largely Greenfield (with those that contain elements of brownfield land not being well-served by public transport). Therefore the policy options reflect the prioritisation of well-established employment areas in closest proximity to existing public transport links i.e. Kingswood Lakeside is in closest proximity to existing bus routes, Cannock train station and cycleways. The options also reflect the potential for enhanced links by focusing development at existing employment locations.
- 8.31 The policy options for Green Belt sites reflect the nature of site submissions received to date and consultation comments to the Local Plan Issues and Scope. These are mainly focused around the north/east of Kingswood Lakeside; north and south of the A5 corridor (around Churchbridge, Watling Street Business Park, Norton Canes, and Little Wyrley); south east of Brereton; and Cannock Wood. It is noted that not all of the employment land site options suggested to date are necessarily for purely B class employment land uses (i.e. some represent leisure uses) and this too will have to be taken into consideration in the site selection process.
- 8.32 In relation to all of the policy options for development, the Council will need to demonstrate that the employment sites identified are realistic prospects for future



## Local Plan Policy Options

### Objective 4: Encourage a Vibrant Local Economy and Workforce

development i.e. they will require more detailed assessment covering a range of issues including landownership and landowner intentions; viability of the development; any key constraints such as physical problems, environmental designations and impacts of the developments. The site selection methodology provides further detail on how sites will be assessed and this process will help inform the preferred spatial strategy.

- 8.33 It is noted at this stage that there are relatively fewer site options for employment land developments across the District. If site options are discounted as inappropriate for employment development a result of the site selection process (and overall employment land needs cannot then be met) there may be a need to consider what alternative sites could be made available within the District (such as mixed use housing/employment sites drawing upon the site options for housing developments, as set out under Objective 3).
- 8.34 In terms of safeguarded land and 'reserve sites' issues, these are discussed further under 'Other Policy Considerations' paragraph 13.14 – 13.19.
- 8.35 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 4: Encourage a vibrant local economy and workforce, in terms of meeting overall employment needs.

#### STRATEGY FOR MEETING OVERALL EMPLOYMENT NEEDS POLICY OPTIONS

##### **Option A: Urban areas- use sites already identified for employment developments within the urban areas and explore opportunities for further supply on urban sites.**

Plan to meet employment land needs identified for the District, taking into account the wider functional economic market area. There is around 25ha of employment land to be developed within the existing urban areas. To provide any additional employment land supply required this option would include identifying additional urban sites from sources such as redeveloped employment land (to generate higher density of development) or open spaces. This could involve reassessing sites that are not considered appropriate for development at present and seeking to identify additional sites that are not currently being considered for employment development. Need to consider balance between losses of other uses to employment land.

##### **Option B: Rugeley Power Station**

##### **Option B1: Urban Areas and employment-led/mixed use redevelopment of former Rugeley Power Station**

Plan to meet employment land needs identified for the District, taking into account the wider functional economic market area. To provide any additional employment land supply required over the current 25ha urban supply, in combination with Option A seek to deliver employment led redevelopment of the former Rugeley Power Station site. This option will depend upon the housing strategy in terms of the redevelopment of the former Rugeley Power Station.

##### **Option B2: Urban Areas and housing-led redevelopment of former Rugeley Power Station**

This option means no employment land provision at the former Rugeley Power Station. This option will depend upon the housing strategy in terms of the redevelopment of the former Rugeley Power Station. As the Green Belt site options (see Option C) are primarily located in the south of the District, this could mean no further employment developments at Rugeley/Brereton other than those identified under Option A.



## Local Plan Policy Options

### Objective 4: Encourage a Vibrant Local Economy and Workforce

#### **Option C: Green Belt sites**

**Option C1: In combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt sites. Prioritise extensions to Kingswood Lakeside followed by extensions to other existing employment sites.**




Plan to meet employment land needs identified for the District, taking into account the wider functional economic market area. To provide any additional employment land supply required over the current 25ha urban supply, in combination with other options consider Green Belt sites. This option would mean considering areas of Green Belt around Kingswood Lakeside and other existing employment areas, such as Watling Business Park. Site options at Kingswood Lakeside would be prioritised followed by site options for extensions to other employment sites and then any stand alone employment site options would be considered lastly (i.e. those that are not connected to an existing employment site). The current site extent of Kingswood Lakeside lies outside of the Green Belt. Some other existing employment areas, such as Watling Street Business Park, lie within the Green Belt. Site options at these locations would therefore need to consider if the removal of the whole existing employment site from the Green Belt was necessary, not just the suggested extension. In line with the NPPF, first consideration to be given to *'land which has been previously-developed and/or is well-served by public transport'*. Consideration would also need to be given to 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.'*

**Option C2: In combination with the options for the Urban Areas and former Rugeley Power Station consider all Green Belt site options across the District with no prioritisation to Kingswood Lakeside.**


As Option C1, but with no prioritisation given to Green Belt site options at Kingswood Lakeside at this stage. Would still need to consider NPPF principles of first consideration to be given to *'land which has been previously-developed and/or is well-served by public transport'*. Consideration would also need to be given to 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.'*

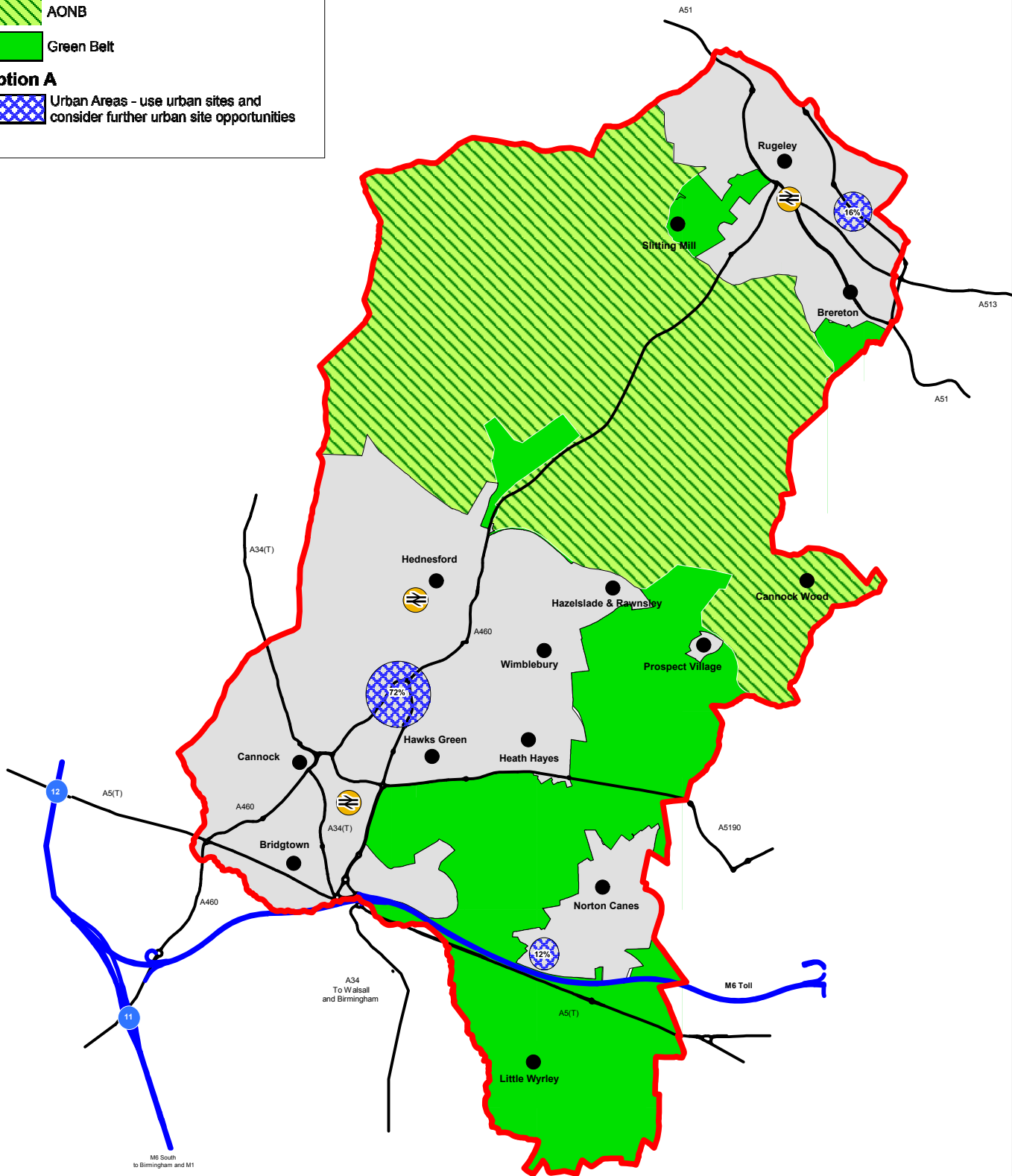


**Key**

-  Urban Areas
-  AONB
-  Green Belt




**Option A**

-  Urban Areas - use urban sites and consider further urban site opportunities







**Key**

-  Urban Areas
-  AONB
-  Green Belt


**Option A**

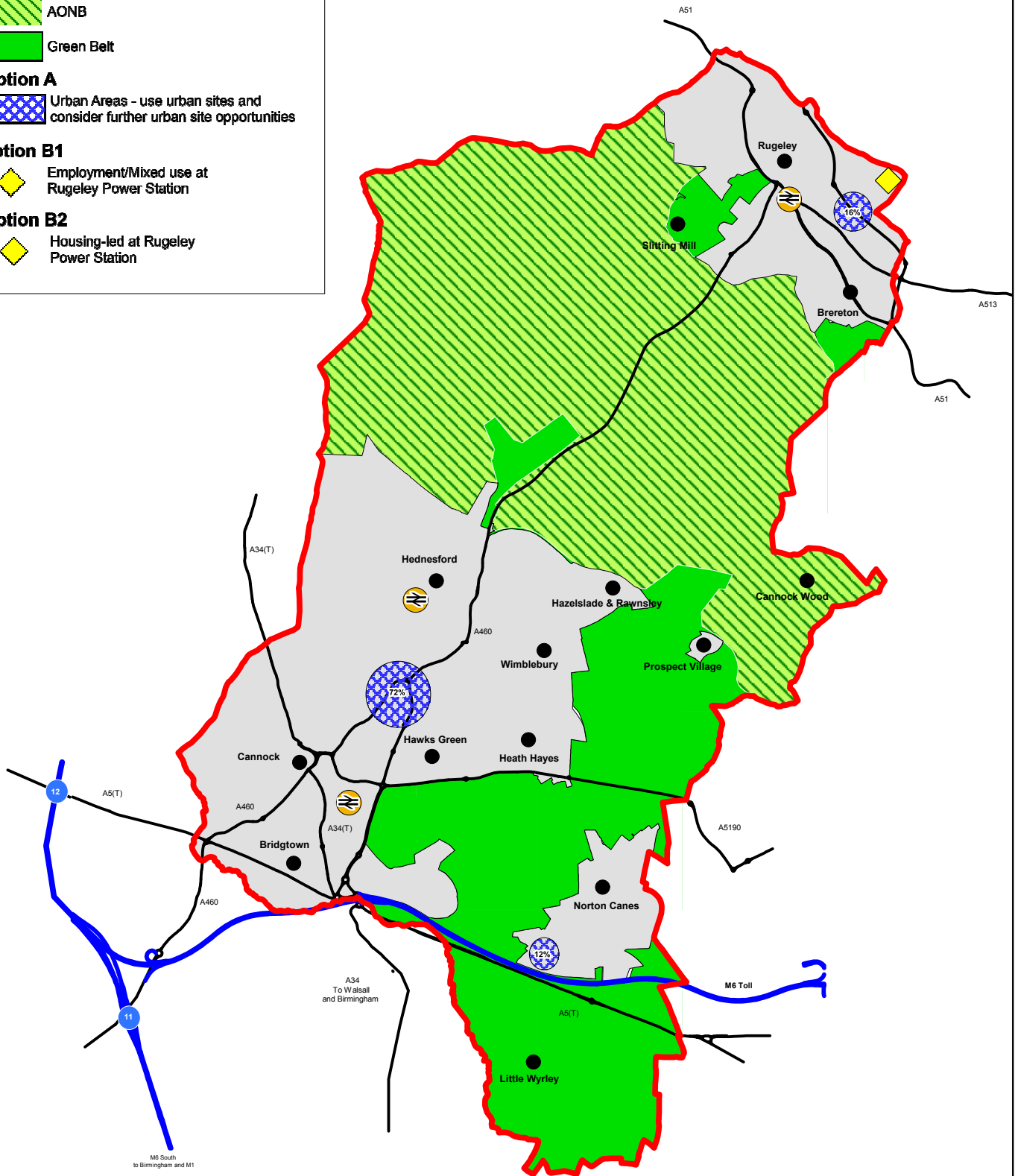
-  Urban Areas - use urban sites and consider further urban site opportunities

**Option B1**

-  Employment/Mixed use at Rugeley Power Station

**Option B2**

-  Housing-led at Rugeley Power Station





**Key**

 Urban Areas

 AONB

 Green Belt

**Option A**

 Urban Areas - use urban sites and consider further urban site opportunities

**Option B1**


 Employment/Mixed use at Rugeley Power Station

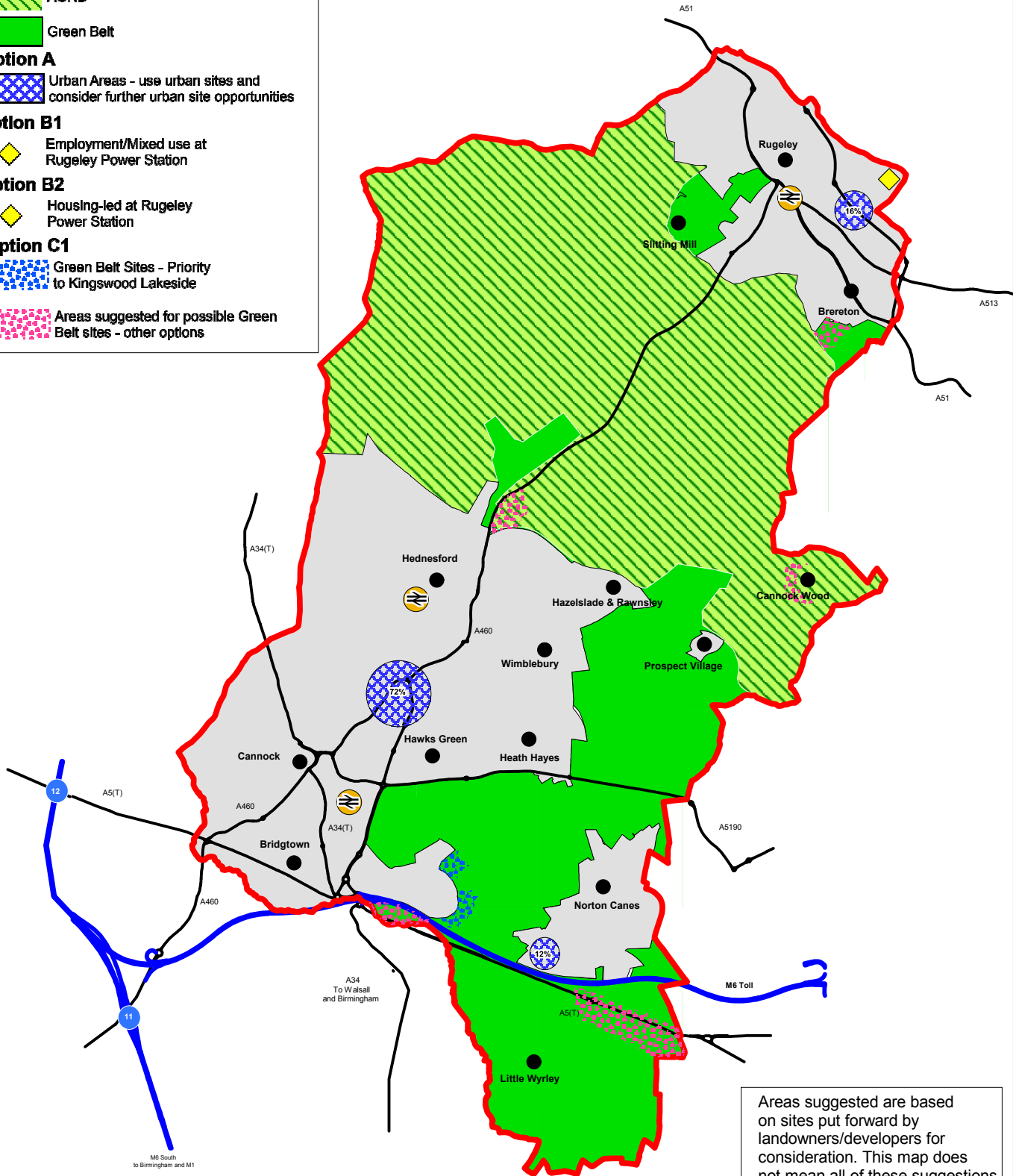
**Option B2**

 Housing-led at Rugeley Power Station

**Option C1**

 Green Belt Sites - Priority to Kingswood Lakeside

 Areas suggested for possible Green Belt sites - other options



Areas suggested are based on sites put forward by landowners/developers for consideration. This map does not mean all of these suggestions will be selected for development; these are only options we need to consider at this stage.




**Key**

 Urban Areas

 AONB

 Green Belt

**Option A**

 Urban Areas - use urban sites and consider further urban site opportunities


**Option B1**

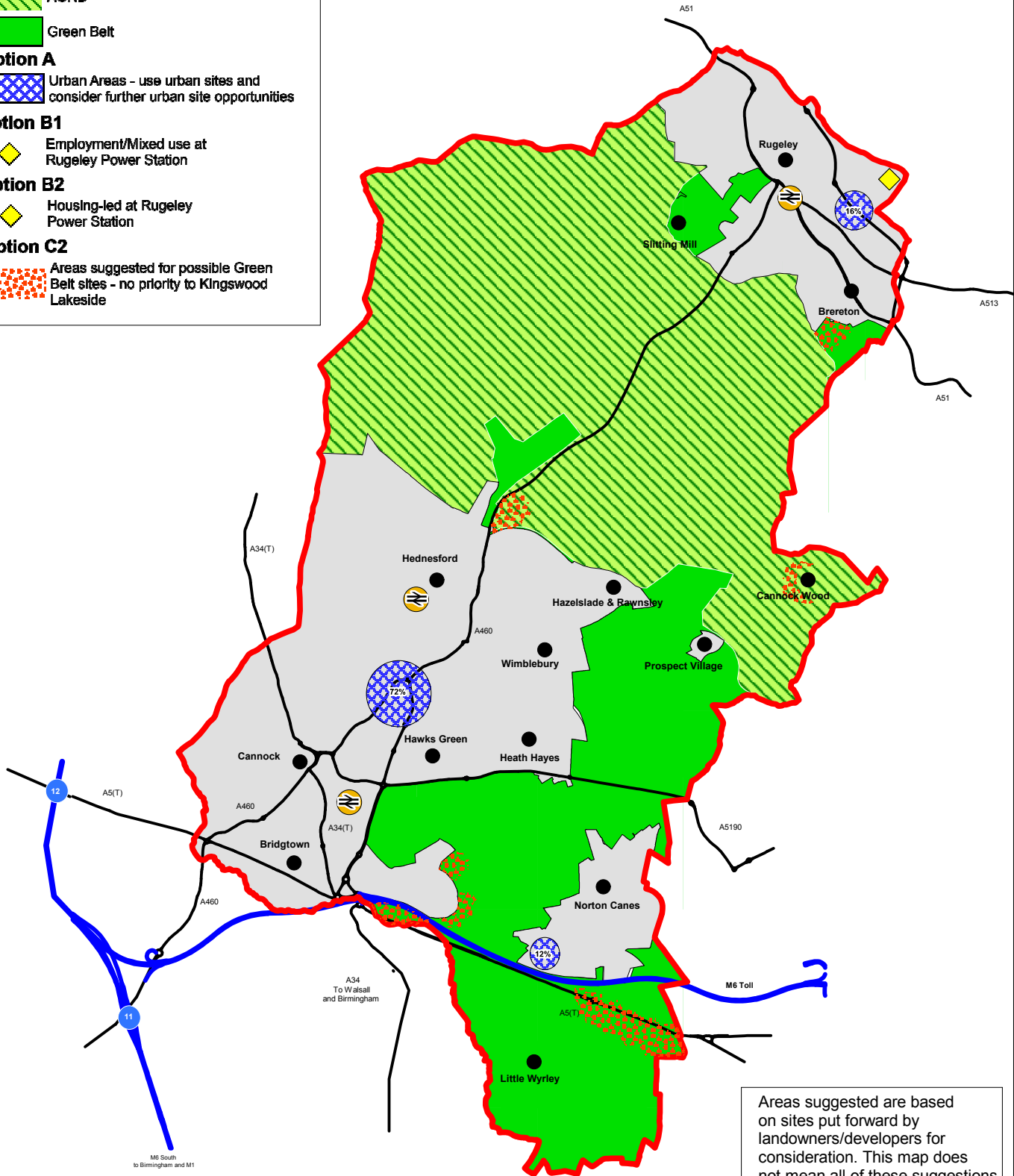
 Employment/Mixed use at Rugeley Power Station

**Option B2**

 Housing-led at Rugeley Power Station

**Option C2**

 Areas suggested for possible Green Belt sites - no priority to Kingswood Lakeside



Areas suggested are based on sites put forward by landowners/developers for consideration. This map does not mean all of these suggestions will be selected for development; these are only options we need to consider at this stage.



## Local Plan Policy Options

### Objective 4: Encourage a Vibrant Local Economy and Workforce

#### OTHER EMPLOYMENT LAND POLICY OPTIONS

**Option A:** Alongside preferred option for District wide strategy, continue with criteria based policy to loss of employment sites. Continue support for redevelopment of existing sites in the Green Belt and continue to specify criteria for considering out of town office developments, reflecting local circumstances.

This would continue the site-by-site approach to considering the loss of any employment areas to non-employment uses. The approach would provide local elaboration to national policy in terms of existing employment sites in the Green Belt and out of town office developments.

**Option B:** Alongside preferred option for District wide strategy, allocate existing employment areas to be protected and do not allocate those that have potential for reallocation for any protection. Continue support for redevelopment of existing sites in the Green Belt and continue to specify criteria for considering out of town office developments, reflecting local circumstances.

This would go beyond the current local plan policy criteria based approach. It could provide further certainty but could also reduce flexibility over the plan period. The approach would provide local elaboration to national policy in terms of existing employment sites in the Green Belt and out of town office developments.

#### **Questions on Strategy for Meeting Overall Employment Needs Policy Options:**

**Question 35.** Which combination of options do you support and why? Should any further options be considered?

**Question 36.** Do you have any comments on the levels and types of employment land needs identified in the Economic Development Needs Assessment for the District?

**Question 37.** Should employment sites be allocated for specific B classes uses, or just a broad B class uses? If the former, which sites should be allocated for specific uses?

**Question 38.** Are there any further employment land development sites that should be considered for assessment?

#### Economy and skills

#### National Policy

- 8.36 As outlined above under 'employment land needs and strategy', national policy places great emphasis upon local plans setting out and delivery an economic vision for the area.
- 8.37 In addition to this, national policy highlights the importance of supporting high quality communications, including high quality digital infrastructure (NPPF, Chapter 10).





## Local Plan Policy Options

### Objective 4: Encourage a Vibrant Local Economy and Workforce

#### Local Policy

- 8.38 As outlined above under 'employment land needs and strategy', Local Plan (Part 1) Policy CP8 and CP9 currently set out the District's economic vision and strategy. These policies will need to be reviewed to reflect updated evidence on economic development needs.

#### Consultation feedback/other issues

- 8.39 Responses in relation to the current Policy CP9 focused mainly upon the issues related to the restoration of the Hatherton Branch Canal. This is addressed under Objective 2, 'Create healthy living opportunities across the District'. One response outlined the need for the role of the agricultural, food and rural based businesses within the District to be reflected in updated policy. Further guidance on agricultural or horticultural developments within the District could be provided. Some responses referenced the need for town centre regeneration (specifically Rugeley in one response) and local jobs for local people. One response highlighted that an extension to Watling Street Business Park could provide quality, market specific provision to meet needs.
- 8.40 As set out in the Issues and Scope consultation, there remain key economic issues to address within the District, particularly related to improving skills and related job opportunities. There are a number of economic-related strategies that the Local Plan needs take into account as part of its own economic vision and strategy for the District. This includes, for example, the emerging Local Industrial Strategy (being jointly produced by the West Midlands Combined Authority and relevant Local Enterprise Partnerships). Local strategies, such as the Council's Corporate Plan provide a steer on the economic priorities for the District. The overarching themes of these locally relevant strategies are reflected in the overall Local Plan draft 'Vision'.
- 8.41 It is therefore considered appropriate to address such issues via an updated local plan policy. The updated Local Plan policy will reflect the findings of the Economic Development Needs Assessment in terms of identifying those sectors that remain important, or need further support, for delivering the economic growth of the District (having regard to the wider economic policy context as outlined above). This policy update will address the range of different sectors within the District, from manufacturing to the visitor economy, linking into related policies where necessary (e.g. retail policies).
- 8.42 The policy options to be considered reflect a broad continuation of the current approach or a strengthening of the approach to require developers to submit more detailed information on how their proposals contribute to the overall economic priorities of the District. For example, in recent years large scale developments (such as schemes at Kingswood Lakeside and the designer outlet



## Local Plan Policy Options

### Objective 4: Encourage a Vibrant Local Economy and Workforce

village at Mill Green) have been asked to provide 'Employment and Skills Plans' which can require measures such as apprenticeships; formal links to school and colleges courses or recruitment via local employment agencies.

#### ECONOMY AND SKILLS POLICY OPTIONS

**Option A: Update current Local Plan Policy CP9 in order to ensure the Local Plan continues to set out a clear economic vision for the District.**

This would update the current Local Plan (Part 1) Policy CP9 to reflect current national and local policy and evidence on the local economy and skills. Would continue to provide overview of which sectors of the local economy are particularly important to retain and which need to be further developed and/or supported (linking to the employment land strategy). It would continue to reflect key local issues, such as the improvement of skill levels. It would continue to encourage developments to demonstrate how they are helping to address key issues identified (but with no specific requirements) e.g. retain current references to considering sustainable transport links and improved ICT services favourably as part of development schemes.

**Option B: In combination with Option A, set out specific requirements from developments.**

In addition to Option A, this option could consider ways in which the Council would require developers to demonstrate new development schemes are addressing the economic issues identified e.g. requiring Employment and Skills Plans, procuring locally sourced materials, or demonstrating connectivity to full fibre broadband, for example. Consider applying requirements to all developments, or setting a threshold (see question below).

#### **Questions on Economy and Skills Policy Options:**

**Question 39.** Do you have any comments on what the policy focus should be in terms of sectors that need to be supported to deliver the overall economic vision and growth for the District?

**Question 40.** If the policy was to set out specific requirements from new developments should these be required from all developments, or only those above a certain threshold e.g. major developments only (10 dwellings or 1,000m<sup>2</sup> floorspace)?

**Question 41.** What other requirements would help assist deliver the economic growth and vision for the District?



## Local Plan Policy Options

### Objective 5: Encourage Sustainable Transport Infrastructure

#### Issues and Options for delivering Objective 5: Sustainable Transport Infrastructure

##### National Policy

- 9.1 Chapter 9 of the National Planning Policy Framework sets the context for promoting sustainable transport. Paragraph 102 states that transport issues should be considered at the earliest stages of plan making to address impacts of development; maximise opportunities from transport infrastructure and changing technology; promote walking, cycling and public transport use; take account of the environmental impacts and mitigate for adverse effects / achieve net environmental gains accordingly; ensure patterns of movement, streets, parking etc. are integral to the design of schemes and contribute to making high quality places.
- 9.2 NPPF Paragraph 103 states that the planning system should actively manage patterns of growth in support of these objectives. Development locations *'should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes'*.
- 9.3 In terms of issues of particular relevance to Cannock Chase district, NPPF Paragraph 104 states that planning policies should: *'support an appropriate mix of uses across an area and within larger scale sites to minimise number / length of journeys; be prepared with the active involvement of highways authorities and other transport infrastructure providers; identify and protect critical sites and routes where there is robust evidence; provide for high quality walking and cycling networks'*
- 9.4 The NPPF does not insist that parking standards must be set but states (in paragraph 106) that if this option is pursued then they should take into account the accessibility of the development, its type, mix and use; the availability of / opportunities for public transport; local car ownership levels and the need to ensure an adequate provision of spaces for charging plug – in and other ultra low-emission vehicles.
- 9.5 NPPF Paragraph 107 states that the importance of overnight lorry parking facilities needs to be recognised and that *'proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use'*.

##### Local Policy

- 9.6 Policy CP10: Sustainable Transport sets out a commitment to work with bus and rail operators, Staffordshire County Council, the West Midlands Integrated Transport Authority, the Local Enterprise Partnerships, local transport bodies and developers to help develop and promote sustainable transport modes that provide realistic alternatives to the car, which help address climate change



## Local Plan Policy Options

### Objective 5: Encourage Sustainable Transport Infrastructure

targets and which reduce air pollution. It sets out approaches to developer contributions, with a link to the Developer Contributions SPD, to ensure that sustainable transport matters are addressed.

- 9.7 The policy is split into different sections, covering buses, rail, roads, walking, cycling, taxi ranks and car parking / servicing.

#### Consultation feedback/other issues

- 9.8 It was commented that policy wording and the Infrastructure Delivery Plan needs to be updated to reflect current developments and partnerships, including the need to assess the impact of development on the strategic road network and the potential to use the Midlands Region Transport Model (to be discussed with Highways England). Transport for West Midlands (TfWM) sets out details of rail policy and how this applies locally, which would need to be included in the local plan (e.g. electrification, redevelopment of Cannock station, improvements to Rugeley and Hednesford Town stations, improvements and connections at Rugeley Trent Valley, promotion of the extension to Chase Line services beyond Rugeley Trent Valley post HS2, promotion of improved bus and rail integration between stations, promotion of initiatives to develop rail freight especially to support the mid Cannock site as a multi modal freight terminal). TfWM also references the West Midlands Stations Alliance and its remit, including Cannock station as one of the master planning pilots. Finally, TfWM references a new link road between the M6 / M54 and M6 Toll to support economic growth and improve traffic flow in the area.
- 9.9 The Road Haulage Association highlights the importance of reliable and consistent journey times and the need for lorry parking facilities. It also points out the importance of air quality policies and the need for these to take account of the movement of goods.
- 9.10 Other responses highlighted the need for improvements to stations including better services (e.g. late evening trains) and the need for disabled access at the Rugeley stations. Some expressed concern about the decline in bus service provision / public transport generally with some areas having no provision at all, and the need for more investment including developer contributions. The reference to Active Travel was welcomed, and opportunities for developing sustainable travel networks in relation to canals were set out.
- 9.11 Concerns were also cited about cuts in bus services and lack of late trains from Birmingham to Rugeley as these stop at Hednesford.
- 9.12 Others had commented previously that servicing and access standards needed to be included in the Local Plan to ensure that these were factored in at the outset of any relevant planning application. It had also been commented that the role of the canal network should feature in transport policy.



## Local Plan Policy Options

### Objective 5: Encourage Sustainable Transport Infrastructure

#### Road

- 9.13 In terms of the issues which will need to be addressed in the new plan, it should be noted that the A5/M6T/A460/A34 Churchbridge junction only has a design life to 2020. This will need improvement to resolve existing and future congestion. In September 2018, Highways England confirmed its preferred route for a link road from the M54 to the M6/M6 Toll although the preferred route is not a direct link and will terminate at M6 Junction 11. Discussions with Highways England and other stakeholders will need to be ongoing as the plan progresses, to assess the impacts of cumulative development across different local authorities on the strategic road network and any mitigation which would be required. It is clear further evidence will be needed in this regard. This will include any impacts arising in South Staffordshire resulting from the West Midlands Interchange (Strategic Rail Freight Interchange).
- 9.14 Further, more localised evidence will also be needed depending on which options are progressed, for example it is known that Five Ways Island in Heath Hayes is already restricted in capacity.
- 9.15 Traffic movements and congestion are particularly concerning in the south of the district as highlighted above, and further work will need to be undertaken also taking into account impacts on air quality given that there are designated Air Quality Management Areas (AQMAs) along the A5 corridor and at Five Ways Island (air quality is addressed in more detail under Objective 2 (create healthy living opportunities)). It is important that traffic issues and congestion are also addressed in terms of ensuring the district can realise its ambitions of economic prosperity, and encouraging inward investment / ensuring reliable and consistent journey times.
- 9.16 Parking (including lorry parking) will also need detailed consideration, noting that the current parking SPD is out of date and that the NPPF provides updated context with any introduction of standards needing to be clearly evidenced and justified. The need to support overnight lorry parks will also need to be considered. Parking is an issue also picked up under Objectives 1 (Promote Pride in attractive, safe local communities) and 6 (Create attractive town centres). Furthermore, with declining bus services (see below) there may well be a rise in taxi usage for which parking will need to be considered.
- 9.17 Linked to parking matters, the plan will need to support electric charging points. Currently there are only two Council charging points at Hednesford Park. A limited number of facilities are available at hotels in CCDC. Tesco have announced in December, they are to provide charging points at 600 stores and have three stores in the District. Other retail stores are likely to follow. However this is an issue which the plan will need to address.



## Local Plan Policy Options

### Objective 5: Encourage Sustainable Transport Infrastructure

#### Rail

- 9.18 Now that the £100m electrification and linespeed upgrade to the Chase Line has been completed (but due to be in operation in May 2019), there is need to recognise the regeneration benefits and implications. Electrification schemes are followed by the 'sparks effect,' which lead to increases demand for rail travel, station parking, increased property values and increased demand for commuter housing.
- 9.19 Improvements to Cannock Station are being pursued with the progression of Mill Green Designer Outlet Village being the catalyst for this. The electrified rail service will increase the attractiveness and patronage of services with the introduction of faster, longer trains, not only to Birmingham but also new direct services to the NEC/Airport and London. Options to upgrade Hednesford station, building on the successful 'Heart of Hednesford' community initiative and Rugeley Town station, including parking facilities and CCTV, need to be pursued.

#### Bus Services

- 9.20 Bus services nationally are declining at 2-4% nationally. Staffordshire County Council reduced their bus support budget to £1.3m from 1 April 2018 which has led to the reduction in evening and weekend services. There are no longer any bus services in the District on Sundays. 96% of bus services in the District are operated on a commercial basis.
- 9.21 Cannock Chase council is jointly working with TfWM to introduce the Swift bus travelcard initiative, in early 2019. It is hoped this will make bus travel more attractive and assist in reversing the decline. Swift readers will be introduced at five locations in Cannock, Hednesford and Rugeley, funded by this Council. Once implemented, TfWM assume responsibility for subsequent management.
- 9.22 Bus access to key employment sites remains an issue. Bus services to Kingswood Lakeside, Cannock and i54 employment sites at Cannock have now been withdrawn.

#### Walking & Cycling

- 9.23 A coherent strategy to promote and develop a network of pedestrian and cycling routes is needed and the Cannock Chase Integrated Transport Strategy will need to be updated, taking this issue into account.



## Local Plan Policy Options

### Objective 5: Encourage Sustainable Transport Infrastructure

#### SUSTAINABLE TRANSPORT POLICY OPTIONS

**Option A:** Update existing Policy CP10 to ensure the most up to date situation is reflected, retaining the current sub-themes (Rail, Roads, Walking, Cycling, Taxi Ranks and Servicing) and adding in strategic references to opportunities from canals / the canal network (including towpaths), lorry parking and electric vehicle charging for example

This option may need to be considered in combination with other options (below) to ensure full compliance with the NPPF. Furthermore, Policy CP10 stated that local parking and servicing standards would be addressed in Local Plan Part 2 and given that work on Part 2 ceased in order to enable a full Local Plan review to progress, there is still a gap needing to be considered.

**Option B:** As per Option A but with the addition of standards for parking, access and servicing, lorry parking and electric vehicle charging set in Local Plan Policy

This option would ensure that expectations are clearly set out in policy and would have clear links to delivering the updated NPPF and ensuring the policy is fit for the future given the anticipated ban on new diesel /petrol vehicles by 2040. As standards are considered to be local rather than strategic issues they would need to be included as Development Management Policy. Including standards in the Local Plan would enable more detail to be assessed in terms of viability, the requirements for which have been increased at the plan making stage.

**Option C:** As per Option A but with standards for parking, access and servicing, lorry parking and electric vehicle charging being set in a supplementary planning document

This option would require a 'hook' in Local Plan policy to make clear that an SPD is required. By including detailed standards in SPD rather than in the Local Plan itself this would provide more flexibility to update requirements especially given the fast pace of technological change.

#### Questions on Sustainable Transport Policy Options:

**Question 42.** Which combination of options do you prefer and why?

**Question 43.** Are there any other options we should be considering and if so, what should these be?



## Local Plan Policy Options

### Objective 6: Create Attractive Town Centres

#### Issues and Options for delivering Objective 6: Create Attractive Town Centres

##### National Policy

- 10.1 The NPPF Chapter 7 sets out national policy for ensuring the vitality of town centres including the need to define a network and hierarchy of town centres to allow them to grow and diversify; to define their extent (including primary shopping areas); to allocate suitable sites to meet development needs; to consider edge of centre sites should suitable locations not be forthcoming within town centres, and to recognise the role residential development can play in ensuring the vitality of centres.
- 10.2 National Planning Practice Guidance provides further elaboration. It states that *'Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work. Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a 'town centre first' approach and taking account of specific town centre policy. In doing so, local planning authorities need to be mindful of the different rates of development in town centres compared with out of centre.'*
- 10.3 The NPPF defines town centre uses in Annex 2, and in order to add detail to the 'town centre first' approach sets out the sequential test for dealing with town centre uses being proposed beyond town centre boundaries (either through local plans or through planning applications), looking first at edge of centre (also defined in the annex) and then beyond the edge of centre. For town centre uses that, via the sequential test, demonstrably cannot be located in town centres the NPPF then makes provision for an Impact Test to be applied to ensure they do not have 'likely significant adverse impacts'. The national default threshold for this is development of over 2,500 square metres (gross); however subject to evidence the NPPF makes provision to allow for local thresholds to be set.
- 10.4 The PPG states that a *'positive vision or strategy for town centres, articulated through the Local Plan, is key to ensuring successful town centres which enable sustainable economic growth and provide a wide range of social and environmental benefits. Once adopted a Local Plan, including any town centre policy that it contains, will be the starting point for any decisions on individual developments. Local planning authorities should work with the private sector, Portas Pilot organisations, town teams, neighbourhood planning groups, town centre management organisations and other relevant groups when developing such strategies. Non-planning guidance produced by other government departments and the sector may be useful in producing such a strategy.'*





## Local Plan Policy Options

### Objective 6: Create Attractive Town Centres

- 10.5 The PPG then goes on to elaborate what such a strategy should contain. This includes the role, function and hierarchy of town centres over the plan period; a vision for each town centre; an appropriate mix of uses; whether the centre can accommodate the scale of assessed need and options for dealing with this; timeframes for providing new retail floorspace; complementary strategies and consideration of parking provision, charges and enforcement. Strategies should also *'manage decline positively' and should 'take account of relevant market signals....and should keep their retail land allocations under regular review'*.
- 10.6 The role of tourism is also included in this section of the NPPF stating that Local Plans should consider the specific needs of the tourism industry including location or sectoral requirements, engage with representatives of the tourism industry, examine the broader social, economic and environmental impacts of tourism, analyse opportunities for tourism to support local services and enhance the local environment and have regards to non-planning government guidance.

#### Local Policy

- 10.7 Current adopted local policy sets out the approach to town centres in Local Plan (Part 1) Policy CP11: Centres Hierarchy (And Area Action Plans)
- 10.8 This policy sets out a hierarchy and sets policy accordingly for the different centres across the District. The main centre is Cannock, which is designated as the strategic town centre for the district, with the next tier being the town centres of Rugeley and then Hednesford, followed by the District Centre at Hawks Green and then the Local Centres at Norton Canes, Heath Hayes, Chadsmoor, Bridgtown, Fernwood Drive and Brereton.
- 10.9 The policy sets out appropriate growth levels for town centre uses (retail and office) based on evidence used at the time, and details the need to take a sequential approach for town centre uses in their local context including retail, office, commercial, leisure and cultural facilities to ensure that regeneration of town centres is not undermined by town centre uses being located out-of-town.
- 10.10 The policy sets out a clear approach to the regeneration of town centres. For Rugeley Town Centre an Area Action Plan is referenced and incorporated into the Local Plan (Part 1). This sets out more local detail, defining a Primary Retail area and identifying a range of Opportunity Sites within the town centre boundary. For Cannock, the policy states that development within the town centre will be guided by a Supplementary Planning Document or Area Action Plan.
- 10.11 For the other centres, the approach for Hednesford is focused upon local regeneration and maximising appropriate tourism as a gateway to the Cannock Chase AONB. The role of Hawks Green as a District Centre is to provide shops, services and community facilities to serve local communities. The Local Centres'



## Local Plan Policy Options

### Objective 6: Create Attractive Town Centres

role is to provide small scale shops, services and community facilities: the policy aims to protect and enhance these and to support the creation of new local centres where appropriate to serve the needs of existing and new communities.

#### Consultation feedback/other issues

- 10.12 Generally the current centres hierarchy was felt to be appropriate although it is clear that the evidence base needs to be updated to ensure that the plan is informed by up to date guidance. The role of Area Action Plans needs to be considered further in terms of whether the Council's current approach remains appropriate or whether any alternative mechanisms would be more appropriate to articulate and implement a strategy or series of strategies for the district's town centres to accord with the NPPF and its guidance. This includes the need for further elaboration and evidence in relation to tourism.
- 10.13 The introduction of a lower threshold for triggering an Impact test needs further consideration as the current (2015) evidence base shows a clear justification for lower thresholds in the district's centres (as set out in the Issues and Scope consultation paper): this would need to be tested through an updated evidence base.
- 10.14 Further consideration also needs to be given to the inclusion of standards in local plan policy which could add more detail to the national framework.
- 10.15 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 6: Create attractive town centres.

#### TOWN CENTRES HIERARCHY OPTIONS

**Option A: Retain the existing centres hierarchy as set out in Policy CP11 with some minor updates to wording ensure the policy is up to date, and set clear town centre boundaries and development quanta where appropriate based on updated evidence base**

The evidence base was produced in 2015 and will be updated shortly to ensure that the most up to date information is taken into account. Wording would be revised to take into account of the increasing emphasis upon the need for town centres to be adaptable to changing economic circumstances and consumer/visitor patterns in the way in which town centres are used, also linking to emerging evidence from other sectors e.g. the GBSLEP<sup>40</sup>

**Option B: As per Option A but introduce a local policy on local thresholds which would trigger the need for an impact test for town centre uses which are proposed in out of town locations**

The national default threshold for an impact test is 2,500 sq.m. gross floorspace if there is no locally set threshold (NPPF para 89). The evidence base produced for the council in 2015 suggested there was a case for introducing lower thresholds for town centres to protect their vitality and viability (1000 sqm gross for Cannock and Rugeley, 500 sqm for Hednesford and

<sup>40</sup> <https://gbslep.co.uk/what-we-do/place/develop-thriving-towns-local-centres>  
<https://gbslep.co.uk/wp-content/uploads/2018/05/Towns-and-Local-Centres-and-Housing-Frameworks.pdf>



## Local Plan Policy Options

### Objective 6: Create Attractive Town Centres

200 sqm for Local and Neighbourhood Centres). This would need to be checked against an updated evidence base.

#### **Option C: Produce separate Area Action Plans (AAPs) for the larger town centres, including the retention and updating of the adopted Rugeley AAP and the continued pursuance of the emerging AAP for Cannock Town Centre**

Local Plan Part 1 supports the production of AAPs to provide a clear framework for investing in and regenerating Rugeley (the AAP was adopted in 2014 but will need reviewing) and Cannock (Issues and Options was consulted on in 2017). AAPs however are like 'mini local plans' i.e. have to go through the same rigorous processes including independent examination by a planning inspector, and given the speed of change in the town centre / retail economy there is concern that these may not be the best way to keep up with the fast pace of change in this area.

#### **Option D: Support the preparation of local policy and guidance to direct investment to centres / town centres via a range of means as most appropriate to the local context e.g. Masterplan, prospectus, Supplementary Planning Documents, Neighbourhood Plan etc.**

This option could provide an alternative approach to the more rigid framework afforded by an Area Action Plan and, whilst not having the same level of statutory status as an AAP could provide a range of options and approaches relevant to the local context and which could provide the adaptability and flexibility needed to keep up with fast paced change.

#### **Questions on Town Centres Hierarchy Options:**

**Question 44.** Which option or combination of options do you prefer and why?

**Question 45.** Are there other options we should be considering and if so what are they and what evidence is there to support this?

**Question 46.** The National Planning Guidance states that 'local authorities should be seeking to improve the quality of parking in town centres.....and, where it is necessary to ensure the vitality of town centres, the quantity too. Local planning authorities should set appropriate parking charges that do not undermine the vitality of town centres and parking enforcement should be proportionate, avoiding unfairly penalising drivers.' How might this be achieved in practice, through the planning system? Should we be setting any other standards for town centre development? If so, what, and what evidence could be used to support this?

**Question 47.** What further work needs to be undertaken in relation to tourism in order to ensure compliance with the NPPF? Is there evidence available already which could assist with this?



## Local Plan Policy Options

### Objective 7: Provide Well Managed and Appreciated Environments

#### Issues and Options for delivering Objective 7: Provide Well Managed and Appreciated Environments

##### National Policy

- 11.1 The environment is one of the three key strands of sustainable development as set out in paragraph 8 of the NPPF.
- 11.2 NPPF Chapters 15, 'Conserving and enhancing the natural environment' and 16 'conserving and enhancing the historic environment' contain the overarching national policies for achieving this objective.

##### Natural Environment

- 11.3 In terms of conserving and enhancing the natural environment, paragraph 170 sets out the need to protect and enhance valued landscapes; recognise 'the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land and of trees and woodland; minimising impacts on and providing net gains for biodiversity.
- 11.4 Paragraph 171 states that: *'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework 53; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'*
- 11.5 Paragraph 171 goes on to emphasise the importance of conserving and enhancing landscape and scenic beauty; this includes Areas of Outstanding Natural Beauty.
- 11.6 National Planning Practice Guidance was updated in 2016 and provides further context, *stating 'Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside'*, and emphasising the need for landscape character assessments 'where appropriate'. Guidance also states that planning policies and decisions should have regard to AONB management plans as they set the strategic context for development.
- 11.7 In terms of habitats and biodiversity, paragraph 174 of the NPPF states that plans should:
  - a) *'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife*



## **Local Plan Policy Options**

### **Objective 7: Provide Well Managed and Appreciated Environments**

*corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*

- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and*
- c) identify and pursue opportunities for securing measurable net gains for biodiversity.'*

- 11.8 National Planning Practice Guidance provides further detail, including the need to collaborate with other partners including Local Nature Partnerships. It also provides further guidance on the evidence base which may be required including the identification and mapping of local ecological networks, mitigation / compensation and offsetting measures (including that relating to 'Habitats Development' i.e. that protected under the Habitats Regulations 2017) and guidance on planning for green infrastructure and its role in delivering sustainable development.

#### Historic Environment

- 11.9 NPPF paragraph 185 sets out the context for the historic environment in terms of local plan preparation. It states:
- 11.10 *'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*
- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
  - b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
  - c) the desirability of new development making a positive contribution to local character and distinctiveness; and*
  - d) opportunities to draw on the contribution made by the historic environment to the character of a place. '*
- 11.11 The National Planning Practice Guidance (dated 2014, not yet updated at the time of writing to accord with the new NPPF), sets out more detail:
- 'In line with the National Planning Policy Framework, local authorities should set out their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. Such as a strategy should recognise that conservation is not a passive exercise. In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets.*



## **Local Plan Policy Options**

### **Objective 7: Provide Well Managed and Appreciated Environments**

*This could include, where appropriate, the delivery of development within their settings that will make a positive contribution to, or better reveal the significance of, the heritage asset.*

11.12 *The delivery of the strategy may require the development of specific policies, for example, in relation to use of buildings and design of new development and infrastructure. Local planning authorities should consider the relationship and impact of other policies on the delivery of the strategy for conservation.’ (Paragraph: 004 Reference ID: 18a-004-20140306)*

11.13 In terms of how the plan should deal with non-designated heritage assets the guidance states:

*‘While there is no requirement to do so, local planning authorities are encouraged to consider making clear and up to date information on their identified non-designated heritage assets, both in terms of the criteria used to identify assets and information about the location of existing assets, accessible to the public.*

*In this context, the inclusion of information about non-designated assets in Local Plans can be helpful, as can the identification of areas of potential for the discovery of non-designated heritage assets with archaeological interest.’*

#### Local Policy

##### Biodiversity and Geodiversity

11.14 Policy CP12: Biodiversity and Geodiversity sets out the Council’s approach to ensuring the District’s biodiversity and geological assets will be protected, conserved and enhanced. It follows national planning policy and guidance and makes reference to supporting key local strategies and plans e.g. the Local Biodiversity and Geodiversity Action Plans.

11.15 The policy highlights key local assets which should be protected, conserved and enhanced including Hednesford Hills and identifies local initiatives to be supported such as the Forest of Mercia.

11.16 Criteria-based policies for where ecological and geological sites may be affected are set out for decision making (in line with national policy and legislation). Policy requirements for individual development schemes to consider integrating biodiversity into their proposals are also set out.

#### Cannock Chase SAC

11.17 Policy CP13: Cannock Chase SAC safeguards the Cannock Chase Special Area of Conservation (SAC). The SAC is unique heathland habitat, protected by European Law and the Habitats Regulations. Evidence has shown that increasing



## Local Plan Policy Options

### Objective 7: Provide Well Managed and Appreciated Environments

visitor numbers from visitors to Cannock Chase as a result of new development could potentially damage the fragile environment. The evidence base which informed Local Plan (Part 1) showed the majority of visitors to be coming from an 8km radius from Cannock Chase, with a lesser but still significant number coming from a wider 8 – 15 km radius.

- 11.18 Cannock Chase Council works with partners impacted by this radius (the ‘Zone of Influence’) on the Cannock Chase SAC Partnership. There is a programme of measures to mitigate for the impacts of development on the SAC and this programme has been formulated based on the levels of housing to be delivered by current adopted local plans.

#### Landscape Character and Cannock Chase AONB

- 11.19 Policy CP14: Landscape Character and Cannock Chase AONB seeks to protect the District’s landscape character and maximise opportunities for restoring and enhancing landscape features and creating green infrastructure links in conjunction with new development. Development proposals in the AONB which are compatible with its Management Plan objectives are supported as are development proposals across the District which help to facilitate these objectives. Appropriate development within the Green Belt must be sensitive to distinctive landscape character. Consideration is being given to allocate land at Rawnsley Road/Rugeley Road, Rawnsley as Local Green Space (NB this last issue is considered under Objective 2.)

#### Historic Environment

- 11.20 Policy CP15: Historic Environment seeks to protect and enhance the District’s historic environment by maintaining a balance between safeguarding historic buildings, areas and other sites and their settings according to their status and supporting development proposals which are sensitive to and inspired by their context and which add value to the existing historic townscape and landscape character of the District.
- 11.21 The policy encourages a focus of regeneration around historic urban areas stating that Rugeley has benefitted from partnership working and financial investment resulting from a Town Centre AAP in conjunction with Local Plan (Part 1). The policy states that support for regeneration of Cannock Town Centre will be taken forward in conjunction with the Local Plan Review including views received during publicity for the Cannock Area Action Plan in 2017. Key development guidance to support and enhance Hednesford town centre was set out in the Design SPD 2016 and is expanded as part of the Hednesford Neighbourhood Plan.
- 11.22 The policy also promotes the sustainable access and enjoyment of heritage assets District-wide through creation of footway/cycle routes, enhancements to



## Local Plan Policy Options

### Objective 7: Provide Well Managed and Appreciated Environments

the canal network and the conservation and enhancement of all types of heritage assets.

#### Consultation feedback/other issues

#### Biodiversity and Geodiversity

- 11.23 From the Issues consultation and from the new NPPF it is clear that while the broad principles of the policy to protect, conserve and enhance the district's biodiversity and geodiversity assets should remain, considerable updating of the policy theme will be needed. 'Do nothing' is therefore not an option as the policy would not comply with the NPPF. Issues raised included the following:
- The need for a strategic approach to biodiversity including mapping, measurable ways of providing net gains for biodiversity, maximising 'natural capital' (i.e. ways of capturing the economic and social benefits that are derived from the natural environment) and requiring plans to provide further details of biodiversity assessments to be clear on how these impact developable areas of sites.
  - More emphasis on the canal network including a strategy for the water environment
  - The need for a specific policy on the Cannock Extension Canal Special Area of Conservation (SAC)
  - The need to engage farmers and landowners and strengthen policy in relation to natural capital assets
- 11.24 The following section therefore sets out the options for updating policy on matters relating to biodiversity and geodiversity.

### **BIODIVERSITY & GEODIVERSITY POLICY OPTIONS**

**Option A: Update existing Policy CP12: biodiversity and geodiversity which sets out the Council's approach to ensuring the district's biodiversity assets will be protected, conserved and enhanced. The policy follows national policy and guidance and makes reference to supporting key local strategies and plans. It highlights key local assets which should be protected, conserved and enhanced. It sets out criteria based policies to aid decision making.**

This option would mean that the policy is updated to reflect new national policy and the most current local context. An updated version could contain links to the most up to date evidence in relation to the requirements for biodiversity offsetting, natural capital, linkages and mapping (including those relating to the water environment) meaning that planning decisions would be made based on the most up to date information available.

**Option B: as above but also introducing a new policy for Cannock Extension Canal Special Area of Conservation (SAC)**

Under the Habitats Regulations the Council must ensure that development does not cause harm to the SAC which is designated due to the canal containing Floating Water Plantain. Its location close to the A5 corridor which is designated as an Air Quality Management Area





## Local Plan Policy Options

### Objective 7: Provide Well Managed and Appreciated Environments

(AQMA) is of particular concern. The impacts of traffic pollution (atmospheric nitrogen deposition) and any other issues which may cause harm need to be further understood before any mitigation measures can be considered. This work is ongoing and further detailed policy development will need to be informed by its outcomes.

#### **Questions on Biodiversity & Geodiversity Policy Options:**

**Question 48.** Which biodiversity and geodiversity option do you support?

**Question 49.** Have you any other issues you wish to raise in respect of biodiversity and geodiversity?

#### **Cannock Chase Special Area of Conservation (SAC)**

- 11.25 Representations made clear that the current policy may need to be updated depending on a review of the evidence base which is currently underway.
- 11.26 The current policy safeguards the Cannock Chase Special Area of Conservation (SAC). The SAC is unique heathland habitat, protected by European Law and (in the UK) the Habitats Regulations. Evidence has shown that increasing visitor numbers from visitors to Cannock Chase as a result of new development could potentially damage the fragile environment. The evidence base which informed Local Plan (Part 1) showed the majority of visitors to be coming from an 8km radius from Cannock Chase, with a lesser but still significant number coming from a wider 8 – 15 km radius.
- 11.27 Cannock Chase Council works with partners impacted by this radius (the ‘Zone of Influence’) on the Cannock Chase SAC Partnership. There is a programme of measures to mitigate for the impacts of development on the SAC and this programme has been formulated based on the levels of housing to be delivered by current adopted local plans.
- 11.28 The evidence base is currently under review to any updated policy would need to be informed by its outcomes. We therefore think there is only one policy option at this point which is to update the wording of the current policy as necessary depending on the updated evidence base to ensure that the plan complies with the Habitats Regulations.

#### **CANNOCK CHASE SAC POLICY OPTIONS**

##### **Option A: Update the Cannock Chase SAC policy CP13 as necessary to reflect the updated evidence**

Policy must comply with the Habitats Regulation to ensure that no harm arises to the SAC as a result of applicable development pressure. An up to date evidence base and mitigation strategy is essential and policy wording may need to change to reflect this. This work is ongoing at present through the Cannock Chase SAC Partnership.

#### **Questions on Cannock Chase SAC Policy Options:**

**Question 50.** Do you have any comments on this option?



## Local Plan Policy Options

### Objective 7: Provide Well Managed and Appreciated Environments

#### Landscape Character and Cannock Chase Area of Outstanding Natural Beauty (AONB)

- 11.29 The NPPF (para 172) states that ‘great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding National Beauty, which have the highest status of protection in relation to these issues’.
- 11.30 Comments to the Issues consultation were mainly focused upon emphasising the importance of the AONB and landscape character, ensuring its protection. It was generally felt that the current policy was appropriately worded. Some felt that there should be exceptions to policy set out to allow for some development although the council considers the existing policy already allows for this assessment on a case by case basis, and furthermore is still broadly worded in a way which complies with national policy.
- 11.31 Notwithstanding this however, Paragraph 172 of the NPPF does state that planning permission should be refused for major development ‘other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest’. It is therefore considered that only one policy option applies: to provide minor updates to exiting policy CP14 to reflect the most up to date evidence.
- 11.32 In addition Policy CP14 sets criteria for assessing acceptable quantum of development (extensions / replacement buildings) in the Green Belt so the approach for this will need considering in the light of the new NPPF.

#### LANDSCAPE CHARACTER AND CANNOCK CHASE AREA OF OUTSTANDING NATURAL BEAUTY (AONB) POLICY OPTIONS

**Option A: retain current policy wording with minor amendments to update and reflect the most up to date evidence base and national policy context if applicable**

Existing policy wording largely robust and flexible enough to be able to address the issues which were raised through the previous consultation. Minor changes to ensure the policy wording remains up to date.

**Option B: include detailed criteria in policy for assessing suitability of different types of application, including retaining the current criteria for extensions / replacement buildings in the Green Belt**

This would have to be evidenced in terms of how more detailed elaboration could be justified within the local context.

**Option C: Retain current policy wording (with minor modifications to update) and provide further elaboration if required via an updated design SPD**

This could provide for more flexibility in approach and a clearer definition between ‘strategic’ policy and ‘non strategic’ (i.e. local) policy as required by the NPPF



## Local Plan Policy Options

### Objective 7: Provide Well Managed and Appreciated Environments

#### **Questions on Landscape Character and Cannock Chase Area of Outstanding Natural Beauty (AONB) Policy Options**

**Question 51.** Which option or combination of options do you support?

**Question 52.** Have you any other issues you wish to raise in respect of Landscape character and Cannock Chase AONB?

#### Historic Environment

- 11.33 The updated NPPF 2018 retains its support for conserving and enhancing the historic environment in its widest sense. Local Plan Policy CP15 emphasis this approach at a local level, and a full coverage of Conservation Area Appraisals and Management Plan SPD's for the District will shortly be in place. The Design SPD 2016 seeks to provide historic character-based design coverage of specific areas of the District and the adopted Hednesford Neighbourhood Plan 2018 reinforces this approach in defining special character areas and a Local List of key buildings considered to be of importance to the history and development of Hednesford. Progress on the District Local List will progress as resources allow.
- 11.34 Responses to the Issues consultation included:
- the need to include specific policy on canals, as the network is important, not just the designated conservation areas;
  - to ensure the plan provides a positive and proactive strategy (including setting) for heritage;
  - heritage policy should not be 'stand alone';
  - heritage –led references are welcomed;
  - planning decisions in Rugeley are undermining the conservation area policies;
  - the recognition of the Historic Environment Character Area and Extensive Urban Survey work is welcomed (though some updating may be needed);
  - the Chase Through Time project may need to be included;
  - the mining history of the area should be celebrated;
  - interpretation boards in suitable locations are supported (eg the Hatherton Canal);
  - the plan needs to recognise that the protection of historic assets requires use of statutory powers;
  - any consideration of the regeneration of Brereton Colliery should be limited in scale and reflect the character of the area as AONB and Green Belt.
- 11.35 The key issue which links many of these responses is the need to reinforce local policy to link aspects of heritage across the District in a multi-functional sense



## **Local Plan Policy Options**

### **Objective 7: Provide Well Managed and Appreciated Environments**

with other objectives and ambitions so that actions across the board dovetail with and reinforce each other to create a strong positive and proactive context for future change. For example, the canal network has potential to assist with biodiversity, recreation and health, economic regeneration unlocking the potential for waterside development, sustainable transport, green and blue infrastructure, drainage and floor management and education and awareness raising via interpretation, as well as more specific heritage protection and enhancement. A further example is in town centres to maximise benefits of the historic environment to accommodate diverse uses on multiple floors whilst providing the community with a strong sense of identity and USP, enhancing local distinctiveness.

- 11.36 Whilst some refreshing of evidence/ a degree of review may be required (such as incorporating references to The Chase Through Time and updating of Conservation Area Appraisals at intervals) generally historic environment evidence stands the test of time well and the need for updates tends to be limited either to coverage of additional heritage topics which have not been fully covered in the past (eg progressing a Local List) or more selective updates in areas subject to more substantial change.
- 11.37 The Issues and Scope consultation asked questions about the review of Policy CP15 based upon responses to the previous Issues and Options Local Plan (Part 2) consultation responses which strongly supported using the historic environment as a catalyst to encourage the positive regeneration of the District. Options relating to town centres, canals and collieries and former mineral railway lines were all supported:
- to help bring new life into town centres and historic commercial buildings;
  - to use the Conservation Area Management Plans as a guide for development;
  - to consider Cannock Extension Canal and Brereton Colliery as regeneration/leisure opportunities;
  - and to enhance the footway/cycleway network via former mineral railways lines across the District, linking existing routes and having health and wellbeing benefits as a green infrastructure opportunity.
- 11.38 There was also support through the consultation for elaborating existing policy CP15 by providing historic environment guidelines for managing change at relevant allocated sites, including avoidance/mitigation measures, indicating key matters for consideration by developers and opportunities to better reveal significance of the historic environment. Finally a wider role for maximising interpretation of the historic environment was supported, with suggestions for heritage trails across the area which may require a specific strategic policy framework, a District-wide interpretation strategy guiding developers involved



## **Local Plan Policy Options**

### **Objective 7: Provide Well Managed and Appreciated Environments**

with sensitive sites and more acknowledgement of the community and landscape history of Cannock Park, including a heritage trail and information boards.

#### **HISTORIC ENVIRONMENT POLICY OPTIONS**

**Option A:** Expand existing policy CP15 to embrace the historic environment as a catalyst for positive regeneration with referenced links to related policy areas and any updates to the evidence base.

Existing policy direction largely robust and flexible in accordance with national policy however wording would benefit from updating to better address responses made.

**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) Heritage Impact Assessment evidence to provide guidance for managing change at allocated sites.

Builds on updated existing policy wording to elaborate upon local heritage opportunities (by generic type rather than site specific), providing framework for development management and making clear potential benefits available.

**Option C:** as above but incorporating a District-wide Interpretation Strategy policy framework.

Builds on updated existing policy wording to elaborate upon local heritage opportunities (by generic type rather than site specific), providing framework for development management and range of potential benefits available including a Heritage Interpretation Strategy for the District to contribute to the quality of life for existing and future generations.

#### **Questions on Historical Environment Policy Options**

**Question 53.** Which option or combination of options for the historic environment do you support?

**Question 54.** Have you any other issues you wish to raise in respect of the historic environment?

## Issues and Options for delivering Objective 8: Support a Greener Future

### National Policy

- 12.1 National planning policy (NPPF, Chapter 14) states that local plans should support the transition to a low carbon future in a changing climate, taking full account of flood risk. Policies and decisions should contribute to reductions in greenhouse gas emissions; minimise vulnerability and improve resilience to climate change; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure. As delivering sustainable development is an overarching objective of national planning policy, these matters also relate to other areas of the NPPF such as sustainable transport.
- 12.2 National policy (NPPF, para 150) and supporting national guidance state that local authorities can make use of the Governments optional technical standards for housing, which includes higher standards for water efficiency. This does not contain any optional standards for energy efficiency or low carbon/renewable energy sources. National policy refers to local requirements for low carbon/renewable energy sources but there are no references to energy efficiency; it has therefore been assumed to data that national policy limits energy efficiency standards to the current Building Regulations (and local policy can not go above these). However, in its responses to the national policy consultation the Government suggested that local authorities were not limited in their ability to set such standards<sup>41</sup> highlighting that the Clean Growth Strategy (2017) supports improvements in energy efficiency standards for new developments (although this then refers to a review of Building Regulations).
- 12.3 National policy (NPPF, para 178-183) addresses ground condition and pollution issues, with particularly locally relevant references to the legacy of mining activities and pollution impacts, including air quality and artificial light. The new 'agent of change' principle is introduced, which states existing businesses should not have unreasonable restrictions place on them as a result of a development permitted after they were established; suitable mitigation should be provided by the new development. Planning policies should not duplicate other pollution control regimes.
- 12.4 National planning policy (NPPF, Chapter 17) requires relevant local authorities to ensure there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods needed. This involves the protection of areas for minerals workings. There is also a specific national planning policy framework for

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728498/180724\\_NPPF\\_Gov\\_response.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728498/180724_NPPF_Gov_response.pdf) - See Question 33 response

waste matters, which requires the relevant local authorities to plan for the management of waste e.g. via the provision of sufficient and appropriate waste management facilities.

### Local Policy

- 12.5 Local Plan (Part 1) Policy CP16 identifies key local issues related to climate change, pollution, flood risk, minerals and waste. There are links to the relevant Staffordshire County Council plans for minerals and waste (as well as flood risk management). There are links to the national plans for the management of water quality. It links to other, related Local Plan policies such as design, healthy living, sustainable transport, and biodiversity reflecting the cross-cutting nature of these issues.
- 12.6 Support is given to renewable and low carbon energy schemes, subject to other local plan policies. A series of development management criteria are set out for individual development schemes to take into account including exceeding national standards for carbon reduction; improved energy efficiency; flood risk; water quality and drainage; green infrastructure; sustainable construction methods; and minerals sterilisation. The policy is supported by the Design SPD which provides further detail on how developments can take such issues into account as part of their design and layout.
- 12.7 The Staffordshire County Council Waste and Minerals Plan also form part of the local planning policy framework. These address the requirements set out within national planning policy for the sustainable management of minerals and waste.

### Consultation feedback/other issues

- 12.8 Individual responses suggested specific additional references and/or wording to be included within the updated policy. These included reference to potential role of canal network in contributing to low carbon technologies and surface water drainage; measures to protect 'controlled waters'; matters to consider in relation to regulated sites, such as waste processing facilities, reflecting the 'agent of change' principle; and enhancing links to the role of green/blue infrastructure in supporting a greener future. Support was given to the current policy wording related to coal mining legacy issues and safeguarding of minerals.
- 12.9 The approach to updating the evidence base received support. Information was provided on key existing strategies, management plans and evidence to be taken into account e.g. River Basin Management Plans and foul drainage capacity. Some respondents supported seeking higher building standards from new developments, such as the optional higher water efficiency standard.
- 12.10 In terms of key local issues, it is recognised that many of those identified in the current local plan policy remain relevant e.g. air quality management areas within the District and flood risk zones. Updated local evidence will enable the policy to

reflect the current local context, identifying the key local issues that need to be addressed. This evidence includes a Strategic Flood Risk Assessment and Water Cycle Study update. Some of these matters also link to other Local Plan policies, such as air quality impacts upon healthy living and natural environments (see Objectives 2 and 7 respectively).

- 12.11 Consideration needs to be given to the extent to which the updated local plan policies encourage or require new developments to achieve higher standards of sustainable construction (above the minimum building regulations requirements). As per national planning policy (NPPF, para.34) any standards and/or requirements would need to be considered as part of the overall local plan viability assessment to ensure any additional costs to developments arising from these were taken into account at the plan making stage.
- 12.12 Based on the above information we think that the following policy options need to be considered to help us deliver Objective 8: Support a greener future.

### GREENER FUTURE POLICY OPTIONS

**Option A: Update current Local Plan (Part 1) Policy CP16 to reflect up to date evidence base work. Include reference to potential role of canal network in contributing to low carbon technologies and surface water drainage; measures to protect ‘controlled waters’; matters to consider in relation to regulated sites; such as waste processing facilities, reflecting the ‘agent of change’ principle. Enhance links to the role of green/blue infrastructure in supporting a green future.**

This would update the current Policy CP16 to reflect updated national and local policy and local evidence. This includes the Staffordshire County Council Minerals and Waste Local Plans; Staffordshire County Council SUDS handbook; Humber River Basin Management Plan; Water Resources Management Plans. Evidence updates to support this policy would include a Strategic Flood Risk Assessment and Water Cycle Study, foul drainage assessments, air quality assessment work, waste and minerals safeguarding assessment. Evidence related to low carbon and renewable technologies would be drawn from nationally available data. The suggested additional elements of the policy relate to consultation comments received

**Option B: In combination with Option A, continue current policy approach of encouraging sustainable construction standards, but not requiring them.**

In combination with Option A continue to encourage, but not require, improved sustainable construction standards such as energy efficiency improvements and low carbon/renewable energy technologies. It would continue to be supported via an updated Design SPD which could set out the standards to be encouraged and how to achieve them. Including more detail on preferred standards in SPD rather than in the Local Plan itself would provide more flexibility to update those standards, especially given the fast pace of technological change.

**Option C: In combination with Option A, require developments to meet specific building standards, including sustainable construction standards such as water efficiency, energy efficiency, low carbon/renewable technologies and include in local plan policy.**

In combination with Option A require individual developments to achieve specific sustainable



construction standards or provide specific assessments as part of the planning application process. As standards are considered to be local rather than strategic issues they would need to be included as Development Management Policy. Including standards in Local Plan would enable more detail to be assessed in terms of viability, the requirements for which have been increased at the plan making stage. It would continue to be supported via an updated Design SPD which could set out how to achieve the required standards.

**Questions on Greener Future Policy Options:**

**Question 55.** Does the updated NPPF and other recent Government policy (e.g. Clean Growth Strategy 2017) allow the Council to set higher energy efficiency standard requirements, where justified by local evidence?

**Question 56.** Apart from a viability assessment of the costs of such measures, what local evidence would be needed to justify the need for higher sustainable constructions standards over and above building regulation requirements?

**Question 57.** If specific standards are considered appropriate, should these be required on a certain threshold of site e.g. large sites only?

**Question 58.** Are there any new or emerging technologies that should specifically be taken into account in gathering the evidence?



Issues for other policy considerations

Development Contributions and Infrastructure

National policy

- 13.1 The need for appropriate infrastructure to support the overall levels of housing and economic growth outlined within local plans is a theme that runs through national policy (e.g. NPPF para 72 and 81). Any barriers to investment that are linked to inadequate infrastructure should be considered. Any opportunities for further investment and growth from infrastructure projects should also be considered. Engagement with infrastructure providers is a key part of the local plan making process (and is related to the overall 'duty to cooperate' in terms of demonstrating effective cooperation on strategic matters).
- 13.2 National policy requires local plans to set out strategic policies that make sufficient provision for a range of infrastructure including transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, the provision of minerals and energy (including heat), community facilities and green infrastructure (NPPF, para 20). Non-strategic policies should be used for the provision of infrastructure at a local level (NPPF, para 28).
- 13.3 National guidance provides further information on how local plans can demonstrate how they can deliver on strategic matters, including infrastructure. This includes early engagement with infrastructure providers and other stakeholders to identify infrastructure deficits and requirements, and opportunities for addressing them. Account should also be taken of the need for any strategic infrastructure within the area.
- 13.4 National policy sets out that local plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan (NPPF, para 34).
- 13.5 National policy sets out the circumstances when planning conditions and obligations are appropriate (NPPF, paras 54-57). Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. There are specific tests to be met if planning obligations are sought. Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the developer to demonstrate



whether particular circumstances justify the need for a viability assessment at the planning application stage.

- 13.6 National guidance provides more detail on how to undertake viability assessments for local plans and individual development schemes. There is an increased emphasis upon testing the viability of local plan policies to avoid delays at the planning application stages due to viability issues. There is also an increased emphasis upon making viability assessments and developer contributions (particularly how they are spent) more transparent and publicly accessible.
- 13.7 The Government has recently announced (Autumn/Winter 2018) that it will be taking forward reviews to the developer contributions system, namely updates to the Community Infrastructure Levy.<sup>42</sup>

### Local policy

- 13.8 Local Plan (Part 1) Policy CP2 provides an overarching policy for developer contributions and infrastructure. Policy CP7 sets out the District's affordable housing requirements. These policies are supported by the Developer Contributions and Housing Choices SPD (2015) which also provides detailed information on the Council's approach to developer contributions, taking account of the locally adopted Community Infrastructure Levy charges. Specific guidance is provided on developer contributions to the Cannock Chase Special Area of Conservation (Guidance to mitigate the impact of new residential development, 2017).
- 13.9 The Local Plan (Part 1) is also accompanied by an Infrastructure Delivery Plan, which identifies a range of infrastructure requirements to support the Local Plan housing and economic growth. These include a variety of projects including those related to formal and informal leisure facilities, schools, waste water management and flood risk management. Key infrastructure requirements are reflected throughout the Local Plan (Part 1) policies.
- 13.10 The Council adopted its Community Infrastructure Levy (CIL) charging regime in June 2015. This includes a Regulation 123 list which identifies a number of projects that may be eligible for CIL funding. Local guidance on the CIL processes is also available.

### Consultation feedback/other issues

- 13.11 Some responses to this issue were high-level e.g. those from statutory agencies citing the need to engage as the plan progresses (Natural England also requested more emphasis on green / blue (i.e. water-related) infrastructure).

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<sup>42</sup> 'Reforming developer contributions' MHCLG consultation (Dec 2018 – Jan 2019)



- 13.12 Many respondents cited the need for updated viability assessment work and the need for robust evidence to justify where contributions were needed and the need for clarity on how CIL would be allocated (and how proposed changes in CIL regulations would need to be applied). Some developers commented that a site by site approach might be needed to take account of specific circumstances; a generalised approach might not be appropriate. West Midlands HARP (representing a range of housing associations) commented that such providers should not have to pay contributions, and exceptions should apply for care homes / extra care facilities as these often provide their own health care facilities. Some commented that if a developer could not deliver on the required infrastructure then the site should not be considered viable.
- 13.13 Other respondents provided information about their particular product (e.g. rent-to-buy housing). Some set out what they felt should be provided for in terms of developer contributions and an updated infrastructure delivery plan, including a range of projects and problems with local infrastructure, funds for the restoration of the Hatherton Canal, sport and recreation facilities as shown by updated evidence for the Rugeley Power Station redevelopment, and the need for a new or expanded police custody facility in the southern Staffordshire area.
- 13.14 In terms of key issues to consider, the overall local plan strategy for housing and economic growth will need to be informed by infrastructure capacity considerations. This includes assessing where future development may not have significant infrastructure implications (or could be accommodated by existing infrastructure provision) and identifying where future development would require further infrastructure provision. The deliverability of this infrastructure will need to be carefully considered, particularly in terms of funding. These requirements may therefore impact upon the viability of developments within the District, where funding is necessary from the developments themselves.
- 13.15 Development contributions can be in the form of planning conditions, planning obligations (Section 106/278 agreements) and CIL charges. Therefore the local plan will need to consider the most appropriate ways for different types, and scales, of infrastructure to be provided for. This will need to take into account the ongoing national Government changes to the development contributions system. It is likely that the local plan will need to be supported by an update to its CIL charging regime. The issue of affordable housing contributions is discussed further under 'Objective 3- Provide for Housing Choice'. The level of development contributions sought through policies in the Local Plan will need to be subject to an overall local plan viability assessment, as per national policy and guidance. This will help guide the content of policies i.e. by providing a steer on what levels of contributions are viable within the District and what are not.
- 13.16 Development contributions and infrastructure requirements will continue to be reflected in a range of policies within the Local Plan Review e.g. policies on



healthy living may contain open space standards, policies on sustainable transport will contain information on key infrastructure projects and the housing policies will set out affordable housing contribution requirements. Therefore the Council would welcome views on whether or not a specific policy similar to the existing Local Plan (Part 1) Policy CP2 is still required; and if so, what further information (if any) should it contain over and above the existing Local Plan (Part 1) policy. We would also welcome views on which elements of developer contributions should be contained within strategic and non-strategic policies (the Council has set out its current view in relation to what elements may be considered non-strategic in other parts of this consultation e.g. see Objective 3 Provide for Housing Choice (housing mix), Objective 5 Sustainable Transport, and Objective 8 Support a Greener Future.)

- 13.17 An updated Infrastructure Delivery Plan (IDP) will be prepared to support the new Local Plan to ensure the required infrastructure and investment needed to deliver the plan effectively is identified. The IDP will include the specific infrastructure projects needed to deliver planned growth and will be updated as the plan progresses, following consultation with infrastructure providers and other stakeholders. The latest version of the IDP is available for comment as part of this Issue and Options Consultation. It has been updated to reflect the most recently available information to the Council. We would welcome views on any further updates required at this stage and the evidence required to inform further updates as the Local Plan progresses. We would also welcome views on the most appropriate ways to engage with infrastructure providers and other stakeholders as the Local Plan progresses. For example, do you consider a 'workshop' event would be useful or are one-to-one meetings with individual providers more appropriate?

**Questions on Policy Development Contributions and Infrastructure:**

**Question 59.** Is there a need for continued overarching policy which sets out Council overall approach to developer contributions i.e. continuation or Policy CP2 (with updates to reflect changed national and local context)? If so, what updates should be made to the policy?

**Question 60.** Do you have any comments on specific development contributions and infrastructure requirements that should be contained within strategic or non-strategic policies?

**Question 61.** Are there any developments which should be exempt from developer contributions (e.g. currently housing for the elderly is exempt from CIL)?

**Question 62.** Do you have any comments on the most recent updated Infrastructure Delivery Plan?

**Question 63.** Do you have any comments on the evidence required to ensure it reflect the infrastructure requirements of the new Local Plan? Are there any existing evidence base documents, strategies or action plans from relevant organisations that could help inform the Infrastructure Delivery Plan updates?



**Question 64.** As an infrastructure provider, in what ways would you be able to best engage with the updates of the Infrastructure Delivery Plan on a regular basis?

Neighbourhood Planning

National Policy

- 13.18 The importance and role of neighbourhood plans is reflected throughout national policy, for instance in terms of how neighbourhood plan policies can support the strategic policies of the Local Plan (NPPF, para 13 and 29-30); allocate sites for a range of uses (open space, housing etc.); and develop local policies such as those on design. National guidance provides detail on the production of neighbourhood plans and their role in the plan and decision making processes.

Local Policy

- 13.19 The current Local Plan (Part 1) contains a generic Neighbourhood Planning policy (Policy CP4) which largely reiterates national policy. Further specific guidance is provided on neighbourhood planning within the Statement of Community Involvement (how the Council will assist with the production of neighbourhood plans) and in other specific, informal Council guidance.
- 13.20 The Hednesford Neighbourhood Plan is the only adopted neighbourhood plan in the District (November 2018). There are two other designated neighbourhood areas; Brereton and Ravenhill and Norton Canes. These areas are in the early stages of their plan production.

Consultation feedback/other issues

- 13.21 The majority of respondents stated that the specific current local plan policy on neighbourhood plans was no longer required due to national policy coverage. Some respondents supported continued guidance on neighbourhood plans at the District level and suggested that the local plan should set out clear links between it and neighbourhood plans. Some respondents suggested that there should be a policy if neighbourhood plans allocate sites for housing.
- 13.22 Following consideration of these responses and the updated national policy context, the Council has concluded that it would be more appropriate to reflect the role and importance of neighbourhood planning by making references to the opportunities for neighbourhood plans to support Local Plan policies across the whole plan, rather than in one single generic policy. For example, the need for a housing requirement to be assigned to neighbourhood areas would be reflected in the overall housing strategy policy for the Local Plan. Opportunities for smaller scale site allocations or more local design guidance at the neighbourhood plan level could be reflected in Local Plan policies on housing, open spaces and design. This approach would align with that taken in national planning policy.



**Questions on Neighbourhood Planning:**

**Question 65.** Do you agree with the Council's suggested approach to reflecting the importance of neighbourhood planning throughout the Local Plan policies, rather than retaining a separate and generic neighbourhood planning policy as at present?

Approach to strategic and non-strategic policies and site allocations  
National Policy

- 13.23 National planning policy (NPPF, para.20-30) is clear that strategic policies should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies. Strategic policies should address the overall strategy for the pattern, scale and quality of development providing for housing needs; employment and other commercial development needs; all forms of infrastructure; conservation and enhancement of the natural, built and historic environment; and addressing climate change.
- 13.24 Non-strategic policies should be used to set out more detailed policies for specific areas or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.
- 13.25 Broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a Policies Map. Strategic policies should plan for and allocate sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies) (NPPF, para 23). This suggests not all sites need to be allocated in the Local Plan strategic policies.

Local Policy

- 13.26 The current Local Plan (Part 1) policies contain elements of strategic and non-strategic policy. It is considered some of the policies could be more clearly defined in light of updated national policy requirements. There is one Strategic Housing Site allocated at Land West of Pye Green Road and there are other site allocations, such as the Green Space Network, within the current Local Plan (Part 1).



Consultation feedback/other issues

- 13.27 In light of the updated national policy context, we would welcome views on which Local Plan (Part 1) policies, and elements of them, could be further refined to reflect strategic and non-strategic matters.
- 13.28 In relation to site allocations, there is a similar need to differentiate between strategic and non-strategic sites. National planning policy states that strategic policies should provide a clear strategy for identifying sufficient land to address needs. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies).
- 13.29 The local context could help determine what constitutes a strategic and non-strategic site e.g. those sites that are critical to the overall strategy. For the Local Plan (Part 1) the only strategic housing site allocated in the District is Land West of Pye Green Road for 900 homes in recognition of its crucial contribution to the overall housing strategy. The Local Plan (Part 2) Issues and Options suggested allocating major sites (with planning permission) of 30 dwellings or more and major sites (without planning permission) of 10 dwellings or more. This approach ensured sufficient allocations to meet the entire housing requirement; however, it did not differentiate between strategic and non-strategic sites.
- 13.30 Strategic sites would need to be allocated via the Local Plan strategic policies and identified on the Policies Map as allocations. It is envisaged that the contribution of non-strategic sites to the overall supply of development could be identified either through non-strategic policies in the Local Plan (e.g. by reference to the most up to date land availability assessments which identifies such sites) or Neighbourhood Plans i.e. these would not be allocated on the Policies Map. However, we would welcome views on this approach.
- 13.31 National planning policy states that local plans should identify land to accommodate 10% of the authorities housing requirement on small sites no larger than 1 hectare (unless justified otherwise by strong reasons). This threshold could be used for non-strategic sites. However, this potentially means sites of 1ha or above would be considered 'strategic' which may not provide a proportionate approach (i.e. a potentially large proportion of sites could require allocation via strategic policies; this may not reflect the intended purpose of a strategic policy).
- 13.32 Another approach could be to use the thresholds used to consider which applications are so significant as to warrant recovery by the Secretary of State in the planning appeal process. This would mean strategic sites would be defined as:





## **Local Plan Policy Options** **Other Policy Considerations**

- Any site providing a minimum of 150 dwellings
- Any housing or employment site of 5ha or greater

13.33 This approach would align with that recently suggested by South Staffordshire District Council in its recent Issues and Options consultation. The applicability of these thresholds to the local context could be tested further as the Local Plan strategy for development emerges. As per the previous approach in Local Plan (Part 2) Issues and Options, the Council is considering whether sites with planning permission should also be allocated via the Local Plan to secure delivery. However, there is also a need to ensure a proportionate approach by focusing upon strategic matters within the Local Plan. We would therefore welcome views on this approach.

### **Questions on approach to strategic and non-strategic policies and site allocations:**

**Question 66.** Do you have any comments on the approach of separating the updated Local Plan policies into clear strategic and non-strategic elements, where necessary?

**Question 67.** Do you have any comments on the approach to considering the allocation of strategic sites and non-strategic sites in the Local Plan?

**Question 68.** Do you have any comments on the site threshold for strategic and non-strategic site allocations within the Local Plan?

**Question 69.** Should sites with planning permissions and/or those that are already under construction be considered for allocation in the Local Plan?

### **Safeguarding future land for development and 'reserve' sites** **National Policy**

13.34 National policy states that local plans should, where necessary, identify areas of safeguarded land between an urban area and the surrounding Green Belt to meet longer-term development needs, stretching well beyond the plan period. Planning permission for safeguarded land can only be granted following an update to the plan which proposes the development (NPPF, para.139). Plans should also be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period (NPPF, para.139).

### **Local Policy**

13.35 The current Local Plan (Part 1) identified that the need for the safeguarding of land for future development, including the existing land east of Wimblebury Road, would be considered via Local Plan (Part 2). The only remaining safeguarded land within the District is that site which lies east of Wimblebury Road (as identified in Policy CP6 and on the Policies Map). The Local Plan Review has since taken over the Local Plan (Part 2) work. Whilst not safeguarded land, Local Plan (Part 1) Policy CP8 highlighted the potential need to extend Kingswood



Lakeside (into current Green Belt land) should the demand for additional land at the District's high quality employment exceed supply.

Consultation feedback/other issues

- 13.36 Some responses highlighted the need for the Council to consider the safeguarding of land for future development beyond the plan period. Some responses identified the need for flexibility in terms of identifying a range of sites that can deliver the local plan growth.
- 13.37 Given the District context in terms of its Green Belt designations, there is a need to consider whether or not land should be safeguarded for future development. The current safeguarded land east of Wimblebury Road will be considered in terms of the overall preferred strategy for development, and taking into account any responses to this issue.
- 13.38 Since the Local Plan (Part 1) was adopted the requirement to review Local Plans every five years has been introduced. National policy now also places more emphasis upon local plans delivering on their requirements (e.g. via the Housing Delivery Test). This means there is an even greater need for local plans to identify suitable sites, with sufficient flexibility to account for changes in circumstances, so that housing requirements are actually delivered on the ground. One way of trying to ensure this is by identifying more sites than are actually needed at the outset, so that if for whatever reason some sites are not developed there will still be enough sites to meet local housing requirements. These can be referred to as 'reserve sites' which are different to Green Belt safeguarded land in that they would potentially not require another plan review to come forward (in line with national policy). The use of such 'reserve sites' would most likely be triggered by any shortfall in delivery from other sites identified within the Local Plan.
- 13.39 Cannock Chase District sits within a housing market area of significant unmet housing needs and the options to address this are still being explored across the 14 local authorities via Local Plan reviews. In combination with the requirement to review the plan every five years, the approach of identifying safeguarded land to ensure development boundaries are maintained "well beyond the plan period" may not be an appropriate response housing market areas' needs. However, whilst 'reserve sites' may offer more flexibility, the point at which they would be released for development would need to be considered carefully and the Local Plan process would need to prioritise the preferred development sites using the site selection methodology. This could also involve releasing sites from the Green Belt, rather than only safeguarding them. An issue with both approaches is how much land should be identified to ensure a proportionate approach.



**Questions on safeguarding future land for development and 'reserve' sites:**

**Question 70.** Should the Council consider identifying additional safeguarded land or reserve sites through the new Local Plan taking into account national policy and the local context? Are there any alternative approaches that the Council could take?

**Question 71.** If safeguarded land or reserve sites are necessary, how much capacity should be identified and should this be distributed in accordance with the overall preferred strategies for housing/employment development?



## **Local Plan Policy Options** **Draft Methodology for Site Selection**

- 14.1 The Local Plan will need to decide which locations have potential to accommodate future growth. In determining the preferred strategy the Council will have regard to relevant matters, taking an evidence-based approach to identifying the most appropriate sites via assessment against the proposed Methodology to determine the 'best performing' sites thus most suitable for development.

### National policy

- 14.2 The NPPF sets out in paras 7-9 that the purpose of the planning system is to contribute to the achievement of sustainable development. Consequently the planning system has three overarching objectives to deliver which are interdependent – economic, social and environmental – with development guided towards sustainable solutions taking account of local circumstances to reflect the character, needs and opportunities of each area. NPPF para 23 explains that broad locations for development should be indicated on a key diagram with land use designations and allocations identified on a Policies Map; strategic policies should provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address objectively assessed needs over the plan period and include planning for and allocating sufficient sites to deliver the strategic priorities of the area. The NPPF also provides guidance on identifying land for new homes (paras 67-72) though is not explicit in the process of selecting sites for development. It also emphasises the need to make effective use of land (paras 117-121) in meeting the need for homes and other uses. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, which should only be altered where exceptional circumstances are fully evidenced and justified (para 136). Before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries, the Council must demonstrate that it has examined fully all other reasonable options for meeting its identified need for development (para 137).

### Consultation feedback/other issues

- 14.3 The Issues and Scope consultation for the new Local Plan did not consult specifically on a site selection methodology although it did pose questions for consideration in developing this. Previously however, when work on Local Plan Part 2 was being progressed (before this was ceased in favour of taking forward a full review of the Plan), a suggested methodology was proposed. This can be seen at:  
[https://www.cannockchasedc.gov.uk/sites/default/files/local\\_plan\\_part\\_2\\_issues\\_and\\_options\\_final\\_0.pdf](https://www.cannockchasedc.gov.uk/sites/default/files/local_plan_part_2_issues_and_options_final_0.pdf) (Pages 12-15)
- 14.4 In terms of the responses received, many broadly supported the approach. Comments were made that the 2016 SHLAA was a robust starting point for



## **Local Plan Policy Options** **Draft Methodology for Site Selection**

identifying options. Some commented that the matrix approach was a useful tool. Some felt it was rather simplistic albeit supported by a narrative – style approach and felt that numerical scoring should not be used for ranking purposes and that assessment should be supported by a robust evidence base (expressing concerns with some areas of evidence and / or suggesting alternative methodology such as a ‘traffic light’ approach).

- 14.5 Some felt there was not enough detail to comment and that examples should have been provided. Some references and terminology were felt to be unclear e.g. in terms of ‘stringent policy constraints’ or ‘sites for which for various reasons are restricted’. Links between the Sustainability Appraisal and Green Belt review were considered to be imprecise and could not therefore result in a fully informed judgement, with the approach being ‘superficial and subjective’.
- 14.6 One representation stated that the matrix was illogical and that Green Belt should not restrict the options for assessment, they should be selected on the basis of sustainability without prejudice to their Green Belt status. It was also commented that there should be another assessment stage before proceeding to Proposed Submission.
- 14.7 Comments were also received in terms of further specifics which respondents felt should be included in the appraisal i.e. the AONB; the potential for Compulsory Purchase (unwillingness to make land available should not be a ‘showstopper’); heritage and setting, ground conditions and land stability (coal mining legacy) ; potential sterilisation of mineral resources; high priority given to brownfield sites; capacity issues in infrastructure; access; formal sport; flood risk; public rights of way (protecting these); and in terms of employment the likely development which would be expected on a site.
- 14.8 In relation to the more recent Issues and Scope consultation for the new Local Plan, we asked questions pertinent to developing a site selection methodology for a range of uses (e.g. housing, gypsy and traveller/travelling showpeople provision, and employment sites). We asked how we could ensure we had considered all potential brownfield opportunities first and invited suggestions for additional brownfield sites (to accord with the new NPPF and its increased focus on a ‘brownfield first’ approach). We also asked what key locations / cross boundary sites might be considered ‘reasonable options’ to consider, and we asked for suggestions on specific criteria for screening out sites which could NOT be considered to be ‘reasonable’ options for development and the justification for this.
- 14.9 In terms of the responses received the following points, expressing a range of views, were made:
- Agree with the ‘brownfield first’ approach



## **Local Plan Policy Options** **Draft Methodology for Site Selection**

- Need to avoid an over reliance on brownfield sites: these carry risks.
- Restricting greenfield sites will not guarantee that brownfield land will come forward
- Brownfield land is a 'finite' resource – supplies will decline over time
- Need to be a range of deliverable sites over the plan period, the SHLAA is key to identifying this to identify a sufficient supply of available, suitable and viable supply
- At least 10% of the housing requirement should be on sites no larger than one hectare
- A trajectory of expected housing delivery over the plan period will be needed
- Larger strategic housing sites with multiple sales outlets are key to increasing supply but need to be accompanied by smaller scale, non-strategic, sites
- Sustainability and deliverability is key (including edge of settlements) and can demonstrate the exceptional circumstances needed to justify Green Belt release; the Green Belt should not be used to screen out sites
- The NPPF should be used as the starting point including para 138 and using a full range of criteria
- A flexible approach is needed
- An up to date SHLAA / call for sites and brownfield land register should provide sufficient information already to inform the supply of brownfield sites
- Various developers promoted the merits of their particular sites for inclusion as 'reasonable options' (including cross boundary where applicable) for consideration
- Proposed sites which compromise the provision of waste related facilities should be screened out so safeguard infrastructure needed
- Different views on weighting and scoring, some supported a numerical approach others stated that numerical scoring should not be used
- Sites should be considered 'in the round' and on their own merits not screened using pre defined criteria
- AONB sites should not be screened out just because they are AONB: some sensitive development might be acceptable depending on circumstances
- AONB sites should be screened out, also sites subject to national / European designations relating to ecological or heritage value



## Local Plan Policy Options Draft Methodology for Site Selection

- When screening out sites, information needs to be used in relation to SSSI risk zones, and the best and the most versatile land (links and details provided)
- Some sites in the 'SHLAA' are classified as 'not available or deliverable' when in fact they could be.
- For employment, business needs (e.g. expansion, modernisation, and location) need to be taken into account and could help justify Green Belt release.

14.10 These factors have been taken into account and considered in the light of national policy and local context in developing the following proposed methodology.

### Proposed Methodology

14.11 A series of factors require consideration in rigorously examining site options for growth. These can most clearly be set out in sequence as a means of filtering each site option to screen out the less desirable, to arrive at the 'best performing' shortlist. This will be an iterative process and may require return to earlier stages as it progresses.

#### Stage 1: Establish Evidence Base

- Define site parameters – threshold 10 dwellings +? For Housing/Employment/Safeguarded Land
- Pool of sites – SHLAA/ELAA – by settlement/area
- Local environmental capacity/urban potential/survey of underutilised land/buildings
- Housing/employment needs – local need, HMA Strategic Growth Study recommendations
- Assorted site specific information – ecology, heritage, etc.
- Green Belt Review
- Infrastructure Capacity Evidence – schools, waste water network etc.
- SA

#### Stage 2: Establish a pool of sites and first site sift

The pool of sites to be considered in the site selection process is drawn from the most up to date Strategic Housing Land Availability Assessment (SHLAA) and Employment Land Availability Assessment (ELAA). This is the primary database for all sites that have been suggested for housing and employment development within the District. It provides an overarching assessment of a sites suitability, availability and achievability. A shortlist of sites for further, more detailed assessment in the site selection process can then be established. This involves sifting out any sites that:

- do not meet the thresholds for sites being considered for allocation in the Local Plan (to be determined- see questions in '**Approach to strategic and non-strategic policies and site allocations**');
- are not being actively promoted for development any longer (so are therefore not now available);
- are not considered suitable due to the majority of the site being affected by key







**Local Plan Policy Options**  
**Draft Methodology for Site Selection**

**Table 2**

**URBAN  
EXTENSION/SETTLEMENT  
EXTENSION/GREEN BELT SITE**



Where necessary to release Green Belt and site previously developed and/or well served by public transport assess performance against:
Contribution to Green Belt Purposes
Landscape character/sensitivity to development
Deliverable/Sustainable/Available/Achievable/Estimated Site Capacity
Key environmental constraints – AONB/ecological/heritage/agricultural/TPO/AQMA
Key capacity constraints – transport/education/services (waste management, health etc.)/flood risk/waste water/other community or social infrastructure
Key locational criteria for specific development types – e.g. near town centres or public transport nodes (affordable and other special housing needs – housing for elderly, aspirational housing etc.); accessibility to strategic road (or rail) network (employment uses); key additional factors for employment sites
Any impacts from loss of current use of land
Key locational/mitigation opportunities – for enhancement of existing green infrastructure/foot/cycle access; better revealing heritage/interpretation; enhancement of local services (bus services/health services/foot/cycle links to stations etc.) to enhance existing sustainability and mitigate impacts
Planning history of site
RAG rating/commentary

**Stage 4: Evaluation Stage**

- professional planning judgement/balance based on performance of site, including site visit and commentary as required
- initial recommendations as to which sites are considered most suitable for selection
- information gathered for sites recommended for selection could be used to inform a policy for each site to ensure that appropriate mitigation, infrastructure and other site specific requirements are delivered when the site is developed. At the planning application stage more detailed site assessment work could further inform these requirements.

**Stage 5: Public Consultation**

- Public consultation process to inform final site selection

**Questions on draft methodology for site selection:**

**Question 72.** Do you have any comments on our proposed site selection methodology?

## Appendices

### Appendix 1: Cannock Chase District Local Housing Needs Calculation

Local Housing Needs are calculated in line with the standard methodology for assessing housing need, set out in national planning guidance. This is a clear three step process as set out below.

#### Step 1 - Setting the baseline

Calculate the average household growth over a ten year period. National planning guidance states that this is done using a continuous 10 year period from the current year, using the most recent national household projections (note that the recent consultation on updates to the standard methodology stated that until 2020 projection are released, the 2014 projections should be used and the 2016 projections discounted). These projections indicate that, the number of households in Cannock Chase District is expected to increase by 2,494 over a 10 year period of 2018-2028, implying an average yearly household growth of 249 dwellings each year (an increase from 42,828 households to 45,322 households).

#### Step 2 – An adjustment to take account of affordability

Government guidance requires us to make an adjustment to the figure given in Step 1, using an adjustment factor which takes account of the ratio of median house prices to median workplace earnings, using the most recently published data provided by the Government (at present this is the 2017 ratios published in 2018). The greater the disparity between house prices and wages in an area, the greater the extent of the uplift. For Cannock Chase District, the local median affordability ratio is 6.23 (i.e. local house prices are around 6 times local wages within the district). Where the ratio is more than 4 (as in Cannock Chase District's case) for every 1% increase in the affordability ratio the average household growth should be increased by 0.25%. No adjustment is required where then ratio is 4 or below. Using calculations set out in the national planning guidance this gives a new requirement for 284 dwellings per annum in Cannock Chase District (a 14% uplift on the household growth from Step 1).

#### Step 3 – Capping the level of any increase

National planning guidance indicates that there are two instances in which uplifts to local housing need made under Step 2 can be limited. These are:

- Where the level of increase implied by Step 2 is 40% above an up-to-date local plan adopted within the last five years (this also applies where the strategic policies that are more than 5 years old have been reviewed and found not to require updating).
- Where the level of increase implied by Step 2 is 40% above the level of household growth implied by Step 1 OR above the average annual housing requirement most recently adopted (whichever is the higher of the two figures).

The level of increase is not 40% above the current Local Plan (Part 1) requirements of 241 dwellings per annum and it is not 40% above the original level of household

## **Appendices**

### **Appendix 1: Cannock Chase District Local Housing Needs Calculation**

growth. Therefore neither of these provisions are relevant in the case of Cannock Chase District. Consequently the district needs to plan for an annual rate of **284 dwellings per annum**, which is projected across the whole plan period (intended to be 2018-2036). This is our OAN (Objectively Assessed Need). As noted in the main consultation document, this figure will need to be recalculated when new affordability ratios are published (annually in Spring) and when new household projections are released (in Autumn 2020). Any changes to the standard methodology which may be proposed by the Government in the interim period will also need to be taken into account. At the point the Council formally submits its Local Plan for independent examination the housing need figure is 'fixed' for two years.

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### Appendix 2: Glossary

Phrase	Abbreviation	Definition
Air Quality Management Area	AQMA	An area designated by the local authority which is not meeting the national air quality objectives.
Local Air Quality Action Plan		A plan to tackle air pollution, particularly focused on AQMAs designated within a local authority.
Area Action Plan	AAP	An optional Development Plan Document. It is aimed at establishing a set of proposals and policies for the development of a specific area (such as a town centre or an area of new development).
Area of Outstanding Natural Beauty	AONB	A statutory National Landscape designation to provide special protection to defined areas of natural beauty.
Authority Monitoring Report	AMR	An annual report produced by the local authority that monitors the effectiveness of Local Plan policies e.g. number of new houses built, amount of new open spaces.
Birmingham City Council		The local Government body responsible for managing the City of Birmingham, including the Planning services.
Brownfield Land		Brownfield (also known as Previously Developed Land) is a previously developed site that is available for re-use, usually due to abandonment or under use.
Brownfield Development		Site available for re-use which has been previously developed and is abandoned or underused.
Brownfield Registers		A statutory list of previously developed sites that could be suitable for residential development.
Call for Sites		The process of collecting and collating information on potential development sites.
Community Infrastructure Levy	CIL	A charge on new developments that can be levied by local authorities (or other authorities with charging powers e.g. Mayor of London) to fund infrastructure projects. The charging rates are set locally and vary from one area to another e.g. on the types of development charged and the value of those charges. In Cannock Chase, the charges are currently £40 per sqm for residential development and £60 per sqm for out of town and all large foodstore retail development (subject to increases due to indexation).
Cannock Chase District Council	CCDC / CCC	The Local Planning Authority for Cannock, Rugeley, Hednesford, Norton Canes and neighbouring villages.

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Phrase	Abbreviation	Definition
Conservation Area		Protected areas of special architectural or historic interest.
Conservation Area Management Plans		Plans that set out how Conservation Areas should be managed to protect their historic assets and integrity.
County Council	CC	The upper tier of two-tier authorities covering a county wide area.
Density		The amount of development that a site can accommodate (often measured in dwellings per hectare for residential development)
Dwellings Per Hectare	DPH	Unit of land measurement relative to the amount of dwellings it could accommodate.
Design Supplementary Planning Document	Design SPD	A document providing additional planning information and guidance on design issues for development in Cannock Chase District.
Development Plan Document	DPD	Sets out the Local Planning Authority's policies and proposals for the development and status of land. It can include a Local Plan, Site Allocations and Area Action Plan documents amongst others.
Developer Contributions and Housing Choices SPD		A document providing additional planning information and guidance on developer contributions and housing provision within Cannock Chase District.
District Council	DC	The lower tier of two-tier authorities, responsible for local services.
Duty to Cooperate		This is a legal test that requires cooperation between local planning authorities and other public bodies to ensure Local Plan policies effectively address strategic issues e.g. infrastructure, housing. It is separate from but related to the Local Plan test of soundness.
Economic Development Needs Assessment	EDNA	An assessment of the amount and type of employment land required in the District, taking into account a range of factors including the existing and potential future economic trends in the District and several forecast models for future needs.
Employment Land Availability Assessment	ELAA	A database of sites put forward by stakeholders including the Council and land owners to be assessed for their suitability for future employment uses.
Environmental Capacity Study		A study carried out to assess future development potential within Cannock Chase District.
Greater Birmingham & Black Country Housing Market Area	GBBCHMA	A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting

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Phrase	Abbreviation	Definition
		the links between places where people live and work. This HMA is based on the wider Birmingham & Black Country (Dudley, Sandwell, Walsall, Wolverhampton) area.
Greater Birmingham and Solihull Local Enterprise Partnership	GBSLEP	The Local Enterprise Partnership (see definition below) for this area, covering a number of local authorities including Cannock Chase District.
Green Belt		A policy and land use designation used to retain areas of largely undeveloped, wild, or agricultural land surrounding or neighbouring urban areas.
Green Belt Review		A process that sets out the methodology and mechanism for potential possible alterations to the Green Belt boundaries.
Green Space Network		A network of linked green infrastructure within Cannock Chase District that links urban areas to the countryside.
Gypsy, Traveller and Travelling Showpeople	GTTS	National Planning Policy defines 'Gypsies and Travellers' as 'persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or family's or dependents' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group or travelling showpeople or circus people travelling together as such'. 'Travelling Showpeople' are defined as 'members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependents' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and travellers as defined above'.
Gypsy, Traveller and Travelling Showpeople Accommodation Assessment	GTAA	An assessment of the accommodation needs of gypsy, traveller and travelling showpeople for the plan period. This is then used to identify how many new sites may be needed for such accommodation in the District.
Habitats Regulation Assessment	HRA	The Habitats Regulations Assessment is a tool to identify whether there are likely to be any harmful effects from minerals and waste policies and development proposals on internationally important nature sites. The

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Phrase	Abbreviation	Definition
		HRA considers how significant any impacts are likely to be, and identifies whether they can be reduced (mitigated) to protect these sites or whether it is not possible to offset any likely adverse effects. Internationally important nature sites include Special Areas of Conservation (SAC) which have important habitat features, Special Protection Areas (SPAs) which relate to important bird populations and Ramsar sites which are internationally important wetlands. Collectively, these are often referred to as Natura 2000 sites.
Hectare	HA	A unit of land measurement.
Housing and Planning Act 2016		An Act of Parliament that introduced changes to housing policy and the planning system.
Housing Delivery Test		An annual test (by central Government) of the extent to which a local authority is meeting its local housing requirements. Where the amount of new homes being built does not meet requirements there are different penalties dependent upon the level of under delivery.
Housing Needs Assessment		An assessment of the amount and type of housing accommodation required in the District, focused particularly upon affordable needs.
Indoor and Outdoor Sports Facilities Assessment		An assessment of the current quantity and quality of the local authority areas' facilities and an assessment of the future needs for indoor and outdoor sports provision (in quantity and quality terms), taking account of future population changes.
Infrastructure Delivery Plan	IDP	A plan to identify and aid implementation of the necessary social, physical and green infrastructure required to create sustainable communities.
Landscape Character Assessment		A detailed study that analyses and sets out different types of landscape within an area and their historical context.
Local Enterprise Partnership	LEP	A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.
Local Green Space	LGS	Local Green Space designation is a way to

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Phrase	Abbreviation	Definition
		provide special protection for green areas of particular importance to local communities.
Local Nature Reserve	LNR	Local Nature Reserves (LNRs) are places with wildlife or geological features that are of special interest locally. There are over 1280 LNRs in England covering almost 40,000 ha
Local Plan		The Development Plan for a Local Planning Authority area. It can include Development Plan Documents such as Site Allocations and Area Action Plans.
Local Planning Authority	LPA	The authority responsible for planning functions within a District, County or any other type of administrative area.
Local Plan (Part 1)	LPP1	The adopted 2014 Development Plan Document that sets out the strategic planning policies and context for Cannock Chase District.
Local Plan (Part 2)	LPP2	The Development Plan Document that was intended to accompany LPP1 by providing further policy context and allocating sites for future development.
Mineral Safeguarding Areas		An area of land protected from development due to the presence of minerals within a site that could be required for future extraction.
Minerals Plan		A planning document that sets out future minerals needs within an area and protects mineral extraction sites to meet that demand.
Mitigation and Implementation Strategy		A framework that aims to provide protection against a potential threat and provide practical solutions or alternatives to solve the problem.
National Planning Policy Framework	NPPF	This document sets out the Governments planning policies for England and how they should be applied.
National Planning Policy Guidance	NPPG	The Government planning advice that accompanies the National Planning Policy Framework.
Neighbourhood Plans		A plan prepared by a Parish Council or Neighbourhood Forum for a particular designated Neighbourhood Area.
Open Space Assessment		An assessment of the current quantity and quality of the local authority areas' open spaces and an assessment of the future needs for open space provision (in quantity and quality terms), taking account of future population changes.
Parking Standards,		A document providing additional planning



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Phrase	Abbreviation	Definition
Travel Plans and Developer Contributions for Sustainable Transport SPD		information and guidance on transport related matters within Cannock Chase District.
Policy Map		A map that shows the location of planning designations, which are usually also set out in written planning policies.
Partner Authorities		The Government bodies working together as a team on a contract or project.
Retail and Leisure Study		A study on retail and leisure uses within Cannock Chase District, including existing and future capacity.
Safeguarded Land		Land that is protected for a specific future, often longer term, land use.
SAC Zone of Influence		An area within which new residential development must provide mitigation measures to avoid harm to Cannock Chase SAC.
Self Build Registers		A register of people who are interested in building their own dwelling within Cannock Chase District.
Self Build and Custom Housebuilding Act 2015		An Act of Parliament that sets out legislation on self build and custom house building.
Site Assessment Matrix		A framework for assessing whether a site is suitable for a proposed use or designation.
South Staffordshire District Council	SSDC	The Local Planning Authority for South-West Staffordshire. It covers areas including Great Wyrley, Cheslyn Hay and Huntington.
Special Area of Conservation	SAC	Special Areas of Conservation (SACs) are protected sites under the European Community Habitats Directive. They provide increased protection to a variety of wild animals, plants and habitats and are a vital part of global efforts to conserve the world's biodiversity.
Stafford Borough Council	SBC	The Local Planning Authority for the Stafford area. It includes the northern part of Cannock Chase AONB, Brocton and Great/Little Haywood.
Staffordshire County Council	SCC	The upper- tier in a two tier Local Authority system County wide Planning Authority for Highways, Minerals and Waste planning matters.

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Phrase	Abbreviation	Definition
Statement of Community Involvement	SCI	A statement of how Cannock Chase Council will consult the local community when preparing planning documents and consulting on planning applications.
Strategic Flood Risk Assessment and Water Cycle Study	SFRAWCS	SFRA – An assessment of flood risk across the District taking into account the most up to date data on flooding from various sources e.g. rivers and surface water.  WCS- An assessment of water resources across the District to identify if there is sufficient supply to support future developments and/or what upgrades to infrastructure may be required.
Strategic Housing Land Availability Assessment	SHLAA	A database of sites put forward by stakeholders including the Council and land owners to be assessed for their suitability for future residential uses.
Strategic Housing Market Assessment		A report on the objectively assessed and evidenced development needs for housing within an area.
Stoke-on-Trent & Staffordshire Local Enterprise Partnership	SSLEP	The economic body for the Staffordshire County Council and Stoke On Trent Government areas. See LEP definition.
Supplementary Planning Document	SPD	A local development document that may cover a range of issues, thematic or site-specific, and provides further detail of policies and proposals in a 'parent' development plan document.
Sustainability Appraisal	SA	An appraisal of the economic, environmental, and social effects of a plan.
Town and Country Planning Regulations 2012		Regulatory framework
Viability Assessment		An assessment of whether or not development is likely to be financially viable, taking into account a range of relevant factors including land values and costs, development costs, financing costs and developer profit. These assessments can be undertaken at a Local Plan level (i.e. how will Local Plan policies affect the financial viability of developments in the District generally) and at a site-specific/development level.
West Midlands	WMCA	A recently constituted authority formed of

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Phrase	Abbreviation	Definition
Combined Authority		local authorities and Local Enterprise Partnerships (LEPs) chaired by the Mayor for the West Midlands. It enables the transfer of powers on decision making and funding from central Government to the West Midlands on specified areas (as set out within devolution agreements) e.g. transport, housing.

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Local Plan Review Issues & Options Consultation: Summary of Responses		
Rep ID No.	Respondent	Comment
<b>Overall/General Comments</b>		
LPIO1	Bywater, A&J	<p><b>Area of Concern: Housing on Greenbelt Land South of A5190, Heath Hayes</b></p> <p>We would want to see the improvement of the local road infrastructure bearing in mind the current weight of traffic and congestion on the A5190 and five ways island, with the additional impact of the new designer outlet village. I.e. build roads first then build houses. A previously suggested link road from the south of five ways island on the B4154, joining the Kingswood Lakeside Road.</p>
LPIO2	Church Commissioners of England (c/o Barton Willmore)	<p><b>Bleak House:</b> The Commissioners' have promoted Bleak House through the CCDC Strategic Housing Land Availability Assessment (SHLAA) in 2014, 2016 and 2019. The 2018 SHLAA identified the Commissioner's site as 'Land to the east of John Street/Wimblebury Road' under SHLAA Ref: C264. The SHLAA also redefined C264 into smaller parcels under C264 (a) to (e). The SHLAA notes that the site has an estimated overall capacity of 1,000 dwellings and replaces former SHLAA site 'C114'.</p> <p>The Commissioners also own a large parcel of land further south of Bleak House, which provides a large spatial gap between the site, the Staffordshire Coalfield Heaths SSSI and Burntwood. For avoidance of doubt, the Commissioners are not promoting the land to the south.</p>
LPIO3	Cycle-R	<p><b>Rugeley Power Station:</b> it must be noted that Engie have, in effect, ignored the feedback from the local communities where three main areas were identified:</p> <ul style="list-style-type: none"> <li>• Good quality, sustainable housing</li> <li>• High quality, well paid jobs</li> <li>• Retention of the historical aspects of the site, in this case, the four towers.</li> </ul> <p>...they have taken the route of building houses on it, whilst the housing is needed, this will create an area that will end up as a commuter site for the surrounding towns and cities, draining money and resources out of Cannock and Lichfield, there will be no community development. The current plans will actively destroy the economy for the area. This site is the single most important infrastructure site in the UK and has the potential for creating a huge level of income for the area, as well as strong employment, training opportunities and the facilities to attract major names. A serious review of policy regarding this site needs to be undertaken, taking a longer term view for the benefit and health of the region rather than the short term, immediate benefits that the current proposal will bring.</p>
LPIO4	KGL Estates Ltd (c/o John Heminsley)	<p><b>Rugeley Power Station:</b> Having recently adopted an SPD jointly with Lichfield District Council on the future development of Rugeley Power Station which proposes a balanced approach to a mix of housing and employment development, the Council is urged to continue with this approach rather than the one proposed in the recent outline planning application which is predominantly housing with very little employment land. In order for Rugeley to continue to be a sustainable settlement rather than rely on significant growth of outward community for jobs the Power Station provides the only significant opportunity for employment land growth in the town.</p> <p><b>Land South of the A5190 Cannock Road, Heath Hayes:</b> Because of the relatively fragmented nature of the GB in the south of the district which continues across boundaries into South Staffordshire, Walsall and Lichfield, the proportionate</p>

		dispersal approach to release of GB in this area as identified in the GL Hearn Study is considered to be the appropriate approach. Land south of the A5190 is the most sustainable location for GB release to meet some of the required local and regional housing need.
LPIO5	National Grid	We have reviewed the consultation document and can confirm that National Grid has no comments to make in response to this consultation. Please remember to consult National Grid on any Development Plan Document or site-specific proposals that could affect our infrastructure. (Contact details on letter)
LPIO6	Wyrley Estate (c/o Fisher German LLP)	The Local Plan review process is welcomed, and the consultation document is, overall, thorough and transparent about the challenges facing the district but provides a useful range of options for how the new document might take shape. That said, it is essential to ensure that the needs of the district in terms of housing and employment land are kept under review, and that figures are both ambitions and achievable. The resultant plans needs to be sufficiently flexible to take account of any uncertainty ahead. This will inevitably mean Green Belt release. Whilst this is always to be avoided where possible, we believe that it is possible to release some sites without significantly impacting on the wider integrity of the Green Belt.
LPIO7	Armitage, J	<b>Recent Developments in Cannock Chase.</b> There has been a lot of sites built on in the last year or 2 with further sites earmarked. I would expect these numbers to be taken into account. Rugeley Bus Station/Market Hall needs development. Both are underused (although we obviously still need a bus service) and the Market Hall is an eyesore.
LPIO8	Armitage, J	<b>Cannock Wood</b> is also very valuable – keep it green! There has also been a high level of infill with people building houses, sacrificing green space. <b>Rugeley Town Centre</b> – in need of developing, particularly the bus station and market hall, unused and an eyesore. Wharf Road does not need more housing pollution is poor and it is heaving under the weight of traffic. Objectives 7 & 8 are lowest on list of requirements.
LPIO9	Armitage, K	Development (current) in Wharf Road has created chaos. The road is now a death-trap with cars speeding up and down. Consider developing the bus station/market hall, Rugeley an eyesore and under-used. Pollution where I live is high. It is difficult to get doctors appointments. Congestion is adding a significant amount of time on journeys I make. Pavement parking is also becoming increasingly bad seemingly in all areas. More housing equates to more cars. Heritage Trail – is part of our Natural, not just industrial heritage. The new housing at the top of Burnthill Lane has gone far enough. More housing here would exacerbate the problem.
LPIO10	Beau Desert Golf Club (c/o FBC Mandy Bowdler LLP)	<b>Site C375</b> remains available and suitable for the proposed mixed development described in the SHLAA and Brownfield Land Register submissions pertaining to that site
LPIO11	Birmingham City Council	Birmingham City Council welcomes the contents of the Issues and Options consultation and the strategic options for growth under consideration and appreciates the opportunity for continued engagement and working with Cannock Chase Council through the Duty to Cooperate process. In particular, the City Council welcomes the recognition given within the consultation to the relevant strategic matters to be addressed across the Greater Birmingham and Black Country Housing Market particularly in relation to unmet housing

		need. We therefore agree with the issues identified and generally support the options explored.
LPIO12	Brereton & Ravenhill Parish Council	BRPC welcomes paragraphs 7.1, 8.1 and 13.1 of the Consultation Document, but these do not go far enough. There should be a clear statement in accordance with the NPPF that land should not be taken out of the Green Belt where the need for housing can be met beyond the outer Green Belt boundary in neighbouring authorities. BRPC welcome paragraphs 11.34 (final indent) and 11.37 (3 <sup>rd</sup> indent).
LPIO13	Brindley Heath Parish Council	BHPC welcomes paragraphs 7.1, 8.1 and 13.1 of the Consultation Document, but these do not go far enough. There should be a clear statement in accordance with the NPPF that land should not be taken out of the Green Belt where the need for housing can be met beyond the outer Green Belt boundary in neighbouring authorities.
LPIO14	Broadbent, A	<b>Traffic on the A1590:</b> Any development south of this road will surely increase this; the traffic is at most times, ridiculous. <b>Rugeley Power Station:</b> site development should be planned to retain or increase greenery as it makes a more pleasant place to live.
LPIO15	Coal Authority	The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking consideration of prior extraction of the coal. The questions asked in the Issues and Options document are generally for local consideration and are not issues the Coal Authority wishes to specifically comment on.
LPIO16	Armitage, D	<b>Rugeley Power Station:</b> It is inconceivable that Lichfield has such a large allocation of Housing. Rugeley will have to use part of their allocation for employment and not Lichfield. Why? Doctors – how will Rugeley cope with thousands more when it is so difficult to get an appointment. There is also no contraceptive/sexual health clinic anymore. Pollution – cars, congestion, unnecessary idling of engines outside schools and in car parks will undoubtedly get worse. It is difficult now to get around to area as it is. Any further development would exacerbate current problems. Flooding –The new flood defence does not cater for the whole of the area. Climate Change – We should be planting trees rather than concreting out greenbelt. Wildlife – I live in close proximity of Sherbrook Valley and have recently noticed that skylarks have returned to our area, alongside other wildlife such as hedgehogs, toads, badgers etc. the loss of the greenbelt would have a severe impact. The greenbelt areas in Brereton, Rugeley are so small it would be sacrilege to build on including those spaces considered ‘brownfield’. Heritage Trail – Building alongside the trail in the greenbelt would destroy the point. It is accessible to all. It benefits both physical and mental well-being, has historical significance and is beautiful...
LPIO17	Environment Agency	The Environment Agency has limited scope to comment on the various options at present, given that the water evidence base is not yet completed. Once the Strategic Flood Risk Assessment and Water Cycle Study have been published, it will allow us to better advise on sustainable levels and locations for growth in terms of the capacity of the water environment to support development.
LPIO18	Goodwin, M	CCDC have destroyed Norton Canes with the ridiculous levels of new housing.
LPIO19	Historic England	Page 20- references Natural England and Historic England as duty to cooperate specialists on one line. We would recommend, as we are two separate Government agencies with different remits, that we be listed separately to avoid any confusion. Paragraph 4.2 – second bullet point, relates to ‘safeguarding’ heritage and we would recommend changing the term to ‘conserving and enhancing’

		We welcome the inclusion of heritage within the vision on page 25.
LPIO20	Jones, T	<p>I welcome paragraphs 7.1, 8.1 and 13.1 of the consultation document, but these do not go far enough. There should be a clear statement in accordance with the NPPF that land should be taken out of the Green Belt where the need for housing can be met beyond the outer Green Belt boundary in neighbouring authorities.</p> <p>I support 12% of the district's housing need being met in the Rugeley/Brereton area, but only if this includes sites outside both the district beyond the Green Belt. I oppose any larger proportion of the housing need being met in the Rugeley/Brereton area since this would both reduce the Green Belt and be unsustainable</p> <p>I welcome paragraphs 11.34 (final indent) and 11.37 (3<sup>rd</sup> indent).</p> <p>I see no need to update the second indent in paragraph 4.2.</p>
LPIO21	Lichfield District Council	<p>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.</p> <p><b>Rugeley Power Station:</b> It would be useful for Cannock Chase DC to confirm how it is treating the Rugeley Power Station site.</p> <p>It is recognised that Cannock Chase DC will be making its own individual site assessments based on professional judgement of each site's performance against the comprehensive list of criteria as set out in the draft methodology proposed in the issues &amp; options paper. In undertaking this work, Lichfield would encourage Cannock Chase DC to maximise the use of the assets that are identified as being able to be allocated through the SHLAA process.</p> <p>Lichfield DC note the cross-boundary planning application for the Power Station site received during the consultation period on the Issues &amp; Options document, and that the scheme is housing led for up to 2300 dwellings across the two authorities. At the time of writing, the full implications of the application remain under careful consideration, and it is recognised that there are implications on a range of matters including in respect of the proposed changes in the housing/employment balance of the scheme from that originally envisaged.</p>
LPIO22	National Farmers Union	<p><b>Wider Environmental Impacts of Development:</b> Large new developments in urban areas have the potential to cause downstream impacts, even when new SuDS techniques are employed. It is important to recognise that farmers have to deal with these impacts as they are responsible for maintaining many of the areas watercourses and drainage infrastructure. Waterlogging and flooding has the potential to directly impact upon the productivity of agricultural land so it is important to value and maintain our existing drainage infrastructure.</p> <p>The proposals for growth outlined in the document will lead to large new housing and employment developments in the urban area, but despite reference to the importance of flooding, scant information is provided on the downstream impacts. The paper does not examine the additional demands that will be placed upon water abstraction or sewerage treatment capacity in the area. Again these are areas that may impact upon adjacent farm businesses and we would welcome more information on how potential impacts will be mitigated.</p> <p><b>Livestock units and residential development:</b> We have not made a detailed examination of all the locations outlined as site allocations for employment or housing development. However, where sites are allocated for development, the proximity of the land to existing livestock units must be examined. Sites should not be allocated for residential development if they are found to be in near proximity to an existing livestock unit. Farms can be sources of noise and odour and therefore neighbouring land could be unsuited to residential development. We are keen to ensure that</p>



		development in the countryside does not result in conflict between new residents and existing farm businesses.
LPIO23	Network Rail	<p><b>Rugeley Power Station:</b> Network Rail has met with Engie the developers of Rugeley Power Station. The scheme will place significant pressure on the station facilities at Rugeley Trent Valley. The station has a lack of car parking and access/egress is poor. Network Rail's land ownership around the station is very limited and acquisitions will be required.</p> <p><b>Developer Contributions:</b> Developer contributions will be required to fully fund potential upgrades at Rugeley Trent Valley Station. Given the increase in patronage that the Rugeley Power Station development of 2300 dwellings would bring. S106 contributions should also be considered for enhancements at Cannock.</p> <p><b>District Stations:</b> The Council should note that Rugeley TV, Rugeley Town, Hednesford and Cannock are all unstaffed stations, are without buildings and consequently they lack facilities. The redevelopment of Rugeley Power Station (2300 homes), coupled with the Chase Line Electrification and development of Mill Green Outlet Village and projected visitor numbers will place significant pressure on each station. With the exception of Cannock, Network Rails' land ownership is limited so acquisitions may be required to increase car parking provision/deliver better facilities.</p>
LPIO24	Palmer, M	<p>A disappointing consultation process...well presented from a Council point of view but lacking in supplied information and diagrams, whilst lacking in fundamental clear outlines to inform residents clearly and simply. No projections of environmental and residential impact of expansions and very poor infrastructure options.</p> <p>Two options dropped out in surprise...traveller sites...we already have three in my local area...truck parking facility...in residential area?</p>
LPIO25	Parlett, G	<p><b>Land Adj Cannock Road, Heath Hayes:</b> I realise there is a growing housing problem which comes with a growing population in the future, but farm land is becoming less, due to the building of motorways, railways and housing. I notice that new warehouses and retail parks are becoming more abundant in the area with less thought to infrastructure. The pollution and air quality in our area is disgusting, add to it the sweet smell from the BIFFA tip and you are left with quite a concoction fallout.</p> <p>An extra 1000 cars on this particular road at any time in the future could cause a lot of problems to this area. The cost of updating the present infrastructure to accommodate 700+ houses would be vast indeed.</p>
LPIO26	Road Haulage Association	<p>The RHA is pleased that Cannock Chase Council acknowledge the points we made about the lack of Lorry Parking Facilities and the need for Lay-by's.</p> <p>Cannock Chase businesses need road freight to collect and deliver goods. All domestic homes require home delivery and that market is increasing. The RHA considers that more needs to be done to support road freight to enhance economic growth.</p>
LPIO27	South Staffordshire Council	<p>It is anticipated that there will be an ongoing dialogue with Cannock Chase District Council to consider the implication of any cross-boundary issues which arise once there is a clearer indication of future growth locations. These issues include potential impact of growth on the A5 corridor in relation to air quality and the Cannock Chase Extension Canal SAC.</p>
LPIO28	St Modwen (Watling Street) (c/o RPS Planning & Development)	<p>St Modwen supports the proposed Plan Objective 4: Encourage a vibrant local economy and workforce.</p> <p>In terms of the relationship between the provision of homes and jobs in Cannock, St Modwen broadly supports the commentary under Objective 3: Provide for Housing Choice, para 7.32.</p> <p>St Modwen also supports the housing choice to locate growth at the Norton Canes area whereby employment growth located near to the settlement can help to balance the provision of homes and jobs to local employment opportunities in order to encourage more commuting by non-vehicular travel modes.</p>

LPIO29	Staffordshire County Council	<p>We note now that the local need has been established but the proportion for the GBBCHMA is represented via a range, which complicates infrastructure planning. A precise picture for required infrastructure will therefore not be possible until the housing figure has been refined. Similarly, in relation to the employment land.</p> <p>We note that the Plan already identifies issues in relation to congestion and air quality around the Five Ways Island and that further growth is proposed in the vicinity under Option C2. In addition to the two identified issues there is pressure on primary school places in this area and that will also need to be considered as there may be resultant implications for the scale of growth.</p> <p><u>Flood Risk &amp; SuDS</u></p> <p>At this stage we would wish to reiterate our previous comments to ensure the SuDS Handbook is clearly referenced in the Local Plan. As sites are allocated we can begin to consider any site-specific requirements.</p>
LPIO30	Startin, P	<p>I think objective one links in well with the housing plan. It is a well known fact that we are running out of suitable brownfield land on which to build new housing developments in the traditional way. With the lack of brownfield sites available and the fantastic improvements in construction technology, CCDC must start looking to build up. This not only allows more housing units on the same plot of land, but it helps with green credentials and helps provide vast swathes of affordable housing.</p>
LPIO31	Walker, C	<p>I would hope along with this comment, my previous comments on the local plan for last year will also be included in responses. I am disappointed that the local plan consultation was stopped and restarted as I feel that this will have an effect on the responses you will gather as many people think they have already commented.</p>
LPIO32	White, R	<p>There has been a large amount of development in Rugeley and surrounding areas. The Power Station development alone is going to place a large strain on services, roads and town.</p> <p>Wildlife in and around Green Belt, particularly Sherbrook Valley. Also green belt in Cannock Wood is outstanding. The chase is too far for me to go and it is a working forest so does not place wildlife at the centre of its operations. The countryside is an important factor in our heritage, keep it that way.</p> <p>Rugeley Market Hall and Bus Station needs to be developed. The market is finished and emotional reasons are not reasons to maintain such a waste of urban space.</p> <p>Objectives 7 and 8 are a long-term essential requirement for future generations.</p> <p>Regarding the Power Station it concerns me that a burgeoning population will pollute the river, particularly litter.</p> <p>Brownfield within the green belt should not be open to exploitation.</p>

**District Context**

Question 1 Do you have any comments on the District Profile? Is there anything missing and if so what, and what source of information should we use?

LPIO33	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	<p>The recognition that the application of the standard method requires the emerging Local Plan to adopt a minimum housing requirement of 284 dwellings per annum is supported. The Council is encouraged to have an ambitious plan for housing growth. The standard method is only a starting point and the Council should consider increasing the housing target upwards to support economic growth and delivery affordable housing.</p> <p>We also support the recognition that Cannock Chase will have a role to play in meeting the 'significant housing shortfall' for the Greater Birmingham and Black Country Housing Market Area.</p> <p>In terms of delivery of the overall housing requirement it is noted that approximately 60% of the district is designated as Green Belt, in addition, there are areas of AONB in the District that act as a further constraint which will require the local</p>
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		authority to consider closely development options at locations which are neither Green Belt or AONB. Given the level of housing growth proposed it is envisaged that the Green Belt will be put under significant pressure through the plan making process to accommodate development. It is, therefore, essential that the best use is made of non-Green Belt and non-AONB opportunities.
LPIO34	Canal & River Trust	<p>We welcome the identification of the canal within the Transport and Infrastructure and Environment sections of the District Profile.</p> <p>Although we welcome reference to the role that our network can play with regards to heritage-led regeneration within the Environment Section, 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. Our network provides an easily accessible green infrastructure resource that can help to promote healthy lifestyles.</p> <p>We therefore advise that the reference to canals within the 'Environment Section' should be expanded to refer to their role as strategic Blue and 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.</p>
LPIO35	Church Commissioners for England (c/o Barton Willmore)	<p>We are in general agreement with the District Profile outlined within Sections 2 and 3... In particular, we consider that Cannock Chase District has a need for future sustainable market and affordable housing, including a contribution to the shortfall across the wider Greater Birmingham and Black Country Housing Market Area (HMA).</p> <p>The 'District Context' section makes reference to the 2012-published Southern Staffordshire Districts Housing Need Study and SHMA Update. This SHMA...was based on the 2008 and 2011 housing projections and informed the Local Plan (Part 1) (adopted June 2014) housing requirements.</p> <p>The Commissioners recommend that Cannock Chase Council produce an updated SHMA, which will take account of the most up-to-date information for housing needs within the Greater Birmingham and Black Country HMA. This should form a key part of the evidence base for the Local Plan Review. The updated SHMA should assess Cannock Chase District's housing needs and work with neighbouring authorities within the Greater Birmingham HMA. This additional information, along with the 2018- published Greater Birmingham HMA Strategic Growth Study, should be used to provide an updated and accurate profile for the District.</p>
LPIO36	KGL Estates Ltd (c/o John Heminsley)	<p>The Council's broad conclusion that in order to meet locally generated housing need plus a proportion of the Greater Birmingham and Black Country Housing Market's unmet need together with future employment land requirements will mean release of Green Belt (GB) land is agreed.</p> <p>The Council's analysis shows that there are limited opportunities for increasing housing densities within existing urban areas because of the extent of existing commitments and the supply of developable brownfield sites within the urban areas is also limited. As potential need for an extension of the Kingswood Lakeside employment park onto adjoining GB has already been identified in the current Local Plan.</p> <p>In relation to national policy on choice of sites for GB release, there are no brownfield sites in suitable locations around the edges of the main urban areas so the key criterion to concentrate on is good accessibility to public transport.</p>
LPIO37	Richborough Estates (Brownhills Rd & S of Cannock Rd)	Richborough Estates is generally supportive of the identified District Profile. The acknowledgement that the housing evidence base will need updating as part of the Local Plan Review is supported, particularly to reflect the requirements of the revised NPPF and the introduction of the Standard Method to calculate housing need.

	(c/o Pegasus Group)	<p>The acknowledgement that the Council will need to play a role in addressing some of the housing shortfall on the Greater Birmingham and Black Country HMA is also supported: any housing relating to the shortfall is above the minimum required by the Standard Method and this needs to be made clear in the profile. The profile also needs to incorporate the growth ambitions of the Greater Birmingham and Solihull LEP and the Staffordshire and Stoke LEP: the Council is a member of both, and both show clear commitment to supporting housing growth and delivery.</p> <p>It also needs to acknowledge its role as a non-constituent member of the WMCA and the associated commitment of the WMCA.</p> <p>It is therefore felt that greater recognition should be given to the importance and ability of Cannock Chase District in meeting not only the unmet housing need arising from the GBBCHMA but also in supporting its own local economic growth ambitions as well as those of the two LEPs and those of the WMCA.</p> <p>The Profile identifies the importance of the Green Belt in providing a range of benefits, including maintaining the openness of the rural-urban fringe. Richborough Estates acknowledges this; however, Green Belt boundaries should not be maintained to the detriment of sustainable development. It should be recognised that, in certain circumstances, it is appropriate to release sustainable sites from the Green Belt so that they can come forward for development.</p> <p>Green Belt Study produced in 2016 – This study should be updated in order to support the Local Plan Review, particularly in light of the publication of the revised NPPF.</p> <p>The profile identifies Cannock, Hednesford and Heath Hayes as a continuous urban area, with the greatest abundance of services and facilities. Richborough Estates continues to submit that this should be strengthened to explicitly identify Cannock, Hednesford and Heath Hayes as the most sustainable settlements within the District. Similarly Norton Canes is identified as a sustainable settlement. It is also felt that the sustainable nature of Norton Canes should be strengthened in the District Profile.</p> <p>It is also considered that the need to support existing and future services and facilities should be identified in the profile, rather than just identifying where those services have been lost as this plays a key part in delivering and maintaining sustainable communities.</p>
LPIO38	Wyrley Estate (c/o Fisher German LLP)	<p>It is considered that the profile is a reasonable assessment of the current position of the authority area.</p> <p>It is of paramount importance that the new Local Plan considers not only the local position, but how the district fits into the wider region.</p> <p>There is clear Duty to Cooperate in the NPPF and the Council must ensure it is fully engaging with its neighbours to ensure that the plan is sound and fit for purpose.</p> <p>As such, the Council must consider opportunities for increasing available employment land, particularly on key transport corridors and allow the continued sustainable growth of sustainable settlements such as Norton Canes. Attention must also be given to maximising the available heritage assets within the district, which can play a key role in regeneration.</p> <p>A point that should be stressed is that delivering suitable levels of development will mean looking at areas where the Green Belt can be amended.</p>
LPIO39	Brereton & Ravenhill Parish Council	<p>BRPC draws attention to the penultimate line on page 15 that Rugeley and Brereton have a <i>“combined population of 24,650 is 25% of the District total (2011 Census).”</i> The level of facilities for a community of this size is poor and well below that of substantially smaller communities elsewhere in Britain. There is a serious real danger than the northern part of the district will be excessively dependant on commuting and trips to facilities elsewhere, most of which would be by private motor vehicle.</p>

		The statement that <i>“Rail services have seen significant improvements to Birmingham”</i> is sadly far from the case. Very frequent cancellations of the Chase Line service to the Rugeley stations are encouraging people to use private motor vehicles rather than the train.
LPIO40	Brindley Heath Parish Council	The statement that <i>‘Rail services have seen significant improvements to Birmingham’</i> is sadly far from the case. Very frequent cancellations of the Chase Line service to the Rugeley stations are encouraging people to use private motor vehicles rather than the train.
LPIO41	Cannock Chase AONB Partnership	<p><u>The District Context</u>  Section 2 notes that <i>‘Cannock Chase AONB provides a strategic area of accessible countryside with conservation, recreation, economic and tourism benefits.’</i> This is certainly true, however I also note that later on, under Environment the text highlights that some of the District’s biodiversity assets are potentially at risk of decline due to development and recreational pressures unless appropriate mitigation is put in place. This applies equally to the AONB which is also at risk of erosion of its natural beauty and special qualities due to recreational pressures unless appropriate mitigation measures are put in place. It would be appropriate to refer to this issue in setting the context for the Local Plan.</p> <p><u>The Rural Areas (Page 17 – Line 1)</u>  The wording of this statement suggests that the statutory designation is for recreation. However, the AONB designation under the Countryside and Rights of Way Act 2000 (CROW) places a duty on all public bodies to <i>“have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”</i> The AONB Partnership would welcome greater clarity in the Local Plan of the purposes of the designated status of the AONB. That it is entirely appropriate to set sustainable and balanced Local Plan policy approach to tourism and recreation. However, it is necessary to continue to safeguard the AONB within that activity, taking account of all forms of development and their impact on the landscape of the AONB. The two things shouldn’t be mutually exclusive but must be balanced by appropriately worded evidence and policies in the Local Plan.</p>
LPIO42	Environment Agency	<p>It is notable that within page 13 there is no reference to the water environment within the Environment Section. This should be rectified once your evidence base has been published to provide a broad summary of the flood risk, water resources, ground water and water quality characteristics of the area, with particular note to those factors which may be a constraining factor to growth, or have the potential to be enhanced through development.</p> <p>We welcome the reference on page 14 (key issues) to flood risk and climate change, however no evidence has been provided in the previous section to support this. We recommend the SFRA and WCS evidence is used to expand this section.</p> <p>We welcome the acknowledgement of the EA flood alleviation scheme on the Rising Brook at Rugeley (Page 16) as working together in partnership with the district council, the county council and local LEPs provided combined flood risk reduction, community and regeneration benefits to the area.</p>
LPIO43	Historic England	<p>Paragraph 2.3 – Historic England did raise the need for a separate section for the historic environment and we remain supportive of this approach.</p> <p>Page 11- under the section on ‘Town Centres and Shopping’ we would be supportive of a reference to the role of heritage in creating prosperous town centres and heritage tourism.</p> <p>Page 12- Under the paragraph relating to canals we would recommend the inclusion of the term ‘heritage’ within the bracketed list</p> <p>Page 13 - We are supportive of the paragraphs relating to this historic environment, within the district profile</p>

		<p>Page 14 – We are supportive of the reference to the historic environment          We are supportive of the references to heritage within Cannock Town Centre and the need to protect and conserve the relevant heritage assets and enhance their character. What is the strategy to achieve this?          Page 16 – We are supportive of a paragraph reflecting the historic environment in this section on Rugeley and welcome the future conversations on how this can be achieved          Within the section on rural areas we would be supportive of the inclusion of text referencing the role of heritage within the AONB, referencing heritage assets such as the World War trenches and cemeteries, as well as research such as a ‘Chase Through Time’ to reflect this important asset as a heritage landscape.          We are generally supportive of the district profile and the reference to the historic environment throughout.</p>
LPIO44	Inland Waterways Association	<p><u>Page 12</u>          Please correct ‘Canal’ to ‘Canals’ in Lichfield &amp; Hatherton Canals Restoration Trust</p>
LPIO45	Jones, T	<p>I draw attention to the penultimate line on page 15 that Rugeley and Brereton have a “<i>combined population of...</i>”. The level of facilities for a community of this size is poor and well below that of substantially smaller communities elsewhere in Britain with which I am familiar. There is a serious real danger that the northern part of the district will be excessively dependent on community and trips to facilities elsewhere, most of which would be by private motor vehicle.          The statement that “<i>Rail services have seen significant improvements to Birmingham</i>” is sadly far from the case, as I (and many others) know only too well. Very frequent cancellations of the Chase Line service to the Rugeley Stations are encouraging people to use private motor vehicles rather than the train.</p>
LPIO46	Natural England	<p>The District Profile provides a good summary of the issues and opportunities for the natural environment. We welcome the references to the Cannock Chase AONB and the area’s SACs.</p>
LPIO47	Cllrs. Preece, J, Stretton, Z and Newbury, J	<p>We feel that on page 16, there should be more explanation of the specific pressures the village is currently facing with regards to Housebuilding. 773 new properties will be built in Norton Canes within a short space of time. Compared to the 2011 census figure of 3090 households, this represents a net growth of 25%; the village will grow by a quarter as a result of planning applications already passed. Nowhere else in the Cannock Chase District is experiencing this intense level of housebuilding in a relatively short timeframe, and the strong pressures on infrastructure that inevitably accompany it. We feel that this fact should be formally acknowledged as it underscores many of the concerns that our residents, and we as district councillors, have both in the context of any future housebuilding and necessary investment in our local infrastructure.          With reference to the health centre, we would like it to stress that concerns do not only relate to service capacity, but also physical ‘bricks and mortar’ capacity to accommodate the equivalent of 4 GP surgeries.          We think that it should be acknowledged on page 17 that the whole rural area south of the A5 in the District is part of Norton Canes, including the ancient hamlet of Little Wyrley. This part of the District is often forgotten but should be included in the Local Plan, particularly with reference to its outstanding heritage potential.</p>
LPIO48	St Modwen (Watling Street) (c/o Pegasus Group)	<p>St Modwen supports in general terms the recognition of the role the A5 corridor is playing in the diversification and expansion of the local economic and business base in Cannock Chase, despite the District exhibiting net-out community of workers. However, the profile, as written, appears to focus on employment structure without any recognition of the significant growth in the number of jobs discussed in other aspects of the evidence base (EDNA) which has broadly exceeded regional and national growth rates since 1997.          In light of this, St Modwen would like to see greater emphasis on recent and longer-term growth in overall total</p>

		employment witnessed in Cannock Chase as this represents a key strength of the District going forward. It is therefore crucial that the Local Plan Review properly assesses and plans for the future employment needs in terms of job growth and the land required to cater for employment development in the District.
LPIO49	Stafford Borough Council	The adopted plan for Stafford Borough (June 2014) focusses the majority of new housing and employment provision at Stafford Town, without releasing Green Belt areas, and a number of significant sites are now being delivered. As you may be aware the Borough Council is currently progressing with the evidence base for the Issues and Options stage for the New Local Plan leading towards a future development strategy beyond the adopted Plan period of 2031. In particular Stafford Borough will continue to work with Cannock Chase District concerning the Cannock Chase SAC Partnership and the Cannock Chase AONB.
LPIO50	Staffordshire County Council	<p><u>Ecology</u> Page 14: The 9<sup>th</sup> bullet point contains a caveat in the second part of the sentence ‘whilst meeting demands and providing...including heritage-led regeneration’ it is the only key issues to be thus qualified, which considerably devalues its aim, contrary to the principle of three equal pillars of sustainable development, and to NPPF (2018) Paragraph 170. The qualified should be deleted.</p> <p><u>Historic Environment</u> Page 14 – the value attributed to the historic environment in bullet point 9 ‘The highly valuable and ...historic environment and...’ is welcomed. Concerns are raised with regards to the potential devaluing of this aim by including <i>whilst meeting demands and providing opportunities...economic activity including heritage-led regeneration</i>. It is recommended that this qualifier is removed.</p>
LPIO51	Wright, T (c/o Pegasus Group)	<p>The profile identifies the importance of the Green Belt in providing a range of benefits, including maintaining the openness of the rural-urban fringe. This is acknowledged, however, Green Belt boundaries should not be maintained to the detriment of sustainable development.</p> <p>Given that 60% of the District is Green Belt, it should be recognised that, in certain circumstances, it is appropriate to release sustainable sites from the Green Belt so that they can come forward for development to meet identified needs.</p> <p>Green Belt Study 2016 – This Study should be updated in order to support the Local Plan Review, particularly in light of the publication of the revised NPPF.</p> <p>The profile should highlight that some development of sustainably located sites would be acceptable in the AONB to meet identified needs provided that this was sensitively designed and located away from those parts of Cannock Chase containing the SAC.</p> <p>It is considered that the need to support existing and future services and facilities should be identified in the profile, rather than just identifying where those services have been lost as this plays a key part in delivering and maintaining sustainable communities.</p>
<b>Wider Context</b>		
Question 2 We reference strategies and plans with which we think we need to align throughout the document, is there anything you need to be aware of in terms of the context within which we are preparing the new local plan?		
LPIO52	Church Commissioners for England (c/o Barton Willmore)	The Local Plan should be prepared so that the housing needs of Cannock Chase District along with the needs of the Greater Birmingham HMA are met, with a specific focus on cross boundary working. The meeting of unmet housing need (both locally and regionally) is a specific issue which should be addressed.

		<p>[...] Notwithstanding the above, the Commissioners recommend that the District specifically consider the following paragraphs and documents, when preparing the Local Plan Review:</p> <ul style="list-style-type: none"> <li>• NPPF (February 2019) – Paragraphs 21, 25, 27, 31</li> <li>• PPG (May 2019) – Paragraph: 029 Reference ID: 61-029-20190315</li> <li>• Greater Birmingham HMA Strategic Growth Study (Feb 2018) – Paragraph 1.23</li> <li>• Birmingham Development Plan (Jan 2017)? – Policy PG1 and Policy TP48</li> <li>• Black Country Core Strategy – Issues and Options Report (July 2017) – Paragraph 2.35 (and figure 6), Paragraph 3.18</li> <li>• North Warwickshire Local Plan Submission (March 2018) – Policy LP6</li> <li>• Solihull Local Plan Review: Draft Local Plan Supplementary Consultation (Jan 2019) – Paragraphs 26 and 29</li> <li>• Bromsgrove District Plan Review: Issues and Options (Sept 2018) – Paragraph 4.18</li> </ul>
LPIO53	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>Richborough Estates supports the identification of housing need and economic growth as key issues in the district profile. However, it should be made clear in this section on wider context that the Council has a requirement to not only test to meet housing need arising from within the District, but also from within the wider HMA and should also be accounting for the wider growth ambitions of the WMCA, LEPS and of its own Corporate Plan.</p> <p>The wider context section should therefore specifically reference the Birmingham Development Plan which was adopted in January 2015 and which identified an unmet need of 37,900 dwellings for the plan period 2011-2031 which, to date, the HMA authorities have failed to re-distribute.</p> <p>This section should also be referencing in more detail the growth ambitions of the WMCA and the two LEPs given that the Council is a member of these organisations. It should set out the Council’s role in the delivery of their plans.</p> <p>Richborough Estates accordingly supports the involvement of Cannock Chase District with the GBBCHMA and its constituent authorities. The Council will need to ensure that the Local Plan fully engages with the GBBCHMA authorities. This engagement should be on-going, clearly documented and genuine, throughout the period of the plan.</p>
LPIO54	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	<p>Reference will need to be made to the recent Government advice published in the recent updates to the Planning Policy Guidance on 26 June 2019 regarding the need to plan for the housing needs of older people.</p> <p>Note will also need to be paid to the SHOP analysis tool which does not currently appear in the SHMA and evidence from the select Committees on the benefits of building with an ageing population in mind. (SHOP link in document)</p>
LPIO55	Birmingham City Council	<p>Birmingham welcomes the recognition given in the document to how Cannock fits into the wider region and its need to fulfil its Duty to Cooperate requirements by working with neighbouring authorities through the partnerships and groups identified in paragraph 3.5 of the Issues and Options document.</p>
LPIO56	Cannock Chase AONB Partnership	<p>The Cannock Chase AONB Management Plan, prepared in accordance with CROW, sets out how the AONB will be conserved and enhanced. The recently published Cannock Chase AONB Management Plan 2019-2024 succeeds the Management Plan 2014-2019. It describes the challenges that the AONB is likely to face in the next five years. This includes potential impact of new areas of housing built close to the AONB and could impact on the setting of the AONB and the growing recreational activity which could harm the AONBs wildlife and special qualities.</p> <p>Cannock Chase Review of AONB Landscape Character Framework 2017 updates the Landscape Character Assessment for the AONB and includes a vision and Landscape Guidelines for each character type.</p>



LPIO57	Environment Agency	<p>Paragraph 3.9 mentions how water quality and drainage issues are cross-boundary, however we note they are not flagged as KEY cross-boundary issues in paragraph 3.10.</p> <p>We look to the SFRA and WCS to inform further on cross-boundary impacts, particularly within the context of the Water Framework Directive (Humber River Basin Management Plan) and waterbodies which flow in and out of the district from neighbouring authorities as these are conduits for impacts to and from neighbouring growth e.g. sewage treatment works and flood risk. As your WCS and SFRA are being undertaken as a joint project with a number of neighbouring authorities we feel this evidence will be particularly pertinent in linking in impacts and opportunities from other districts Local Plans.</p>
LPIO58	Greenlight Developments Ltd (c/o Lichfields)	<p>Greenlight wishes to reiterate its support for CCDs recognition of how the district fits within the wider West Midlands Context within Chapter 3 of the Issues and Options Consultation document.</p> <p>In particular, Greenlight supports the Council's updated commitment to work with neighbouring authorities on a range of strategic issues.</p>
LPIO59	Natural England	<p><u>Paragraph 3.5</u> We welcome the references to the Cannock Chase AONB Partnership and the Cannock Chase SAC Partnership in the list of key partners.</p> <p><u>Paragraph 3.10</u> We suggest a slight amendment to the list of key cross-boundary issues. Under bullet point 11 we would add, 'Conserve and enhance landscape character'. This would better reflect what is meant by the term 'landscape'.</p> <p><u>Additional Plans and Strategies</u> Natural England and other cross boundary partners in the Cannock Chase to Sutton Park areas share an ambition to:</p> <ul style="list-style-type: none"> <li>• Use a partnership approach to better manage, protect, expand and enhance lowland heathland and associated habitats to improve biodiversity.</li> <li>• Link and buffer these sites and also create a network of further complementary habitats</li> <li>• Facilitate integrated sustainable public access and education to increase the value that people put on local biodiversity and the landscape.</li> </ul> <p>This is reflected in your Local Plan's ambition to deliver the Government's 25 Year Environment Plan to work with other Local Authorities and Duty to Cooperate authorities to create ecological links, networks and green corridors for nature and people to enjoy. We also welcome and note the reference to this ambition in the Local Plan Vision and Objectives.</p>
LPIO60	South Staffs Water and Cambridge Water	<p>In response to a request from DEFRA for further information, we have both updated our Water Resources Management Plans (WRMPs).</p> <p>Here are the updated pages:          South Staffs Water: <a href="https://www.south-staffs-water.co.uk/about-us/our-strategies-and-plans/our-water-resources-plan">https://www.south-staffs-water.co.uk/about-us/our-strategies-and-plans/our-water-resources-plan</a>          Cambridge Water: <a href="https://www.cambridge-water.co.uk/about-us/our-strategies-and-plans/our-water-resources-plan">https://www.cambridge-water.co.uk/about-us/our-strategies-and-plans/our-water-resources-plan</a></p>
LPIO61	Stafford Borough Council	<p>The Borough Council acknowledges the key cross boundary linkages concerning travel to and from Stafford for employment, retail and leisure particularly in relation to Rugeley, continuing the broad approach of the current Local Plan. The Borough Council considers that, in terms of the relationship between Rugeley and Stafford Borough, new development for Rugeley should not impact on the rural areas of the Borough, and therefore no future development through the new Cannock Chase Local Plan should impact on the Green Belt or AONB within Stafford Borough. Nevertheless, it is noted that a number of the housing and employment options within the Issues and Options</p>

		Consultation Document do identify locations in the Cannock Chase AONB and/or the Green Belt.
LPIO62	Wright, T (c/o Pegasus Group)	<p>The identification of housing need and economic growth as key issues in the district profile is supported. However, it should be made clear in this section on wider context that the Council has a requirement to not only test to meet housing need arising from the District, but also from within the wider GBBCHMA and should also be accounting for the wider growth ambitions of the WMCA, the LEPs and of its own Corporate Plan.</p> <p>The wider context section should therefore specifically reference the Birmingham Development Plan which was adopted in January 2017 and which identified an unmet need of 37,900 dwellings for the plan period 2011-2031 which, to date, the GBBCHMA authorities have failed to redistribute.</p> <p>This section should also be referencing in more detail the growth ambitions of the WMCA and the two LEPs given that the Council is a member of these organisations. It should set out the Council's role in the delivery of their plans.</p>
LPIO63	Association of Black Country Authorities (c/o Walsall Council)	The list of plans in paragraph 3.6 should include neighbouring authorities' development plans.
<b>Question 3 What do you think should be the key areas of focus for the preparation of Statements of Common Ground, and who should be involved in these?</b>		
LPIO64	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	<p>It is our view that Statements of Common Ground will be required in respect of the various issues identified in paragraph 3.10 of the Consultation Document, however, the most significant cross boundary issue that needs to be addressed is its housing growth and housing need.</p> <p>As acknowledged by the emerging Plan the District will need to play a role in assisting in meeting the unmet housing requirements of both Birmingham and the Black Country.... The Council should actively engage with Birmingham and the Black Country in order to establish the quantum of additional housing development it will be required to accommodate to meet the housing shortfall.</p> <p>The principal parties involved in the preparation of the Statements of Common Ground will be the Authorities within HMA. However, it is our view that the Statements of Common Ground will need to be informed by representations from interested parties including the development industry.</p> <p>It is anticipated that the quantum and overall distribution of development will be a key issue at the forthcoming Local Plan examination (and indeed the other Local Plan examinations within the HMA area.) Early consultation on the distribution of development will help minimise areas of disagreement in this regard.</p>
LPIO65	Church Commissioners for England (c/o Barton Willmore)	<p>Paragraph: 011 Reference ID: 61-011-20190315 of the PPG outlines what a Statement of Common Ground is expected to contain. In the case of Cannock Chase District and authorities within the Greater Birmingham HMA, it is clear that the following strategic issues should be the key areas of focus for the preparation of Statements of Common Ground(s):</p> <ul style="list-style-type: none"> <li>• Housing</li> <li>• Employment</li> <li>• Green Belt Review</li> <li>• Infrastructure</li> <li>• Transport</li> <li>• Air Quality</li> </ul>

LPIO66	Holford Farm Partnership (c/o Hawksmoor Property Services Ltd)	We support the updated list of cross boundary issues contained within the consultation document at Paragraph 3.10. With regards to potential future Statements of Common Ground, we would consider that housing and economic growth to meet the needs of the District together with adjoining areas should be viewed as priorities. Future joint working with organisations such as the Greater Birmingham & Solihull Local Enterprise Partnership (GBSLEP), the Staffs & Stoke LEP, The West Midlands Combined Authority (WMCA) and all local authorities within the Greater Birmingham & Black Country Housing Market Area should be of paramount importance.
LPIO67	Home Builders Federation	The meeting of unmet needs should be set out in a SoCG signed by all respective authorities (see HBF answer to question 4) in accordance with the 2019 NPPF (paras 24, 26&27). The new Local Plan should be based on effective joint working on cross boundary strategic matters that have dealt with rather than deferred as evidenced by a SoCG. One key outcome from co-operation between authorities should be the meeting of housing needs in full. A key element of Local Plan Examination is ensuring there is certainty through formal agreements that an effective strategy is in place to deal with strategic matters such as unmet housing needs when Local Plans are adopted.
LPIO68	Lichfield & Hatherton Canals Restoration Trust	We feel there is a need for a Statement of Common Ground between Cannock Chase Council and South Staffordshire District and Walsall Councils for a continuous protected route for the restored Hatherton Canal linking from the Wyrley & Essington Canal in the Walsall Council area to the Staffordshire and Worcestershire Canal in the South Staffordshire area. We in the Lichfield & Hatherton Canals Restoration Trust would be the relevant organisation to provide information about the proposed route where it is not already evident and recorded as existing canal channel on the ground.
LPIO69	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	In line with Paragraph 27 of the Framework, Statements of Common Ground should be prepared in line with the NPPG. In terms of the GBBCHMA it is clear that the Strategic Growth study requires a coordinated approach by the fourteen authorities concerned. Given the complexities of the geography, the clear need for Green Belt release and the related need to demonstrate 'exceptional circumstances' local Plans need to be taking this evidence forward collectively, fairly and transparently. Clear evidence of this joint approach is needed to avoid an endless cycle of development being pushed from one local authority area into another as a result of disaggregated discussions on a sub-HMA level. Richborough Estates submits that Statements of Common Ground will be required with the GBSLEP, the SLLEP and the WMCA.
LPIO70	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that one of the key areas of focus in SoCG should be housing growth and the need to make an appropriate and sustainable contribution to the wider housing area shortfall. Taylor Wimpey consider that any additional identified need from the GBBCHMA can be accommodated in part by releasing and allocating suitable Green Belt sites in Cannock Chase District for housing. The site at Wimblebury Road, Cannock is considered to be suitable to help contribute to the future housing need.
LPIO71	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	Given the clear cross boundary issues relating to the overall apportionment of housing within the HMA it is clear that such strategic matters will require policies to be dealt with in SoCG adhering to the Duty to Cooperate. Clearly Para 20-23 of the NPPF provide the bass for the matters on which cooperation is required. Such matters, whilst including housing, including affordable housing, should also extend to meeting the needs for an ageing population and how these needs can be best met at a strategic level.
LPIO72	Birmingham City Council	Key areas of focus for any SoCGs will be housing and employment particularly in terms of agreeing to test fully whether any unmet need arising from within the Greater Birmingham and Black Country HMA of which Cannock Chase forms a part of, can be accommodated within Cannock Chase.

LPIO73	Greenlight Developments Ltd (c/o Lichfields)	A core part of demonstrating the statutorily required Duty to Cooperate is the preparation of one –or more- SoCG. Whilst Greenlight concurs with the Council’s updated list of key cross-boundary issues, there is a clear and cogent need to prioritise housing growth, and establish an appropriate and sustainable contribution to the wider HMA shortfall. The GBBCHMA authorities, of which the Council is a constituent authority, should play a critical role in Duty to Cooperate discussions. Due to the Greater Birmingham HMA Strategic Growth Study establishing that there is a significant housing shortfall across the GBBCHMA. This has implications for the ability of individual local authorities across the wider West Midlands to meet their own needs as well as that of neighbouring authorities, with potential ‘cascade’ effects of displaced need across a wider area, including along transport corridors.
LPIO74	(Watling Street) (c/o RPS Planning & Development)	St Modwen consider that key focus for any SoCG will be the need to address the acknowledged shortfall in employment (and housing) land emanating for the Black Country Authorities. Addressing these unmet needs is a clear ‘cross-boundary matter’ falling under the remit of the Duty to Cooperate obligations for the District.
LPIO75	Wright, T (c/o Pegasus Group)	SoCG should be prepared in line with NPPG. In terms of the GBBCHMA, it is clear that the Strategic Growth Study requires a coordinated approach by the fourteen authorities concerned. Clear evidence of this joint approach is needed to avoid an endless cycle of development being pushed from one local authority area into another as a result of disaggregated discussions on a sub-HMA level, which would potentially result in fragmentation of the HMA partnership and consequential failure to deliver the housing required. Therefore, it is especially important that discussions are documented accordingly through SoCG. This is of particular significance given the housing delivery remits of the LEPs and of the WMCA so it is proposed that SoCG will be required with the GBSLEP, the SSLEP and the WMCA.
LPIO76	Association of Black Country Authorities (c/o Walsall Council)	The list in paragraph 3.10 would provide a good starting point. Neighbouring authorities should certainly be involved.
Question 4 We think that the appropriate geography for housing issues is the area covered by the Greater Birmingham and Black Country Housing Market Area. Do you agree? If not what evidence is there for any alternative approach?		
LPIO77	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	It is agreed that the Greater Birmingham and Black Country HMA area should be the geographical focus for addressing overarching housing issues including the distribution of the Black Country and Birmingham housing shortfall.
LPIO78	Church Commissioners for England (c/o Barton Willmore)	The Commissioners agree that the appropriate geography for housing issues is the area covered by the Greater Birmingham and Black Country HMA. Cannock Chase District is one of fourteen local authorities which comprise the Greater Birmingham HMA, as such the combined administrative geography for said fourteen authorities is a sensible and logical approach. Cannock Chase District, along with other authorities within the Greater Birmingham HMA commissioned the Greater Birmingham HMA Strategic Growth Study. This study examined the entire administrative area and outlines recommendations that could potentially deliver sustainable development, which meets the housing needs across the HMA. As such, this geography should be maintained when it relates to addressing housing issues.

LPIO79	Home Builders Federation	The GB&BC HMA is an appropriate geographical area for housing.
LPIO80	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Richborough Estates agrees that the evidence has demonstrated that the appropriate geography for housing issues in the area covered by the GBBCHMA. Cannock Chase Council needs to play a significant role on helping the GBBCHMA to deliver the shortfall within the defined geographical boundaries of the HMA, in line with the recommendations of the Strategic Growth Study.
LPIO81	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that the appropriate geography for housing issues is the area covered by the GBBCHMA.
LPIO82	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	Cannock Chase forms part of the wider GBBCHMA. This is considered an important geography for housing issues to be addressed and for the district to be able to follow a strategic approach to the review of the green belt and AONB where exceptional circumstances will need to be demonstrated. This will need to be integrated into overall housing needs of the other authorities through the Duty to cooperate.
LPIO83	Birmingham City Council	Birmingham City Council agrees that the appropriate geography for housing issues is the Greater Birmingham and Black Country HMA. This is backed up by a history of joint working across the HMA and evidence such as the Strategic Growth Study carried out by GL Hearn.
LPIO84	Gladman	Gladman considers the GBBCHMA represents the most appropriate geography upon which to set the Council's housing requirement and to consider the justification for the release of Green Belt land for unmet needs. Gladman considers that it would not be appropriate or sustainable for some of the unmet needs of the Greater Birmingham HMA to effectively "leapfrog" Cannock Chase and be provided in authorities outside the HMA such as Stafford.
LPIO85	Greenlight Developments Ltd (c/o Lichfields)	Greenlight concurs with the Council's assertion that the appropriate geography for housing issues is the area covered by the GBBCHMA.
LPIO86	St Modwen (Watling Street) (c/o RPS Planning and Development)	In terms of the appropriate economic geography for Cannock Chase, the Council's own evidence moots that the District Falls within a '...much wider strategic travel to work area, including Wolverhampton, Walsall, <i>South Staffordshire, Lichfield and Stafford...</i> ' (Paragraph 3.124 of the EDNA refers). This is further evident based on the District's generally central position geographically within the wider proximity to the major conurbation.
LPIO87	Wright, T (c/o Pegasus Group)	It is agreed that the evidence has demonstrated that the appropriate geography for housing issues is the area covered by the GBBCHMA. It is therefore essential that the GBBCHMA addresses its own needs within that defined appropriate geography and does not seek to export growth to other areas as this would extend delivery beyond where the need has been demonstrated to arise.
LPIO88	Association of Black Country Authorities (c/o Walsall Council)	We agree.
Question 5 What do you think is an appropriate geography for the consideration of economic issues? What evidence is there to support this?		
LPIO89	Church Commissioners for England(c/o Barton Willmore)	We suggest that an appropriate geography for the consideration of economic issues is the Greater Birmingham Local Enterprise Partnership (LEP) area.

LPIO90	Holford Farm Partnership (c/o Hawksmoor Property Services)	Given the existence of the Strategic Economic Plans (SEPs) at the GBSLEP, the Staffs & Stoke LEP and also the WMCA, we consider focussing on the sub-regional geographics covered by the organisations would make sense. The Economic Development Needs Assessment (EDNA) produced by Lichfields in April 2019 as part of the Council's evidence base for the new Local Plan Review notes that Cannock Chase is not a self-contained Functioning Economic Market Area (FEMA), and notes "strong linkages with other areas" including Southern Staffordshire and also the nearby Black Country. Focusing on the area covered by the two LEPs and also the WMCA would allow for the distribution of unmet employment land need to be redistributed from areas such as the Black Country. The shortfall could be then accommodated, in addition to supporting the economic objectives of delivering inward investment into Cannock Chase for the future.
LPIO91	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The updated Economic Development Needs Assessment provides the evidence for the Functional Economic Market Area which is noted. There are clear links with Stafford Borough as part of this which would lend credence to the need for Rugeley Power Station to be an employment-led development, providing local job opportunities in that part of the district and reducing the need to travel as part of a sustainably balanced strategy.
LPIO92	Birmingham City Council	The appropriate geography will be the Functional Economic Market Area for Cannock Chase established in the employment land/economic needs assessment. However, given that there is a shortage of larger employment sites within the conurbation, we would encourage Cannock Chase Council to investigate and test options for the release of larger sites for employment purposes.
LPIO93	Wright, T (c/o Pegasus Group)	The updated Economic Development Needs Assessment provides the evidence for the Functional Economic Market Area which is noted. There are clear links with Stafford Borough as part of this which would lend credence to the need for Rugeley Power Station to be an employment-led development, providing local job opportunities in that part of the district and reducing the need to travel as part of a sustainably balanced strategy.
LPIO94	Association of Black Country Authorities (c/o Walsall Council)	As referred to in Economic Development Needs Assessment (EDNA) for the District Council, Cannock Chase is considered to fall within an area of 'moderate economic transactions' with the Black Country. The functional economic relationship can be seen in terms of commuting patterns. [...]. The strongest relationship is with Walsall, where some 2,243 residents travelled to work in Cannock Chase and 3,855 residents from Cannock Chase travelled to work in Walsall. [...]. Of Course, Cannock Chasse will have relationships with other nearby districts in southern Staffordshire as well as with Birmingham. In the case of the latter many of the commuters from Cannock Chase to Birmingham are likely to be office-based rather than employed in B1(b)/(c)/B2/B8 uses that are normally within the scope of economic studies [...]. We would suggest that the Cannock Chase takes a similar approach to that of the Black Country and South Staffordshire by identifying a core area (including Walsall and appropriate parts of neighbouring districts in southern Staffordshire) and a secondary zone.
Question 6 Do you have any other comments on the issues in this chapter?		
LPIO95	Beau Desert Golf Club (c/o FBC Manby Bowdler LLP)	The updated list of cross-boundary issues includes Housing Growth, Housing Need, Economic growth, Health, Recreation, Green Belt, and Landscape. We agree that these are important factors but it should be clearly emphasised in the Plan that these factors must be considered holistically rather than in isolation.
LPIO96	Greenlight Developments Ltd	Greenlight supports the Council's acknowledgement of the District's role within the wider context, the Council's commitment to work with neighbouring authorities on a range of strategic issues, and that the GBBCHMA represents the

	(c/o Lichfields)	most appropriate geographical area for the consideration of housing issues. However, given the scale of the housing issue present within the GBBCHMA, Greenlight considers that one of the principal areas of consideration for the SoCG should be housing growth and the provision of a sustainable and appropriate contribution to addressing the wider shortfall across the GBBCHMA.
<b>Vision &amp; Objectives</b>		
Question 7 Do you have any comments on the updated Vision and Objectives?		
LPIO97	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	We generally support the vision and objectives identified by the consultation document. It correctly acknowledges that it will be necessary to release a sufficient quantum of land for housing to meet the District's own housing need and the appropriate contribution towards the wider housing market area shortfall is supported. It is however, our view that an additional objective should be added. It should be specified that the emerging Local Plan will seek to maximise non-Green Belt development opportunities for development before Green Belt land release takes place.
LPIO98	Canal & River Trust	We welcome the updated objectives, which encompasses additional comments regarding the importance of the canal network. We support the proposed vision to strengthen and positively manage the network of open green space within the District, with specific mention of canals. We do request, however, that the vision should seek to 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. With regards to the proposed Objectives, we wish to make the following comments: <ul style="list-style-type: none"> <li>• Objective 2 – We welcome the reference to the use of canals and other watercourses in providing sport and leisure opportunities, including walking and cycling.</li> <li>• Objective 5 – We welcome the reference to the aim to achieve improvements to walking and cycling. We do, however, believe that there may be an opportunity to include an objective for development to engage positively and interlink with existing walking and cycling routes, as this would identify a key measure as to how walking and cycling can be promoted, and would make the Plan more effective in meeting its aims.</li> <li>• Objective 8 – We welcome reference to the promotion of renewable energy and green technologies. We also welcome the aim to reduce pollution, which could help to promote improved water quality within our canals, and would be compliant with the aims of paragraph 170 (part e) of the Framework.</li> </ul>
LPIO99	Church Commissioners of England (c/o Barton Willmore)	The objectives and vision in the Local Plan Review should be consistent with national policy and enable the delivery of sustainable developments. In relation to Objective 3: Provide for housing choice, we consider there should be recognition in relation to meeting housing need in appropriate locations this is likely to include greenfield and Green Belt Land. The Commissioners welcome the proposed vision for the Local Plan, which has been refined and updated when compared to the vision in the Cannock Chase Local Plan Part 1. Our client supports the revised end date of the plan period (2036), on the basis this will provide a 15year period from adoption. This vision and objectives of the Local Plan Review should also align with the end date of the Greater Birmingham HMA Strategic Growth Study and cover the entire plan period.

LPIO100	Lichfield & Hatherton Canals Restoration Trust	<p>We welcome the words in paragraphs 4.1, 4.4, 4.6 and 4.7 which apply to our proposals for the restoration of the Hatherton Canal.</p> <p>We are particularly supportive of the objective of safeguarding land – as referred under paragraph 4.7 – for sustainable transport routes. We wish to see formal policy protection by the relevant local authorities safeguarding the projected route of the Hatherton Canal, end-to-end. Some of that route lies within the Cannock Chase District.</p>
LPIO101	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>Richborough Estates is generally supportive of the vision although it is considered too long and should be distilled to highlight key issues as this will serve to provide greater pertinence and clearer links with the identified objectives. Richborough Estates is supportive of the objectives set out within the Local Plan Review Document, insofar as they collectively promote sustainable development. In particular objective 3 is endorsed. Richborough Estates also supports the recognition of the economic benefits that providing for increased housing choice can bring, as well as the need to release land for housing development in appropriate locations.</p> <p>Further to Richborough Estate’s representations to the previous Issues and Scope consultation, it is noted that Objective 3 has been strengthened to include reference to contribution to the wider housing market area shortfall and this addition is fully supported. It is also considered that the title of the objective should be renamed ‘<b>Provide for Housing Need and Choice</b>’ which would more accurately reflect the Council’s duties.</p> <p>It is considered that an additional strategic objective should be added, which underlines the requirement to support the needs of neighbouring authorities through the Duty to Cooperate. This will strengthen the requirement and ensure that the Duty to Cooperate is fully engaged with throughout the plan period.</p>
LPIO102	Severn Trent	<p><u>Objective 7</u></p> <p>We suggest the use and designation of open green spaces to deliver the objective. We welcome proactive engagement around designation of open green spaces and believe they can be used to house green blue infrastructure. We recognise your increased efforts to push sustainable development. To maximise natural capital and environmental benefits SuDS should focus on more than simply flood alleviation purposes.</p> <p><u>Objective 8</u></p> <p>We acknowledge the County Councils SuDS handbook and support its use as a tool to help deliver effective SuDS. We’re open to consultation and discussion around such policies and helping build the appropriate evidence base to support such case.</p>
LPIO103	Sport England	<p>Sport England welcome the acknowledgement of ‘active design’ in Objective 1 but consider that the 10 design principles should be acknowledged. To assist with the understanding of active design it is viewed that the Local Plan should contain a link to the document. It is also viewed that the principles of active design assists are relevant to Objective 2.</p>
LPIO104	Taylor Wimpey (c/o Lichfields)	<p>Taylor Wimpey suggests that the Vision acknowledges that some Green Belt release would need to be considered as part of this process.</p> <p>Taylor Wimpey recognises the need for sustainable development. However, the wording of part of the vision is considered to be overly prescriptive and onerous as there is no requirement in national planning policy for development to meet the highest possible sustainability standards. Taylor Wimpey suggests that alternative wording could be used here to indicate that the highest possible sustainable standards will be <u>encouraged</u>.</p> <p>Taylor Wimpey also suggests that the vision is amended to indicate that housing will be flexible to be able to adapt to the changing needs of residents, where evidence is provided to demonstrate a need for such dwellings.</p>



LPIO105	Beau Desert Golf Club (c/o FBC Manby Bowdler LLP)	It will be important to ensure that the objectives in relation to preserving and enhancing the AONB and building sustainable and healthy communities are considered holistically alongside the housing and other policies so as to ensure that suitable sites (such as C375) where provision is made for appropriate AONB and landscape enhancements alongside a sustainable housing proposal, are considered favourably.
LPIO106	Brereton & Ravenhill Parish Council	BRPC sees no need to update the second intent in paragraph 4.2
LPIO107	Briggs, T	<p><u>Page 25</u> There is a key phrase here ‘no inappropriate development within or on the edge of the AONB’. The green belt will be protected from inappropriate development...’ CCDC needs to be very clear about this; there have been ‘greenbelt reviews’ in other areas that have led to precious greenbelt being lost. The policies you state mean nothing unless they are backed up by a commitment to retain the greenbelt designation for all areas currently within the greenbelt for the period of the Plan. As it stands a number of ‘reviews’ could be carried out, leading to ‘death by a thousand cuts’ as various parcels of land are removed from greenbelt either by virtue of a formal greenbelt review or through revised permitted development. The Council’s stance appears at first glance to be a noble one, but it is easily circumvented.</p> <p><u>Objective 4 (Page 27)</u> There needs to be an additional point here to confirm that the AONB/Greenfield will be prioritised over business need. In short, the business owner should be answerable to the demands of the AONB, not the AONB being answerable to the demands of the business owner.</p>
LPIO108	Cannock Chase AONB Partnership	<p>The AONB Partnership warmly welcome the commitment that ‘<i>There will be no inappropriate development within or on the edge of the Cannock Chase Area of Outstanding Natural Beauty. The Green Belt will be protected from inappropriate development, will be well managed and will be linked to the Area of Outstanding Natural Beauty.</i>’</p> <p><u>Objective 7</u> The first bullet point refers to protecting conserving and enhancing Cannock Chase AONB. This should be further clarified to acknowledge that maximising opportunities for access and enjoyment must be balanced with the statutory requirement to minimise impacts on the AONB and would only be appropriate where there is no conflict with statutory designation, bearing in mind the primary purpose of the AONB. Potentially there will be instances where mitigation is not possible and therefore a proposal will not be acceptable, and the AONB would welcome reference to this potential scenario. Emphasis on the provision of easily accessible high-quality recreational areas outside the AONB would be welcomed to relieve recreational pressure in the AONB, and thereby assist in delivering a more sustainable future for the AONB.</p>
LPIO109	Gladman	<p>Gladman considers that the Vision and Objective should give a much greater emphasis upon meeting affordable housing need rather than the vague aspiration to “help meet local need for both affordable and aspirational housing” as currently proposed.</p> <p>There has been a significant failure of the Local Plan to deliver affordable homes since its adoption in 2014. This should be addressed through the Local Plan Review by having an ambitious target for new housing in the District. There is a need for the allocation of greenfield sites as well as previously developed land as the former are more likely to produce policy compliant levels of affordable homes.</p>

LPIO110	Greenlight Developments Ltd (c/o Lichfields)	In particular, Greenlight is advocative of the Council's broadening of its Vision to deliver housing to meet the local needs, and make an "appropriate and sustainable contribution to the wider housing market area shortfall". Similarly, Greenlight welcomes the premise of the Council's update to Objective 3 and its intent "to manage the release of sufficient land..." It is critical that the Council define and include a housing-related objective within the Local Plan Review, which sets out the objectives of the Plan over the new Plan period and provides a barometer against which the Plan can be assessed. Greenlight considered that the Council's current plan, as updated in the IOC to now include the housing needs of the GBBCHMA, is consistent with the objectives of the NPPF, and is supported.
LPIO111	Historic England	We would request a separate objective for the historic environment. Coupling it with the natural environment can cause difficulties where there are competing issues for these two themes and it also proves difficult to monitor the success of the objective if it has been positive or negative for one theme and not the other.
LPIO112	Lyons, O	The grounding of the Local Plan should be to ensure that, as the district evolves, it is an attractive place for residents to call home.... The area and any future developments must be in keeping with local heritage and developments must be of a high quality and well suited to the surroundings. In order to ensure than links to traditional heritage and architectural design are maintained, any distinctive characteristics of an area should be protected, preserved and, where possible, replicated. [...] I firmly believe the best way to protect this is to ensure that the community themselves and the residents are at the heart of the process, such as through the creation of local Neighbourhood Plans.
LPIO113	National Farmers Union	<u>Objective 4</u> We are pleased that this objective offers support for the land based economy of the District. The planning needs of rural businesses are evolving and policy should ensure it keeps pace with developments in the industry. This is particularly important for those businesses located within the green belt who may need to invest in new infrastructure in order to meet environmental and animal welfare standards.
LPIO114	Natural England	<u>Vision</u> We are pleased to note that our previous comments about soils and water have been taken into account. The only additional tweak we would suggest is in bullet point 2 under the section of the vision that talks about people leading greener, more environmentally friendly lifestyles...we would suggest the following wording 'There will be no inappropriate development within or in the <i>setting</i> of Cannock Chase AONB'. This wording is more in line with the Cannock Chase AONB Management Plan and developing AONB Design Guidance. <u>Objectives</u> Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para 170 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure. We suggest that an additional bullet point under Objective 7 would address this issue, 'To ensure net gain for biodiversity is considered for all aspects of the plan and development types...'
LPIO115	Cllrs. Preece, J, Stretton, Z and Newbury, J	On page 23 it states that part of the District Council's vision will be "safeguarding of heritage assets...". We need to be sure that this stated aim is able to become a reality. If the District Council is serious about safeguarding heritage assets, then it must start with ones that it owns, of which the Grove Colliery site is one. This site has tremendous heritage and leisure potential, something which the owner of adjacent land recognises and is keen to promote alongside the District Council. There are other assets in Norton Canes which

		<p>should also be safeguarded as part of a strategy which is inclusive of the whole District, not just the three towns. On Page 24, it states that “the district centre at Hawks Green...will have improved facilities.” We are keen to establish how this will manifest itself on reality. In recent years, there has been much emphasis placed on the town centres of Cannock, Hednesford and Rugeley but little strategic attention has been paid to village centres such as ours. We welcome this statement as improvements can be made to our village centre but it needs to be backed up with the strategic oversight that has been afforded to successful regenerations of town centres in the District.</p> <p>On page 25 it states that “The Cycle network will have been expanded...together more effectively.” To achieve this, we believe that it is essential that the historic mineral routes that line the District are preserved, documented and given protected status even before any commitment to use them in an integrated way for a cycle network is made. In future housing developments, any suitable route should be identified as a core part of the conditions of acceptance of application. [...]</p> <p>On Page 25 it states that “There will be a ‘green corridor’ ...linking the Cannock Chase AONB to Sutton Park.” Norton Canes is home to No Man’s Bank which is part of the Chasewater and the Southern Staffordshire Coalfield Heathlands SSSI. At the present time, it is listed as of low quality and Natural England have come up with a list of recommendations for work that needs to be undertaken in the area to raise its ecological quality. We believe that there should be a priority given in the Local Plan to the enhancement of these areas as they could make a valuable contribution to the vision of creating a corridor of much needed lowland heathland from the AONB to Sutton Park.</p>
LPIO116	St Modwen (Watling Street) (c/o RPS Planning and Development)	St Modwen broadly supports the commentary in the IOD Vision and Objectives, at page 24 which states “ <i>The potential of the District’s accessible location along major transport routes...There will be new investment in areas of growth, and the levels of commuting will be reduced.</i> ”
LPIO117	Stafford Borough Council	The Borough Council are generally supportive of the Vision and Objectives within the new Cannock Chase Local Plan to cover the period to 2036. It is important to ensure that a balanced approach takes place between the development requirements of neighbouring areas and the focus for new infrastructure, housing and employment growth within the Cannock Chase District area. In particular the Council supports the approach to maintaining the Green Belt areas confirmed through the Green Belt Study 2016 for Cannock Chase District whilst maximising the use of brownfield land and potentially discussing with neighbouring authorities the potential to accommodate development needs in nearby urban areas. However, Stafford Borough Council can confirm it is not in a position for any unmet gypsy, traveller and travelling showpeople needs within Stafford Borough.
LPIO118	Staffordshire County Council	<p><u>Historic Environment</u> The reference to the historic environment, cultural heritage, and heritage assets in the updated vision are welcomed. Likewise, objective 7 is supported.</p>
LPIO119	Strathclyde Pension Fund (c/o Savills)	Paragraph 4.2 focuses solely on the designated retail centres, but remains silent on the fact that Cannock chase does have out of centre retail parks which provide vital large format accommodation not found within the designated centres. We would request that further consideration of the contributions which the existing retail parks make to the wider economy of the district is recognised.
LPIO120	Wright, T (c/o Pegasus Group)	<p>The vision is broadly supported although it is considered too long and should be distilled to highlight key issues as this will serve to provide greater pertinence and clearer links with the identified objectives.</p> <p>The objectives set out within the Local Plan Review Document are generally supported, insofar as they collectively</p>

		<p>promote sustainable development. In particular, objective 3, Providing for Housing Choice is endorsed. It is noted that Objective 3 has been strengthened to include reference to contribution to the wider housing market area shortfall and this addition is fully supported. It is also considered that the title of the objective should be renamed 'Provide for Housing Need and Choice' which would more accurately reflect the Council's duties to deliver a requirement which addresses not only the minimum figure set by the standard but also a contribution towards the shortfall.</p> <p>It is considered that an additional strategic objective should be added, which underlines the requirement to support the needs of neighbouring authorities through the Duty-to-Cooperate. This will strengthen the requirement and ensure that the Duty-to-Cooperate is fully engaged throughout the plan period.</p>
LPIO121	Association of Black Country Authorities (c/o Walsall Council)	<p>We broadly support the Vision and Objectives for the district, in particular the 2<sup>nd</sup> bullet of Objective 3 [...]. [...], the Local Plan should play its part in meeting the needs of nearby urban areas, so that regard should be had to the scale and location of development in Cannock Chase, to ensure that it complements and does not undermine investment in existing urban areas and can be accessible to all those who might need and/or wish to benefit from it [...].</p>

**Design Policy Options**

Question 8 Is there any local evidence to support the need for the Council to adopt minimum internal space standards for new dwellings (the nationally described space standard)? If so, what?

LPIO122	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	<p>It is in our view that the emerging Local Plan should not seek to adopt minimum internal space standards for new dwellings as set out in the Nationally Described Space Standards. There is no such requirement within the Framework. Setting such standards removes flexibility. The size of properties should be controlled on a site by site basis through the development control process. Smaller properties cost less to construct and buy. There may, therefore, be occasions when the Local Authority wishes to encourage the provision of smaller housing as it will assist in the provision of affordable market housing. The imposition of space standards will increase construction costs have an impact on the price point of new homes.</p>
LPIO123	Home Builders Federation	<p>The adoption of the NDSS should be in accordance with national policy (2019 NPPF para 127f&amp;Footnote 46), the Written Ministerial Statement (WMS dated 25<sup>th</sup> March 2015 and the NPPG. [...])</p> <p>It is incumbent on the Council to provide a local assessment evidencing the specific case for Cannock Chase which justifies the adoption of the NDSS which should only be introduced on a "need to have" rather than a "nice to have" basis. The identification of the need for the NDSS must be more than simply stating that in the past some dwellings have not met the standard. The Council should identify the harm caused or may be caused in the future and identify if there is a systemic problem to resolve. The HBF is not aware of any evidence that market dwellings not meeting the NDSS have not sold or that those living in these dwellings consider that their housing needs are not met. There is not evidence that the size of houses built are considered inappropriate by purchasers or dwellings that do not meet the NDSS are selling less well in comparison with other dwellings.</p> <p>[...]The Council should robustly test the impacts of adopting the NDSS on the viability of development. There is a direct relationship between unit size, cost per sqm, selling price per meter and affordability.</p> <p>Where the NDSS is to be adopted the impact on affordability should be assessed including the potential impact on meeting first time buyer demand for starter homes often the NDSS most significantly impacts on smaller 1, 2 and 3 bedroomed dwellings.</p> <p>An inflexible policy requirement for adoption of the NDSS may impact on affordability and reduce housing choice. Any</p>

		<p>adverse impact on affordability of starter home/ first time buyer products may translate into reduced or slower delivery rates which should be reflected in the Council's housing trajectory.</p> <p>It is possible that additional families who can no longer to afford to buy a NDSS compliant home are pushed into affordable housing need at the same time as the Council undermines delivery of affordable housing.</p> <p>If the NDSS are adopted then the Council should put forward appropriate proposals for transitional arrangements.</p>
LPIO124	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>Richborough Estates submits that the introduction of the NDSS would have a significant detrimental effect on the efficiency of land use within Cannock Chase District. The introduction of such restrictive policy requirements would be unduly onerous in terms of the consequences for the range of affordable products which could be offered.</p> <p>There appears to be no evidence to justify the requirement for all residential development to meet the NDSS. Therefore, it should not be included in policy. A wide range of house sizes provides for better uptake by potential purchasers.</p>
LPIO125	Rugeley Power Ltd (c/o Savills)	<p><b>Owners of Rugeley Power Station.</b></p> <p>Although the Local Plan will not be adopted by the time the outline planning application is determined, this plan may be adopted when future Reserved Matters applications are submitted on site. Therefore, it is considered important that the Local Plan does not contain policies that could negatively impact on the innovative development proposals that Rugeley Power Ltd intend to deliver at Rugeley Power Station.</p> <p>We consider that CCDC should maintain an approach that allows flexibility in delivering good design at an appropriate internal space and density within the District. A blanket approach to space and density standards will lead to inflexibility in the housing market. By setting space and density standards, it could limit the potential to deliver homes that meet the needs of the population in the District.</p>
LPIO126	Taylor Wimpey (c/o Lichfields)	<p>Should the Council wish to include policy requirements for such standards in the Local Plan it will need to ensure that the appropriate evidence is provided to justify this requirement and that the application of the standards is fully tested through viability evidence produced to inform the Local Plan.</p>
LPIO127	Bloor Homes Ltd (c/o Define Planning and Design)	<p><b>Written Ministerial Statement dated 25<sup>th</sup> March 2015.</b> If the Council wish to adopt the NDSS within a Local Plan policy, then clear and up to date evidence of a local need to do so is required. In this case there is no known evidence of dissatisfaction with the size and standard of housing that is being delivered in the District to meet the identified need or of the dwellings being providing actually being too small.</p> <p>Moreover, the potential imposition of the NDSS on development viability, housing affordability, and the potential impact on development delivery rates in the District, would also need to be carefully examined.</p>
LPIO128	Gladman	<p>If the Council wishes to adopt the NDSS as a policy requirement then this should only be done in accordance with the NPPF footnote 46. The WMS dated 25<sup>th</sup> March 2015 and the NPPG (ID:56-020). The Council should consider the impacts on need, viability and timing before introducing the NDSS.</p>
LPIO129	Thornton, H	<p>Rugeley and Brereton lack job opportunities, particularly jobs of high quality and jobs for women, resulting in a high level of out-commuting, rectifying this should be a priority.</p>
LPIO130	West Midlands HARP (c/o Pegasus Group)	<p>To facilitate an increase in the delivery of affordable housing across Cannock Chase the Council needs to establish policies in the new Local Plan which are ambitious, but pragmatic and flexible.</p> <p>Should the Council decide, on the basis of clear evidence, that new density standards and the NDSS should be introduced locally, we ask that such policies be applied across all housing tenures to ensure Housing Associations can continue to deliver homes on an equal footing with other developers.</p>
LPIO131	Wright, T	<p>It is submitted that the introduction of the NDSS would have a significant detrimental effect on the efficiency of land use</p>

	(c/o Pegasus Group)	<p>within Cannock Chase District. The introduction of such restrictive policy requirements would be unduly onerous in terms of the consequences for the range of affordable products which could be offered. Through the insistence on the provision of oversized smaller properties as 'standard' this has the potential to impact on the delivery of a range of affordable stock available to the consumer as required by the Framework, as well as having implications for viability which could undermine plan delivery.</p> <p>There appears to be no evidence to justify the requirement for all residential development to meet the NDSS. Therefore, it should not be included in policy.</p>
Question 9 Are there other standards we should be including, and of so what evidence can you provide which would provide the local justification for this?		
LPIO132	Home Builders Federation	There are no other standards considered necessary for inclusion in the new Local Plan.
LPIO133	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>[...]Standards should be applied in suitable locations such as town centres and those benefitting from good public transport links. Richborough Estates would endorse this approach, any standard should also retain a degree of flexibility to allow for development to reflect local character and context and specific, identified needs at settlement level. Regarding the application of such standards, Richborough Estates considers that any standards should be set within a Local Plan Policy rather than in a SPD. The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.</p>
LPIO134	Rugeley Power Ltd (c/o Savills)	<p>[...]For large sites, it is considered that densities should be varied across the site to reflect varying character areas and ensure that an appropriate and diverse mix of dwelling types are provided to meet housing needs. Subsequently, it is considered that applications should be considered on a site by site basis.</p> <p>Any design policy within the Local Plan should provide flexibility to ensure that innovative design is not restricted. For the design policy we support <b>Option A</b>. However, in relation to updating the Design SPD, CCDC should produce a flexible document that promotes innovative design and supports the efficient use of land, especially brownfield sites, taking account of existing site constraints and allowing opportunities for innovation where appropriate.</p>
LPIO135	Sport England	It is viewed that current Local Plan Policy CP3 and the Design SPD does not provide sufficient clarity as how to optimise the promotion of physical activity within developments. Therefore either of the Design Policy Options (a and b) should ensure that active design principles are explained in greater detail and embedded further.
LPIO136	Bloor Homes Ltd (c/o Define Planning and Design)	<p>NPPG (ref 56-001-20150327) highlights that the Government has created a new approach to the setting of technical standards for housing.</p> <p>It is, therefore, entirely inappropriate to seek to set any local technical standards or requirements relating to the construction, internal layout or performance of new dwellings in Local Plan policy beyond the very few clearly specified exceptions, and only then, where there is robust evidence of a need to do so.</p>
LPIO137	Historic England	Historic England is supportive of clear and strong policies on design, within the local plan and associated guidance within an SPD. We are keen to ensure that the historic environment is fully considered in any design guidance.
LPIO138	Hughes, R	<b>Option B</b> - The greatest consideration should be given to design to maintain a community's character.
LPIO139	Lyons, O	Although I would favour <b>Option A</b> in terms of amending, updating and expanding the existing policy, I believe that the Council should begin looking at more modern developments which include shared spaces, such as high quality, well designed modern apartments. It is, however, crucial that these options are well explored and consulted on widely. In

		addition to this, and as a Council, we must adopt the greenest methods of development and pursue green, environmental policies in all that we do.
LPIO140	Startin, P	I think <b>Option B</b> for Objective One is the correct choice as the Council must start looking up to solve the challenges it faces in housing.
LPIO141	Wright, T (c/o Pegasus Group)	The setting of any density standards in the new local Plan should only be undertaken in accordance with Paragraph 123 of the NPPF. Any standard should also retain a degree of flexibility to allow for development to reflect local character and context and specific, identified needs at a settlement level. Regarding the application of such standards, it is considered that any standards should be set within a Local Plan Policy rather than in a SPD. The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.
Question 10 Is the Local Plan still the right place to include a Local List, or would this be more appropriate to be developed by local communities (for example Hednesford Neighbourhood Plan has identified buildings of local significance which it wishes to protect).		
LPIO142	Historic England	We are very keen for a district wide list and would be supportive of the Council bringing this forwards, when their resources allow.
LPIO143	Cllrs. Preece, J, Stretton, Z and Newbury, J	We feel that it is essential that the District Council maintains a Local List as some communities may not have the capacity to develop one themselves; we also think it would be more efficient for a District-wide local list to be maintained.
LPIO144	Staffordshire County Council	It is suggested that the Local Plan is still the place for a local list. Inclusion of locally significant buildings in neighbourhood plans is to be supported and encouraged especially when there isn't a district-wide local list. A local list included in the Local Plan would provide consistency and perhaps more traction.
LPIO145	Thornton, H	Better if Local Lists are in the Local Plan but compiled with input from Parish Councils, Heritage and Local History Groups.
Question 11 The NPPF (paragraph 70) states that 'planning policies and decision should avoid the development of isolated homes in the countryside' but sets out exceptions to this. Should we be elaborating further to define local policy in this context and if so what should be focus on and what local evidence is there to support this?		
LPIO146	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	This should refer to Paragraph 79 of the Framework (Feb 2019). Richborough Estates considers that national policy is sufficient unless local evidence can justify further elaboration.
LPIO147	Wright, T (c/o Pegasus Group)	This should refer to Paragraph 79 of the Framework (Feb 2019). National Policy is considered sufficient unless local evidence can justify further elaboration.
LPIO148	Association of Black Country Authorities (c/o Walsall Council)	Given that nearly all the open countryside in the District, including that adjacent to the boundary with Walsall, lies in the Green Belt, there would appear to be little scope for the development of isolated homes in the authority's area.

**Social Inclusion and Healthy Living Policy Options**

Question 12 Which options or combinations of options do you support and why?

LPIO149	Canal & River Trust	<p>We welcome the aims of Option A, which we believe could help to increase the focus of the Local Plan upon opportunities for improving health and wellbeing in the District. Reference to an increased emphasis upon a network of green and blue infrastructure and the role it can play, as suggested, would be an especially powerful route towards meeting the overall policy aims.</p> <p>The existing Plan includes details of the indicative route in support of the Hatherton restoration. We welcome the proposals under Option D, as the inclusion of a policy specific to the restoration, including a requirement to ensure that the route is safeguarded and not severed by new development, would help to ensure that developments are required to consider it in their proposals and help to manage development which may otherwise sever the line or prevent its restoration.</p> <p>We note that the present Core Strategy currently indicates a requirement that the restoration proposal should demonstrate that additional boat movements along the Cannock Extension Canal SAC can be prevented. We believe this should not be included in the new document. The Cannock Extension Canal, and navigation along it, is the responsibility of the Canal &amp; River Trust and it is not considered appropriate for a planning policy to specifically restrict boat movements. [...]</p>
LPIO150	Cycle-R	<p>Objective 2 is an excellent objective that needs working on, through the Charity I work for (Cycle-R), we have noticed high levels of poor health, bad diets, obesity and lack of exercise. A lot of this is focussed on those areas of high deprivation in the area, low income leads to poor diets and levels of indolence. Looking at the options, I would favour <b>option D</b>, this creates a broader range of available activities.</p> <p>However, I would note at this stage that the facilities for cycling in the District are very poor. Whilst the trails on the Chase are superb, it is not easy to get there if you don't drive and road based cycle routes in and around Cannock are very poor. These do need to be looked at, I understand that roads are the purview of the County, but they are desperately needed.</p>
LPIO151	Lichfield & Hatherton Canals Restoration Trust	<p>We are supportive of any of the options identified provided that the projected route for the Hatherton Canal, where that route lies within the Cannock Chase District, is protected from development which would compromise the future restoration of the canal for navigation and other appropriate (leisure etc.) uses. We are particularly supportive of <b>Option D</b> whereby a specific policy statement is produced and adopted. [...]</p> <p><b>Hatherton Canal:</b> it is necessary for the policies and route alignments on the Policy Maps of Cannock Chase Council, South Staffordshire District Council and Walsall Council to cross-refer and mesh so that there is protection over a feasible and continuous end-to-end route including space for land alongside to be battered down to canal water level.</p>
LPIO152	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>Richborough Estates supports <b>a combination of Options A, C and D</b>. There would be concern with Option B as it is important that as much information as possible is set out in the Local Plan.</p> <p>Richborough Estates considers that any open space standards should be set within Local Plan Policy rather than in an SPD. [...]Standards should be clear and not onerous to allow for clear guidance in formulating any scheme.</p>
LPIO153	Rugeley Power Ltd (c/o Savills)	<p>We support <b>Option A</b> that open space, sport and playing requirements should be based on updated evidence not within the Policy itself. The policy should link up to date evidence as suggested by Sport England to ensure that development sites are providing sufficient open space to meet local needs.</p> <p>It is considered the development at Rugeley Power Station can assist in achieving the aims of the social inclusion and healthy living policy.</p>



LPIO154	Sport England	<p><u>Objective 2 – Para 6.12 – Footnote 32</u>  Clarity is sought as to the Council's future approach CIL in relation to playing pitches and indoor facilities to understand how this would shape objective 2 policy options.  Sport England would support the allocation of <b>Option A</b> and that headline findings within the Playing Pitch Strategy and Indoor Strategy should be recognised within a policy and subsequent projects contained within a site allocation policy (where relevant) and within the infrastructure delivery plan.</p>
LPIO155	Taylor Wimpey (c/o Lichfields)	<p>Taylor Wimpey considers that a <b>combination of Options A and C</b> would be appropriate.  It is essential that details of open space standards are set out in a transparent manner within local plan policy.  The policy would need to make clear that requirements for open space will be assessed against the most up to date evidence on need and shortfall, so that existing provision in the local area is properly taken into account.  The policy should cross refer to the most up to date open space assessment and playing pitch and indoor sports strategies.  Taylor Wimpey considers that green spaces of strategic significance on a district scale are appropriate for inclusion in the Local Plan and that smaller areas of green space which are of particular importance at the community level could be identified through the Neighbourhood Plan process.</p>
LPIO156	Bloor Homes Ltd (c/o Define Planning and Design)	<p>It is essential that the Local Plan ensures that all future developments make a fair contribution to the provision of community infrastructure in the District.  In relation to open space provision the Local Plan must clearly set out <u>all</u> of the requirements, and in respect of off-site provision, the mechanism(s) for securing the required contributions.  It is not helpful to seek to apply blanket requirements for a variety of very specific types of open space to each and every site. Instead guidance is required that encourages proposals to respond to both the strategic context and existing (or proposed) provision, and the specific nature of the site.  The provision of multi-functional spaces that respond to a variety of needs should be encouraged.  The provision should be established on local standards based on a robust and up to date assessment of the local need for open space and sports and recreation facilities, taking account of deficits and surpluses in existing provision.</p>
LPIO157	Briggs, T	<p>I strongly support <b>Option D</b> to enable the canal route to be safeguarded. This project is working well in Lichfield and will be an excellent visitor draw once completed.</p>
LPIO158	Cannock Chase AONB Partnership	<p><b>Option A or C:</b> Allocating green spaces of strategic significance on a district scale would be supported, to focus enhancement of strategic areas of open space outside the AONB, connected by a network of robust green links accommodating cycle routes, which could potentially relieve recreational pressure on the AONB.</p>
LPIO159	Hughes, R	<p><b>Option C</b> – Support local communities develop their own local-scale planning policies; local people know best for their community</p>
LPIO160	Inland Waterways Association	<p>IWA supports <b>Option D</b>; to create a separate policy for the Hatherton Branch Canal restoration and seek to safeguard the canal route. However, the word “Branch” should be removed, as the proposal extends beyond the historic Hatherton Branch to include a new section of route replacing a lost part of the original Cannock Extension Canal to form a new through route, with the whole project call the “Hatherton Canal”  The Hatherton Canal route cross the boundary between Cannock Chase DC and South Staffordshire DC in several places, and now also has a short section in Walsall MBC, requiring cooperation between the Councils to ensure continuity</p>

		<p>and consistence of policies and maps.</p> <p>The route as identified by the Lichfield &amp; Hatherton Restoration Trust is safeguarded in Policy SAD8 of the adopted South Staffordshire Site Allocations document. The adopted Walsall Site Allocation Document, Policy SAD4 also safeguards the Hatherton Canal.</p> <p>Cannock Chase Local Plan (Part 1) undertakes in Policy CP9 to identify and safeguard a firm route on the Policies Map via the Local Plan Part 2, subject to certain conditions. However, that will not now happen, leaving important parts of the route unprotected and with no detailed mapping to guide applicants in avoiding any prejudicial impacts from their development proposals. It is vital therefore the necessary safeguarding of the route is implemented through the reviewed Local Plan.</p> <p><b>IWA suggested wording for a Hatherton Canal Restoration Policy is provided in the response.</b></p>
LPIO161	Lyons, O	I would adopt <b>Option C</b> in supporting local communities to develop their own policies via Neighbourhood Plans. Again, a green agenda must be implemented within this process and focus placed on the importance of tackling air pollution issues and encouraging and enabling community groups to adopt, protect and promote local green spaces.
LPIO162	National Farmers Union	All options include reference to networks of green and blue infrastructure. Farmers and landowners must be fully engaged with discussions on Green Space and green and blue infrastructure as they own and manage many of the areas key assets. Option C states that greenspace would be allocated at a local level via local policy including neighbourhood plans. These initiatives must ensure they fully consult the owners of land that could be allocated as greenspace or green and blue infrastructure and fully understand how they are currently managed and how they contribute to the local economy.
LPIO163	Cllrs. Preece, J, Stretton, Z and Newbury, J	We would support <b>Option C</b> for policy objective 2 but we would also like to see a separate policy for the Hatherton Branch Canal within the Local Plan because we believe a concerted effort should be made to safeguard it.
LPIO164	Norton Canes Parish Council	The Parish would support <b>Option C</b> . Existing Local Plan policy CP5 needs to be updated to reflect new evidence on need for indoor and outdoor sport recreation provision and overall open space provision.
LPIO165	Startin, P	I am in support of <b>Option C</b> for objective 2. Neighbourhood Plans are a great way for the community to take ownership of their area.
LPIO166	West Midlands HARP (c/o Tetlow King Planning)	If identified needs are to be met the Council needs to decide which infrastructure to prioritise, and set policy accordingly. Robust viability testing is required to justify any increase in development requirements, particularly those that may cause the delivery of affordable housing to be reduced.
LPIO167	Wright, T (c/o Pegasus Group)	A <b>combination of Options A, C and D</b> is supported. There would be concern with Option B as it important that as much information as possible is set out in the Local Plan. Open space standards should be set within a Local Plan Policy rather than in an SPD. [...]Standards should be clear and not onerous to allow for clear guidance in formulating any scheme.
LPIO168	Association of Black Country Authorities (c/o Walsall Council)	We have no comment to make about these options, except to advise that (as referred to in 'Option D') we support the provision of a specific policy to safeguard the route for the potential restoration of the Hatherton Canal [...]. [...].

Question 13 Are there any other options we should be considering? What are these?		
LPIO169	National Farmers Union	<p>Health Authorities increasingly recognise the role of public rights of way in improving public health and wellbeing. Therefore it is very important to increase user's awareness of their responsibilities as rights of way users and for those promoting the outdoors to consider how adequate resources can be delivered to support the maintenance of the network. Farmers and Landowners are largely responsible for the maintenance of footpaths across their land. Therefore the impacts of new residential development on adjacent agricultural land need to be carefully thought through. Many field parcels adjacent to housing developments are unfortunately then subject to repeated trespass, fly tipping (particularly garden waste), dog worrying, and concerns about disease carried in dog faeces.</p> <p>Therefore where new housing is proposed adequate green space must be incorporated into the development in order to relieve pressure on adjacent farmland and investment must be made (with prior consultation of local farmers) in the surrounding areas access infrastructure. This is to mitigate the impact of new urban development on the surrounding farmland. [...]</p>
LPIO170	Staffordshire County Council	<p><u>Public Rights of Way (PRoW)</u></p> <p>We welcome the overall intention of the Plan to seek the enhancement of the opportunities to walk/cycle and ride within the area. We also welcome the recognition that public rights of way can from a key part on promoting health and wellbeing and the future sustainability of a community.</p> <p>Where appropriate the plan should seek to encourage/require development to enhance the existing path network where possible in line with Staffordshire County Council's Rights of Way Improvement Plan.</p>
Question 14 How should we be seeking to develop local policy concerning air quality, and what evidence can we use to support this?		
LPIO171	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	It is vital that any local standards are based on robust and proportionate evidence. These should be set through Local Plan policy rather than in a SPD. The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.
LPIO172	Taylor Wimpey (c/o Lichfields)	Any policy on air quality should be worded so that it would allow for development in sustainable locations, where it can be demonstrated that there would be no air quality constraints with the appropriate mitigation measures as required. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.
LPIO173	St Modwen (Watling Street) (c/o RPS Planning & Development)	<p>Care should be taken when using AQMAs to provide the bases for local planning policies that seek to take air quality issues apparently evident in particular parts of the District. [...]</p> <p>In addition, nitrogen dioxide concentrations are anticipated to reduce during the Local Plan period, and thus will be much lower than at present by the end of the period. Based on this, it is unreasonable to determine the impact of development of a particular site (including CE20) upon air quality should be based purely on proximity to an AQMA.</p> <p>This illustrates that a simplistic evidence-based approach may not be necessarily appropriate in the case of the A5 corridor. This should be recognised and incorporated into any emerging policy to be proposed at later stages of the Local Plan Review.</p>
LPIO174	West Midlands HARP (c/o Tetlow King Planning)	<p>Improvements to Air quality through planning policy should only be sought where fully supported by evidence that there is a significant existing issue.</p> <p>The Council needs to understand baseline conditions across the district before drafting policies, and should policies be</p>

		required, make these very clear as to expectations, aspirations and requirements.
LPIO175	Wright, T (c/o Pegasus Group)	Local Policy should be formulated in line with national policy. It is vital that any local standards are based on robust and proportionate evidence. These should be set through Local Plan policy rather than in a SPD. The including of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.
<b>Overall Housing Growth Policy Options</b>		
Question 15 Which option do you support and why?		
LPIO176	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	It is our view that housing growth Options A and Options B are unrealistic. The level of housing growth proposed is insufficient to meet the growth requirements of Cannock Chase and a suitable and sustainable proportion of the Greater Birmingham and Black Country HMA housing shortfall. Indeed, it is our view that the quantum of development to meet the unmet needs identified by Option C is also likely to be too low.
LPIO177	Church Commissioners of England (c/o Barton Willmore)	In order for the Local Plan Review to align with and deliver Objective 3: Provide for Housing Choice, the Commissioners consider that Overall Housing Growth Policy <b>Option D</b> is most suitable. The Commissioners also support Overall Housing Growth Policy <b>Option C</b> . Although this approach could be considered acceptable, we recommend that Overall Housing Growth Policy Option D is most suitable, given the local circumstances and acute needs within the wider HMA. We do not support the Overall Housing Growth Policy Options A and B, as they fail to adequately deliver the quantum of housing required to address the needs within Cannock Chase District and the Greater Birmingham HMA. Therefore, a more proactive and strategically streamlined approach is recommended, as part of the Local Plan Review. This approach should be based on Paragraph 60 of the NPPF [...]The District should note that the Standard Method is the minimum starting point. [...] The Greater Birmingham HMA Strategic Growth Study identified a significant housing need, including the unmet need from Black Country Authorities and an outstanding minimum shortfall of dwellings to 2031 and 2036 across the Birmingham HMA. Considering this, we assume the District will engage constructively and actively with the 13 other authorities which comprise the Greater Birmingham HMA, in order to maximise the effectiveness of the Local Plan in the context of strategic cross boundary matters, such as an identified acute housing shortage. It is within this context that we support Option D, which is based on the maximum capacity identified for the 'proportionate dispersal' option identified in the Greater Birmingham HMA Strategic Growth Study. [...] The inclusion of Bleak House for future residential development in the Local Plan Review will contribute to delivery at this rate.
LPIO178	Home Builders Federation	Currently the Council has calculated the LHN figure for Cannock Chase as 284 dwellings per annum. It is agreed that this figure should be kept under review until the date of submission for examination. This LHN figure is only the minimum starting point. The Council is encouraged to have an ambitious plan for housing growth. The new Local Plan's housing requirement figure should comprise the LHN figure for Cannock Chase plus an additional unmet housing need figure for the GB&BC HMA. In this context the Council should consider as a minimum the capacity of 500 dwellings (Option B) up to the maximum of

		2,500 dwellings (Option D) as identified in the proportionate dispersal option of the Strategic Growth Study for the period 2018-2036. The housing requirement figure should be set out in an agreed and signed SoCG (see HBF answer to Q3)
LPIO179	KGL Estates Ltd (c/o John Heminsley)	Option A would clearly not meet the required need and Option B is a minimum response. <b>Option C</b> is the most appropriate in allowing for a reasonable degree of flexibility. Option D appears to be difficult to achieve bearing in mind environmental constraints in the District.
LPIO180	Lichfield & Hatherton Canals Restoration Trust	We have no preference between the various alternatives outlined but in the event of residential development alongside or close to the projected through-route we would want there to be easy pedestrian access connections to the canal towpath from those developments so that the canal brings benefits to that local community. We welcome the CIL funds that Cannock Chase Council has already provided to us in support of the Hatherton Canal Restoration and would be pleased to receive further funding under s.106 or CIL in support of our continuing programme of work for this Canal.
LPIO181	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<u>Quantum</u> Firstly, it is clear that the standard method generates a figure which should be treated as a <u>minimum</u> . The constructive approach to addressing the shortfall is welcomed in principle, and this aligns to the approach being suggested by South Staffordshire Council (Issues & Options Oct 2018) as one which should be rolled out across the GBBCHMA as a consistent way of addressing the housing shortfall under the statutory Duty to Cooperate. Richborough Estates wishes to highlight concerns that this option would only provide a comprehensive solution to meeting the identified housing shortfall if all other constituent LPAs within the HMA adopt a complementary approach to meeting the minimum capacity of all recommended areas of search within the Strategic Growth Study. This approach is also heavily dependent upon the delivery of significant strategic growth across the GBBCHMA to 2036 including new settlements. Therefore, Councils should be seeking to deliver more than the 'lower' end of the range suggested. It is submitted that Cannock Chase Council should be aiming for the upper end of this range. Even then, this should be treated as a minimum requirement (when added to the OAN). The Council's requirement should be calculated using the standard method figure, plus a contribution to the GBBCHMA shortfall, plus an additional allowance to allow for economic uplift.
LPIO182	Severn Trent	With reference to the three scenarios described in 7.9, we would be more favourable of an approach towards larger development allocations. This approach means we can assess and plan infrastructure needs and upgrades in fewer locations which is more efficient and less disruptive to deliver. Utilising a large array of windfall sites and increasing development dispersion can result in wide spread pressures on infrastructure which then require more interventions to resolve.
LPIO183	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey wishes to make a number of comments in relation to the overall housing growth options identified in the LPIO and these comments are set out below. <u>Local Housing Need</u> TW welcomes the use of the 2014 Sub-National Household Projections (SNHP) in the LNHA. However, TW notes that the LNHA has applied the 2018 projections as 'current year' projections and considers that the projections for 2019 need to be applied instead. TW also considers that the most recently available affordability ration for 2018 (6.13) should be applied. Figure 14 of the LHNA suggest that projected institutional population growth needing communal accommodation has

been identified within the Standard Method calculation. However, this C2 provision is not included in the household projections and should not form part of the adjustment in the LHN which is to take account of affordability. The need for C2 accommodation should be separate to the LHN calculation, and the Council should be making separate provision to meet C2 need.

Different figure to the LHN generated by the standard method

The reference to uplifting the housing figures in the Plan to help deliver affordable housing need suggests that this is a component part of the calculation of the housing requirement, rather than the LHN. It is against this policy context that the housing need for the Cannock Chase Local Plan must be considered.

TW is concerned that matters have not been properly considered and assessed in the document. In particular:

- There is no consideration as to whether increases in housing need are required to support growth strategies such as the GBSLEP and the WMCA.
- There is no consideration as to whether increases in housing need are required to support strategic infrastructure improvements.
- The LHNA identified an affordable housing need excluding a vacancy/2<sup>nd</sup> home allowance. The provision of this level of affordable housing on sites is considered to be completely unrealistic (and is unlikely to be unviable).

TW also has concerns with inputs used to derive the affordable housing need identified including:

- Much of the data used is historic or nationally specific
- The number of homeless households is identified as zero which seems unlikely
- The household dissolution figure in the LNHA is likely to be too low because the net household growth has been factored into the calculation as opposed to the gross household growth as required in the Practice Guidance.

TW considers that the LNHA should be updated to fully consider all of the relevant factors identified in this Practice Guidance, including above matters, and that the updated report used to inform the next iteration of the Local Plan.

The Local Plan should ensure that sufficient sites are allocated to ensure that identified housing need can be delivered

Unmet need for the GBBCHMA

There is a clear requirement to go for a higher housing need figure where needs cannot be met within neighbouring areas. There is an important need for the Council to consider how it can make provision for a sustainable and appropriate contribution to addressing the wider shortfall across the GBBCHMA. Taylor Wimpey considers the 'proportionate dispersal area options' derived in the SGS is an appropriate evidence base upon which the Council should derive and test individual options through its own Local Plan.

Whilst the Council legitimately point to recent delivery rates in Cannock Chase (Para 7.15) and resultant uplift that each Option would represent above this, TW considers that this is a relatively artificial barometer – a point partially acknowledged by the Council (para 7.15). It would not be unrealistic, or undeliverable, to boost the supply of housing by c.34% (as a minimum) within the District, were it supported by planning policy. The consequence of this, also, would be that the Council would make a significant contribution to addressing the GBBCHMA unmet housing needs.

TW considers that the additional dwellings to be provided to meet this shortfall should be no less than 1,500 (Option C). It is considered that there is scope to provide up to 2,500 dwellings (Option D). There is no basis to conclude that the highest rate of growth (Option D) is not deliverable.

Given the growth ambitions of the wider area and significant shortfall in the HMA, it is clear that the district will need to plan to deliver an increased number of homes to what is currently required, in the future. The Council must therefore

		<p>ensure its evidence base sufficiently assesses all reasonable alternative options to supply this land for housing, including the release of Green Belt.</p> <p><u>Meeting Longer Term Needs</u></p> <p>TW supports the allocation of safeguarded land in general as it will provide greater certainty over the Green Belt boundaries beyond the plan period.</p>
LPIO184	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	<p>It is clear of the options identified, Option A would fail to meet the wider housing needs.</p> <p>Option B suggests an additional 500 dwellings over the plan period but it is predicated on a number of assumptions.</p> <p><b>Option C</b> is therefore considered likely to provide the <u>minimum</u> level that Cannock Chase should provide.</p>
LPIO185	Wyrley Estate (c/o Fisher German LLP)	<p>The Council is encouraged to be ambitious in its housing targets.</p> <p>The LHN figure needs to stay under review through the process. In times of economic uncertainty evidence can change rapidly and become out of date. The final plan needs to be both ambitious and realistic and consider how the council will meet its obligations in terms of the housing need in the wider region.</p> <p>The Council would be encouraged to aim for <b>option D</b>, as this represents the most ambitious model, although it significantly outstrips current delivery, it would be achievable if the council considers a large potential release of Green Belt land.</p>
LPIO186	Beau Desert Golf Club (c/o FBC Manby Bowdler LLP)	<p><b>Option D</b> is supported in that the opportunity to provide additional housing growth will not only support the housing need arising from the Birmingham and Black Country Areas, but will also maximise the opportunity for economic growth within the District; this option has the greater potential to ensure the sustainability of local communities with the District, provided that a sustainable approach is taken to the distribution of the housing growth.</p>
LPIO187	Birmingham City Council	<p>BCC supports investigating all options which can offer additional housing growth over and above Cannock Chase's projected housing need at this stage in line with the requirements of the NPPF and the Duty to Cooperate.</p> <p>Option A should therefore not be considered as it does not fulfil the requirement to meet some of the unmet need elsewhere within the HMA.</p>
LPIO188	Bloor Homes Ltd (c/o Define Planning & Design)	<p>Option A is clearly an inappropriate option given that in order to comply with the NPPF policies, the Local Plan must also effectively address the established unmet housing needs that are already arising elsewhere in the GBBCHMA.</p> <p>Options B-D set out different scenarios that, to varying degrees, would also address some of the unmet need arising from elsewhere in the HMA.</p> <p>Critically, the Local Plan must commit to a robustly justified level of provision that will make a substantive contribution to addressing the unmet housing needs arising in the GBBCHMA otherwise it will be fundamentally unsound.</p> <p>Option B would only represent a "token gesture" in this respect reflecting the minimum capacity identified in the Strategic Growth Study, and therefore, ignoring the capacity that would be identified through a local assessment of growth opportunities.</p> <p><b>It is considered, therefore, that the level of provision should be <u>at least</u> that set out in Option C, but appropriately uplifted</b> to reflect the capacity of all of the growth opportunities identified and demonstrated to be suitable, available and deliverable through the Local Plan process. The Local Plan must then allocate these sites to facilitate their timely development and significantly boost the supply of housing above past delivery rates.</p>
LPIO189	Boot, A (c/o CT Planning)	<p>Support <b>Option D</b>.</p> <p>The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate,</p>

		then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.
LPIO190	Boss, P	<b>Option A</b> – the required housing identified should be delivered. Additional housing should be identified when it is required to ensure it is built where it is required.
LPIO191	Brigden, J (East of Long Lane) (c/o CT Planning)	Support <b>Option D</b> . The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.
LPIO192	Brigden, J (Land to the North of Norton Hall Lane) (c/o CT Planning)	Support <b>Option D</b> . The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.
LPIO193	Brigden, J (Land west of Hednesford Road) (c/o CT Planning)	Support <b>Option D</b> . The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.
LPIO194	Brigden, J (West of Long Lane) (c/o CT Planning)	Support <b>Option D</b> . The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.



LPIO195	Briggs, T	<p>Much is made of the need to preserve greenbelt in earlier pages but here we seem to have the suggestion that greenbelt can be ‘carved up’ in order to make up for others shortfall. CCDC should build the minimum number of houses that is required to comply with its statutory commitments, not sell off precious, irreplaceable land in order to be seen to be helping other authorities that are struggling.</p> <p>A long term view also needs to be taken, if CCDC allows these extra homes to be built, will it be given a ‘free pass’ to build less when the next Local Plan period begins? I very much doubt it, so where will the additional land come from then? More greenbelt and AONB land lost I assume. <b>Option A</b> is the most prudent way forward.</p>
LPIO196	Messrs Conway, Lyons, Emery, Horsford (c/o CT Planning)	<p>Support <b>Option D</b>.</p> <p>The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.</p>
LPIO197	Friel Homes (c/o CT Planning)	<p>Support <b>Option D</b>.</p> <p>The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.</p>
LPIO198	Gladman	<p>Paragraphs 4.3 and 4.4 of the Consultation Document refer to the Standardised Methodology for assessing housing need as set out in the NPPF as the basis for the housing requirement in the Local Plan review. Whilst the role of the Standardised Methodology in defining housing needs in plan making is acknowledged, Gladman advises caution in the use of implied figures at face value for establishing the housing requirement.</p> <p>The Standardised Methodology must be considered to represent a tentative and minimum starting point, with the actual level of objectively assessed need for the District somewhat higher.</p> <p>Gladman considers that <b>Option D</b> would be the most appropriate and proportionate approach, subject to the caveat regarding the housing requirement for the District’s own housing needs as expressed above.</p> <p>Whilst it is accepted that this level of growth would be in considerably in excess of the annual average number of housing completions in the District over the past 20years, it should be borne in mind that the planning policy context for the District over that period has been one of severe constraint in terms of housing development; it should not be assumed that this reflects the appetite for the delivery of new housing in the District by the housebuilding industry.</p>
LPIO199	Greenlight Development Ltd (c/o Lichfields)	<p><u>LHN Calculation</u></p> <p>Broadly, Greenlight consider the Council’s calculation of the minimum LHN figure aligns with the standardised methodology and the LHNA appropriately utilises the 2014-based households projections in accordance with the Governments updated PPG. However, the Council’s calculation utilises the 2017 median work-place based affordability</p>

		<p>ration. The PPG is clear that the most up-to-date affordability ratios should be utilised for the standard method. Notably, the LHNA, at paragraph 3.2, states that the most up-to-date affordability data was the 2017-based affordability ratio. However, the LHNA was published in April 2019 after the workplace based affordability ratios were published. There is a need for the Council to review and update their LHN calculation and figure to ensure a robust evidence base underpins the Local Plan.</p> <p><u>Uplifts to LHN</u></p> <p>The NPPF and PPG are clear that the LHN figure generated by the standard method is a minimum starting point. Indeed, the IOC, at paragraph 7.2 acknowledges this. Whilst the Council has taken consideration of the unmet need arising from the GBBCHMA the Council has not given due consideration to whether other uplifts to the LHN figure are required:</p> <ul style="list-style-type: none"> <li>• Economic Growth – The Council does not appear to have considered whether the planned economic and employment growth would require additional housing growth above that of the minimum starting point.</li> <li>• Infrastructure – similarly, the LHNA has not considered whether an increase in the LHN figure for the District would be required to support strategic infrastructure</li> <li>• Affordable Housing - Coupled with the aforementioned uplifts, Greenlight considers that an uplift in the housing figure to help deliver affordable housing need would, on the face of it, appear justified.</li> </ul> <p>Greenlight welcome the Council’s testing of a number of options to address the cumulative housing supply shortfall across the HMA up to 2036, in accordance with paragraph 60 of the NPPF.</p> <p>Greenlight considers the <i>‘proportionate dispersal area options’</i> (500-2,500) derived in the SGS is an appropriate evidence base upon which the Council should derive and test individual options through its own Local Plan.</p> <p>Whilst the Council legitimately point to recent delivery rates in Cannock Chase (Para 7.15) and resultant uplift that each Option would represent above this, Greenlight consider that this is a relatively artificial barometer – a point partially acknowledged by the Council (Para 7.15)</p> <p>Accordingly, there is no basis at all for the Council to consider making provision for less than c.1500 (Option C), based on the median capacity identified for the ‘proportionate dispersal’ option, albeit, it is also clear – as highlighted by the SA – that Option D (2,500) has been assessed as having the same impacts against the SA Objectives as Option C (1,500), and both options did not score markedly worse than Option B (500). There is also no basis to conclude that the highest rate of growth (Option D) is not deliverable.</p> <p>Therefore, Greenlight considers that such levels of provision are not considered to be unreasonable, or undeliverable – subject to testing matters such as deliverability, infrastructure considerations and overall sustainable development matters. Given the above, the Council must ensure that its Local Plan is underpinned by an evidence base which sufficiently, and lawfully, assesses all reasonable alternative options to address the GBBCHMA unmet need, including the release of Green Belt land.</p>
LPIO200	Hughes, R	<b>Option B</b> – Provide the minimum figure of 284 plus the lower end of the “proportionate dispersal” range
LPIO201	Lichfield District Council	<p>Lichfield welcomes Cannock Chase’s continued commitment to making a contribution towards meeting the unmet need identified in the GBBCHMA study.</p> <p>It is acknowledged that delivery of this need through the proportionate dispersal approach is also consistent with the area of search approach in the Strategic Growth Study.</p> <p>Cannock Chase DC is correct in assuming as referenced in paragraph 7.13 that Lichfield DC will be making its own contribution to the unmet need identified in the Strategic Growth Study. Lichfield has already consulted on its potential</p>

		<p>options in meeting the unmet need identified in the SGS and it is considered that this will be challenging to deliver in its own right given the constraints that exist.</p> <p>Lichfield DC supports Cannock's approach of considering the area of proportionate dispersal on its own as a basis for identifying the quantum to be provided in addition to the local need identified through the NPPF standard methodology. The SGS recognises that the proportionate dispersal approach will rely on need being met through individual local plan reviews and that the SHLAA process will play a key role in this form of delivery. In this regard, given the mutual constraints across Cannock Chase DC and Lichfield DC, it is reaffirmed that the SHLAA update which will be needed as part of the evidence base should continue to use a methodology consistent with Lichfield DC as has been the approach previously.</p>
LPIO202	Lyons, O	<p>I agree that the focus should centre around urban supply, primarily regenerating existing brownfield sites. I agree with the suggestion of proportionate dispersal and believe that we should begin with meeting targets, and then building upon that to meet additional need. In this instance I would favour <b>Option B</b> to being with ensuring the minimum figure provided by Government and then working towards an additional 500. If this can be met, then the needs/demand can be reassessed at that point and the situation reanalysed.</p>
LPIO203	Newton, A (c/o CT Planning)	<p>Support <b>Option D</b>.</p> <p>The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.</p>
LPIO204	Cllrs. Preece, J, Stretton, Z and Newbury, J	<p>We would support <b>option B</b> which includes the proposal for a contribution of 500 additional houses for the shortfall in the GBBCHMA. The housing target could potentially put substantial pressure on Norton Canes' greenbelt, but as a District we must also recognise the pressure that is being brought to bear from regional housing need we feel that 500 additional houses is the absolute maximum that the Cannock Chase District should be expected to contribute. Compared to other authorities in the GBBCHMA such as Lichfield, North Warwickshire and Stratford-on-Avon, Cannock Chase has very little land left which is not part of the designated West Midlands Green Belt.</p> <p>Additionally, we are constrained by our small geography compared to those authorities and also by the AONB which takes up a substantial proportion of our District's land. Based on these considerations, we do not believe that it would be feasible or reasonable to expect the Cannock Chase District, and potentially by extension Norton Canes, to contribute the figures outlined in options C or D.</p>
LPIO205	Norton Canes Parish Council	<p>The Parish would support <b>Option C</b> in relation to dealing with both locally generated housing need and a proportion of the Birmingham and Black Country requirements this is on the basis that the sites chosen should not involve further expansion to either the north or south of the village.</p>
LPIO206	South Staffordshire Council	<p>We welcome the publication of the Issues and Options document and support the approach towards examining a range of potential development scenarios which would contribute towards meeting both locally generated and wider HMA needs. [...] South Staffordshire Council would support the District Council using the same methodology as South Staffordshire has for calculating your contribution towards the GBHMA shortfall. This would reflect the lower range of the 'proportional</p>

		dispersal' recommendation in the 2018 GL Hearn Growth Study and would equate to a 500 dwelling contribution.
LPIO207	South Staffs Water	<p>Support <b>Option D</b>.</p> <p>The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.</p>
LPIO208	St Modwen (West of Pye Green Rd) (c/o RPS Planning and Development)	<p>We note that the LP is appropriately intending to address the GBSLEP issues (para 5.52) and potential 60,900 dwelling shortfall to 2036. In this regard, we urge the Council to reconsider the findings of the GL Hearn GBSLEP report and the 60,900 is to be regarded as a minimum figure and there are significant uncertainties about the basis on which that figure was reached. The Local Plan Review should therefore treat this as a minimum baseline figure in terms of assessments of its future housing requirement.</p> <p>It is noted at paragraph 5.41, the standardised OAN methodology indicates an increased housing requirement for Cannock from 241dpa to 284dpa. However, as the document has acknowledged, even though NPPF2 has recently been published, the Government's advice on the standardised OAN is that the approach to the assessment may well change. This is likely to increase the housing requirement above the standardised approach and is likely to result in a change to the methodology that could see an increase for Cannock. This will require addressing in relation to the future Preferred Options Consultation.</p> <p>Given the above and in advance of the housing requirement being established through the revised standard OAN there is a lack of evidence on which to establish the housing requirement at the present time. However, as a minimum the above indicates a need to establish a housing requirement above Option B in the I &amp; O Consultation.</p>
LPIO209	Startin, P	Building up, I believe is the solution to the housing challenge. I would broadly being in support of <b>Option D</b> for the housing objective as this would represent huge job opportunities in the District as long as the deals were constructed correctly.
LPIO210	Thornton, H	<p>Support <b>option B</b> as it appears to be reasonable, given the limited amount of housing land available.</p> <p>Para 7.40: Apartment blocks would not be appropriate as they are more for students in town-cities with colleges/universities, and for similar 'mobile' residents, whereas the norm in the Rugeley area is for established families who prefer their own private gardens.</p> <p>Para 7.41: When the approx. 1125 dwellings on the 'A' Power Stations land, entirely in Lichfield District, were allocated in 2010-12 500 of them were credited towards meeting "the growth requirements of Rugeley &amp; Brereton" which made the overall allocation more equitable. Therefor a similar arrangement should apply to the 'B' Power Station – if not, why?</p>
LPIO211	West Midlands HARP (C/O Tetlow King Planning)	We suggest that <b>Option C</b> would be the most suitable approach to maximising the delivery of affordable housing through a higher overall housing growth across the District.
LPIO212	Wright, T (c/o Pegasus Group)	<p><u>Quantum</u></p> <p>Firstly, it is clear that the standard method generates a figure which should be treated as a <u>minimum</u>. The constructive approach to addressing the shortfall is welcomed in principle, and this aligns to the approach being suggested by South Staffordshire Council as one which should be rolled out across the GBBCHMA as a consistent way of</p>

		<p>addressing the housing shortfall under the statutory Duty-to-Cooperate. However, there is a concern that this option would only provide a comprehensive solution to meeting the identified housing shortfall if all other constituent LPAs within the HMA adopt a complementary approach to meeting the minimum capacity of all recommended areas of search within the Strategic Growth Study. The approach is also heavily dependent upon the delivery of significant strategic growth across the GBBCHMA to 2036 including new settlements.</p>
LPIO213	Association of Black Country Authorities (c/o Walsall Council)	<p>Note: Using the 2014-based household projections for the period 2019-29 and the 2018 affordability ratios, we think the local housing need for Cannock Chase is 277 dwellings per annum rather than 284. We are pleased the consultation recognises the relationship between Cannock Chase District and the Black Country. We see the consultation acknowledges work done at the Housing Market level and we would welcome opportunities to hold Duty to Co-operate discussion with Cannock Chase to determine the approaches to meeting needs arising the Black Country. [...].</p> <p>[...]</p> <p>Previously, in 2017 we commented in response to consultation on the proposed Part 2 plan for Cannock Chase that a figure of 1,000 dwellings in excess of local need might be appropriate (i.e. a figure between Options B and C). More recently, work for the review of the Black Country Core Strategy (now 'The Black Country Plan') is revealing the scale of projected housing growth to 2038 and the likely shortfall in supply within existing urban areas. This is now estimated to be in the region of 26,000 homes, whilst there will also be a need for additional employment land. The scale of such a gap in supply is unlikely to be met by the review of the Black Country's Green Belt that is currently taking place. [...]. In the circumstances, we welcome efforts by nearby authorities to help accommodate development needs and, given the scale of the shortfall in our capacity, we would encourage the testing of as high a figure as possible. Option D is therefore now preferred.</p> <p>We recognise that the option still needs to be tested to determine where there are or can be sufficient sites in the district to accommodate the amounts of development that can be pursued. In this regard, we recognise that Cannock Chase District is constrained by the Green Belt, AONB and SAC. The ability of the local housing market to deliver new homes is also a potentially limiting factor [...]. On the other hand, we agree with the comment in paragraph 7.15 that delivery rates can be reflective of the planning policies that apply at the time.</p>
<p>Question 16 Are there any further options to be considered? Please provide supporting evidence for any alternative options suggested.</p>		
LPIO214	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	<p>We have significant concern about the reliance which is placed upon the findings of the Greater Birmingham and Black Country Housing Market Area Study by the Issues and Options consultation draft Local Plan. The overall housing requirement referred to in the Housing Market Area Study is not robust. The study itself confirms that the overall housing requirement should be treated with caution as it is simply a demographic figure. Furthermore, this study was produced prior to the publication of the revised Framework. The housing requirement for the various authorities within the HMA in emerging replacement plans should be calculated using the standard method. This is not reflected by the Housing Market Area Study.</p> <p>In addition, a number of the assumptions in the study regarding urban capacity and the ability to increase densities are not tested. The study effectively relies upon the existing allocations and SHLAA sites (that are yet to be tested for suitability for an allocation) and an assumption that new development will come forward for development at an increased</p>

		<p>density. This is not a realistic assumption. That being the case, any general conclusions drawn regarding the quantum and distribution of the unmet housing need based upon the Housing Market Area Study will ultimately be flawed. In addition, the study concentrates upon large sites and leaves the assessment of smaller development opportunities to the local level. Whilst the study does consider the opportunities for smaller urban extensions (500 – 2,500 dwellings) within the plan area, it does not consider opportunities below that scale. It would be entirely appropriate for Cannock Chase to consider identifying urban extensions of less than 2,500 units in size as part of its assessment of options. For reasons referred to above, the suggestion in paragraph 7.12 of the consultation Local Plan that the HMA authorities simply need to accommodate the minimum amount of housing development identified by the Housing Growth Study to address the conurbations housing shortfall is incorrect. The housing requirement, urban capacity assessments, assumptions regarding density and the tested distribution options are not reliable enough to inform the emerging Plan. We would suggest that Cannock Chase will need to accommodate a similar quantum of development to North Warwickshire, which will be in the region of 4,000 additional units over and above the local level housing requirement.</p>
LPIO215	KGL Estates Ltd (c/o John Heminsley)	It would be useful to test a further option of locally generated need + 1000 as this would be within the range of supply requirements of 1900 to 4400 dwellings over and above existing identified supply.
LPIO216	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	No further options to be considered although the right is reserved to reconsider this view at a later stage depending on progression of matters relating to the housing shortfall and how this is progressed through the Duty to Cooperate.
LPIO217	Brereton & Ravenhill Parish Council	BRPC supports 12% of the district’s housing need being met in the Rugeley/Brereton area, but only if this includes sites outside both the district beyond the Green Belt. BRPC opposes any larger proportion of the housing need being met in the Rugeley/Brereton area since this would both reduce the Green Belt and be unsustainable.
LPIO218	Historic England	<p>We consider that in identifying sites for housing then this would need to be accompanied by appropriate heritage assessment.</p> <p>If Cannock Chase Council will be taking on additional housing growth to meet the needs of the Greater Birmingham HMA, we would want to ensure that there was appropriate heritage assessment to ensure that appropriate sites only were put forward for allocation.</p>
LPIO219	St Modwen (West of Pye Green Rd) (c/o RPS Planning & Development)	<p><u>Para 7.21 – Exceptional Circumstances</u></p> <p>Paragraph 7.21 is correct that <b>non-Green Belt land for housing</b> should be identified and allocated in advance of Green Belt land: <i>“Before concluding that Green Belt boundary changes are justified...with neighbouring authorities on whether or not they could accommodate additional development” (NPPF, Para 137)</i></p> <p>The Local Plan Review therefore must establish suitable locations for housing growth in Non-Green Belt locations and ensure those sites are allocated for housing in advance of undertaking a Green Belt Review. The Green Belt sites should only then be allocated, based on the residual housing requirement of the plan. It must not allocate Green Belt sites based on the whole housing requirement. This means non-Green Belt housing sites should be identified under para 137, <b>PRIOR TO</b> moving to finding suitable Green Belt under para 138 of the NPPF.</p>

**Strategy for Meeting Overall Housing Growth Policy Options**

Question 17 Which combination of options do you support and why? Should any further options be considered?

LPIO220	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	It is difficult to comment on the most appropriate option to deliver the housing requirement whilst there is so much uncertainty about the quantum of housing that needs to be delivered through the plan making process. To put this into context, there is approximately a 2,500-unit figure difference between Options A and D identified by the consultation documents Housing Growth Policy Options. It is, however, our view that the best possible use should be made on non-Green Belt land before allocating options to remove the land from the Green Belt. In terms of wider distribution options, the principal urban areas of Cannock and its adjoining area, Rugeley and Norton Canes should be the priority locations for delivering additional residential development. These are the most sustainable locations for development within the District and should be the preferred locations for housing allocations.
LPIO221	Bywater, A&J	<b>Area of Concern:</b> Housing on Greenbelt, Land South of A5190, Heath Hayes Assuming that no other brownfield sites can be found then we would reluctantly accept housing development south of the A5190.
LPIO222	Church Commissioners of England (c/o Barton Willmore)	The Commissioners support both <b>Option C2:</b> Green Belt Extensions ('in combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extensions at Cannock/Hednesford/Heath Hayes and Norton Canes urban edges'" and <b>Option C3:</b> Green Belt Urban Extensions ('in combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extension distributed across the district.') The Cannock Chase Green Belt Review (March 2016) identifies Bleak House under reference 'C13' and concludes that it is 'mid-performing' against the purposes of the Green Belt, which are set out in national policy. Bleak House has the ability to accommodate new residential development without contributing to an increase in the extent of unrestricted sprawl of a large built-up area. <b>Bleak House:</b> Residential-led development on the site would result in a limited loss of countryside and a limited reduction in 'technical openness' compared with the existing character of Bleak House. Therefore, a sensitively design residential-led proposal within a robust landscape framework at the site would comply with the purposes of the Green Belt in the NPPF. The Commissioners request that Bleak House is allocated in the Local Plan Review, as it constitutes sustainable development, is free from designations once the Green Belt boundary is amended and could assist the District in meeting its housing need, including affordable.
LPIO223	Cycle-R	Objective 3: This is a tricky area to review. There is a need for housing in and around Cannock, especially with a focus on Social Housing and provisions for self-build. Personally, I would look at <b>Option C</b> , this would provide the minimum necessary with a decent overflow. This is partially where the redevelopment of the Rugeley Power Station site would play a role later; I am attaching an outline brief regarding this site and will look at more detail a little later. The options are a tricky choice, the current plans for Rugeley Power Station show that it will be a housing led development (going specifically against the community feedback), this limits the option to Option C, whilst there would be objection to using some greenbelt land, I would look at a broader distribution (Option C3).
LPIO224	Home Builders Federation	The HBF's preference is <b>Option C3</b> which combines Option A and Option B. The widest possible range of housing sites by both size and market locations should be sought to provide suitable land or small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings. Housing delivery is maximised

		<p>where a wide mix of sites provides choice for consumers, allow places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p>
<p>LPIO225</p>	<p>KGL Estates Ltd (c/o John Heminsley)</p>	<p>Option A would not meet the requirements for minimum additional housing growth. Of the two Rugeley Power Station options <b>B1 and B2</b> a balanced approach with mixed housing and employment development is considered most appropriate for the reasons already given. Option C1 with GB release as urban extensions to Rugeley and Brereton is not considered to be the most appropriate. The land at Etchinghill and on either side of Hednesford Road is both GB and AONB and is prominent in the landscape, therefore also environmentally sensitive. There is very limited scope for infill development within Slitting Mill. <b>Option C2</b> includes land south of the A5190 at Heath Hayes and Norton Canes which is considered to be the most appropriate land for release from GB having no major environmental or landscape constraints. It is also close to Cannock railway station and has good bus service access. Norton Canes as a village already has commitments which amount to 21% growth, well exceeding its proportion of District population and therefore major sites immediately around the village boundaries, particularly to the north would continue to unbalance the strategy of housing growth being related to the size of existing settlements. Sites east of Heath Hayes/Wimblebury also have significant environmental and landscape constraints. So in conclusion <b>part of option C2</b> is supported so far as it releases land south of the A5190 Cannock Road. Option C3 includes all potential urban extension in GB around three main settlements in the District plus extending village boundaries, which in combination would provide much more housing land than would be needed. However, it would have been helpful for this part of the document to provide estimate for the additional housing capacity which would be provided over and above the quotes urban capacity and the RPS options.</p>
<p>LPIO226</p>	<p>Richborough Estates (Brownhills Rd &amp; S of Cannock Rd) (c/o Pegasus Group)</p>	<p>In terms of the spatial distribution of the housing growth Richborough Estates has the following comments:</p> <ul style="list-style-type: none"> <li>• Option A provides only the minimum figure which is fixed by the Government’s Standard Methodology. Whilst this provides a starting point for setting a requirement this is an absolute minimum and therefore Option A alone will not suffice and the Council’s acceptance of this matter is welcomed.</li> <li>• Option B1 combines Option A with housing-led redevelopment of Rugeley Power Station, whilst B2 supports employment-led/mixed use redevelopment at this site. Again, the Council acknowledges that either option will be unlikely to meet housing needs in full and this realistic approach is welcomed. The Council also need to be factoring in the deliverability of Rugeley Power Station and will need to be realistic as to how much of this site will actually come forward over the plan period. Richborough Estates submits that <b>Option B2</b> is the most appropriate as this will contribute to a sustainable and balanced strategy for Rugeley otherwise the town will expand considerably in residential terms without complementary employment balance. The Rugeley Power Station SPD (2018) clearly states mixed use for the site and this should be adhered to. The importance of the employment element must not be underestimated. It should be borne in mind that the Power Station Site as a whole (also taking into account the Lichfield part) needs to be considered when determining whether the Cannock section is either housing-led or employment-led.</li> <li>• Option C1 focuses upon Green Belt around Rugeley, C2 around Cannock/Hednesford/Heath Hayes/Norton Canes, and Option C3 which is a more even distribution of Green Belt options across the district. Richborough Estates supports <b>Option C2</b> as this would help to address the GBBCHMA housing shortfall closer to where the need arises (i.e. the majority stems from Birmingham and the Black Country) and would achieve a balanced</li> </ul>



		<p>sustainable strategy, given the potential levels of housing growth at Rugeley Power Station which would, in reality, reduce the potential for release of Green Belt sites.</p> <ul style="list-style-type: none"> <li>• If however, the Council is minded to allocate Rugeley Power Station as an employment-led development then C3 would also be potentially suitable depending on the more detailed evidence which will be needed to support the plan as it advances, as this would still enable significant provision to be made by the most deliverable, suitable and sustainable options including Norton Canes.</li> </ul> <p>In summary, Richborough Estates' strong preference is to support option A in combination with Option B2 and Option C2.</p>
LPIO227	Rugeley Power Ltd (c/o Savills)	<p>We support <b>Options B and C</b> which include the redevelopment of Rugeley Power Station. Options B1 and B2 set out different redevelopment options for Rugeley Power Station relating to whether it will be housing-led or employment-led/mixed use. The outline application which has been submitted is for a residential-led mixed use scheme with up to 5ha of employment proposed. Therefore, the housing growth policy should be updated to reflect this.</p> <p>In light of figures discussed, the tables set out under Paragraphs 7.29 and 7.30 on the number of dwellings that are expected to be delivered within the next 15years should be updated to incorporate the dwellings that are expected to be delivered at Rugeley Power Station.</p>
LPIO228	Severn Trent	<p>Our preference would be <b>Option A</b>. We also support additional proposals around the Rugeley Power Station sites. The various version of Option C and green-belt utilisation, are less favourable for us for two reasons</p> <ul style="list-style-type: none"> <li>• Less existing infrastructure</li> <li>• Overall environmental and biodiversity impact is higher</li> </ul> <p>This being said, developing a green belt site can pose a great opportunity to install innovative and exemplar sustainable features. This should be defined and pushed through planning policy to ensure it materialises.</p>
LPIO229	Taylor Wimpey (c/o Lichfields)	<p>Taylor Wimpey considers that <b>Option C2</b> which proposes Green Belt urban extensions at Cannock/Hednesford/Heath Hayes and Norton Canes urban edges in combination with the options for the Urban Areas and former Rugeley Power Station is the most appropriate of the options identified.</p> <p>Taylor Wimpey considers that Cannock (including Heath Hayes) should continue to be the main focus for development, and should be identified as the priority for development in a settlement hierarchy and the majority of new residential development should be focussed within and around the settlement.</p> <p>Taylor Wimpey considers that any distribution of development which does not prioritise the settlement of Cannock (including Heath Hayes) as the focus for development would be unreasonable given its role as a strategic sub-regional centre and its role in providing the majority of employment opportunities for the District.</p> <p>Taylor Wimpey considers that sufficient allocations should be provided in the Local Plan to ensure that identified housing requirement can still be met if sites such as Rugeley Power Station do not deliver as anticipated.</p>
LPIO230	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	<p>A strategy focused on Urban Areas only (Option A) or Options B1 and B2 will certainly fail to provide for this minimum level of housing growth,</p> <p>Both <b>Options C1 and C3</b> identify land around Etchinghill as possible areas for Green Belt urban extensions within the district and we would express support for these as potential options to meet housing needs.</p> <p><u>Green Belt</u></p> <p>Green Belt boundaries will clearly need to be reviewed to facilitate the housing need for the district and safeguard land for development beyond the plan period. We are also in agreement that the smaller parcels of land identified, adjacent to</p>

		<p>larger built up areas of the District are most likely to be the most sustainably located sites for possible development. The March 2016 Cannock Chase Green Belt Study assessed parcels of land in terms of how they function against each of the Green Belt purposes by using a scoring system. We believe the scoring system is not robust and offers a very subjective assessment of the sites.</p> <p><u>AONB</u> It is anticipated that an updated Landscape Character Assessment will be required to assist in reviewing Green Belt boundaries. However, at this stage, it is apparent that none of the land the subject of these representations performs particularly strongly against these key AONB criteria. The land at Etchinghill being promoted is very much at the fringe of the AONB and is characterised by farmed landscape with some regular field patterns and hedgerows.</p>
LPIO231	Wyrley Estate (c/o Fisher German LLP)	It is considered that <b>option C2</b> represents the most suitable compromise between protecting the AONB and allowing for sustainable urban extensions of settlements in accessible locations. This should enable ambitious housing targets to be met in the most sustainable way without unacceptable detriment to the environment.
LPIO232	Astbury, J	<p>Would not want to see any areas removed from Green Belt, in particular land at the east of Heath Hayes known as Bleak House and adjoining site of Wimblebury Road. This road is already heavily congested and Five Ways island is subject to a poor air quality order, due to pollution from more vehicles.</p> <p>Capacity in Heath Hayes is at a maximum now. I have seen plans published by large housing developers suggesting the area before mentioned is suitable for up to 1,000 homes, schools, doctor's surgeries. It could not accommodate such a development, wildlife would disappear and the individual identify of the village would be lost as Heath Hayes would be joined up on all four compass points to Wimblebury, Hednesford, Norton Canes and Burntwood.</p>
LPIO233	Astbury, L	<p>Can see from plan that one of the options could be to remove the former Bleak House site at Heath Hayes (Wimblebury Road) from Green Belt. Would like to say that Heath Hayes is already heavily congested with traffic. More housing developments have been permitted in the last 20years that have allowed the road network to become overloaded. Five Ways island and area surrounding is already subject to a poor air quality report. Any housing allowed on this site would further worsen this problem. This site is also a buffer between the villages of Heath Hayes, Wimblebury, Norton Canes and Burntwood. The green corridor is required to both preserve wildlife on the site and retain the villages own identify.</p>
LPIO234	Armitage, J	<p>I have strong objections to any large-scale development in Rugeley, particularly within AONB and the green belt. Option C3, although impossible to ascertain the numbers on areas suggested is encroachment of our precious green belt. Additionally, it appears as though Slitting Mill will merge with Rugeley.</p> <p>The Green belt and AONB in Rugeley is rich in wildlife, particularly across Sherbrook Valley. [...] Please do not consider ANY development of the AONB or green belt. I am concerned about any development alongside Sant's Brook.</p> <p>I am very concerned that massive development will add to the amount of traffic congestion. 2000 houses on the Power Station site, I wonder how many children will need to be driven to the Hart School?</p> <p>Green Belt spaces and the benefit to physical and mental well-being. Rugeley is a small area with limited access to the green belt.</p> <p>HS2. If this goes ahead it will undoubtedly cause problems for Rugeley and surrounding villages. Full-scale development, particularly of the Power Station site will exacerbate the problems. Additionally, we will also be losing trees, woods and wildlife to HS2.</p>

		Rugeley' Power Station. I have read that Lichfield will gain a greater share for their housing burden. Will all of the Lichfield residents in Rugeley travel to Lichfield for schools, doctors, services, leisure, shopping? NO, they will go Rugeley, causing more damage to our roads, congestion, littering, noise etc. This seems highly unfair to Rugeley particularly given to the fact that some of the housing capacity will be given to employment. Therefore, creating a potential burden on the green belt. It is outrageous, Rugeley suffers again.
LPIO235	Armitage, J	<p>Firstly, the 2,000 homes for Rugeley Power Station - a larger proportion will be allocated to Lichfield, people living there will no doubt be placing further stress (already strained) on our roads, doctors, schools and services not Lichfield! No doubt Rugeley will be allocated the less desirable housing and small units. Also, I hope that established 'green' areas will remain.</p> <p>Developments in previous 2-3years have supplied quite a lot of housing. Traffic, availability of doctors etc. are bearing the brunt already.</p> <p>Green Belt – Should not be considered. It is what makes Rugeley a lovely place to be. Option C1 will just result in expansion of development on green belt. We are also due to experience major losses with HS2.</p> <p>Option C is not in the interest of local people. Green space is becoming more valuable and should be given respect. It is necessary for both physical and mental health. Option C1 would be outrageous!</p>
LPIO236	Armitage, K	<p>Rugeley makes quite a small area of Cannock Chase, its inconceivable you would use the Green Belt and even AONB. Option C1 seems to be merging Slitting Mill with the town</p> <p>From C1 it appears that half of Breerton's Green belt would be considered. More houses = more pollution, less access to services, busier roads, I would not wish my children to grow up in area without green space. Think of the health factor – more people walking, cycling and not along roads but green spaces. The Chase is too far for many but we have our lovely green belt for all.</p>
LPIO237	Beau Desert Golf Club (c/o FBC Manby Bowdler LLP)	<p><b>Options C2 and C3</b> are supported as they allow the opportunity for a more dispersed and therefore more sustainable pattern of development across the District's urban fringes.</p> <p>The identification of the area in the vicinity of the site C375 as a possible Green Belt urban extension at Hednesford is welcomed and supported. It is considered that the area identified should more clearly extend to include that part of site C375 and has been submitted in the SHLAA for housing development.</p> <p>This location is a suitable and sustainable place for such an extension, being well-connected with road and public transport links. As set out in detail in the SHLAA submission, the proposal for a small area of housing in the north-western part of the site would facilitate the improvements to the remainder of the site, to include sensitive landscaping and improved public access, giving rise to significant environmental and ecological benefits, this enhancing the AONB and the public enjoyment of it, as well as improvements to local leisure facilities through the modest extension to the Golf Club.</p>
LPIO238	Birmingham City Council	The Issues and Options Document recognises the need for Cannock Chase Council to look towards meeting unmet need from elsewhere within the HMA. All combinations of options should therefore be tested at this stage to determine the most realistic and viable capacity within the District in line with the sequential approach to any possible green belt release outlined in the NPPF. Exploring options which are in line with the suggested 'proportionate dispersal' approach within the West Midlands Strategic Growth Study is welcomed.
LPIO239	Bloor Homes Ltd (c/o Define Planning & Design)	It is clear, that to accord with the NPPFs policy requirements, the Local Plan Review must facilitate a continual supply of housing from a "portfolio" of deliverable development sites, based on a robust and broad sustainable spatial development strategy and with sufficient flexibility in the planned housing land supply.

		<p>The portfolio approach will ensure that the identified LHN is met in full within the plan period, that unmet needs are addressed and that a rolling 5year housing land supply is maintained.</p> <p>Option A is clearly not an appropriate option by itself as it completely fails to address the requirements of the NPPF. The Consultation Document also refers to the potential for substantive housing delivery at Rugeley Power Station and that forms the basis of Option B. That growth opportunity may or may not have a significant role to play in addressing the identified housing needs in the District. It will, by its very nature, be an extremely complicated scheme to realise and the difficulties in that respect should not be under estimated. Therefore, any reliance on it in the Local Plan must reflect the NPPFs very clear focus on demonstrating deliverability and evidence the required timescale for delivery.</p> <p><b>Option C:</b> is supported as the only option that reflects the requirements of the NPPF and most likely to result in the scale of delivery required to ensure that everyone actually has the opportunity of a decent home in a sustainable community and that the nation’s housing crisis is effectively addressed.</p> <p>The Local Plan should, therefore, seek to release sites from the Green Belt and allocate them for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of new and enhanced infrastructure, notably highways, public transport and the community.</p> <p>Extensions to the existing urban areas in the District that are already well served by services and facilities and offer employment opportunities, such as Norton Canes, should therefore, form a key part of any spatial strategy within the Local Plan.</p> <p>In identifying Areas of Search the SGS highlighted the importance of the existing public transport network and the associated journey time to the Main Urban Areas. Close proximity to Birmingham and the Black Country and accessibility to public transport links to it is, therefore, a key consideration for locating strategic development. That clearly triggers the need for Green Belt release in the southern part of the District, including Norton Canes. The approach also has the clear advantage of avoiding the AONB that covers the northern part of the district. <b>Option C2 is, therefore, supported.</b></p> <p>Bloor Homes Ltd have an interest in land to the north west of Norton Canes (SHLAA REF: N24, N33, and N64) that is available and suitable for residential development. Whilst the site currently provides an otherwise sustainable and deliverable residential development opportunity.</p>
LPIO240	Boot, A (c/o CT Planning)	<p>Support <b>Options C2 and C3</b> which would seek to accommodate a proportion of the required new housing growth for the District for the period up to 2036 at Norton Canes. This strategy would seek urban extensions to the west and south of Norton Canes and the release of land from the Green Belt.</p> <p>Additional housing growth at Norton Canes would provide the land and opportunity to enhance the range of services offered and strengthen the sustainable nature of Norton Canes.</p> <p><b>Land at 89 Commonsides (part of SHLAA site N63):</b> [...] lies to the South of Norton Canes within the urban-rural fringe area located between the M6 Toll and the A5. The land is urban in character and comprises largely of existing dwellings and their extensive curtilages. Following the construction of the M6 Toll, the land no longer serves any of the five purposes for including land in a Green Belt set out in Paragraph 135 of the Framework.</p> <p>The site could come forward as part of a larger residential allocation. Incorporating adjoining land which has been identified in the SHLAA.</p>
LPIO241	Boss, P	<p><b>Option C3</b> – The former Rugeley Power Station site should provide the majority of housing but all options throughout the district should be included to deliver as response to Q15</p>

LPIO242	Brereton & Ravenhill Parish Council	<p>Given the way in which Rugeley and Brereton are surrounded by other districts and by land that is AONB, Green Belt or both, it is most important that some of the housing need in the northern part of the district is met in non-Green Belt areas of neighbouring authorities.</p> <p>Appropriate brownfield land should be redeveloped for housing. In this context it is important to note that some employment land along Redbrook Lane and on the Levels could be made available for housing if the businesses there at present want to expand are able to do so on the Power Station site. This would prevent those businesses leaving the Rugeley/Brereton area and would reduce HGV traffic on Brereton's residential roads.</p> <p>Higher densities will be needed in appropriate locations. However, this must not be at the expense of amenity of existing residents. Appropriate locations are the Power Station site, which with its lower altitude and distance from existing dwellings could take development higher than two storeys, and the former school site off Hardie Avenue. The latter depends on substantial improvements in the form of either a roundabout or traffic lights being made to the junction of Queensway with Hednesford Road. Wharf Road is too narrow and too impeded by necessary parking for residents who have no other parking and the nursery school.</p> <p>To the extent (if any) that the existing urban area cannot accommodate needed housing, this should not be in the Green Belt. Rather the statutory duty to cooperate and NPPF guidance applies. Sites should be sought outside the district. These should include sites well served by existing rail services and by frequent bus services.</p> <p>Paragraph 7.23 should mention the housing development off Wolseley Road in Stafford Borough. This is in reality part of Rugeley and should be counted as meeting part of Rugeley and Brereton's need. To count it as meeting part of Stafford's need is wholly unrealistic.</p> <p>BRPC is firmly opposed to paragraph 7.44. This is totally contrary to NPPF policy that favours development beyond the Green Belt rather than inside it. Given the lack of facilities in Rugeley/Brereton it is highly unsustainable. Similarly "<i>consider Green Belt urban extensions at Rugeley/Brereton urban edges</i>" in Option C1 is contrary to government policy and unsustainable.</p> <p><b>Rugeley Power Station:</b> BRPC is concerned that new GP and school facilities are provided. This must not involve a delay after new houses are occupied.</p>
LIPO243	Bricka, L	<p>As a former resident of the Cannock Chase area and still a frequent visitor of family and friends, I agree that there is a growing need for housing, including affordable housing in the area. However, I am dismayed that areas within the AONB are being considered for development when ample Green Belt fields of less environmental importance are available next to existing infrastructure.</p> <p>I would therefore support <b>option C2</b> (with the exception of AONB land north of Cannock).</p>
LPIO244	Brigden, J (East of Long Lane) (c/o CT Planning)	<p>Supports <b>Options C2 and C3</b> which would look to accommodate a proportion of the required new housing growth for the District at Norton Canes. This strategy would seek urban extensions to the west and south of Norton Canes and the release of land from the Green Belt.</p> <p>Additional housing growth at Norton Canes would provide the land and opportunity to enhance the range of services offered, and strengthen the sustainable nature of Norton Canes.</p> <p><b>Land at East of Long Lane, Norton Canes (SHLAA Ref N64):</b> [...] lies to the west of Norton Canes immediately adjacent to the urban area. The site is well located in size and scale to the existing built form and is in a predominantly residential area.</p> <p>In association with adjacent land a comprehensive scheme could be brought forward which would deliver further green</p>

		<p>and built infrastructure that would enhance the service provision of Norton Canes. Furthermore, in line with NPPF (Paragraph 138) there is sufficient land within Mr Brigden’s land holding to provide compensatory improvements to the environmental quality of, and accessibility to, the remaining Green Belt land.</p>
<p>LPIO245</p>	<p>Brigden, J (Land to the North of Norton Hall Lane) (c/o CT Planning)</p>	<p>Supports <b>Options C2 and C3</b> which would look to accommodate a proportion of the required new housing growth for the District at Norton Canes. This strategy would seek urban extensions to the west and south of Norton Canes and the release of land from the Green Belt.</p> <p>Additional housing growth at Norton Canes would provide the land and opportunity to enhance the range of services offered, and strengthen the sustainable nature of Norton Canes.</p> <p><b>Land to the north of Norton Hall Lane (SHLAA Ref N66):</b> [...] lies to the south of the urban area of Norton Canes. Its north-east boundary abuts the frontage properties along Norton Hall Lane. The site lies between the urban area of Norton Canes and the M6 Toll. It is situated in a sustainable location close to services and facilities</p> <p>Release of land in this location, particularly given the presence of the M6 Toll would not undermine the purposes of including land in the Green Belt. A residential development of Land North of Norton Hall Lane would not materially reduce the gap between Heath Hayes and Norton Canes.</p>
<p>LPIO246</p>	<p>Brigden, J (West of Hednesford Road) (c/o CT Planning)</p>	<p>Supports <b>Options C2 and C3</b> which would look to accommodate a proportion of the required new housing growth for the District at Norton Canes. This strategy would seek urban extensions to the west and south of Norton Canes and the release of land from the Green Belt.</p> <p>Additional housing growth at Norton Canes would provide the land and opportunity to enhance the range of services offered, and strengthen the sustainable nature of Norton Canes.</p> <p><b>Land west of Hednesford road (SHLAA Ref N33):</b> [...] lies immediately adjacent to the urban area of Norton Canes. Well located in size and scale to the existing built for of the settlement, and to the south and west lies residential development. The site is entirely suitable for an urban extension to Norton Canes. The land can be released for housing development without impacting on the five purposes of including land in the Green Belt.</p>
<p>LPIO247</p>	<p>Brigden, J (West of Long Lane) (c/o CT Planning)</p>	<p>Supports <b>Options C2 and C3</b> which would look to accommodate a proportion of the required new housing growth for the District at Norton Canes. This strategy would seek urban extensions to the west and south of Norton Canes and the release of land from the Green Belt.</p> <p>Additional housing growth at Norton Canes would provide the land and opportunity to enhance the range of services offered, and strengthen the sustainable nature of Norton Canes.</p> <p><b>Land to the west of Long Lane (SHLAA Ref N65):</b> [...] lies to the west of Norton Canes. The southern boundary of the site abuts the built up area of Norton Canes. The release of land west of Long Lane is association with Land to the East of Long Lane comprises a site sufficiently large size to deliver comprehensively planned, sustainable urban extension to Norton Canes. Residential development on this site would contribute to meeting the identified housing needs, including affordable homes and would deliver physical, green, social and community infrastructure necessary to support a sustainable community.</p> <p>Land to the West of Long Lane has boundaries that are readily recognisable and defensible, such that the release of land from the Green Belt, in association with adjacent land could be undertaken without undermining the purposes of the Green Belt in this location and without undermining the gap between Norton Canes and Heath Hayes. Furthermore, in line with NPPF (Paragraph 138) there is sufficient land within the land holding to provide compensatory improvements to the environmental quality of, and accessibility to, the remaining Green Belt land.</p>

LPIO248	Briggs, T	<p>The options as presented seem to form a good 'sequential test', beginning with urban extension, taking in to account the Rugeley Power Station and then look to greenbelt as a last resort.</p> <p>A commitment needs to be made to keep the greenbelt 'as is' once lost it will never be reclaimed and the precedent will be set. Releasing greenbelt land would lead to that land being built on first due to the potential profits and the lack of costs in site preparation when compared to brownfield land.</p>
LPIO249	Brindley Heath Parish Council	<p>Given the way in which Rugeley, Brindley Heath and Brereton are surrounded by other districts and by land that is AONB, Green Belt, or both, it is most important that some of the housing need in the northern part of the district is met in non-Green Belt areas of neighbouring authorities.</p> <p>Appropriate brownfield land should be redeveloped for housing.</p> <p>To the extent (if any) that existing urban area cannot accommodate much needed housing, this should not then be introduced into the Green Belt. [...] Sites should be sought outside the district. These should include sites well served by existing rail services and by frequent bus services.</p> <p>Paragraph 7.23 of the review should mention the housing development off Wolseley Road in Stafford Borough, this is in reality a part of Rugeley and should be counted as meeting part of Rugeley, Brindley Heath and Brereton's need. To count it as meeting part of Stafford's need is wholly unrealistic.</p> <p>Opposition to Paragraph 7.4 of the review has been expressed. This is contrary to NPPF policy which favours development beyond the Green Belt rather than inside it. Given the lack of facilities in Rugeley/Brereton it is highly unsustainable. Similarly, 'consider Green Belt urban extensions at Rugeley/Brereton urban edges' in Option C1 is contrary to Government policy and unsustainable.</p> <p>Adequate Primary Medical Care (GP Practices) and school facilities should be provided to serve development. This must not involve a delay after new houses are occupied.</p>
LPIO250	Broadbent, A	<p><b>Option A.</b></p> <p>I respectfully submit that the Government minimum should be adhered to in compliance with the law, presumably. But Brownfield sites should be used first, as in the Old Rugeley Power Station Site.</p> <p>The Green Belt should, like the AONB of the Chase and the area east of and south of Heath Hayes be sacrosanct, we need these areas to be kept for posterity.</p>
LPIO251	Cannock Chase AONB Partnership	<p><b>Option A or B are supported:</b> Urban extensions south of Rugeley and Brereton (Option C1) lie either in the AONB, or in the case of Brereton in the setting of the AONB, and development would be contrary to the NPPF, the AONB designation and the policy in the AONB Management Plan.</p> <p>Options C2 and C3 include release of areas within the Green Belt, in the AONB and in the immediate setting of the AONB. Release of areas either within the AONB or in its setting should as a principle be resisted to avoid eroding the special qualities of the AONB or detrimental impacts on the setting.</p>
LPIO252	Messrs Conway, Lyons, Emery, Horsford (c/o CT Planning)	<p>Support <b>Options C2 and C3</b> which would seek to accommodate a proportion of the required new housing growth for the District at Norton Canes. This strategy would seek urban extensions to the west and south of Norton Canes and the release of land from the Green Belt.</p> <p>Additional housing growth at Norton Canes would provide the land and opportunity to enhance the range of services offered, and strengthen the sustainable nature of Norton Canes.</p> <p><b>Land at Commonsides:</b> lies to the south of Norton Canes within the urban-rural fringe area located between the M6 Toll and the A5. The land is urban in character and comprises largely of existing dwellings and their extensive curtilage. The</p>

		<p>land is well related in size and scale to the pattern of development adjoining the site to the east at Brownhills West. The release at Land at Commonsides, along with land at 89 Commonsides comprises a site of sufficiently large size to deliver an attractive, comprehensively planned, sustainable urban extension. The land is well related to both Norton Canes and Brownhills West. Residential development on this site could contribute to meeting the identified housing needs of Cannock Chase Council and the GBBCHMA.</p> <p>Land at Commonsides has boundaries that are readily recognisable and defensible, such that the release of the land from the Green Belt, in association with adjacent land could be undertaken without undermining the purposes of the Green Belt in this location and without undermining the gap between Norton Canes and Heath Hayes.</p>
LPIO253	Dunkley, B	<p>In my opinion the locations shown in the Cannock/Hednesford/Heath Hayes and Norton Canes urban edges should all be discounted. These areas are already over populated areas and removal of the green belt in these areas would not be acceptable. I am in support of the urban areas and the Rugeley Power Station as these do not impact our green spaces only those already impacted by urbanisation and population. I understand that the Council is being pushed to meet targets but resistance should be the first defence but if all this fails then we should consider no more of the green belt than that proposed in the urban extensions at Rugeley/Brereton urban edges.</p>
LPIO254	Dunkley, N	<p>In my opinion the locations shown in the Cannock/Hednesford/Heath Hayes and Norton Canes urban edges should all be discounted. These areas are already over populated areas and removal of the green belt in these areas would not be acceptable. I am in support of the urban areas and the Rugeley Power Station as these do not impact our green spaces only those already impacted by urbanisation and population. I understand that the Council is being pushed to meet targets but resistance should be the first defence but if all this fails then we should consider no more of the green belt than that proposed in the urban extensions at Rugeley/Brereton urban edges.</p>
LPIO255	Elliott, L	<p>I disagree with options of housing development that include green belt use.</p> <p>Use of the greenbelt is devastating to wildlife and we should now be utilising our brownbelt and industrial sites instead of these areas.</p> <p>The designer outlet has used up space that could have been used for housing.</p> <p>The Cannock, Heath Hayes and Wimblebury areas have been extensively developed over the years and the local facilities and roads are not suitable for further heavy development.</p> <p>With this in mind, I agree that <b>A and B options</b> are needed, however would be against options C onwards. If greenbelt was needed to meet housing demands (not exceed it), then any surrounding areas in Cannock, Heath Hayes and Wimblebury and Hednesford should be avoided due to the excessive burden on facilities brought about by the designer outlet.</p>
LPIO256	Elphick, R	<p>This is in particular reference to Green Belt Land South of Cannock Road, Heath Hayes, Cannock.</p> <p>Richborough Estates have produced a proposal for the development of approximately 700 dwellings and a possible Primary School. On the proposed plan, there is provision for two new islands, one mini and a larger one. These will be the only access for entry and exit to the site.</p> <p>The new McArthur Glen Designer Outlet will inevitably also attract a good share of traffic along A5190.</p> <p>We have seen a very considerable increase in road use, more so recently with HGVs. This is obviously resulting in increased noise and more importantly, a rise in air pollution.</p> <p>Whilst I appreciate that you have to adhere to Government Legislation for housing quotas, I think that any future development, on this particular mentioned area, would result in an enormous impact on the A5190. Therefore, I strongly</p>



		believe, that serious thought be applied to any suggestion of allowing such a proposal to being accepted.
LPIO257	Cllr Fitzgerald, A	In my opinion I think it is crucial that green belt land is preserved. Whilst there is clearly a need for new housing provision for local residents, it is important to ensure sufficient land is allocated for employment hubs to develop and energise employment within Cannock. Therefore, my preference is for <b>B2</b> , which provides expansion of both housing and employment, this enabling all round growth and local employment for local people. This option also potentially reduces issues with transport links, which has proven a major factor for many people struggling to get to their places of employment, which also impacts on employment levels.
LPIO258	Friel Homes (c/o CT Planning)	Supports <b>Options C1 and C3</b> . If the Council is seeking to provide land for some 1900-4400 new dwellings as part of their Duty to Cooperate it will be necessary to release Green Belt Land to meet this requirement. A comprehensive review of the Green Belt should be undertaken which considers the potential of all land at the urban-rural fringe. Land at the edge of Rugeley/Brereton represents a highly sustainable location for new housing growth. Concentrating new housing development at Rugeley would assist in the regeneration of the town and provide the land and opportunities to further enhance the sustainability of the settlement. <b>Land at Armitage Lane, Rugeley (SHLAA Ref: R32):</b> [...] lies adjacent to the built-up area of Rugeley. The site can be released from the Green Belt without adversely impacting on the five purposes of the Green Belt. Land at Armitage Lane represents a medium sized housing site. Paragraph 68 of the NPPF recognises the important contribution such sites make to meeting the housing requirement of an area, particularly as they can be built out relatively quickly. Furthermore, the site is owned by a housebuilder with an interest to deliver the site early in the Plan period.
LPIO259	Gladman	Overall a development strategy that provides a number of opportunities in a range of locations of varied scales is likely to be the most effective in terms of delivery. Gladman believes that the overall development strategy should combine a number of the options presented within the consultation document rather than focusing solely on one type of site or location. This will ensure delivery across the course of the plan period, due to differing timescales and lead in times with different types of site and also that if delivery in one area is delayed for whatever reason there are alternative options which can come forward. The Council needs to avoid a development strategy which is too heavily reliant on just one type of site location, as if these fail to come forward it could put the delivery of the plan as a whole at risk.
LPIO260	Greaves, M	<b>C116a Richborough Estates, Land Off Cannock Road, Heath Hayes:</b> A proposal was drawn up in 2014 for development on arable land in the greenbelt area for circa 700 dwellings. There is the potential for an extra 800+ vehicles within the immediate area all using the A5190 with potentially further vehicles requiring access to the proposed school. Add to that the expected increase in vehicles gaining access to the new McArthur Glen Retail Park. I am concerned about the impact this vehicular increase will have on the noise and air pollution in the area. There has been a significant increase in traffic over the past 20+years, including the amount of HGVs which will also have the added inconvenience of traversing 3 roundabouts within 50-100 yards causing hold ups and pollution. The land in question has been farmed regularly during the last 20+years and I believe that arable land is at a premium and should be maintained for that sole purpose. I sincerely hope these factors are taken into account when this proposal is discussed and that a great deal of thought is given to the impact this development may create.

LPIO261	Greenlight Development Ltd (c/o Lichfields)	<p>The NPPF is clear on the weight attached to Green Belt by Government (Paragraph 137 and 138 referenced). Greenlight supports the Council’s recognition of the need to have regard to this approach in its forthcoming derivation of a spatial strategy, set out at paragraph 7.33 and 7.34 of the IOC, and considers that it accords with the NPPF in principle. In this regard, Greenlight considers that the acuteness of the unmet housing need arising from the GBBCHMA can, and in this instance should, constitute exceptional circumstances, as established in the case of Calverton Parish Council V Nottingham City Council.</p> <p>Cannock remains the largest settlement and main strategic centre within the District, with access to a range of services and facilities. As such, it should remain the primary focus for development, to ensure its role within the settlement hierarchy – and the wider West Midlands region – is strengthened.</p> <p>On this basis, Greenlight considers that <b>Option C2</b> is the most appropriate of the options identified; albeit, it would also support <b>Option C3</b>. Greenlight supports the principal of the approach and considers that Cannock should continue to be the main focus for development with an emphasis on sustainable sites on the edge of the existing urban areas. With regards to Cannock, in particular, Greenlight considers that their site should be included as a reasonable option for housing delivery within the settlement.</p> <p><b>Land off Wellington Drive in Cannock Chase (SHLAA Ref: C121):</b> the site represents a brownfield site which is currently underused and comprises a disused car auction site on the western edge of Cannock Chase settlement, abutting the edge of Cannock built-up area, and is also a cross-boundary site with SSDC. The site should be considered, in its own right, a reasonable option for future housing land supply delivery of c. 55-70 homes through allocation in Cannock Chase District. The wider site provides the opportunity for a large allocation of a total of c.250 homes. Notwithstanding, Greenlight consider there is nothing preventing the allocation of the smaller, predominantly brownfield parcel in Cannock Chase on its own merits.</p> <p>Greenlight supports the Council’s commitment to consider the option to release Green Belt land as part of a revised spatial strategy; albeit, in accordance with the sequential approach of the NPPF.</p> <p>In particular, Greenlight supports <b>Option C2</b> for meeting the housing needs of the District and GBBCHMA.</p>
LPIO262	Griffiths, P	<p>I see one of the Council’s objectives is to create healthy living opportunities across the district. Building on the greenbelt in Slitting Mill would definitely be the opposite.</p> <p>Many local people enjoy the walking &amp; running &amp; cycling down Jones Lane and onto the Heritage Trail. They enjoy the peace and fields around this area, houses built here would ruin that opportunity.</p> <p>The road junction onto Penkridge Bank Rd is already dangerous without more traffic.</p> <p>Environmental sensitivity should be considered important.</p> <p>The Council should choose <b>Option A</b> to focus on urban areas first or <b>Option B</b> to use the power station land. But I strongly object to Option C – Building on Green Belt. This is unnecessary as the other options are perfectly adequate.</p>
LPIO263	Grigg, S	<p>I believe the options for additional housing highlighted in <b>Options A, B1 and B2</b> would be useful to utilise the brownfield and urban sites already highlighted within the district. Additionally, the option of potential development highlighted in <b>C1</b> would positively meet additional housing needs whilst keeping the change to the landscape and green spaces minimal. These options would deliver greatly to need for additional housing, and not create such a great impact on the wider environment.</p> <p>With regards to the options of C2 and C3, I am deeply, utterly concerned if such plans were to be approved and go ahead</p>

		<p>in the district. I appreciate development has to take place, but I urge you not to consider options C2 and C3 to meet the housing needs of the district. This would cause greater further destruction within the region to green sites the region is well known for and has to offer. Additionally, the sites highlighted under options A, B1 and C1 would provide alternative housing options, and the council must consider alternatives to the green belt.</p> <p>The site highlighted between Wimblebury, Hazel Slade and Rawsley and Prospect Village, I believe fundamentally is not suitable to be released from the Green Belt for development of housing. [...] Release of the land in Wimblebury would cause over urbanisation, and would not be a viable option for development due to the already struggling local facilities including schools and transport.</p> <p>Additionally, with regards to over urbanisation the local villages surrounding this site would lose their identity completely. Wimblebury, Hazel Slade and Rawsley and Prospect Village would become one large area which does not really have any identity apart from being a housing development and would cause all three areas to be combined and lose their own local identities, something the green belt is designed to prevent from happening.</p>
LPIO264	Guest, C	<p>I was opposed to the use of any greenbelt land for housing development and continue to be of this mind. We have many industrial sites that are empty and not used. We also have many spaces in Cannock town centre that are not used to the lack of development there and the building instead of the designer outlet. With this in mind, I would be opposed to any of the housing options you have put forward except <b>options A and B</b> where existing urban and industrial sites are used. I feel that you could meet the housing quotas using this and to exceed housing quotas by using greenbelt land would be a travesty for our area and completely against the wishes of government, the environmental secretary and more important local people.</p>
LPIO265	Guest, J	<p>I was opposed to the use of any greenbelt land for housing development and continue to be of this mind. We have many industrial sites that are empty and not used. We also have many spaces in Cannock town centre that are not used to the lack of development there and the building instead of the designer outlet. With this in mind, I would be opposed to any of the housing options you have put forward except <b>options A and B</b> where existing urban and industrial sites are used. I feel that you could meet the housing quotas using this and to exceed housing quotas by using greenbelt land would be a travesty for our area and completely against the wishes of government, the environmental secretary and more important local people.</p>
LPIO266	Hewitt, P	<p>The Rugeley Power Station site is a big part of the decisions that will need to be taken. I believe that high quality employment with a range of suitable housing is vital to the future of Cannock Chase.</p> <p>[...]Therefore, I totally oppose building on Green Belt Land, to do this goes against what Cannock Chase is and why people live and visit here.</p> <p>I support <b>Options B1 and B2.</b></p>
LPIO267	Highways England	<p>Highways England have undertaken a high-level review of the potential impacts of the development options presented as part of the Cannock Local Plan, and have determined the potential trip generations and distributions/assigned of development traffic onto the strategic road network (SRN).</p> <p>Our principle concern is the A5 corridor [...] but we have also considered the potential impact of local plan development traffic on M6 Junctions 11 and 12.</p> <p>Following our high-level review of potential trip generations routed onto the SRN we have noted that residential options B2, C1, C2 and C3 are likely to present the largest levels of trips onto the A5 and M6.</p> <p>The initial analysis undertaken considers the housing and employment development proposals in isolation from each</p>

		<p>other. The analysis carried out identifies the <b>relative scale of impacts</b> associated with each option, which will be helpful to Cannock Chase District Council moving forward. At this stage, the analysis does not take into account trips associated with the proposed residential sites travelling to/from the proposed employment sites. At such a time a preferred overall housing and employment option emerges, then it may be possible to refine the analysis.</p>
LPIO268	Hughes, R	<p><b>Option B2</b> – Focus development on urban areas first plus a lower level of housing on the Rugeley Power Station site, Green Belt and AONB land should be protected from development.</p>
LPIO269	Jackson, D	<p>I think that <b>Option A</b> is the only option based on my experience of living in the area. Plus, develop the Market Hall in Rugeley.</p> <p><b>Wharf Road:</b> has already been inundated with development. All that is left is a small patch of green belt, this should remain. Further development will make the road even busier and polluted.</p> <p><b>Hart School:</b> [...] There appears to be an area suggested on the AONB quite close to the school (option C1). This would be totally unacceptable, more pollution, more congestion, threat to health and safety and in close proximity to the school. Our Green Belt will disappear if Option C3 is considered.</p> <p><b>Pear Tree Estate/Hednesford Road:</b> Another bottleneck area. More houses means more cars, which means more congestion and higher levels of pollution. Not ideal for a town which lies in a valley.</p> <p><b>Sandy Lane Surgery:</b> Busy times of day result in long waiting times entering and exiting the car park. More houses will result in more people placing more strain on our GP surgeries which already struggle with demand.</p> <p><b>Rugeley Power Station:</b> If Lichfield are having a bigger percentage of the housing I would be interested to know where they will go for schools, doctors, services, shopping and leisure. Even though the intended housing is supposed to be using renewable energy that hardly applies to the vehicles. Also, the Power Station site has some beautiful natural areas encouraging wildlife and screening potential development. More people inevitably bring disruption to wildlife, litter, and anti-social behaviour.</p> <p>Sherbrook Valley has had enough development with the building of the estate at the top of Burnthill Lane and off the Hednesford Road. [...]</p>
LPIO270	Jones, T	<p>Given the way in which Rugeley &amp; Brereton are surrounded by other districts and by land that is AONB, Green Belt or both, it is most important that some of the housing need in the northern part of the district is met in non-Green Belt areas of neighbouring authorities. [...]</p> <p>Appropriate brownfield land should be redeveloped for housing. In this context it is important to note that some employment land along Redbrook Lane and on the Levels could be made available for housing if the businesses there at present that want to expand are able to do so on the Power Station site. This would prevent those businesses leaving the Rugeley/Brereton area and would reduce HGV traffic on Brereton’s residential roads.</p> <p>Higher densities will be needed in appropriate locations. However this must not be at the expense of the amenity of existing residents appropriate locations are the Power Station site, which with its lower altitude and distance from existing dwellings could take development higher than two storey, and the former school site off Hardie Avenue. The latter depends of substantial improvements in the form of either a roundabout or traffic lights being made to the junction of Queensway with Hednesford Road. Wharf Road is too narrow and too impeded by necessary parking for residents who have no other parking and the nursery school.</p> <p>To the extent (if any) that the existing urban area cannot accommodate needed housing, this should not be in the Green Belt. Rather the statutory duty to cooperate and NPPF guidance “<i>towards locations beyond the outer Green Belt</i>”</p>

		<p><i>boundary</i>” applies. Sites should be sought outside the district. These should include sites well served by existing rail services and by frequent bus services.</p> <p>Land close to Rugeley Trent Valley Station outside flood zones 2 and 3 should be considered.</p> <p>Paragraph 7.23 should mention the housing development off Wolseley Road in Stafford Borough. This is in reality a part of Rugeley and should be counted as meeting part of Rugeley and Brereton’s need. To count it as meeting part of Stafford’s need is wholly unrealistic.</p> <p>I am firmly opposed to paragraph 7.44 <i>“The strategy for future development...”</i> this is totally contrary to NPPF policy that favours development beyond the Green Belt rather than inside it. Given the lack of facilities in Rugeley/Brereton it is highly unsustainable. Similarly, <i>“consider Green Belt urban extension at Rugeley/Brereton urban edges”</i> in Option C1 is contrary to government policy and unsustainable.</p> <p>I am concerned that new GP and school facilities are provided. This must not involve a delay after new houses are occupied.</p>
LPIO271	Lichfield District Council	<p>The comments in paragraph 7.35 recognising the wider context for neighbouring districts are welcome and Cannock Chase DC should look to meet the housing needs within their district boundary rather than in neighbouring authorities. Lichfield would advise Cannock Chase DC to meet as much need as is possible whilst still being deliverable within its authority boundary. [...] It is important to emphasise that we support Cannock Chase in looking at their own potential supply and we encourage careful and ongoing scrutiny where there is under supply to ensure the assets are maximised. [...] This may involve, for example, a review of the level of employment land allocated and considering the suitability of some of it being used instead to deliver some of the housing need requirements.</p> <p>[...]</p>
LPIO272	Lyons, O	<p>In terms of the location of this housing within the District, it should be with the former Rugeley Power Station site given that this is one of the largest brownfield sites in the region and the plans detail that the site can cater for up to 2300 houses, approximately half of which fall within Cannock Chase. However, I do not believe that housing on that site should take precedence over employment. As such, I would favour <b>Option B</b> with regards to the location of housing, beginning with the redevelopment of urban areas prior to focusing on the former Power Station site as part of an employment-led regeneration scheme (<b>Option B2</b>). Additional areas, such as smaller brownfield sites could then be explored to meet any additional needs.</p>
LPIO273	Morgan, A	<p>The options that should be considered are <b>A and B</b> only as they do not include green belt areas. Green belt should be preserved as far as possible and those highlighted in option C2 would take too much of the green belt area away and cause too much of the landscape to be impacted. Heath Hayes, Wimblebury and Hednesford have already seen too much housing development in recent years and further expansion would have a further negative impact. Please discount these areas from consideration for housing growth.</p>
LPIO274	Morgan, P	<p>The options that should be considered are <b>A and B</b> only as they do not include green belt areas. Green belt should be preserved as far as possible and those highlighted in option C2 would take too much of the green belt area away and cause too much of the landscape to be impacted. Heath Hayes, Wimblebury and Hednesford have already seen too much housing development in recent years and further expansion would have a further negative impact. Please discount these areas from consideration for housing growth.</p>
LPIO275	Newton, A (c/o CT Planning)	<p>Supports <b>Option C3</b>.</p> <p>If the council is seeking to provide land for some 1900-4400 new dwellings as part of their Duty to Cooperate it will be</p>

		<p>necessary to release Green Belt Land to meet this requirement. A comprehensive review of the Green Belt should be undertaken which considers the potential of all rural-urban fringe land, not just land adjacent to the main urban areas, and should therefore include land adjacent to the District's villages.</p> <p><b>Land at UK Architectural Antiques, Hayfield Hill, Cannock Wood:</b> the site is located close to the existing settlement boundary and is located in a sustainable location. It is submitted that the site could come forward for residential development for some 25 dwellings.[...] Furthermore, there is sufficient land within the wider landholding to provide additional woodland planting and public access to offset the loss of Green Belt land.</p> <p>In seeking to accommodate some of the housing shortfall for the GBBCHMA, the opportunity arises for Cannock Chase Council to undertake a comprehensive review of its Green Belt and consider releasing land from the edge of the sustainable settlements. This should include the District's Villages. A proportionate amount of new housing growth should be allocated in the villages to maintain and improve the vitality and viability of the community. The emerging Housing Growth Policy should identify opportunities for villages such as Cannock Wood to grow and thrive, especially where this will support local services.</p>
LPIO276	Cllrs. Preece, J, Stretton, Z and Newbury, J	<p>We would prefer <b>option C1</b> in terms of the strategy for meeting overall housing growth. As outlined on page 47 of the consultation document, Norton Canes has provided nearly a quarter of the 3,200 houses identified for the current Local Plan period to 2028. As we indicated in our response to q1, Norton Canes is experiencing a high level of housebuilding in a short space of time. We therefore strongly feel that when it comes to the District's housing target for this local plan period, new housing needs to be spread more evenly around the District.</p> <p>Point 7.23 on page 45 describes the overall strategy for meeting housing growth requirements within the District. It is clear that both Hednesford and Norton Canes have seen large housing growth within the current Local Plan period whilst other areas, such as Heath Hayes, Rugeley and Brereton have not seen housebuilding on this scale for many years. We believe that in the south-east of the district, the land east of Wimblebury Road should now be considered as land suitable for development given the extensive building taking place in Norton Canes. With the Horseshoe Drive development and the Sycamore Road/Hawthorn Road estate, a precedent has already been set for development east of Wimblebury Road. Consideration should be given to sites which would not impact on the area of separation between Heath Hayes, Rawnsley and Prospect Village; this could include the fields which lie within the Heath Hayes and Wimblebury Parish between Hawthorn Road and Heath Hayes Park.</p>
LPIO277	Norton Canes Parish Council	<p>Our small geography and the Cannock Chase AONB means we should not be expected to make a contribution as large as other authorities which have plenty of non-green belt land.</p> <p><b>Option C3</b> is supported which potentially provides the widest choice of sites across the whole of the District with the caveat that major new sites on the edge of the village should not be included.</p>
LPIO278	Mr & Mrs Priest, C	<p><b>Richborough Estates Ref. C116ab Land South of the A5190</b></p> <p>We have seen a considerable increase in volume of traffic and HGVs on Cannock Road; with traffic delays quite common outside our property. The New McArthur Glen Designer outlet opening in 2020 the volume of traffic will almost certainly double, which will cause more pollution and traffic chaos.</p>
LPIO279	Pugh, J & M	<p><b>Richborough Estates Ref. C116ab Land South of the A5190</b></p> <p>We would like to oppose the proposed plans [...].</p> <p>We have noticed a large increase in the volume of traffic, particularly HGVs. Our house, along with others on Cannock Road, has suffered from subsidence in the past and we have restraint bars fitted. We are very concerned that the extra</p>

		<p>traffic created by the new housing estate will negatively impact on this, especially during the construction stage when heavy machinery will be used. The new McArthur Glen Designer Outlet, will also inevitably generate an increase in traffic. The road is already incredibly busy at peak times with queues of traffic. All this combined will add to the growing congestion, noise and air pollution.</p> <p>We are also concerned of the negative effect the new estate will have to the local wildlife and their habitats.</p>
LPIO280	Quinn, M	<p><b>Options A and B</b>, are acceptable, option C1 could be considered if it is a last resort but C2 locations should at all costs be discounted as they would have a negative impact to the Cannock Chase area. Green Belt spaces are important to our local area now and for future generations. Wimblebury, Heath Hayes and Hednesford has lost a lot of its green spaces over recent years, increased housing and residents have put strain on the infrastructure including the road networks, causing air quality problems in Wimblebury areas and traffic problems.</p>
LPIO281	Quinn, S	<p><b>Options A and B</b>, are acceptable, option C1 could be considered if it is a last resort but C2 locations should at all costs be discounted as they would have a negative impact to the Cannock Chase area. Green Belt spaces are important to our local area now and for future generations. Wimblebury, Heath Hayes and Hednesford has lost a lot of its green spaces over recent years, increased housing and residents have put strain on the infrastructure including the road networks, causing air quality problems in Wimblebury areas and traffic problems.</p>
LPIO282	Ricketts, R & B	<p><b>Land at Hagley Park Farm and Jones Lane (R38)?</b></p> <p>We are completely against the proposal that housing will be built on Green Belt land and AONB.</p> <p>This proposal for building on Green Belt Land; cannot be allowed to happen.</p> <p>Prevent urban sprawl – Green Belt’s primary purpose is to prevent urban sprawl.[...]</p> <p>Prevent neighbouring towns merging into one another – the separate nature of the Village of Slitting Mill will be completely be lost by this development. The village will be merged into Rugeley Town with no boundary between. This is unacceptable.</p> <p>Assist in safeguarding the countryside from encroachment – the land is next to Cannock Chase AONB. If building were allowed, this would encroach on the countryside attached to the AONB and cause damage to the outlook and wildlife therein.</p> <p>Cannock Chase AONB MUST be protected at all cost.</p> <p>Preserve the setting and special character of historic towns – the village of Slitting Mill got its name from the Rolling and Slitting Mill which was working in the 17<sup>th</sup> centuries.[...]. This is quite separate and has its own unique character; this will be lost forever if the building were allowed. We cannot allow this to happen.</p> <p>Assist in urban regeneration, by encouraging the recycling of derelict and other urban land. There are plenty of other areas of land available in the area that has been identified as requiring urban regeneration and recycling of derelict land.</p> <p>Building on this green belt land would reduce the urban regeneration that needs to take place elsewhere in the wider Rugeley area.</p>
LPIO283	Scarle, D	<p><b>Richborough Estates Ref. C116ab Land South of the A5190</b></p> <p>Wildlife – if the land is used for building where will all the wildlife go? Where will local residents exercise their dogs?</p> <p>Traffic – There is already an increase in the traffic coming along Cannock Road due to the new shopping development. I do not what the increase in traffic that this development would bring. There will be extra pollution from the increased traffic which I do not wish my family to live in. The increase in traffic would bring more safety concerns for the local residents – mainly for the children.[...]</p>

		Horses – I currently rent just under 19 acres of land along the Cannock Road. This land is now home to my 10 horses, most of them rescued or retired. By taking the land away means that they will lose their home.[...]
LPIO284	Shepherd, J	<p><b>Richborough Estates Ref. C116ab Land South of the A5190</b></p> <p>I find that the proposal to build approximately 700 dwellings on land to the south of Cannock Road, Heath Hayes with only two access points represents planning at its worst – with no consideration for traffic issues. At peak times this road is far too busy with traffic ‘hold-ups’ caused by Five Ways Island.</p> <p>I suggest that further access should be made at the south of the site using Hickling Road, which should be widened and the junction at the far end improved.</p> <p>It would also be useful to construct a road running east from my proposed southern access, along its path of the old Bleak House mineral route, connecting the B4154 (Hednesford Rd to Norton Canes) and the A5190 (Cannock Road) towards Chasetown. This would largely alleviate the congestion problems at Five Ways Island.</p>
LPIO285	South Staffs Water	<p>SSW support <b>Option C3</b>.</p> <p>If the council is seeking to provide land for some 1900-4400 new dwellings as part of their Duty to Cooperate it will be necessary to release Green Belt Land to meet this requirement. A comprehensive review of the Green Belt should be undertaken which considers the potential of all rural-urban fringe land, not just land adjacent to the main urban areas, and should therefore include land adjacent to the District’s villages.</p> <p><b>Land at Jones Lane, Slitting Mill:</b> the site is located adjacent to the existing settlement boundary. It is located in a sustainable location. It is submitted that part of the site, close to the Slitting Mill Road frontage could come forward for residential development, providing housing for the village.[...] Furthermore, there is sufficient remaining land within South Staffordshire Water’s land holding to offset the loss of Green Belt Land through compensatory improvements to local environmental quality and accessibility.</p> <p>In seeking to accommodate some of the housing shortfall for the GBBCHMA, the opportunity arises for Cannock Chase Council to undertake a comprehensive review of its Green Belt and to consider releasing land from the edge of the Districts sustainable villages, with a view to allocating a proportionate amount of new housing growth to maintain and improve the vitality and viability of the community. The emerging Housing Growth policy should identify opportunities for villages such as Slitting Mill to grow and thrive, especially where this will support local services.</p>
LPIO286	St Modwen (West of Pye Green Road) (c/o RPS Planning & Development)	<p>Concentrating and exploring all housing growth as a priority at the urban area is supported. This means <b>Option A</b> (urban edges) is supported in advance of exploring other policy options. In relation to the capacity at Pye Green Road, there exists a greater housing capacity on non-Green Belt sites above the 3,200 dwellings already identified.</p> <p>The land west of Pye Green Road clearly represents a ‘reasonable alternative’ for housing (as opposed to a mixed use site references as site c113).</p>
LPIO287	Staffordshire County Council	<p><u>Education</u></p> <p>From a school place planning perspective, the identification of larger development sites or sites that are adjacent to each other assist with the school place planning process as opposed to a scattered approach of smaller housing development sites where there is pressure on places.</p> <p>Option A: We note that the Council is undertaking an ‘urban capacity study’ to bring together the various pieces of evidence on urban capacity to provide a more comprehensive picture. This evidence needs to be considered within the context of existing school capacity in the local area, and the potential to provide additional school places at existing schools if required.</p>



		<p>Option B1/B2: A new primary school is proposed as part of the RPS development as part of the current planning application, which will mitigate the need for additional school places to accommodate children generated by development. Additional high school places may need to be factored into the plan at a later stage.</p> <p>Option C1: These proposed sites are all within the Rugeley Town primary school place planning area and the Rugeley High School place planning area. There is pressure for primary school places within this school place planning area, particularly around the Power Station and Brereton area, so additional housing in this area is likely to require the provision of additional primary school places. There is existing pressure in the Rugeley high school place planning area.</p> <p>Option C2: Norton Canes: There is pressure for primary school places in this area, with an existing identified need to provide [...] primary school places to mitigate housing developments that have recently been built or are due to commence. Further housing will therefore require the provision of additional primary school places.[...]</p> <p>Cannock Town: The two sites to the north of Cannock Town are located in the catchments of Hazel Slade Primary Academy and West Hill Primary School. There is pressure for places and these schools, and in this part of Cannock Town. New housing development in this area is therefore likely to require the need for additional primary school places. Given the pressure for primary school places in the Heath Hayes/Wimblebury area any housing will require additional primary school places.</p> <p>Option C3: Our preference would be for the identification of larger development sites rather than this scatter approach of small housing allocations to assist with school place planning process.</p> <p><u>Ecology</u></p> <p>All Norton Canes area options will need to consider possible effects on the Cannock Extension Canal SAC. Housing options C2 and C3 give two serious concerns for ecology: The potential for direct impacts on the Cannock Chase SAC, and the potential for direct impact on Ancient Woodlands.</p> <p><u>Historic Environment</u></p> <p>Option C3 in Cannock Wood area has the potential to impact upon the setting of two scheduled monuments. Additional development in urban areas has the potential to impact upon designated heritage assets.</p>
LPIO288	Startin, P	With regards to the location of housing, I believe that if the Council does look to go up, Option A is all that is required.
LPIO289	Trine Developments Ltd (c/o First City Ltd)	<p>Support <b>Option C2</b></p> <p>We agree that there is insufficient land within the urban area to meet wider housing need in the sub region. In these circumstances there is an urgent need to release Green Belt sites, not as a last resort but to take account of the need to promote a pattern of development in the District.</p> <p><b>Land off Spring Close on the northern edge of Norton Canes (N20):</b> In our view the site should be allocated for residential development to assist in meeting the District's objectively assessed housing needs combined with the need to be the shortfall from the GBHMA.</p> <p>We consider that Norton Canes should be supported for modest expansion on the northern edge of the settlement on a well contained site with strong and defensible boundaries that will have permanence, close to facilities and services, and with ease of access visa the A5 to employment. This would be consistent with the Plan's urban and key centre sustainable development strategy and the exceptional circumstances that justify the release of Green Belt land.</p>
LPIO290	Walker, C	The options that should be considered are those that have little to no impact on the green belt areas. The areas highlighted in <b>options A and B</b> , I would be in support of as they utilise the brownfield and housing sites within the urban areas and the redevelopment of the Rugeley Power Station for the housing requirements.

		<p>I cannot support the use of green belt but if it is mandatory to utilise some green belt then C1 is as far as this should be considered as this will have the least impact to the area.</p> <p>The area highlighted in C2 should not be considered it covers too large an area and the impact in areas of Hednesford and Heath Hayes would be too great.</p>
LPIO291	Walker, C	<p>I continue to be opposed to the use of greenbelt sites to meet housing quotas when they can be met using urban and industrial sites we have already developed. Our green spaces are important and should be preserved. We have many industrial units that are unused and some that can be relocated to areas like Kingswood Lakeside to enable houses to be built on already developed land. With this in mind, I offer my support to housing <b>Options A and B</b> but not to any other options. I feel that using the greenbelt should be avoided at all costs.</p>
LPIO292	Walker, C	<p>I am against building on greenbelt land when we have developed so much in the area already and do not have any infrastructure to support it. I understand that there is a housing need to be met and feel that this should and could be met by using already developed sites. With this in mind, I would be in support of <b>options A and B</b> using existing industrial (and brownbelt) and urban sites but against any use of greenbelt (C onwards). Should greenbelt need to be used, then I think the Cannock area has already been overdeveloped especially when the new designer village which will impact on our roads and therefore feel that option C1- Developing the Rugeley area would have the least social impact.</p>
LPIO293	Walker, P	<p>I disagree with options of housing development that include green belt use. [...] use of greenbelt is devastating to wildlife and we should now be utilising our brownbelt and industrial sites instead of these areas. The designer outlet has used up space that could have been used for housing. The Cannock, Heath Hayes and Wimblebury areas have been extensively developed over the years and local facilities and roads are not suitable for further heavy development. With this in mind, I agree that <b>A and B options are needed</b>, however would be against options C onwards. If greenbelt were needed to meet housing demands (not exceed it) then any surrounding areas in Cannock, Heath Hays and Wimblebury and Hednesford should be avoided due to the excessive burden on facilities brought about by the designer outlet.</p>
LPIO294	Walker, S	<p>I am against building on greenbelt land when we have developed so much in the area already and do not have any infrastructure to support it. I understand that there is a housing need to be met and feel that this should and could be met by using already developed sites. With this in mind, I would be in support of <b>options A and B</b> using existing industrial (and brownbelt) and urban sites but against any use of greenbelt (C onwards). Should greenbelt need to be used, then I think the Cannock area has already been overdeveloped especially when the new designer village which will impact on our roads and therefore feel that option C1- Developing the Rugeley area would have the least social impact.</p>
LPIO295	Wright, T (c/o Pegasus Group)	<p>In terms of the spatial distribution of the housing growth the following comments are offered:</p> <p><u>Option A:</u> provides only the minimum figure which is fixed by the Government's Standard methodology. While this provides the starting point for setting a requirement this is an absolute minimum and therefore Option A alone will not suffice and the Council's acceptance of this matter is welcomed.</p> <p><u>Option B1:</u> combines Option A with housing-led redevelopment of Rugeley Power Station, whilst B2 supports employment-led/mixed use redevelopment at this site. Again, the Council acknowledges that either option will be unlikely to meet housing needs in full and this realistic approach is welcomed.</p> <p>It is submitted that <b>Option B2</b> is the most appropriate as this will contribute to a sustainable and balanced strategy for Rugeley, otherwise the town will expand considerably in residential terms without complementary employment balance. It is acknowledgement of the fact that, even taking the aforementioned scenarios into account, there will still need to be consideration of Green Belt sites.</p>

		Of these options, those which support the release of Green Belt sites around Rugeley are supported ( <b>Option C1</b> ).
LPIO296	Paterson, L	<p><b>Richborough Estates Ref. C116ab Land South of the A5190</b></p> <p>My objection to the location of this planned housing estate is based primarily on traffic problems. Recently all the residents along this road have been subjected to a major increase in road traffic and heavy duty vehicles. The site location would add more cars onto a road that I consider to be very overused. These houses are built on mining area's and the movement and cracks that have appeared on the many houses along this street, along with some that have subsided, show its instability. Adding more cars along this road, which would not only come from residents but from people doing the school run, would make the situation far worse.[...]</p> <p>My other objection is that I find it illogical to put more housing surrounding the SSSI site located at Fairlady Coppice off Newlands Lane to this area, which I believe would be negatively impacted by the housing estate.[...]</p>
LPIO297	Association of Black Country Authorities (c/o Walsall Council)	<p>Given that any housing supply above that required to meet local need would be to serve need arising from the Black Country and/or Birmingham, it would be reasonable for it to be location where residents could continue to enjoy existing links for employment and family close to these areas. This would appear to favour Option C2. However, all the options are likely to require further assessment in terms of their sustainability and impact on landscape sensitivity. The limited length of the boundary between Walsall and Cannock Chase means that there would appear to be little scope for any cross-boundary development. [...].</p>
Question 18 Are the current settlement boundaries for the District's villages appropriate? If not, how should they be amended and why?		
LPIO298	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	<p>In order for Green Belt boundaries to be amended to accommodate growth requirements it is necessary for Local Authorities to demonstrate 'exceptional circumstances' to justify the revisions in accordance with the requirements of the Framework. We would suggest that exceptional circumstances will not exist if suitable and sustainable sites outside of the Green Belt are not allocated for development in the first instance. Green Belt land release should only be considered where there is no alternative sustainable option for meeting the overall housing requirement.</p>
LPIO299	Church Commissioners of England (c/o Barton Willmore)	<p>We endorse the principle of updating of the extant settlement boundaries as this will assist in accurately reflecting the development on the ground since they were last drawn up. The revised settlement boundaries will also play a pivotal role in directing future development to the most sustainable locations in Cannock Chase District and show where new development would be appropriate in principle.</p> <p>We recommend that the District utilise the most up-to-date evidence to update the settlement boundaries. It is considered that in drawing up or revising settlement boundaries, the Local Plan Review should recognise that settlement boundaries are only to be drawn around settlements, which are assessed to be the most sustainable in the District. The future development needs of an area should also be a material consideration.</p> <p>The Commissioners consider that a settlement boundary should be drawn up along the southern extent of Bleak House.</p>
LPIO300	Home Builders Federation	<p>The current settlement boundaries of the District's villages should be reviewed under Option C3 (see HBF answer to Question 17)</p>
LPIO301	KGL Estates Ltd (c/o John Heminsley)	<p>Extending the current settlement boundaries of Cannock Wood, Hazelslade, Prospect Village and Slitting Mill would not be likely to deliver a significant contribution to meeting housing need. There are AONB constraints affecting 3 of the villages. Minor changes to boundaries may be appropriate to respond to local housing requirements but is not considered to be a strategic issue.</p>

LPIO302	Richborough Estates (Brownhills Rd) (c/o Pegasus Group)	Settlement boundaries, including those to the urban areas, will need to be amended to accommodate some Green Belt release as confirmed by the evidence base.
LPIO303	Wyrley Estate (c/o Fisher German LLP)	<p>It is noted in the district profile that Norton Canes has accommodated significant growth in recent years, most around the southern edge. Whilst there are potential sites to the west, there are opportunities also to the north on Wyrley Estate land to create a more balanced approach to urban extension, providing also opportunities for improved services and infrastructure to accommodate new development.</p> <p><b>Site 1 – Land of Hednesford Road/Norton:</b> located off the main Hednesford Road and is a large greenfield site to the north of Norton Canes on the edge of the settlement boundary. The site would create a natural extension to the settlement of Norton Canes.[...]</p> <p><b>Site 2 – Land off Burntwood Road:</b> Close to site 1, the land is near Norton Canes High School. The site is within an identified residential area and just outside the settlement boundary. Located to the rear of existing residential properties and near to the school, this makes it a sustainable and logical place for new residential development to help meet the LHN. [...]</p> <p><b>Site 5 – Land off Lime Lane:</b> the land is partially divided by two administrative boundaries; Cannock Chase Council and Walsall Council. The site is not allocated in the Walsall Local Plan and is designated as Green Belt Land. It is recognised that this land is not well connected to Brownhills and is located as an island within the Green Belt areas of CCDC and Walsall Council. However, although the wider land at present has limited development potential, it adjoins an existing Gypsy and Traveller Site at Lime Lane and could be utilised to provide additional facilities adjoin that site and also as potential safeguarded land for future development.</p>
LPIO304	Beau Desert Golf Club (c/o FBC Manby Bowdler LLP)	The settlement boundary for Hednesford should be reviewed and amended to accommodate Housing Growth Policy Options C2 and/or C3.
LPIO305	Briggs, T	<p>Yes, current boundaries are appropriate.</p> <p>There is the possibility of setting a dangerous precedent by extending village boundaries, eroding the character of the district, the potential loss of greenfield/AONB, siting developments in areas with little or no facilities and that would be unable to cope with the influx.</p> <p>Extending boundaries (and also considering building on AONB sites) is counter intuitive to other stated policies where the aim is to maximise the AONB as a tourist attraction and (for example) town centres such as Hednesford maximising tourism as a gateway to the AONB. Again, the Council should set a definite policy here.</p>
LPIO306	Gladman	<p>Gladman recommends that the settlement boundaries should be reviewed as part of the plan preparation process to ensure that the necessary scale of growth can be delivered.</p> <p>The Policy should be flexible enough to be able to accommodate new development outside of settlement boundaries, to allow the Councils to quickly address any issues of shortfall in housing supply against the plan requirement.</p> <p>The Council could incorporate a criteria based policy to achieve this, such an approach would allow the plan to protect itself against unsustainable development at the same time as being flexible to additional development opportunities to come forward to meet identified needs. (Reference to submission version of the Harborough Local Plan Policy GD2).</p>

LPIO307	Lyons, O	In terms of the geographical boundaries within the District, I believe the distinct areas are Cannock, Hednesford, Rugeley, Norton Canes and Rawsley. These areas all have very individual identities with differing priorities, characteristics and heritage.
LPIO308	Newton, A (c/o CT Planning)	Amendments to the Settlement Boundaries should be sought to allow limited housing growth in the villages and in doing so would contribute to the viability and vitality of local services, businesses' and the general community. Consideration should be given to extending the settlement boundary to the south of Cannock Wood to include the <b>Land at UK Architectural Antiques, Hayfield Hill, Cannock Wood</b> . The site is located adjacent to a public transport service along Hayfield Hill which provides access to services and facilities in neighbouring settlements.
LPIO309	South Staffs Water	Amendments to the Settlement Boundaries should be sought to allow limited housing growth in the villages and in doing so would contribute to the viability and vitality of local services, businesses' and the general community. Consideration should be given to extending the settlement boundary at Slitting Mill to accommodate new housing growth.
LPIO310	Thornton, H	The present settlement boundaries around villages in the District are still appropriate.
LPIO311	Wright, T (c/o Pegasus Groups)	Settlement boundaries, including those to the urban areas, will need to be amended to accommodate some Green Belt release as confirmed by the evidence base.

**Affordable Housing Percentage Requirements Policy Options**

Question 19 Which Option, or combination of options do you support and why? Should any further options be considered?

LPIO312	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	Questions 19-24 raise a series of issues in relation to the delivery of affordable housing including the threshold for delivery and the potential for increasing the percentage requirements and off-site affordable housing provision. It is not, however, clear if the various options have been tested through a viability assessment.
LPIO313	Cycle-R	There does need to be more affordable housing in the District, however the issues are quite complex, as reflected in the Local Plan. I feel that the maximum flexibility needs to be applied to a situation, as noted I would favour <b>Option B</b> , but perhaps extending this to all sites, whether 5 houses or 500.
LPIO314	Home Builders Federation	The Affordable Housing Policy should be updated to reflect the 2019 NPPF (paras 62-64) and the definition of affordable housing set out in Annex 2 – Glossary.
LPIO315	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<b>Option A</b> is broadly supported as this provides certainty as to how affordable housing requirements would be assessed in compliance with national policy but without being overly prescriptive which would compromise other aspects of project delivery. The review of viability on large sites is an important inclusion as it enables flexibility as the details of a scheme are prepared. In terms of <b>Option B</b> , the recognition that large sites may not fit specific 'typologies' and should be considered in the light of site-specific viability assessments is welcomed. Approaches to viability should not be over simplistic as there may well be a range of factors on such sites which would impact upon delivery of affordable housing and these matters would need to be considered in the round.
LPIO316	Rugeley Power Ltd (c/o Savills)	In relation to option A we consider that affordable housing policy should not just be amended to reflect the Housing Need Assessment. Local Plan viability work should first and foremost be taken into account in determining affordable housing percentage and tenure mix. The Housing Needs Assessment should include Universal Credit to provide a true picture of affordability and the full range of tenures in the NPPF should be included in the assessment.

		<p>Registered providers should also be consulted on local affordability of different tenures. Local plan viability works should include realistic and evidenced costs, and should not just be used to determine adorable thresholds.</p> <p>In terms of reviewing viability, unless significant market changes occur, the need to review for sites over a 2-year period seems excessive.</p> <p>Option B's proposed site specific affordable requirements is encouraged in particular for large sites. There will still be a need for flexibility in affordable housing policy as on or off site costs are not fully known at the Local Plan making stage. The LPA will need to be better prepared in terms of S106 costs and off site highways requirements at the local plan stage in accordance with updated Planning Practice Guidance.</p> <p>The other factor is the cost of undertaking site specific viability work, which should be borne out of the local plan costs.</p>
LPIO317	Taylor Wimpey (c/o Lichfields)	<p>Taylor Wimpey considers that <b>Option B</b> is likely to be the most appropriate option. The proposed flexibility for off-site provision in lieu of on-site provision in exceptional circumstances is supported. The implementation of specific affordable housing requirements on large site allocations may also be appropriate where sites have significant infrastructure requirements or are critical to the overall housing supply.</p> <p>The LPIO is clear that further viability work will be undertaken in advance of the Preferred Options. This viability work will need to consider the likely delivery of affordable housing. To provide certainty on viability, affordable housing requirements should be expressed as a single figure rather than a range, as recommended in the Practice Guidance. It will be important to ensure that local market housing needs are met in full as well as the need for other housing tenures including affordable.</p>
LPIO318	Bloor Homes Ltd (c/o Define Planning & Design)	<p>In light of the acute affordable housing need that has been identified in the District, the provision of affordable housing as an integral part of housing development is supported. However, the target level of provision within the policy needs to be carefully considered in order to ensure that the viability of housing development schemes coming forward is not compromised. Indeed, rather than establishing an unduly onerous requirement for individual schemes, the Local Plan should seek to increase the overall level of housing provision, and therefore, increase the actual number of affordable homes that would be delivered.</p> <p>It is also important that affordable housing provision reflects the changing needs of the District over the plan period, both in terms of quantum and tenure. The actual provision within individual schemes should, therefore, be based upon the most up to date evidence of need and delivery in differing locations within the District, and the Local Plan policy should facilitate that.</p>
LPIO319	Gladman	<p>Paragraphs 62 to 64 of the NPPF provide clear guidance in respect of the approach that Local Plans should take in respect of affordable housing and Gladman would expect that the CCLP will update its affordable housing policy accordingly. The CCLP should also adhere to the definition of housing set out in Annex 2 of the NPPF.</p>
LPIO320	Greenlight Developments Ltd (c/o Lichfields)	<p>In general, Greenlight supports the Council's proposal in <b>Option A</b> to update the strategic affordable housing to reflect the new NPPF, which although not explicit, is assumed to encompass the definitions of affordable housing contained within Annex 2, such as starter homes.</p> <p>Similarly, Greenlight supports the inclusion of off-site contributions in exceptional circumstances. However, Greenlight considers that <b>Option B</b> is likely to be the most appropriate option.</p>
LPIO321	Hughes, R	<p><b>Option B</b> - To enable separate consideration for large sites to factor in their own individual needs; not a one size fits all approach.</p>

LPIO322	Lyons, O	I would believe <b>Option A</b> to be the best option as this enables the current policy to be updated in order to reflect the needs identified in the Housing Needs Assessment and by ensuring affordable housing is available in most developments exceeding more than 10 dwellings.
LPIO323	West Midlands HARP (c/o Tetlow King Planning)	<p>Our members support the delivery of an uplifted housing target figure for this new Local Plan which will best support the delivery of affordable housing.</p> <p>While we do not provide detailed comments on the options set out in this consultation, we strongly recommend to the Council to take the most ambitious approach which will best meet needs, while balancing local constraints. This should mean ensuring that policies do not rigidly preclude the delivery of affordable housing led-schemes across the district with the delivery of rural and entry-level exception sites considered separately.</p> <p>It is appropriate to thoroughly consider the benefits of setting different affordable housing thresholds and the ability to increase the delivery of affordable housing through the new Local Plan.</p> <p>The use of site-specific thresholds and percentage expectations for affordable housing can be a very useful tool to properly target such delivery on site allocations; this can also help separate out the site specific constraints on such sites from wider housing delivery, reducing the potential to skew the viability assessment on policy.</p> <p>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.</p>
LPIO324	Wright, T (c/o Pegasus Group)	<p><b>Option A</b> is broadly supported as this provides certainty as to how affordable housing requirements would be assessed in compliance with national policy but without being overly prescriptive which could compromise other aspects of project delivery. The review of viability of large sites is an important inclusion as it enables flexibility as the details of a scheme are prepared: this level of detail only emerges at the planning application stage as many matters cannot be pre-empted through the local plan process.</p> <p>In terms of Option B, the recognition that large sites may not fit specific ‘typologies’ and should be considered in the light of site-specific viability assessments is welcomed. Approaches to viability should not be over simplistic as there may well be a range of factors on such sites which would impact upon deliverability of affordable housing and these matters would need to be considered in the round. Notwithstanding this, however, large sites provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure.</p>
Question 20 Do you have any comments on the Housing Needs Assessment for the District?		
LPIO325	Rugeley Power Ltd (c/o Savills)	<p>The Housing Needs Assessment does not consider Universal Credit in calculating affordability and assumptions made to assess affordability are not shown. Mortgage availability does not appear to have been researched and consultation with Registered Providers would have been useful to understand affordability options.</p> <p>Figure 4 does not take account of the potential for those in over-crowded homes to be addressed by those in under-occupied homes, if those in under-occupied homes moved to more suitable accommodation.</p> <p>Figure 5 does not take account of the existing affordable stock in terms of relets. Or new build affordable that is in the pipeline, not just via S106 agreements but additionally planned by Registered Providers.</p>
LPIO326	Taylor Wimpey (c/o Lichfields)	<p>Please see our detailed response to Q15 in relation to the Housing Needs Assessment.</p> <p>The Local Plan should ensure that sufficient sites are allocated to ensure that the identified affordable housing need can be delivered.</p>

LPIO327	Norton Canes Parish Council	The latest Housing Needs Assessment identifies major growth in demand for a variety of housing types for the elderly. This should be capable of being reflected locally in Norton Canes and there is a role for the Neighbourhood Plan in seeking to deliver on this issue.
LPIO328	Thornton, H	NPPG require housing to be safe and accessible to avoid crime and disorder, therefore houses on the Power Station site, which will become a semi-rural area, should be limited to 3storeys as higher buildings are often apartments with internal public areas which encourage crime and bad behaviour, especially if situated next to public areas. Any higher domestic building would set a precedent for future buildings over the wider area and could create future 'sink' estates.
Question 21A Are there any other options for securing affordable housing supply that we should be considering?		
LPIO329	Home Builders Federation	The Council should consider rural exception and/or entry level exception sites.
LPIO330	Taylor Wimpey (c/o Lichfields)	In order to ensure that affordable housing need is met, the council should consider providing a buffer on top of the chosen housing growth option and allocating additional sites to help deliver this need.
LPIO331	West Midlands HARP c/o Tetlow King Planning)	We support the Council; in considering the setting of a lower threshold of five dwellings for seeking affordable housing <u>delivery on-site</u> where this is achievable, and viable. The Council should also seek to maximise supply of affordable housing by exploring a policy of supporting exception sites and the delivery of affordable housing-led schemes where these target identified needs.
Question 21B Should the Council consider a lower threshold of 5 dwellings for seeking affordable housing contributions from schemes within the AONB, taking into account the local context?		
LPIO332	Home Builders Federation	If the Council considers that the lower threshold of 5 dwellings within the AONB in Cannock Chase is appropriate then the lower threshold should be applied in accordance with the WMS dated 28 <sup>th</sup> November 2014. The lower threshold should also be robustly viability tested.
LPIO333	Cannock Chase AONB Partnership	It would be appropriate for the Council to consider a lower threshold of 5 dwellings for seeking affordable housing contributions from schemes within the AONB, taking into account local context.
Question 22 Should affordable housing requirements for schemes be set higher than the needs identified in the Housing Needs Assessment to off set no contributions from schemes under 10 dwellings?		
LPIO334	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	The percentage of affordable housing required in the District will be linked to the total quantum of development proposed. The greater the housing requirement the greater the quantum of affordable housing that will be delivered if the percentage level of provision remains the same. It is, therefore, difficult to comment upon what the preferred quantum and percentage of affordable housing should be until there is greater certainty on the overall housing requirement. It will be important to make sure that the future affordable housing requirements can be viably delivered through the overall housing requirement and the development sites which are allocated.
LPIO335	Home Builders Federation	Affordable housing provision should not be set higher than identified needs to offset no contributions from residential developments of less than 10 dwellings.
LPIO336	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that the off-setting of contributions in this manner would be inappropriate and could threaten the delivery of sites for viability reasons.



		Taylor Wimpey considers that a more appropriate way to ensure that affordable housing requirements are met would be to allocate sufficient land to meet any need identified.
LPIO337	West Midlands HARP (c/o Tetlow King Planning)	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.
Question 23 Is there a minimum level of feasible on site affordable housing provision that the Council should take into account as part of its evidence base work e.g. currently assumed to be 3 affordable dwellings on site?		
LPIO338	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	The Council should consult with Registered Social Landlords (RSLs), such as Bromford, who are active in the Cannock Chase plan area to establish the feasibility of a minimum level of on-site affordable housing provision.
LPIO339	Home Builders Federation	The Council should consult with the Registered Social Landlords (RSLs) active in the Cannock Chase plan area to establish the feasibility of a minimum level of on-site affordable housing provision.
LPIO340	West Midlands HARP (c/o Tetlow King Planning)	The minimum feasible level of on-site affordable housing provision will vary on a case-by-case basis. According to existing stock levels, proximity to existing stock, the types and tenures of affordable housing being delivered, availability of grant funding and general viability considerations.
LPIO341	Association of Black Country Authorities (c/o Walsall Council)	Given that some of the additional housing to be provided in the district is expected to meet the needs of the Black Country, it is important that this includes our requirement for affordable housing. However, provided the overall numbers are sufficient and affordable housing is developed in locations that are accessible to people from the Black Country, we have no comments to make about the way these numbers are provided on individual sites.
Question 24 Previous consultation responses suggest that affordable housing should not be retained 'in perpetuity'. In what other ways could the Council secure the affordable housing supply within the District if an 'in perpetuity' requirement is not included within the policy i.e. so that any recycled funding from the sale of affordable housing is spent on replacement/new affordable housing supply within the District?		
LPIO342	Home Builders Federation	Affordable housing should be provided as set out in the 2019 NPPF (paras 62-64) and the definition in the ANNEX2 – Glossary. On residential developments of 10 or more dwellings at least 10% of dwellings should be available as affordable home ownership (para 64) which are not necessarily an "in perpetuity" affordable housing tenure. An updated affordable housing policy must comply with national policy.
LPIO343	West Midlands HARP (c/o Tetlow King Planning)	It is not appropriate for the Council to seek to secure affordable housing <i>in perpetuity</i> where affordable housing is not being delivered on rural exception sites. It would be more appropriate for the Council to establish a rural exception site policy for those areas where this will enable more affordable housing to come forward, and set out model conditions based on existing national examples in supplementary guidance.
LPIO344	Association of Black Country Authorities (c/o Walsall Council)	The Black Country authorities have received similar representations on behalf of housing associations raising concerns that section 106 agreements that require housing to remain affordable in perpetuity create difficulties in securing funding from lenders. However, such a requirement is a matter of national policy. In fact the NPPF defines affordable housing from rent as housing which meets all the listed conditions including provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled. [...]. Whilst there may be some cases where it is not necessary for individual units to be retained as affordable indefinitely, as a matter of principle we would support a general policy to

		secure the retention of the required level of affordable housing in perpetuity, including through recycling where existing affordable homes are sold or otherwise cease to meet the definition of affordable.
<b>Housing Mix Policy Options</b>		
Question 25 Which option, or combination of options do you support and why? Should any further options be considered?		
LPIO345	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	Bromford supports <b>Option A</b> which continues with the current policy approach of encouraging an appropriate mix of housing sites, types and tenures for different groups in the community on a District wide basis as informed by an up to date Housing Needs Assessment combined with Option D of allocating specific sites for different housing needs such as 100% affordable housing sites, sites for care homes, self build sites etc.
LPIO346	Church Commissioners of England (c/o Barton Willmore)	We support housing mix policy <b>option A</b> , which proposes to continue with the current policy approach of encouraging an appropriate mix of housing sizes. Types and tenures for different groups in the community on a District wide basis, informed by the Housing Needs Assessment. This approach allows flexibility to varied needs and supports absorption of homes once developed. The other options are overly prescriptive and onerous and do not allow for flexibility and changes over time.
LPIO347	Cycle-R	Whilst probably the most difficult to manage, I strongly favour <b>option D</b> in this case.
LPIO348	Home Builders Federation	The HBF's preference is <b>Option A</b> which continues with the current policy approach of encouraging an appropriate mix of housing sizes, types and tenures for different groups in the community on a District wide basis as informed by an up to date Housing Needs Assessment combined within <b>Option D</b> of allocating specific sites for different housing needs such as 100% affordable housing sites, sites for care homes, self build sites etc. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households without seeking overly prescriptive housing mixes on individual sites. [...]
LPIO349	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<b>Option A</b> is supported. The new Local Plan should deliver housing to meet the full range of needs, including affordable and specialist housing, in addition to unmet affordable need within the HMA. [...] larger sites provide the greatest level of opportunity to provide for a mix of housing in terms of size, type, and tenure. Option B and C are not supported as this approach would be too prescriptive. Housing mix should not be specified in any local plan policy which only presents a specific snapshot in time. Instead policy should direct the reader to the latest evidence base which should be routinely updated across the 15-year plan. <b>Option D</b> could be supported to help deliver on specific needs.
LPIO350	Rugeley Power Ltd (c/o Savills)	Options B and C seek to implement a specific housing mix percentage for sites. We do not support this approach as we consider that it is inflexible, especially considering the length of time the Local Plan will remain in place. Housing mix should be determined on a site by site basis and determined by the SHMA. Large sites should be expected to provide a mix of housing sizes, types and tenures but this does not mean that a specific percentage requirement should be set. [...] Option D proposes to allocate specific sites for different housing needs. It is considered that whether a site is suitable for a specific use should be undertaken on a site by site basis.
LPIO351	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that a policy approach of encouraging an appropriate mix of housing sizes, types and tenures for different groups in the community on a District wide basis, informed by the Housing Needs Assessment is the most appropriate approach ( <b>Option A</b> ). However, any policy wording should provide the appropriate flexibility to allow for an alternative housing mix to be provided where this is justified by exceptional circumstances, such as viability concerns.

		<p>Whilst on the face of it Taylor Wimpey supports this flexible approach, [...] Taylor Wimpey has some concerns in this regard.</p> <p>The advocated approach may be incorrect when having regard to the High Court judgement in William Davis Ltd &amp; Ors v Charnwood Borough Council [2017] EWHC 3006. Whilst relating to an SPD, the principle – i.e. seeking to adopt a specific mix which has not been tested at examination or forms part of the development plan applies to an even greater extent to a piece of untested evidence (such as that within any updates the LHNA).</p> <p>Therefore, whilst having regard to paragraph 61 of the Framework, Taylor Wimpey considers that any Policy should reference the current LHNA derived housing mixes as a guide and exclude reference to future evidence updates. To account for the need to reflect changing circumstances, Taylor Wimpey would recommend that the Policy itself remains suitably flexible, and not overly prescriptive, through the inclusion of specifically worded caveats in the policy that allows for alternative housing mixes to be provided where this is justified by exceptional circumstances.</p> <p>It is unclear how the figures in Figure 45 have been derived. As such, Taylor Wimpey considers that the LNHA does not currently sufficiently or robustly evidence and justify the proposed housing mixes contained within Figure 45. The Council should, therefore, provide further detail in this regard.</p> <p>Taylor Wimpey also considers that the allocation of specific sites for different housing needs such as 100% affordable housing sites, sites for care homes and self-build sites (<b>option D</b>) should be considered. This will allow these sites to be provided in the most appropriate locations.</p> <p>[...]</p>
LPIO352	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	We believe that there is a very real and clear case now for specific allocation of specialist housing including areas capable and suitable for a full range of housing for older people and that this option (Option D) could be adapted to include such a mechanism.
LPIO353	Bloor Homes Ltd (c/o Define Planning & Design)	<p>A flexible approach to the determination of the housing mix in future developments, informed by up to date evidence and agreed at the application stage, is required in order to widen the opportunities for home ownership and create sustainable, inclusive and mixed communities.</p> <p>A continuation of the current policy approach that encourages the provision of an appropriate mix of housing is supported (<b>Option A</b>), rather than the alternative options that seek to prescribe a specific mix within Local Plan Policy.</p>
LPIO354	Gladman	<p>Gladman considers that the mix of housing on a site should be negotiated on a site by site basis so that it can be reflective of the specific area's needs at the time of the application. Housing mix also has a huge impact upon the overall viability of a scheme and small changes in the housing market over time, can severely impact scheme deliverability.</p> <p>Therefore to allow sufficient flexibility for the plan to adapt to these situations, the policy on housing should ensure that it is based on the most up-to-date evidence at the time of the application.</p>
LPIO355	Greenlight Developments Ltd (c/o Lichfields)	<p>The Current policy position (Policy CP7) aims to achieve a balanced housing market by requiring new housing developments to provide for a mix of housing sizes, types and tenure which meet the needs and aspirations of the current and future population, informed by the SHMA. However, as noted in the IOC, it allows for flexibility through site-by-site negotiations and recognises the developments will individually provide different mixes according to their context. (Para 7.69).</p> <p>Greenlight supports the Council's existing position in this regard and considers that any market/affordable housing mix requirements should not be overly prescriptive and inflexible. As such, Greenlight considers that a policy approach that encourages an appropriate mix of housing sizes, types and tenures for different groups in the community on a District-</p>

		<p>wide basis, informed by the LHNA (<b>Option A</b>), is the most appropriate approach. Whilst on the face of it Greenlight supports this flexible approach, which includes a caveat to take account of future updated evidence to provide flexibility over the lifetime of the Local Plan to potentially reflect changing circumstances and needs, Greenlight has some concerns in this regard. The advocated approach may be incorrect when having regard to the High Court Judgement in William Davis Ltd &amp; ORS v Charnwood Borough Council [2017] EWHC 3006. Therefore, whilst having regard to Paragraph 61 of the NPPF, Greenlight considers that any policy should reference the current LNHA derived housing mixes as a guide, and exclude reference to future evidence updates. Alongside this, to account for the need to reflect changing circumstances, Greenlight would recommend that the policy itself remains suitably flexible, and not overly prescriptive, through the inclusion of specifically worded caveats in the policy that allows for alternative housing mixed to be provided where this is justified by exceptional circumstances. In addition to Option A, Greenlight would welcome the inclusion of <b>Option D</b>, which would enable specific sites to deliver and meet the needs of specific household groups, such as 100% affordable housing or older person housing schemes.[...]</p>
LPIO356	Hughes, R	<b>Option A (plus Option D)</b> – Determine housing mix provision on a site by site basis and consider sites for specific needs.
LPIO357	Lyons, O	<p>I believe that the evidence gathered via the needs assessment should form the basis upon which the housing policy is developed, allowing the creation of differing sizes, types and tenures to meet demand. I would favour <b>Option C</b> given that I do not believe it appropriate to set requirements through policy but rather a flexible approach catering for the needs of different areas, different communities and making informed decisions on a case by case basis through an assessment of the evidence available at that time. However, I believe that it may be advantageous, in some instances, to specify percentages on larger sites to ensure all needs are met. [...]</p>
LPIO358	Norton Canes Parish Council	<b>Option D</b> should include housing for the elderly more generally not just care homes.
LPIO359	Thornton, H	<p>Support combination of <b>Options A, B2 and C2</b> because they cover areas with most employment opportunities and have good transport links with Birmingham and the Black Country. Para 8.27 – The Rugeley ‘B’ Power Station SPD of 2018 identifies the part in Cannock Chase District as employment-led development. This is absolutely necessary to make-up for the deficiency of job opportunities referred to above but its also need to provide local employment for occupants of the dwellings now almost completed on the ‘A’ Power Station site, where no nearby employment land has been provided whatsoever.</p>
LPIO360	West Midlands HARP (c/o Tetlow King Planning)	<p>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. We support <b>Option A</b>, as Options B and C would unreasonably limit the ability to deliver housing mixes as needed, across the Plan Period. With regards to affordable housing mix, it may be most useful for the Council to set policy aspirations for affordable rent and sale tenures, rather than specifying for each of the four categories as set out in Annex 2 of the NPPF as this would retain an element of flexibility while responding to priority needs. We do support the identification of sites to meet specific needs as set out in <b>Option D</b>, however, this must be supported by sufficient site appraisal work to ensure allocations are deliverable, and responsive to the differing needs of housing providers.</p>

LPIO361	Wright, T (c/o Pegasus Group)	<b>Option A</b> is supported. The new Local Plan should deliver housing to meet the full range of needs, including affordable and specialist housing, in addition to unmet affordable need from within the GBBCHMA. It is submitted that, whilst it is important to identify a wide range of sites for housing, larger sites provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure. Options B, C and D are not supported as this approach would be too prescriptive. Housing mix should not be specified in any local plan policy which only presents a specific snapshot in time.
LPIO362	Association of Black Country Authorities (c/o Walsall Council)	The housing market area comprises the entire district so there would seem to be little evidence to support a specific mix of housing types on individual sites (Option B). Option A would therefore seem to be the appropriate approach. However, it is important to continue to monitor the housing mix achieved on new developments to ensure it remains in line with the assessed need.
Question 26 Do you have any comments on the Housing Needs Assessment for the District?		
LPIO363	Home Builders Federation	The Council's Housing Needs Assessment is useful but it is inadequate as an evidence support to justify the adoption of any higher optional housing standards. If the Council wishes to adopt such standards then further supporting evidence as set out in the NPPG should be collated.
LPIO364	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The Housing Needs Assessment represents a snapshot in time and will need updating throughout the plan period to ensure that it remains up to date and relevant in order to be able to inform policy which can continue to deliver viable sites in a time manner to meet Local Plan requirements. Also see the response to Q25.
LPIO365	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	Cannock Chase Housing Needs Assessment provides an analysis of the need for specialist older persons housing and identifies a backlog of dwellings at the start of the plan period in 2018. As stated in Q25, we believe that there is a very real and clear case now for specific allocation of specialist housing including areas capable and suitable for a full range of housing for older people.
LPIO366	Greenlight Developments Ltd (c/o Lichfields)	In respect of the Council's evidence of housing mix requirements over the Plan period, the LHNA does not explicitly set out details of the proposed housing mix. The LHNA provides some context on the size of the existing dwellings within the District, at Figure 18, with some further analysis in the affordable housing chapter. However, it is unclear how the figures in Figure 45 have been derived. As such, Greenlight considers that the LHNA does not currently sufficiently or robustly evidence and justify the proposed housing mixes contained within Figure 45. The Council should, therefore, provide further detail in this regard.
LPIO367	Inland Waterways Association	<u>Houseboats (Page 75)</u> While the number of permanent residential boat dwellers in the District may be small (10) they form a distinctive local community at the northern end of the Cannock Extension Canal. Boat dwellings have particular characteristics and needs different from bricks and mortar housing, which should be referred to in the Local Plan. For example, boats have a greater susceptibility to external noise which should be taken into account in the planning system when any developments nearby are being considered.
LPIO368	Wright, T (c/o Pegasus Group)	The HNA represents a snapshot in time and will need updating throughout the plan period to ensure that it remains up to date and relevant in order to be able to inform policy which can continue to deliver viable sites in a timely manner to meet Local Plan requirements.

LPIO369	Association of Black Country Authorities (c/o Walsall Council)	No. It appears to comply with national guidance.
Question 27 Should there be different approaches to the affordable housing tenure mix/bedroom mix and the market housing bedroom size mix i.e. affordable housing tenure percentage requirements specified in policy only? Should this be strategic or non-strategic policy?		
LPIO370	Home Builders Federation	[...] Any housing mix requirements for market and/or affordable housing should not be overly prescriptive or unduly inflexible. The HMF preference is <b>Option B</b> (see HMF answer to Q25). The level of specified detail in the policy should determine if this is a strategic or non-strategic policy (see HBF answer to Q66).
LPIO371	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	This approach would be too –prescriptive. Housing mix should not be specified in any local plan policy which only presents a specific snapshot in time. Instead policy should direct the reader to the latest evidence base which should be routinely updated across the 15-year plan. This ensures that the housing mix is reflective of current need and can be delivered in the market conditions which prevail at this time.
LPIO372	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that a policy approach of encouraging appropriate mix of housing sizes, types and tenures for different groups in the community on a District wide basis, informed by the Housing Needs Assessment is the most appropriate approach. Policy wording should provide the appropriate flexibility to allow for an alternative housing mix to be provided where this is justified by exceptional circumstances, such as viability concern. This approach should apply to both market and affordable housing.
LPIO373	West Midlands HARP (c/o Tetlow King Planning)	We do not consider it appropriate to set specific housing mix policy as this unnecessarily fetters the delivery of housing to meet needs across the district, and over the lifetime of the Plan. Policies should also not differentiate between affordable and market housing mix as this creates difficulties for Housing Associations in purchasing land and sites with permission.
LPIO374	Wright. T (c/o Pegasus Group)	This approach would be too prescriptive. Housing mix should not be specified in any local plan policy which only presents a specific snapshot in time. Instead policy should direct the reader to the latest evidence base which should be routinely updated across the 15year plan period. Adopting a more rigid, prescriptive approach which is ‘set in stone’ through the Local Plan itself would have long term consequences for viability and delivery of individual sites, and of the plan as a whole.
Question 28 Should there be a separate policy for meeting the needs of an ageing population?		
LPIO375	Home Builders Federation	The Council should consider a separate policy for meeting the needs of an aging population as set out in the recently published NPPG (ID63-001 to 019) dated 26 <sup>th</sup> June 2019.
LPIO376	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	It would be appropriate to include policy which recognises the issue and provides a broad strategic steer. In line with response to questions 25, 26 and 27 any policy should not be prescriptive but instead be capable of responding to current evidence and provide a link to evidence.
LPIO377	Rugeley Power Ltd (c/o Savills)	We consider that a separate policy should identify how the needs of an ageing population are to be met, including O55s, assisted living and other specialist care facilities (Use Class C2). This will ensure that there is flexibility in the market and that C2 uses will be provided on appropriate sites across the District.

LPIO378	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that a separate policy for meeting the needs of an ageing population could be worthwhile to address this issue. [...] Should the Council consider adopting optional standards related to specific elements of building design, including standards set out in Part M4 of the Building Regulations relating to accessibility, adaptability and wheelchair users, the appropriate evidence will need to be provided as detailed in the Practice Guidance including evidence of need, viability and a consideration of site specific factors. These standards will need to be tested through the Local Plan viability assessment work.
LPIO379	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	There is clearly a need for a step-change in policy and a far more “pro-active” and “positive” approach on the need for local authorities to plan for housing for older people.
LPIO380	Bloor Homes Ltd (c/o Define Planning & Design)	There is no objection to the principle of sheltered and extra care accommodation to meet the needs of an ageing population being provided in appropriate locations, but a blanket policy requirement would not be appropriate as it would not take account of the site and location specific constraints to delivery of specialist housing of this type.[...]
LPIO381	Gladman	The provision of specialist housing to meet the needs of older people is of increasing importance and the Council need to ensure that this is reflected through a positive policy approach within the Local Plan. The Council needs a robust understanding of the scale of this type of need across the District. Gladman recommend that the CCLP should include a specific policy in relation to the provision of specialist accommodation for older people (Example text provided). In relation to the options presented in the consultation document, Gladman reiterates the need for a positive policy approach which both allocates specific sites and also provides flexibility for additional sites to be brought forward.
LPIO382	Greenlight Developments Ltd (c/o Lichfields)	In relation to meeting the needs of older persons within the District, paragraph 61 of the NPPF is clear that local authorities should assess the size, type and tenure of housing needed for different groups in the community and then reflect these needs in planning policies. Indeed, in this context, the LHNA provides some background on the projected increase of older person households within the District over the Plan period and identifies that there is already a significant backlog in the supply of accommodation for such households (Para 22). [...] Greenlight considers that the council should set out specific policies for meeting the needs of older person households within the new Local Plan.
LPIO383	Norton Canes Parish Council	Yes there should be a specific policy for meeting the housing needs of an ageing population.
LPIO384	Staffordshire County Council	Our ‘Next Generation Care’ project provides insight and intelligence around the need for and supply of specialist housing for older people across Staffordshire. The evidence base and assessment siting behind the project is relevant to plan making. We are mindful the Government has recently updated the PPG around Housing for older and disabled people, our reports, coupled with officer input, could be useful in helping determine the housing requirements/mix for older persons and the proportion of specialist accommodation potentially needed for the District. This is particularly relevant for the Design Policy and Housing Mix Sections of the Plan.
LPIO385	West Midlands HARP (c/o Tetlow King Planning)	We encourage the Council to set a separate policy aimed at meeting the diverse needs of the district’s ageing population. This should encompass the wide variety of housing types and tenures which are being delivered across the country by our members [...]

		The policy within the adopted Bromsgrove District Plan is a useful exemplar. We would encourage the Council to consider sites not only within, but 'adjacent' and 'close proximity' to defined settlements, as this will allow a greater range of sites to be considered when searching for suitable locations for specialist housing and care for the elderly.
LPIO386	Wright, T (c/o Pegasus Group)	It would be appropriate to include policy which recognises the use and provides a broader steer. In line with the response to questions 25, 26 and 27, any policy should not be prescriptive but it instead be capable of responding to current evidence and provide a link to evidence.
Question 29 Are there any sites that should be considered for specific housing needs allocations? Are there any site specific criteria that should be considered in allocating sites for meeting specific housing needs?		
LPIO387	Bromford Housing Group Ltd c/o PlanIt Planning and Development)	Housing needs will vary across the District and what may be a suitable housing mix in Cannock may be inappropriate within a more rural area.
LPIO388	Home Builders Federation	The Council should consider specific housing need allocations. There are site specific criteria which should be considered, for example, the proximity of sites for specialist housing for older people to public transport, local amenities, health services and town centres.
LPIO389	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	The land identified within this representation provides a site suitable and available for a range of housing needs especially suited to accommodate older persons housing. On the one hand it forms a logical extension to the settlement whilst having ease of access to all necessary services and in addition, representing a viable and deliverable site.
Question 30 Do you have any other comments on the suggested housing mix policies, taking account of recent Letwin Review and NPPF requirement for 10% affordable homeownership?		
LPIO390	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	It is our view that the Local Plan should maintain a flexible position in relation to the housing mix of new developments. The housing mix requirements are likely to change during the course of the plan period as the demographic profile of the District changes and new housing developments come forward.
LPIO391	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	[...] policy should not be too prescriptive and should not be set in the Local Plan but instead should link to the most up to date evidence which would establish the most appropriate local mix. Development sites will need to be mindful of the NPPF requirement for 10% affordable home ownership.
LPIO392	Taylor Wimpey (c/o Lichfields)	In formulating policy, the Council, will need to consider these factors and appropriate wording may be required to ensure that they can be considered throughout the life of the plan. If this option is to be pursued, the provision of this level of affordable home ownership on sites will also need to be tested through the Council's viability assessment work.
LPIO393	West Midlands HARP (c/o Tetlow King Planning)	As the NPPF seeks a minimum of 10% affordable home ownership tenures as part of the affordable housing mix on major development sites, we support such an expectation in any housing mix policy adopted by the Council. These should be flexible to enable a variety of sites to be delivered to meet needs in individual site circumstances across the plan period.



**Question 31 Do you agree that the local context does not justify the need for further local policies on rural exception or entry level exception sites over and above existing national policy?**

LPIO394	Richborough Estates Brownhills Rd & S of Cannock Rd (c/o Pegasus Group)	Yes, this is agreed.
LPIO395	West Midlands HARP (c/o Tetlow King Planning)	We expect the Council to set local policy, which is consistent with the NPPF particularly on the delivery of rural and entry-level exception sites.

**Question 32 Do you agree that the local context does not justify the need for further local policies on rural or agricultural workers dwellings, over and above national policy?**

LPIO396	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Yes, this is agreed
LPIO397	National Farmers Union	We still feel that the document would benefit from the inclusion of some support for rural or agricultural workers dwellings in order to facilitate the growth and development of agricultural businesses. The paper states that 60% of the District is designated as Green Belt, much of which will be managed by agricultural businesses. People living and working in these areas will present a very small proportion of the Districts population but they would benefit from some policy support given that their activities contribute to the delivery of environmental management across the district.

**Gypsy, Traveller and Travelling Showpeople Housing Needs Policy Options**

**Question 33 Do you have any comments on the Gypsy, Traveller and Travelling Showpeople Assessment for the District?**

LPIO398	Cycle-R	I am reminded of what Leeds are doing at the moment with the provision of sites and providing utilities and waste collection on those sites. This would mitigate many of the issues that the general public see. I would favour <b>Option C</b> in this case.
LPIO399	Hughes, R	<b>Option A</b> - Do not allocate a specific site however, develop criteria to help determine planning applications.
LPIO400	Lyons, O	I believe that <b>Option A</b> should be looked at. This would enable the Council to adopt a flexible approach by determining considerations to be taken into account by the Planning Committee when deciding upon proposals. I believe that allocating such sites through the local plan limits possibilities in terms of land usage and becomes too restrictive.
LPIO401	Cllrs. Preece, J, Stretton, Z and Newbury, J	We are minded to support <b>option C</b> . Given the difficulties encountered in identifying suitable sites this far, we feel that a District-wide area of search and cooperation with neighbouring local authorities would be the best approach. A current concern we have is that the lack of clarity around identified sites is leading to speculative planning applications being submitted in Norton Canes. We appreciate that the A5 corridor is a key route in the context of this policy but any evaluation of potential sites needs to take into consideration possible impacts on the settled community in the village.
LPIO402	Norton Canes Parish Council	The Parish would wish the area of search for sites to be broadened across the district ( <b>Option C</b> ) using a criteria based approach ( <b>Option A</b> ).

LPIO403	St Modwen (Watling Street) (c/o RPS Planning and Development)	St Modwen consider that in terms of the latest evidence of need for additional gypsy and traveller, this represents a significant reduction on previous measures in earlier GTTSPs (2012 iteration) down from 50 to 29 on the Council's own evidence. However, based on the analysis presented in section 4 of this submission, (and Appendix 6 thereon), St Modwen suggests that the reduced figure of 29 additional pitches between 2018 and 2036 should be further reduced to 25 additional pitches and, if turnover in the existing stock is properly accounted for, this could be even lower still. Consequently, the Council should rethink the previous strategy that sought to address local need for new sites based on a very widely drawn 'Area of Search'. St Modwen controls an existing GTTSP located at Watling Street that fell within the area of search. St Modwen will look to work with the Council as its evidence base on GTTSP progresses.
Question 34 Do you have any comments on how sites could be secured for gypsy, traveller and travelling showpeople accommodation given the difficulties faced to date e.g. is there a need to consider the provision of public sites?		
LPIO404	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Richborough Estates considers that <b>options A and C</b> should be considered further. Option D is not supported: housing mix such prescriptive requirements should not be set in policy as this would impact upon the viability and deliverability and upon individual strategic sites.
LPIO405	Wyrley Estate (c/o Fisher German LLP)	The identification and allocation of sites for Gypsies, Travellers and Travelling Showpersons is generally a complex matter, and it is noted that the council currently struggles in this regard. It is however, essential for the council to resist unplanned sites coming forward in an ad-hoc manner, or by allowing the needs to be met through appeal. The Council should consider providing sites on its own land for development, if available, but needs to consider Green Belt Allocations, in line with the conclusions of the 2016 Green Belt Assessment, if the identified needs are to be met.  In addition to the general risk from allowing an ad-hoc approach to site provision, it could also mean sites being established in areas where it may place other strategies at risk. Taking a short-term approach would not represent good planning and could jeopardise the future economic well-being of the borough if important strategies and aspirations are curtailed as a result of harmful unplanned development.  Wyrley Estate are willing to offer land within site 5 as an extension to the well-populated and popular site at Lime Lane. As an isolated site in the Green Belt, there would be obvious encroachment into the countryside and impact on openness. However, it would act as an extension to an existing site and would not lead to any significant encroachment between settlements.
LPIO406	Historic England	Any sites identified for allocation to meet the needs of Gypsy, Traveller and Travelling Showpeople needs would also need to be accompanied by appropriate site assessment.
LPIO407	Wright, T (c/o Pegasus Group)	It is considered that <b>options A and C</b> should be considered further. Option D is not supported: such prescriptive requirements should not be set in policy as this would impact upon the viability and deliverability of the plan and upon individual strategic sites.
LPIO408	Association of Black Country Authorities (c/o Walsall Council)	The report acknowledges the difficulties in securing the provision of sites where landowners have expectations of higher land values. This highlights the need to allocate and safeguard existing sites as well as to allocate land for new ones. Option A [...] is unlikely to achieve the provision of an adequate number of sites to meet needs [...]. Option B would therefore seem the most appropriate. This option (looking at the A5 corridor) is also the one most likely to provide sites that could contribute, if necessary, to meeting needs arising from the Black Country. We recognise that all existing pitches in Cannock Chase are in the Green Belt, and that new ones are likely to need to be similarly located.

**Strategy for Meeting Overall Employment Needs Policy Options**

Question 35 Which combination of options do you support and why? Should any further options be considered?

LPIO409	Canal & River Trust	<p><u>Option C – Green Belt Sites</u>                  We note that Option C for the delivery of sites via Green Belt release would potentially encompass land to the south of Bridgtown, upon the route of the proposed Hatherton Canal Restoration, and also includes land next to the Cannock Extension Canal, south of Norton Canes.                  Whilst we would not object to the allocations in these areas, consideration would need to be given towards the impact of development upon the potential restoration of the canal, and the impact upon setting and biodiversity of the Cannock Extension Canal.  <b>Hatherton Canal:</b> Development upon this route could introduce additional obstacles to its future restoration, including from new road crossings and buildings upon the route. We therefore request that any policy for new allocations upon the canal route should include requirement for development to accommodate for the future restoration – including the provision of bridge crossings where necessary, and the avoidance of development that would sever the route.  <b>Cannock Canal Extension:</b> Development in proximity to this route could impact adversely upon the setting of the canal, and could introduce additional air pollution, which could harm the SSSI. We therefore advise that consideration is given towards the direct impact to the canal as part of any future allocation in this area.</p>
LPIO410	Holford Farm Partnership (c/o Hawksmoor Property Services Ltd)	<p>We support <b>Option C2</b>                  [...] it can be seen that the relatively limited supply of brownfield land in the District will not be enough to adequately meet the future needs of Cannock Chase, nor any additional unmet need arising from adjoining local authorities that have insufficient employment land supply.                  The EDNA recommends a flexible portfolio of sites, and we agree with this recommendation on the basis that it will provide the key to choice within the employment land market, to allow the District's supply of land to be flexible to accommodate future market needs.                  We particularly support the area shown along the A5 in the south eastern part of the District on the plan at page 83 of the Consultation documents which shows, under Option C2, the area suggested for possible Green Belt sites to come forward for development.                  Our clients have two landholdings in the area, both of which are immediately available for future employment land supply:  <b>Jubilee Fields:</b> extends to approximately 5.08ha and adjoins the existing Watling Street Business Park to the east, with direct frontage to the A5 trunk road to the north, and the Wyrley and Essington canal to the west.  <b>Turf Field:</b> extends to approximately 2.12ha and is contained by the A5 to the south, the M6 Toll to the north and the B4154 Walsall Road and Turf Tavern Public House to the east. We consider that the site does not contribute effectively to the functions of the Green Belt and would be well utilised for the development of a future employment/mixed use site.                  We consider that rebalancing the proposed supply of employment land away from Kingswood Lakeside towards other parts of the District will assist in distributing economic activity across the District, and providing a wider variety and choice of sites for the future to meet the needs of the market.</p>
LPIO411	KGL Estates Ltd (c/o John Heminsley)	<p>In relation to the employment land, as already stated RPS should deliver a significant contribution in the interests of maintaining Rugeley as a sustainable settlement. The option of extending Kingswood Lakes is the most sustainable to provide for the needs of the south of the District with much of the necessary infrastructure already in place. There is also the potential synergy with housing proposals south of the A5190 with the potential to relieve congestion at Five Ways</p>

		Island. So a <b>combination of options B1 and C1</b> is supported.
LPIO412	Richborough Estates (Brownhills Rd) (c/o Pegasus Group)	<b>Option A</b> is supported. It is important that employment is retained and encouraged in urban areas to deliver a balanced and sustainable strategy. <b>Option B1</b> is also supported: the Rugeley Power Station should be employment-led to provide a sustainable balance for Rugeley. This would also be consistent with the joint Rugeley Power Station SPD.
LPIO413	Richborough Estates (S of Cannock Rd) (c/o Pegasus Group)	<b>Option A</b> is supported. It is important that employment is retained and encouraged in urban areas to deliver a balanced and sustainable strategy. <b>Option B1</b> is also supported: the Rugeley Power Station should be employment-led to provide a sustainable balance for Rugeley. This would also be consistent with the joint Rugeley Power Station SPD. <b>Option C1</b> is supported, in particular the extension of Kingswood Lakeside, as this would provide further employment opportunities to future residents of a development at land south of Cannock Road, Heath Hayes [...]. Such an approach would also enable a balanced strategy for the district, as Rugeley's economic growth needs would be able to be delivered by an employment-led development at Rugeley Power Station.
LPIO414	Rugeley Power Ltd (c/o Savills)	Option B1 seeks to deliver an employment-led redevelopment at Rugeley Power Station. We do not support this option as we have identified as part of our application that the site is not suitable for large scale employment use. Option B2 sets out a housing-led redevelopment solution which does not include any employment provision. We suggest that another option of a housing-led redevelopment with supporting uses should be added.
LPIO415	Severn Trent	We would support efforts in line with <b>Option C</b> . This effort could help mitigate geo-spatial pressures that a single site may have due to its surrounding context.
LPIO416	Wyrley Estate (c/o Fisher German LLP)	It is imperative that a suitable range of employment land across the borough needs to be provided, to exploit opportunities for sustainable extensions to existing business parks in accessible locations. In this regard <b>the C options</b> appear to be the most reasonable. The council must ensure a suitable supply of economic land to complement the ambitious housing growth targets, if a situation is to be avoided where unsustainable patterns of commuting are encouraged.
LPIO417	Birmingham City Council	Any option which seeks to meet employment needs should be explored as well as options which enable large industrial sites (>25ha) to be tested and considered. This is due to the fact that there is a shortage of large sites of this kind within the conurbation so any such sites will help towards meeting wider regional needs particularly where they have good access to the rail and highway network.
LPIO418	Briggs, T	The options provide a good sequential test as presented. I am concerned that businesses within the AONB will organically expand and the impacts become considerable for local residents. Setting aside areas for business use allows the correct infrastructure to be incorporated and the impact on neighbouring residential areas minimised, especially if it is a joint residential/commercial scheme; shoehorning a business into an AONB and allowing it to expand unfettered is not a good policy, especially as such sites often give very low yield in terms of employment versus the detrimental impact on the character of the AONB and of the district. If any business use is granted within the AONB it should be heavily restricted with permitted development rights removed in perpetuity.
LPIO419	Cannock Chase AONB Partnership	<b>Options A, B and C1 are supported.</b> Allocations within the AONB should be resisted (as for Q17).
LPIO420	Highways England	Highways England have undertaken a high-level review of the potential impacts of the development options presented as part of the Cannock Local Plan, and have determined the potential trip generations and distributions/assigned of

		<p>development traffic onto the strategic road network (SRN).  Our principle concern is the A5 corridor [...], but we have also considered the potential impact of local plan development traffic on M6 Junctions 11 and 12.  Following our high-level review of potential trip generations routed onto the SRN we have noted that employment options C1 and C2 are likely to present the largest levels of development trips onto the A5 and M6.</p>
LPIO421	Hughes, R	<p>Option B1 – Development should focus on urban areas first plus employment as well as on the redeveloped Rugeley Power Station site. Green belt land should be protected from development.</p>
LPIO422	Lyons, O	<p>It is important to ensure that adequate land is earmarked as employment space and can therefore be promoted as such. In terms of the location of this employment space I would favour <b>Option B (B1)</b> which would focus on identifying urban sites and brownfield sites for employment based development, such as Rugeley Power Station under a employment/mixed use regeneration scheme. I strongly believe that more focus should be placed on encouraging start-up businesses and entrepreneurs, particularly given that Cannock Chase is currently lacking.  I do also believe that existing employment sites are in need of protecting and would therefore opt for <b>Option B.</b></p>
LPIO423	Cllrs. Preece, J, Stretton, Z and Newbury, J	<p>We would be open to supporting <b>option C1</b> for the strategy for meeting overall employment needs policy. We believe that Rugeley Power Station site should be leveraged for employment land as far as possible but given its redevelopment is likely to be housing-led, some development at Kingswood Lakeside may be needed to deliver growth in employment land. We feel that priority should initially be given to filling currently vacant space at Kingswood Lakeside.  [...] additional development of greenbelt land for employment would put further pressure on greenbelt sites which could adversely impact Norton Canes; therefore, maximising capacity at Kingswood Lakeside makes strategic sense [...]  However, any growth in employment land within the Norton Canes Parish should be taken into account when potential strategic sites for housing are considered; Norton Canes should not be expected to deliver a disproportionate contribution to both employment and housing growth as this will have a very negative impact on our local infrastructure, particularly from a highways perspective.  We support <b>option A</b> for other employment land policy options. A flexible approach will be needed to employment sites, both within Norton Canes and the wider Cannock Chase District, so we would prefer for the District Council to continue to provide a local context to national planning policy for employment sites.</p>
LPIO424	Norton Canes Parish Council	<p>Norton Canes already has a large number of business units both within the village and at Kingswood Lakeside. Additional business sites located in the village pose increased problems in terms of volumes of traffic through the village.  <b>Option B1</b> having an employment led redevelopment of Rugeley Power Station which would reduce pressure to find additional employment land elsewhere including in Norton Canes is supported.  Option C1 including an extension of Kingswood Lakes is not supported as a priority because if the potential for further traffic problems in the village. The other part of this option involving an expansion to Watling Street Business Park is preferred.</p>
LPIO425	St Modwen (Watling Street) (c/o RPS Planning and Development)	<p>All the options have been identified against the assumption that 25ha of employment land is already ‘available’ within existing urban areas to meet future employment needs. These options, therefore, deal with the ‘residual’ amount of employment land yet to be identified through the Local Plan Review process. In meeting this (as yet undetermined) residual land supply, the IOD appears to argue for a sequential approach by first looking to existing urban areas, then to the Rugeley Power Station Site and then, if insufficient sources of supply exist under options A and B1/B2, then consideration will be given to potential release of green belt sites in accordance with the national policy.</p>

		<p>It is clear from the approach being taken in the IOD that the choice of/or combination of options to meet the overall employment needs is influenced to a great extent by two factors; firstly, the overall employment development needs of the District; and secondly, the confirmed supply of employment land. In terms of the overall need for employment growth, the IOD does not identify an overall employment need, but figures are discussed and presented in the updated EDNA report. St Modwen does not accept the growth figures being suggested in the EDNA, and we make separate representations on the EDNA under Q36. Furthermore, in terms of employment land supply, RPS does not accept that 25ha of employment land exists, as suggested by the Council in the updated Employment Land Availability Assessment, which we address in more detail in our response to Q38.</p> <p>St Modwen consider that there is a need to identify further land to deliver sustainable employment growth within the District, based on consideration of sites within the existing Green Belt, including land contiguous to Watling Street Business Park. On this basis, St Modwen support <b>options C1 and C2</b> (with an overall preference for option C2) in combination with other options where justified.</p> <p>In addition, the emerging Employment Strategy needs to fully recognise the contribution that existing employment estates and areas can make to the future economic prosperity of the District, including creating a positive policy framework to support well-planned extensions in appropriate locations to help meet future employment needs of the District and the unmet needs of its neighbours.</p>
LPIO426	Staffordshire County Council	<p><u>Ecology</u> All Norton Canes area employment options will need to consider possible effects on the Cannock Extension Canal SAC.</p> <p><u>Historic Environment</u> Options C1 and C2 in the Cannock Wood area have the potential to impact upon the setting of two Scheduled Monuments. Additional development in urban areas has the potential to impact upon designated heritage assets.</p> <p><u>Employment</u> The County Council strongly supports <b>Option C1</b>. Whilst the opportunities for employment development within the urban context is limited, the physical limitations would ensure an appropriate moderate size of development. This has the potential to bring low-level employment back within the remit of sustainable parameters. [...] Kingswood Lakeside has many reasons for being chosen as the focus of development in Cannock Chase District: history, concentration of development, minimisation of visual impact, and quantum range and quality of development.</p>
LIPO427	Startin, P	<p><u>Objective 4</u> I am in support of <b>Option B1</b>. I have visited a facility that has around 20 different companies using a very bohemian space, all built in a warehouse. These kinds of spaces that offer cheap solutions to encourage start-up businesses and provides them with space and opportunity to grow. This coupled with a more vibrant approach to housing communities and options could encourage younger people to stay in the area to set up their businesses, in all instances, I am generally against building on green belt unless it is totally unavoidable. I think I have addressed, in part, my views on “other employment land”; I would support <b>Option A</b> but with the caveat that consideration should be given to trying to convert employment land into more relevant working space for the people and businesses of the district.</p>

LPIO428	Thornton, H	Prefer <b>Options A, B1, C1</b> because they appear to be a reasonable mix although the employment site shown at Brereton should only be developed if absolutely necessary and only used for Type B1 employment as it is next to the AONB and would be mainly accessed via Coalpit Lane which is wholly residential and on a 1 in 14 gradient.
LPIO429	Wright, T (c/o Pegasus Group)	<b>Option A</b> is supported. It is important that employment is retained and encouraged in urban areas to deliver a balanced and sustainable strategy. <b>Option B1</b> is also supported: the Rugeley Power Station Site should be employment-led to provide a sustainable balance for Rugeley and for the power station site as a whole given that Lichfield District Council is proposing housing on the section of the site which lies within their area. This would also be consistent with the joint Rugeley Power Station SPD which was adopted by both councils in 2018.
LPIO430	Association of Black Country Authorities (c/o Walsall Council)	We welcome the acknowledgement of the shortfall in supply of employment land in the Black Country. The current supply of land in Cannock Chase is relatively small relative to our needs, even with the potential for some land at Rugeley Power Station to be used for this purpose. [...]. Additional employment land provision beyond that required to meet local needs should be located where it can best contribute to the needs of the Black Country. For this reason, Option C1 would be preferred, given that Kingswood Lakeside lies at the southern edge of the district closest to the Black Country.
Question 36 Do you have any comments on the levels and types of employment land needs identified in the Economic Development Needs Assessment for the District?		
LPIO431	Holford Farm Partnership (c/o Hawksmoor Property Services)	We consider that the level of employment land requirement should be at the higher end of the figures suggested, to take account of the potential for higher amounts of future economic growth. In addition, through its obligation under the Duty to cooperate, the District, through a Statement of Common Ground, should accommodate an appropriate proportion of the unmet employment land need arising from the Black Country which is quoted in the EDNA to be between 300-500ha. With regards to the type of employment land, given the fluid nature of demand, we would argue that any allocations should be made for broad 'B-Class Uses' rather than being overly prescriptive.
LPIO432	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The range of 30 to 67ha (to 2036) is significant. The Council should be ambitious in what it aims to deliver in the district, not confining itself to the lower end of the range and this should include urban sites and employment-led redevelopment at Rugeley Power Station. This should be part of a balanced sustainable strategy for the district whereby housing requirement should also be treated as a minimum with further growth supported as part of a wider economic development strategy.
LPIO433	Brereton & Ravenhill Parish Council	Employment land must be provided both for new businesses and for existing businesses that wish to expand and may otherwise leave the area. Current proposals for the Power Station site fail to provide sufficient employment land and what is proposed is inadequate, of the wrong nature and designed in a way that would facilitate conversion to further housing. Without sufficient employment land the Rugeley/Brereton area would become increasingly dependent on commuting, much of which would be by private vehicle motors. The reference to "a focus upon the high quality employment sites" in paragraph 8.9 could be interpreted as impeding existing B2, B8 and sui generis businesses from relocating to the Power Station site. It should be made clear that existing good local businesses with these uses are recognised as being high quality.

LPIO434	Brindley Heath Parish Council	Employment land must be provided both for new businesses and for existing businesses that wish to expand and may otherwise leave the area. Current proposals for the Power Station site fail; to provide sufficient employment land and what is proposed is inadequate, of the wrong nature and designed in a way that would facilitate conversion to further housing. Without sufficient employment land the Rugeley, Brindley Heath and Brereton areas would become increasingly dependent on commuting [...]
LPIO435	Cllr Fitzgerald, A	It is important to ensure that applications submitted to Planning for new places of employment are scrutinised careful to ensure that the businesses provide the high skills type of work. (See also Q17)
LPIO436	Jones, T	Employment land must be provided both for new businesses and for existing businesses that wish to expand and may otherwise leave the area. Current proposals for the Power Station site fail to provide sufficient employment land and what is proposed is inadequate, of the wrong nature and designed in a way that would facilitate conversion to further housing. Without sufficient employment land the Rugeley/Brereton area would become increasingly dependent on commuting [...] The reference to “a focus upon the high quality employment sites” in paragraph 8.9 could be interpreted as impeding existing B2, B8 and sui generis businesses from relocating to the Power Station site. It should be made clear that existing good local businesses with these uses are recognised as being high quality.
LPIO437	South Staffordshire Council	Our latest economic evidence suggests that South Staffordshire shares a common Functional Economic Market Area with Cannock, Wolverhampton, Walsall and Dudley. The level of future employment requirements has not yet been determined however we look forward to continuing our close working relationship with the constituent FEMA authorities to explore how any identified shortfall in employment land supply can be addressed.
LPIO438	St Modwen (Watling Street) (c/o RPS Planning and Development)	An immediate observation St Modwen would like to make is that there appears to be very little consideration or discussion on the specific need figures, or the evidence that underpins them, in the IDO itself. [...] St Modwen considers that the employment land requirement recommended in the EDNA 2019 Report should be set at a significantly higher level. Our analysis on the EDNA is set out in a separate submission attached to these representations. [...]In summary, St Modwen does not support the approach to deriving the employment land requirement ‘range’ of 33-60ha between 2018-2036 suggested in the updated EDNA Report.
LPIO439	Wright, T (c/o Pegasus Group)	The range of 30 to 67ha (to 2036) is significant. The Council has clearly stated its economic ambitions through its own Corporate Plan and through its membership of two LEPs and via its role as a non-constituent member of the WMCA. It should therefore be ambitious in what it aims to deliver in the district, not confining itself to the lower end of the range and this should include urban sites and employment-led redevelopment at Rugeley Power Station. This should be part of a balanced sustainable strategy for the district whereby the housing requirement should also be treated as a minimum with further growth supported as part of a wider economic development strategy.
LPIO440	Association of Black Country Authorities (c/o Walsall Council)	We would note that the assessment of future need does not distinguish B1a from B1b uses. Since B1a offices are a main town centre use, they are not appropriate for general employment land (offices to serve factories, warehouses, etc. would, of course, be ancillary to the primary use). The annual need for land is low so projecting past trends may not provide an accurate indication of future needs. The 25%/75% split recommended in paragraph 6.94 of the EDNA would appear to exaggerate the future need for land for offices. A more realistic figure should be used with objective justification. The assessment does not appear to take into account changes in the employment density of modern industrial premises. Newer buildings tend to employ fewer workers in a given floorspace because of increased automation. It is recognised that, unlike the Black Country, much of the existing industrial stock in Cannock Chase is relatively modern. [...]. However,



		modern warehouses tend to have a significantly lower density than older units so this should be taken into account in assessing the land supply required to provide the desired number of jobs.
Question 37 Should employment sites be allocated for specific B classes uses, or just a broad B class uses? If the former, which sites should be allocated for specific uses?		
LPIO441	Holford Farm Partnership (c/o Hawksmoor Property Services)	Employment sites should be allocated for broad B Class uses. This is to ensure that there is flexibility in future employment land supplied to meet the market's needs.
LPIO442	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	As with housing policies the approach should avoid being too prescriptive, to enable flexible responses to be made to changing market conditions.
LPIO443	Rugeley Power Ltd (c/o Savills)	It is considered that employment sites or mixed use sites should be allocated for broad B Class uses to ensure flexibility. Recognition should also be given to other employment generating uses that do not fall within the B class uses e.g. health sector.
LPIO444	Birmingham City Council	It is suggested that a flexible approach is taken to employment site allocations so that a broad range of B class uses is covered rather than rigid allocations which limit development to specific B uses.
LPIO445	St Modwen (Watling Street) (c/o RPS Planning and Development)	It is clearly beneficial to identify employment sites that can potentially deliver a range of employment uses (across the B-use class), thus ensuring that local policies are responsive to changing economic circumstances over the lifetime of the Plan in accordance with national policy. [...] However, certain sites are more suited to particular elements of B class employment uses and this should be factored when establishing the employment locations to be allocated. Local evidence would suggest that a range of sites, in terms of size and location, will still be required to support the employment growth need and aspirations of the District during the plan period. Part of the District's employment need can be met through appropriate allocation of land adjacent to existing employment uses, including land at Watling Street Business Park, which is generally (although not exclusively) aimed at the B2/B8 sectors.
LPIO446	Staffordshire County Council	In general, impositions of restrictions on commercial development through specification of use class restriction will hinder the potential rate of attracting developments to the Cannock District. However, there may be sites whereby due to localised issues a restriction may be appropriate. Therefore, it may be appropriate to consider this matter on a site by site basis based on the context and setting of the site in question.
LPIO447	Wright, T (c/o Pegasus Group)	As with housing policies the approach should avoid being too prescriptive, to enable flexible responses to be made to changing market conditions.
LPIO448	Association of Black Country Authorities (c/o Walsall Council)	As noted under question 36, B1a office uses should be distinguished from other uses.

Question 38 Are there any further employment land development sites that should be considered for assessment?		
LPIO449	Holford Farm Partnership (c/o Hawksmoor Property Services)	Landholdings at Jubilee Field and Turf Field within the potential area of new employment land allocation at Norton Canes, adjacent to the A5, should be considered for assessment as part of an agglomeration of employment land within this corridor. We attach details of the recent SHELAA submissions in support of both of these sites.
LPIO450	Nurton Developments Ltd (c/o JLL)	<p>The Issues and Options does not express an objectively need for employment land. Instead it states that in Section 2, under the heading of Employment (on page 11), that this Issues and Options was produced prior to the employment evidence being updated. However, the Issues and Options does refer (in paragraph 8.21) to a recent assessment of employment land supply (i.e. the ELAA). This identified a supply of 25ha. However, in paragraph 8.22 it cautions that this figure should be treated as a maximum as some of this land is being considered also for alternative use. It is noted further in paragraph 8.23 that the vast majority of site options for additional new employment land lie within the Green Belt. [...] [...] Given that there are few development options available within Cannock that do not include release of the Green Belt, the Council should be aware of other potential strategic employment sites in the same FEMA, which takes in neighbouring South Staffordshire and parts of the Black Country.</p> <p><b>Land at Hilton Park, Jn 11, of the M6 Motorway:</b> The site has a gross area up to 99ha (and with a developable area of 52ha) and could sustain a development of around 200,000sqm of B1, B2 and B8 floorspace and associated uses. The latest masterplan, showing the scheme as it relates to the route chosen by Highways Englands for the M54, M6, M6 Toll Link Road, is attached. [...]</p> <p>The site is not situated within Cannock, but neighbouring South Staffordshire, and is within the Green Belt. As the site falls outside your jurisdiction, we recognise your Council has no control over its identification for development. However, we do consider it does hold relevance to your Council in considering how you cater for your employment land needs, in conjunction with your neighbouring LPAs, through Duty to Cooperate. The site is located close to your boundaries and only a few minutes drive from Cannock town centre and its local road and rail communications. As such, we would ask you to take this into consideration in reviewing your strategy in terms of employment land.</p>
LPIO451	Wyrley Estate (c/o Fisher German LLP)	<p>Our client owns land adjoining the Watling Street Business Park, which would enable a sustainable extension whilst protecting the overall integrity of the Green Belt.</p> <p>In consideration of Current Local Plan Policy CP8, it is considered a logical extension to remove the business park and extension land from the Green Belt, to provide businesses with the ability to settle and grow on the business park without the restrictions imposed by Green Belt policy.</p> <p>The land adjacent is brownfield, and this greenfield site will provide an extension to an important and well-connected employment site in the Green Belt. The site is currently devoid of extension land and it is required for the district to meet its employment land aspirations. There is insufficient urban brownfield land available and the allocation would meet the exception test.</p>
LPIO452	Cllrs. Preece, J, Stretton, Z and Newbury, J	We believe that before any development at Kingswood Lakeside is determined; consideration should be given to the Watling Street Business Park which has proposed expanding its capacity. The feeling locally is that development here would be less disruptive than at Kingswood Lakeside or elsewhere as it feeds directly onto the A5.

LPIO453	St Modwen (Watling Street) (c/o RPS Planning and Development)	The Council's selected employment growth options set out in the IOD are predicated on the claimed existing supply of 25ha of employment land. However, St Modwen, can show, based on analysis of the existing land supply relied upon by the Council, that further sites will be required to address the likely scale of need and to address delivery issues within the existing supply. This is particularly the case given the very limited amount of employment land delivered in the Norton Canes/Watling Street area since 2006, according to the latest ELAA. Consequently, this should therefore include giving proper consideration to those sites in appropriate locations that are deliverable in the southern parts of the District, including the land at Watling Street Business Park.
<b>Economy and Skills Policy Options</b>		
Question 39 Do you have any comments on what the policy focus should be in terms of sectors that need to be supported to deliver the overall economic vision and growth for the District?		
LPIO454	Cycle-R	Well Paid Permanent Jobs with Prospects – a worker needs to know they can get full time work at a decent wage and the company they are working for will strive to keep them – companies need to move away from viewing staff as assets to support the business and into being people, with lives and needs. A Strong Retail Community – the nature of retail is changing and shifting back to specialist stores, but Cannock will never retain a vibrant retail community if people can't afford to rent shops. The situation is ridiculous when it is cheaper for someone to rent a shop in Hednesford than have a stall in the indoor market. We are facing a situation where the market is empty, shops are standing vacant for long periods of time and the in-stores are so expensive, virtually no-one can afford it. Please, look at the cost profiles for these areas, people want to open their own shops and become self-employed, but simply can't afford it.
LPIO455	Lichfield & Hatherton Canals Restoration Trust	We would favour <b>option A</b> under the Economy and Skills policy options (Page 89) with the specific mention of the opportunities for relevant economic activity on land alongside the restored Hatherton Canal so that restoration of the canal brings employments benefits in addition to the expected leisure opportunities.
LPIO456	Hughes, R	<b>Option A</b> – Update the existing policy
LPIO457	Lyons, O	I believe that the Council needs to work to attract a variety of businesses and investors to the area and create a balanced economy, primarily with the aim of encouraging local businesses to recruit locally and therefore ensuring that skills match. I favour <b>Option A</b> which focusses on the existing policy and allows this to be updated to reflect the more recent findings.
LPIO458	Staffordshire County Council	We would favour <b>Option B</b> that incorporates option A and also puts a focus on implementing Employment and Skills Plans for new development sites. The policy needs to focus on encouraging employers to invest in workforce training and development and take up available assistance such as Apprenticeships and ESF funded programmes. In addition the Plan could encourage developers of major housing and business/industrial sites to contribute to the development of the construction sector and skills locally.
LPIO459	Startin, P	<b>Option B</b> gets my support here. Consideration should be given to trying to convert employment land into more relevant working space for the people and businesses of the district

Question 40 If the policy was to set out specific requirements from new developments should these be required from all developments, or only those above a certain threshold e.g. major developments only (10 dwellings or 1,000m <sup>2</sup> floorspace)?		
LPIO460	Home Builders Federation	The HBF's preference is <b>Option A</b> which does not set out specific requirements for new developments.
LPIO461	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	This depends upon the context relating to the particular issue. Local Plan policy should avoid being overly prescriptive as issues will need to be considered 'in the round'. Instead of setting firm requirements, it is recommended that the Council instead provide 'good practice' guidance supported by evidence which could then be referenced in policy, and the approach could then be tailored on a case by case basis. The guidance must not be placing unnecessary burdens upon the development process and will need to be considered in the balance with other plan policies.
LPIO462	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that <b>Option A</b> where the Local Plan policy would continue to encourage developments to demonstrate how they are helping to address key issues identified but with no specific requirements is the most appropriate option. This part of the policy should apply to major developments only (10 dwellings or 1,000m <sup>2</sup> floorspace)
LPIO463	Staffordshire County Council	To ease the burden on smaller developments the Government's definition of a major development should be used as a general guideline but with a more appropriate threshold for residential developments. For smaller developments the Council could promote a more informal 'light' touch approach to ESP creation or a plan on a page approach. Flexibility should be applied when considering each application of ESPs to development proposals as it is recognised that not all development proposals will suit the application of ESPs nor should the Council seek to overburden a development, however, all proposals should be considered on an individual basis as to their suitability to undertake an ESP.
LPIO464	Wright, T (c/o Pegasus Group)	This depends upon the context relating to the particular issue, however Local Plan policy should avoid being overly prescriptive as issues will need to be considered 'in the round'. Instead of setting firm requirements which could then impact on the viability and deliverability of sites it is recommended that the Council instead provide 'good practice' guidance supported by evidence which could then be referenced in policy, and the approach could then be tailored on a case by case basis. It is stressed, however, that the guidance must not be placing unnecessary burdens upon the development process and will need to be considered in the balance with other plan policies.
Question 41 What other requirements would help assist deliver the economic growth and vision for the district?		
LPIO465	Lichfield & Hatherton Canals Restoration Trust	We feel that there are opportunities for relevant economic activity on land alongside the restored Hatherton Canal so that the restoration of the canal brings employment benefits in addition to the expected leisure opportunities. This aspect should be reflected by specifically identifying areas of land alongside the projected through route for the Canal for development for canal-related businesses.
LPIO466	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	To recognise the importance that residential development plays in economic growth, especially in supporting a working age population, in supporting existing and new services and facilities which provide local employment and opportunity, in supporting town and local centres and in providing employment during the construction phase.

LPIO467	Staffordshire County Council	<p>Consideration could be given to having focussed support on community-based employability projects providing assistance to those seeking to enter or return to the labour market.</p> <p>Improve jobseekers, parent’s and young people’s knowledge of the local economy and local employers. [...]</p> <p>Promote the development of transport links and services between residential areas and employment sites, service centres, and visitor attractions for residents, commuters and visitors.</p>
LPIO468	Wright, T (c/o Pegasus Group)	<p>To recognise the importance that residential development plays in economic growth, especially in supporting a working age population, in supporting existing and new services and facilities which provide local employment during the construction phase.</p>

**Sustainable Transport Policy Options**

Question 42 Which combination of options do you prefer and why?

LPIO469	Canal & River Trust	<p>We believe that the requirements of <b>Option A</b>, as summarised, would help to ensure that the opportunity from promoting the use of towpaths, as well as other walking and cycling routes, can be achieved.</p> <p>Opportunities for utilising, enhancing, and linking in to this existing infrastructure should be fully considered. Future developments should be encouraged to consider this at an early stage in the development process and to aid the potential of the canal network should be clearly referenced within the revised Policies.</p> <p>We do not wish to raise any comment about whether Options B or C should be implemented.</p>
LPIO470	Cycle-R	<p><b>Option B</b>, of course, however there needs to be a review of the bus services, the dropping of bus routes, lessening the frequency of service and stopping entirely on a Sunday is creating one thing, people are either relying on personal transport or not travelling.</p>
LPIO471	Home Builders Federation	<p>If the use of electric and hybrid vehicles is to be encouraged, the HBF support a national standardised approach which should be implemented through the Building Regulations.</p> <p>Any option for the inclusion of a policy requirement for electric vehicle charging should be clearly written and unambiguous (2019 para 16) specifying the quantum and type of provision sought. The requirement should be supported by evidence demonstrating technical feasibility and financial viability. Any requirement should be fully justified by the Council including confirmation of engagement with the main energy suppliers to determine network capacity to accommodate any adverse impacts if all or a proportion of dwellings have EVCPs.</p>
LPIO472	Lichfield & Hatherton Canals Restoration Trust	<p>We would welcome any of the three policy options, noting that the projected restored Hatherton Canal would form part of the network for sustainable transport in the Cannock Chase District – with connections through to the adjacent districts of Walsall and South Staffordshire, and beyond.</p>
LPIO473	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>The setting of any minimum or maximum car parking standards for residential development should be undertaken in accordance with Paragraphs 105 and 106 of the NPPF.</p> <p>Richborough Estates acknowledges that the existing Parking Standards, Travel Plans and Developer Contributions for Sustainable Transport SPD is out of date and is in need of updating.</p> <p>It is considered that any transport standards should be set within a Local Plan Policy rather than via SPD, but only where the NPPF allows such standards to be considered, and they would need to be robustly evidence and justified before this could happen.</p> <p>Standards should be clear and not onerous to allow for clear guidance in formulating any scheme.</p>

LPIO474	Rugeley Power Ltd (c/o Savills)	We consider that <b>Option C</b> is the most appropriate option as it will ensure flexibility in terms of addressing evolving technology. Any SPD that is produced should include enough flexibility and/or a review mechanism to ensure that required parking standards on sites are based on up to date information. The SPD should also include flexible parking requirements on sites that are in close proximity to sustainable transport modes.
LPIO475	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey <b>generally supports Option B</b> for viability to be assessed; it is considered that any such policies should be dealt with through the application of policy within the Local Plan rather than through the use of a SPD. Requirements for electric vehicle charging infrastructure also needs to be set out in order that the costs of providing this infrastructure can be fully considered in the viability assessment work which will form the evidence base to the Local Plan. This requirement also needs to be future proofed with flexibility to allow for the rapidly changing needs for electric vehicles. In considering whether to apply parking standards and formulating policy the Council will need to ensure that any standards applied are appropriately evidenced in accordance with these requirements.
LPIO476	Hughes, R	<b>Option C</b> – Set standards for parking, access and service, lorry parking and electric vehicle charging in a supplementary document.
LPIO477	Inland Waterways Association	IWA supports <b>Option A</b> - adding in strategic references to opportunities from canals/the canal network (including towpaths)
LPIO478	Lyons, O	I believe that green, environmental policies should weave into all aspects of planning. This is a continually developing landscape and, for the purposes of development and continuity, the existing policy should be updated to include the canal network, HGV parking facilities, and importantly, electric vehicle charging points. In addition to this and to align policies, I also believe that there is scope for minimum standards to be identified. This then forces a transition to greener policies, I therefore believe that <b>Option B</b> should be adopted.
LPIO479	Road Haulage Association	We consider <b>Option C</b> the preferred option. Option B makes an assumption that there will be no fossil fuel vehicles after 2040. Whilst this may be the case, it is aspirational and may not happen. Option C allows greater flexibility to adapt to the best available solution at any given time.
LPIO480	Startin, P	I support <b>Option B</b> . Standards should be implemented. If you have no standards, the standard of the offering will always be low, this isn't a viable option for a progressive Council. Very keen to see support of electric car charging. The thing that seems to be missing here is support for cyclists. The cycle network through the whole district is shambolic.
LPIO481	Wright, T (c/o Pegasus Group)	The setting of any minimum or maximum car parking standards for residential development should be undertaken in accordance with Paragraphs 105 and 106 of the NPPF. It is nevertheless acknowledged that the existing Parking Standards, Travel Plans and Developer Contributions for Sustainable Transport SPD dated from 2055 is out of date and is in need of updating. It is considered that any transport standards should be set within a Local Plan Policy rather than via SPD, but only where the NPPF allows such standards to be considered, and they would need to be robustly evidenced and justified before this could happen. Standards should be clear and not onerous to allow for clear guidance in formulating any scheme.

Question 43 Are there any other options we should be considering and if so, what should these be?

LPIO482	Canal & River Trust	<p>We believe that the Local Plan should consider the potential impact of development on existing walking and cycling infrastructure that would be used by the new occupants of development. Modelling or an assessment of pedestrian, cycling and recreational use of the walking and cycling routes should be required; which would allow for an assessment of the impact of proposed developments beyond the development site upon such infrastructure.</p> <p>Applications should also be required to detail any necessary mitigation measures to accommodate additional use. [...] 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.</p> <p>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.</p>
LPIO483	Cycle-R	<p>Cycling – A there is a desire to encourage sustainable transport, there is one obvious area that needs to be looked at – Cycling, creating safe and comfortable cycling routes, many people won't ride on the roads as they consider them to be unsafe.</p>
LPIO484	Brindley Heath Parish Council	<p>The Government has targeted the replacement of diesel and petrol driven vehicles with electric, being the sustainable replacement for the future. We need to prioritise within the plan that on street charging points in town centres and parking areas 'need to be planned in sooner rather than later'.</p>
LPIO485	Road Haulage Association	<p>Given that Road Freight, whatever the means of propulsion, will need roads to travel on. The RHA is extremely disappointed that there are no plans for new roads to service local communities.</p>
LPIO486	Staffordshire County Council	<p>The County supports the update of the existing sustainable transport policy and the Scoping and Issues Consultation and the recommendations in paragraphs 9.13 – 9.23. A new Cannock Chase Integrated Transport Strategy will be produced by the County Council to support the emerging new Local Plan. It is recommended that the following should also be considered in the revised policy:</p> <ul style="list-style-type: none"> <li>The importance of enhanced telecommunications in terms of reducing the need to travel, particularly in AM and PM peak commuter periods, should be acknowledged. Developers of residential sites need to be strongly encouraged to make the necessary arrangements for the provision of superfast broadband services.</li> <li>As well as the locations described in para 9.17, developers should be encouraged to install infrastructure to facilitate electric vehicle charging at designated parking spaces within residential developments.</li> </ul> <p>The Consideration of lorry parking within the Local Plan is supported (Para 9.9)</p> <p>It is also recommended that new development which will increase road-based freight should consider where vehicles will park overnight and provide suitable facilities to accommodate deliveries and distribution vehicles.</p>

**Town Centres Hierarchy Options**

Question 44 Which option or combination of options do you prefer and why?

LPIO487	Cycle-R	<p><b>Option D</b> – there needs to be an input from the local community. Cannock town centre is typical of those in deprived areas, charity shops and betting shops prevail, the costs are too high for most people to consider taking premises to open their own business (Hednesford is cheaper and is gaining an excellent reputation, similar to Moseley in Birmingham.)</p>
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LPIO488	Boss, P	<b>Option D</b> – Rugeley town centre has a shortage of quality day and evening licensed premises, including entertainment that will attract people from all the new and existing houses in and around the town to spend social time in the town. This leads to the town being continually run down and inevitably people then travel to nearby Stafford and Lichfield that causes unnecessary damage to the environment and continues the circle of no investment so no one comes in, so no investment etc. Contributions and ‘planning encouragement’ should be used to attract funding into re-using existing premises in the town centre to provide quality licensed premises that local residents, particularly those new to the area or who will be coming to live in the area, can and will, want to enjoy locally.
LPIO489	Hughes, R	<b>Option C</b> – Produce/update separate Area Action Plans for the large towns in keeping with their individual needs
LPIO490	Lyons, O	<b>Option B</b> should be adopted and an ‘Impact Test’ implemented in the Planning Process. However, in addition to this, I also feel that <b>Option D</b> is also relevant on this occasion to develop prospectuses and therefore outline the ambitious local investment opportunities on offer, so long as they compliment rather than compete against existing provision.
LPIO491	Startin, P	I would support an <b>amalgamation of Options C and D</b> . Having the hierarchical system means those at the bottom get served last. We have some wonderfully active parish/town councils who would love to create vibrancy in their areas.
LPIO492	Strathclyde Pension Fund (c/o Savills)	The options have been recommended despite the LPA recognising that they will have to update their time expired Retail and Leisure Study. Until this update has been undertaken, we believe it is premature to consider options on retail matters, not least because the local retail context has changed significantly since November 2015 with the approval and construction of the retail designer outlet village at Mill Green. [...]We recommend that Option B is the least appropriate route, with no evidential basis and for the reasons provided, <b>Option A</b> is preferred. In addition, Option B is not sufficiently precise. The thresholds vary from centre to centre. Therefore, if an out of centre retail proposal had an anticipated catchment area which includes two centres with differing thresholds it is difficult to determine which threshold applies.
LPIO493	Association of Black Country Authorities (c/o Walsall Council)	We note that the evidence base relating to town centres is to be updated. We would wish to reserve comments pending the outcome of this.

Question 45 Are there other options we should be considering and if so what are they and what evidence is there to support this?

LPIO494	Armitage, D	Rugeley Town Centre. Develop the bus station and market hall. It is under-used and is an eyesore. Expand the Elmore Park; it’s extremely small given the numbers of people who live here. Rugeley has experienced constant building. I can’t imagine more development especially coupled with the disruption that HS2 would bring.
LPIO495	Hewitt, P	Town and Village centres are vital in our community, we need to look at them as places of leisure and not just shopping, this may include an option to change some buildings to residential use to add vibrancy to the areas. This would include looking at parking restrictions and may lead to residents parking. People go to town centres to relax and we need to create a structure that encourages restaurants, hotels, and cinemas to come to Cannock Chase. Visiting will increase dramatically when the outlet centre is open, we need to create town centres that people want to visit and stay. We also need to look at Rugeley Town Centre in line with the development at the Power Station and not develop the



		Power Station in isolation.
LPIO496	Historic England	<p><u>Paragraph 10.10</u>          We would be supportive of either a policy led Area Action Plan or additional guidance in as Supplementary Planning Document, as the Council see fit. We would support consideration of the historic environment and using historic characterisation to create attractive town centres that respond to their historic setting and assess and respond to any heritage at risk or enhancement to the historic environment, as well as heritage led regeneration and heritage tourism.</p>
<p>Question 46 The National Planning Guidance states that; local authorities should be seeking to improve the quality of parking in town centres....and, where it is necessary to ensure the vitality of town centres, the quantity too. Local planning authorities should set appropriate parking charges that do not undermine the vitality of town centres and parking enforcement should be proportionate, avoiding unfairly penalising drivers'. How might this be achieved in practice, through the planning system? Should we be setting any other standards for town centre development? If so, what, and what evidence could be used to support this?</p>		
<p>Question 47 What further work needs to be undertaken in relation to tourism in order to ensure compliance with the NPPF? Is there evidence available already which could assist with this?</p>		
<p><b>Biodiversity &amp; Geodiversity Policy Options</b></p>		
<p>Question 48 Which biodiversity and geodiversity option do you support?</p>		
LPIO497	Canal & River Trust	<p>We welcome the content of paragraph 11.23, which clarifies that more emphasis on the canal network, including a strategy for the water environment, could be included in the updated document.          We also welcome consideration of an individual policy in relation to the Cannock Extension Canal SSSI. Developments in proximity to our network can result in harm to our network through dust exposure, or from accidental/unmanaged runoff from construction sites. Additional wording in the Local Plan regarding the water quality of our network would help to make the Local Plan more effective at safeguarding (and enhancing) the waterway environment.          Developments can have an adverse impact on the ecology of the waterways. The Cannock Extension Canal is a designated SSSI and SAC for its Floating water-plantain. It is important to ensure that any increased recreational use of the canal and towpath and any development proposals in the vicinity of the canal take full account of its status as a SAC and SSSI and ensure adequate protection of the biodiversity importance of the canal.          Despite the above, we do believe there is a need to ensure that any policy relating to our canal network does 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 of water quality.[...]</p>
LPIO498	Cycle-R	There is little to comment on here, so <b>option B</b>
LPIO499	Lichfield & Hatherton Canals Restoration Trust	We favour <b>option A</b> – provided that the policy recognises the need for a balanced approach between protecting areas for wildlife habitat and enabling work to proceed to achieve corridors of Green Infrastructure where safe access is facilitated both for people and for wildlife. The restoration of the Hatherton Canal is a programme where that balance must be achieved for the work to proceed to secure the full range of benefits.
LPIO500	Richborough Estates (Brownhills Rd & S of	This will depend upon the evidence as to whether a separate SAC policy is needed for the extension canal. It is important that, as policies are formulated, any quantified measures are clearly evidenced, robust and justifiable and

	Cannock Rd) (c/o Pegasus Group)	do not impose unreasonable burdens when considered in the round with other planning requirements.
LPIO501	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey supports policy which protects and enhances the biodiversity and geodiversity of sites. Clarity surrounding biodiversity offsetting should be clearly set out through the Local Plan policies.
LPIO502	Wyrley Estate (c/o Fisher German LLP)	It is considered that <b>option B</b> is the most justified, as it is imperative that the importance of heritage asset is protected, and harmful forms of development prevented to enable a heritage-led regeneration scheme to come forward as identified as a key priority.
LPIO503	Hughes, R	<b>Option B</b> – Update current policy and include new policy for Cannock Extension Canal SAC.
LPIO504	Inland Waterways Association	IWA supports <b>Option B</b> ; introducing a new policy for Cannock Extension Canal SAC. However, if this is pursued, it should be a comprehensive policy balancing the statutory requirements to protect this SAC with the status of the canal as a navigation and its use for recreational activity and residential boats. It should also address the wider context of adjacent land uses including the existing commercial boatyards, the various current and potential future uses of the Grove Colliery site, and the impact of proposed traveller sites and the go-kart track. As concerns about air quality demonstrate, the SAC does not exist in isolation, and a dedicated plan policy should address all such relevant matters to provide a sustainable plan for both the protection of the SAC and the legitimate interests of local people, visitors, residents and businesses on and adjacent to the site. (note also para 11.37).
LPIO505	Lyons, O	I believe that it is important to protect SACs such as the existing Cannock Chase SAC, I would also extend this to include the Cannock Extension Canal SAC as outlined in <b>Option B</b> .
LPIO506	Natural England	Natural England supports <b>Option B</b> as set out in order to update existing Policy CP12 and to introduce a new policy for Cannock Chase Extension Canal SAC. As you are aware there is progression, through the Cannock Chase SAC Partnership and the Ecological Joint Approach Group, to develop a Strategic Nitrogen Action Plan for the South Staffordshire SACs. This work is in development but will aim to collate an evidence base and a robust strategic approach to avoid and mitigate for the effects of traffic pollution.
LPIO507	Cllrs. Preece, J, Stretton, Z and Newbury, J	We would support <b>option B</b> . The Cannock Extension Canal is an environmental asset of particular concern in Norton Canes, especially with respect to recent developments with the Grove Colliery site. We would prefer to see sympathetic developments along and around the Canal, particularly better cycle routes access and a pedestrian crossing on the A5 following the line of the Canal.
LPIO508	Norton Canes Parish Council	<b>Option B</b> which proposes a specific policy regarding the Cannock Extension Canal is supported.
LPIO509	Staffordshire County Council	Recent work on Nature Recovery Network mapping by Stafford BC and Staffordshire Wildlife Trust offers a cost-effective way to meet the strategic approach promoted in NPPF, and if expanded within the county will also offer cross-boundary insights. <b>Option B</b> is favoured because the Cannock Extension Canal SAC needs specific consideration.
LPIO510	Wright, T (c/o Pegasus Group)	This will depend upon the evidence as to whether a speared SAC policy is needed for the extension canal. However, it is important that, as policies are formulated, any quantified measures are clearly evidenced, robust and justifiable and do not impose unreasonable burdens when considered in the round with other planning requirements.

Question 49 Have you any other issues you wish to raise in respect of biodiversity and geodiversity?

LPIO511	Richborough Estates (S of Cannock Rd) (c/o Pegasus Group)	The inclusion of a country park as part of the proposals for land south of Cannock Road, Heath Hayes will be able to ensure significant net gains in terms of biodiversity. This will include protection of the existing Site of Biological Interest adjacent to the south east of the proposal country park area, and the creation of wet woodland in association with Newlands Brook. The proposal also creates opportunities to enable links from the site to the wider proposed heathland enhancement corridor between Cannock Chase and Sutton Park as referenced in Policy CP12 of the current adopted Local Plan so the site will be able to offer significant additional benefits beyond its boundaries.
LPIO512	National Farmers Union	Farmers and landowners must be fully engaged with discussions on biodiversity and geodiversity as they own and manage many of the districts key natural capital assets. For the majority of farmers environmental management is a core business activity. Previous studies have shown that agricultural businesses routinely invest in landscape management and enhancement works for example hedging, tree planting, cutting and grazing.
LPIO513	Cllrs. Preece, J, Stretton, Z and Newbury, J	Additionally, as referred to in our response to question 7, we would like to see more focus on the Chasewater and Southern Staffordshire Coalfield Heaths SSSI. It should be a fundamental focus of the Local Plan specifically to formalise and firm up to efforts to bring the SSSIs sites that lie within the District up to higher standard.
LPIO514	Staffordshire County Council	The District contains very little ancient woodland; an additional policy to protect this, including creation of buffering habitat would be helpful. Suitable policy support for this habitat should include mature trees and near veterans because they are the veterans of the future.
LPIO515	Association of Black Country Authorities (c/o Walsall Council)	See our response to Questions 12, 13, 14 above with reference to the Hatherton Canal and its potential restoration. (See Question 12)

**Cannock Chase SAC Policy Options**

Question 50 Do you have any comments on this option?

LPIO516	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	It is accepted that mitigation is required in line with up to date evidence, the site of Brownhills Rd, Norton Canes lies within a designated 15hkm radius of Cannock Chase SAC. The site has the potential to provide on-site green infrastructure and is conveniently situated close to Chasewater Country Park.
LPIO517	Bloor Homes Ltd (c/o Define Planning & Design)	An update of the evidence base and mitigation strategy for addressing the recreational pressures at Cannock Chase that would arise from further growth is welcomed in order to facilitate the scale of development required in the District to meet the identified housing need and address the nation's housing crisis.
LPIO518	Cannock Chase AONB Partnership	The SAC forms a key part of the AONBs special qualities, therefore policy to ensure its conservation incorporating measures to avoid or mitigate for increasing pressures is warmly welcomed.
LPIO519	Natural England	We support <b>Policy A</b> . The visitor survey work is now complete and can feed into the Local Plan. We will continue to provide support on this matter via the Cannock Chase SAC Partnership and at further stages of the Plan.
LPIO520	Staffordshire County Council	It is agreed that the policy may need to change as the local evidence base changes. Legal interpretation of the Habitats Regulations also continues to expand and may affect how this policy is implemented.

LPIO521	Wright, T (c/o Pegasus Group)	It is accepted that mitigation is required in line with up to date evidence. The site at Birches Farm (Land at Upper Birches Farm, Rugeley) lies within a designated 15km radius of Cannock Chase SAC. The site has potential to provide on-site green infrastructure to provide an alternative, local and attractive alternative destination for walkers and, in particular dog walkers, as the evidence shows that the latter then to use Cannock Chase regularly and cause the most damage.
LPIO522	Association of Black Country Authorities (c/o Walsall Council)	We reserve the right to comment (including through the SAC Partnership) once the evidence review is complete and we have had the opportunity to consider it.
<b>Landscape Character and Cannock Chase AONB Policy Options</b>		
Question 51 Which option or combination of options do you support?		
LPIO523	Cycle-R	There is little to comment on here, so <b>Option C</b>
LPIO524	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<b>Option A</b> is the most appropriate option. Option B is not appropriate as it would be too prescriptive and could be treated as a ‘tick-box’ exercise by decision makers without having regard to the wider context/ ‘planning balance’.
LPIO525	Briggs, T	<b>Option A</b> is supported. There should be no exceptions to the policy other than those that are a requirement due to national planning law; to develop parts of the AONB sets a dangerous precedent [...]
LPIO526	Cannock Chase AONB Partnership	<b>Option C</b> is supported. An updated design SPD would provide appropriate support to this policy. Policy and Actions in the AONB Management Plan support production of guidance on design and on setting and views, which could potentially become reference documents to the Local Plan. The AONB Joint Committee would welcome specific reference in Local Plan Policy CP14 – Landscape Character and Cannock Chase AONB to protection. Conservation and enhancement of the landscape and scenic beauty of the AONB for its own sake, in line with para. 172 of the NPPF. [...] In order to add this clarity and therefore ensure that the Local Plan is fully in accordance with the provisions of the NPPF, it is suggested that a sub-paragraph is added to CP14. This could be worded so as to complement the clear protection that is afforded to biodiversity interests and the SAC in the preceding policies (CP12 and CP13).
LPIO527	Hughes, R	<b>Option C</b> – Update current policy, including a supplementary policy document on design
LPIO528	Lyons, O	I would opt for <b>Option B</b> in this instance on the basis that applications may be submitted within the area that actually enhance Cannock Chase and allow the area to be better promoted and utilised. I do, however, think that any criteria developed to judge applications against must be detailed, robust and centre around the protection of our natural environment.
LPIO529	Natural England	The Cannock Chase AONB Management Plan 2019-2024 has now been adopted by Local Authorities. It sets out clear action to prepare guidance on ‘Building and Infrastructure Design in Cannock Chase AONB’ which Local Planning Authorities will be invited to adopt. <b>Option C</b> would give capacity to enhance the current policy wording and accommodate the adoption of Design Guidance produced by the AONB Partnership.
LPIO530	Wright, T (c/o Pegasus Group)	It is submitted that <b>Option A</b> is the most appropriate option. Option B is not appropriate as it would be too prescriptive and could be treated as a ‘tick box’ exercise by decision makers without having regard to the wider context/‘planning balance’.

Question 52 Have you any other issues you wish to raise in respect of Landscape Character and Cannock Chase AONB?		
LPIO531	Richborough Estates (Brownhills Rd) (c/o Pegasus Group)	Both the adopted and the emerging local plan, linked to the AONB Management Plan, highlight the significance of this key asset and the need for its protection including its setting. The site being promoted south of Brownhills Rd, Norton Canes, is well located in terms of its distance away from the AONB.
LPIO532	Richborough Estates (S of Cannock Rd) (c/o Pegasus Group)	Both the adopted and the emerging local plan, linked to the AONB Management Plan, highlight the significance of this key asset and the need for its protection including its setting. The site being promoted south of Cannock Road, Heath Hayes, is well located in terms of its distance away from the AONB, and offers the opportunity for landscape enhancement through the proposed country park.
LPIO533	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	It will be necessary through the Local Plan process to allocate land to meet housing needs and as identified within the Issues and Options, one option may be the allocation of land within the AONB. It will be for the Local Plan to ensure that AONB boundaries are adjusted as part of this process to ensure that strategic allocations are not frustrated by an additional layer of complexity at the planning application stage.
LPIO534	Beau Desert Golf Club c/o FBC Manby Bowdler LLP)	Within the AONB policy provision should be made, exceptionally, for new development, particularly on brownfield land, which enables, supports, and enhances local distinctiveness and landscape quality and public accessibility to and enjoyment of the AONB (e.g. to include the proposal for site C375).
LPIO535	Briggs, T	The Council should stand firm on a policy of no AONB development; if this results in not being able to meet full allocations for new development then so be it; it appears that others areas can simply report that they cannot meet demand and other authorities are expected to take up the slack – I do not see why CCDC cannot take the same approach given the national importance of protecting much threatened areas such as the AONB.
LPIO536	Cannock Chase AONB Partnership	The AONB Management Plan defines one of the AONBs special qualities as ' <i>Relative Wildness and tranquillity</i> ', describing the AONB as ' <i>A haven in tranquillity and wildness.</i> ' Some policy wording around protecting that quality and avoiding impacts on tranquillity, such as that potentially arising from increased user pressure, would be welcomed.
LPIO537	National Farmers Union	Given that large areas of the District are either designated as AONB or Green Belt it is important that some provision is made to support rural businesses when they need to invest in new infrastructure and modern agricultural buildings. Environmental compliance and animal welfare standards are changing and it is important that these businesses are able to evolve in order to meet them. These businesses play a vital role in maintaining the landscape and their activities provide a wide range of public goods.
LPIO538	Wright, T (c/o Pegasus Group)	Both the adopted and the emerging Local Plan, linked to the AONB Management Plan, highlight the significance of this key asset however it is possible to achieve high quality schemes in AONB areas to meet identified needs and this site presents such an opportunity in helping to achieve a balanced strategy for Rugeley which provides for both economic and residential growth.
LPIO539	Association of Black Country Authorities (c/o Walsall Council)	We have no comments to make about these questions. However, in respect of option B, we would point out that the Green Belt is not a landscape designation, so policies used to assess planning applications in terms of the impact on the Green Belt should distinguish between the impact on Green Belt and the impact on landscape.

Historical Environment Policy Options		
Question 53 Which option or combination of options for the historic environment do you support?		
LPIO540	Canal & River Trust	We would support the aspirations of <b>Option B</b> , as it would give additional reference and importance to those historic elements that contribute positively to the setting of the District as a whole. In Rugeley, the canal can offer a significant opportunity to help provide a setting for heritage led regeneration, and can provide an asset to promote visits to the town. A policy that makes specific reference to heritage opportunities here would make the Local Plan more effective in fostering and promoting regeneration initiatives here.
LPIO541	Lichfield & Hatherton Canals Restoration Trust	We favour <b>Option B</b> – with the specific interest that the Hatherton Canal be identified as an element of local heritage to be made more accessible and to be given a higher public profile by the deployment of interpretation boards at appropriate locations.
LPIO542	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The positive and flexible wording of <b>Options A and B</b> is supported as this accords with the spirit of the NPPF for planning positively. There is concern that Option C could be too prescriptive unless it was formulated as guidance rather than a requirement to enable consideration of the local context.
LPIO543	Wyrley Estate (c/o Fisher German LLP)	It is considered that <b>option C</b> is the most justified, as it is essential to have a robust policy that sits within a broader strategy, which is advocated by national policy.
LPIO544	Hughes, R	<b>Option A</b> – Update and expand the current policy
LPIO545	Lyons, O	In recent years many memorials have been erected and there is symbolic recognition across the District of our heritage and historic environment. I believe a sole focus on this would place too many limitations on future developments, however, I do believe heritage to be important. The Council must strike a reasonable balance and I believe <b>Option A</b> – updating and expanding the existing policy whilst also including more references to opportunities for regeneration related to heritage – would be best suited.
LPIO546	Cllrs. Preece, J, Stretton, Z and Newbury, J	We support <b>option C</b> . We believe it is an opportunity lost for the Council to allow the Grove Colliery site to be sold for the development of a gypsy and traveller site which was not identified in the 2014 incarnation of the Local Plan; in fact, it was identified as a site which potentially could be development with a key focus on its outstanding heritage value, something which has been tentatively planned by the District Council and the owner of adjacent land for decades as was confirmed in a briefing produced by a Senior Planner at the District Council as recently as last year.
LPIO547	Norton Canes Parish Council	<b>Option B</b> which makes specific reference to local heritage opportunities including canals, collieries and former railway lines is strongly supported.
LPIO548	Staffordshire County Council	A combination of <b>Options B and C</b> referring to the forthcoming Heritage Impact Assessment evidence and including the development of a district-wide interpretation strategy would be the preference.
LPIO549	Thornton, H	Support for <b>Option B</b> seems the best, particularly with respect to Rugeley’s deteriorating 13 <sup>th</sup> Century Old Chancel which hopefully can become a visitor attraction.
LPIO550	Wright, T (c/o Pegasus Group)	The positive and flexible wording of <b>Options A and B</b> is supported as this accords with the spirit of the NPPF for planning positively. There is a concern that Option C could be too prescriptive unless it was formulated as guidance rather than a requirement to enable consideration of the local context.

Question 54 Have you had any other issues you wish to raise in respect of this historic environment?

LPIO551	Cycle-R	There is little to comment on here, so <b>option C</b>
LPIO552	Richborough Estates (S of Cannock Rd) (c/o Pegasus Group)	Whilst the site south of Cannock Rd, Heath Hayes is of little obvious significance in terms of the District's historic past, it sits within the wider context of a varied and dynamic heritage and there are opportunities to celebrate this through local interpretation which could be incorporated into the public spaces of the site.
LPIO553	Wyrley Estate (c/o Fisher German LLP)	<p>The main heritage matter of interest to Wyrley Estate is the future of the Grove Colliery site.</p> <p>The future of the canal SAC particularly around the former Grove Colliery site, is at a critical crossroads. It has been a long-standing policy aspiration to see the areas developed as a leisure and recreational centre, but this has never come to fruition.</p> <p>At present the site comprises low-grade commercial and storage uses and is massively under-utilised. The site has enormous potential to deliver a high-quality heritage-led regeneration scheme that will significantly boost the economy of not only the area but the wider district. [...]</p> <p>Wyrley Estate owns a part of the Grove Colliery site, with other lands being owned by the Council. Discussions about how there might be a joint approach to considering the future of the site, perhaps as apart of a mixed-use scheme that might use some residential and employment development to enable a heritage-led development.</p> <p>To boost the opportunities for development, it is suggested that the Grove site should be taken out of the Green Belt and a robust policy framework put in place that provides flexibility around a heritage-led regeneration. A policy could refer to the need for a masterplan to be created for the site to show how it will deliver heritage and leisure aspirations in a comprehensive and deliverable manner.</p>
LPIO554	Historic England	We are supportive of a section on the historic environment and note the existence of the current historic environment policy in the local plan. We would welcome an updated approach that seeks to continue NPPF conformity as well as develop elements of local distinctiveness and protection of local assets. We would welcome a local list being prepared for the district, and consider that the Local Plan poses a useful opportunity for dealing with this. [...]
LPIO555	Staffordshire County Council	<p>As previously advised in the Issues and Scope consultation, it is noted that important pieces of the baseline heritage evidence, namely the Historic Environment Character Area and the Extensive Urban Surveys, are now nearly a decade old and it is recommended that a degree of review of these will be required to ensure that they continue to be relevant to the aims of the District Council in protecting and enhancing all types of heritage asset.</p> <p>It is welcomed that there is recognition that the results of the Chase Through Time project will be included as part of the updated evidence base, whilst it is also recommended that Historic England's guidance 'The Historic Environment and Site Allocations in Local Plans' is considered in this process.</p>

**Greener Future Policy Options**

Question 55 Does the updated NPPF and other recent Government policy (e.g. Clean Growth Strategy 2017) allow the Council to set higher energy efficiency standard requirements, where justified by local evidence?

LPIO556	Home Builders Federation	<p>The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning &amp; Energy Act 2008 to prevent the Council from stipulating energy performance standards that exceed the Building Regulations but consider that the Council should comply with the spirit of the Government's intention of setting standards for energy efficiency through the Building Regulations [...]</p> <p>It is the HBF'S opinion that the Council should not be setting different targets or policies outside of Building Regulations.</p>
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		The key to success is standardisation and avoidance of every LPA in the country specifying its own approach to energy efficiency which would mitigate against economies of scale for both product manufacturers, suppliers and developers.
LPIO557	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	It should be noted that the Code for Sustainable Homes has now been surpassed by Building Regulations which exceeds the energy efficiency standards defined by Code for Sustainable Homes Level 4, 2015. Paragraph 150 (b) of the NPPF states: “any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.” The expectation of Government is therefore clearly that local planning authorities should seek to enforce those standards required by Building Regulations.
LPIO558	Rugeley Power Ltd (c/o Savills)	It is considered that the Greener Future Policy within the Local Plan should remain flexible and the viability of sites when providing energy efficient schemes should be considered. Therefore, it is considered that <b>Option B</b> is the most appropriate option, that sustainable construction standards should be encouraged not required.
LPIO559	Taylor Wimpey (c/o Lichfields)	The Practice Guidance makes clear that local requirements should form part of a Local Plan following engagement with appropriate partners and will need to be based on robust and credible evidence and pay careful attention to viability. The Practice Guidance advises that the WMS on Plan Making dated 25 March 2015 clarified the use of plan policies and conditions on energy performance standards for new housing developments. The standard sets out the government’s expectation that such policies should not be used to set conditions on planning permission with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes.
LPIO560	Bloor Homes Ltd (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	As Stated in response to Question 9, it is entirely inappropriate to seek to set any local technical standards or requirements relating to the construction, internal layout or performance of new dwellings in Local Plan policy beyond the clearly specified exceptions, and only when there is robust evidence of a need to do so. Notably, any improvement to energy efficiency standards will be realised through the revision of Building Regulations, not local planning policy.
LPIO561	Inland Waterways Association	IWA supports <b>Option A</b> ; include reference to potential role of canal network in contributing to low carbon technologies and surface water drainage.
LPIO562	Staffordshire County Council	We would agree that this is the case and that further local evidence may be necessary. <u>Minerals and Waste</u> This should include consideration of the existing requirements of policies 2.4 and 2.5 of the Waste Local Plan relating to safeguarding waste management facilities as well as policy 3 of the Minerals Local Plan relating to safeguarding important mineral resources and mineral infrastructure sites. Note that within the District, there will be other mineral infrastructure sites which are subject to the regulation of the District Planning Authority and should be safeguarded e.g. brickworks, concrete batching plants.
LPIO563	Wright, T (c/o Pegasus Group)	Paragraph 012 of the Planning Practice Guidance reference ID: 6-012-20190315 (updated March 2015) states: ‘Different rules apply to residential and non-residential premises. [...] local planning authorities: Can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes [...] in sitting performance standards above the building regulations for non-housing developments.’ The guidance goes on to state: ‘The Planning and Energy Act 2008 allows local planning authorities to set energy efficient standards in their development plan policies that exceed the energy efficiency requirements of the building regulations. [...] The Written Ministerial Statement on Plan Making dated 25 March 2015 clarified the use of plan policies and conditions on energy performance standards for new housing developments.[...] provisions in the Planning and Energy



		<p>Act 2008 also allow development plan policies to impose reasonable requirements for a proportion of energy used in development in their area to be energy from renewable sources and/or to be low carbon energy from sources in the locality of the development.'</p> <p>The guidance cited above is dated March 2015 and had not been further amended at the point of writing these representations.</p>
<p>Question 56 Apart from a viability assessment of the costs of such measures, what local evidence would be needed to justify the need for higher sustainable constructions standards over and above building regulation requirements?</p>		
LPIO564	Home Builders Federation	Higher sustainable construction standards over and above Building Regulations should not be sought. The HBF's preference is <b>Option B</b> to continue with the current policy approach of encouraging sustainable construction standards.
LPIO565	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	If higher standards are to be required over and above those set by Building Regulations, these would need to be justified through local evidence. However, it is considered that this would be contrary to Paragraph 150 (b) of the NPPF.
LPIO566	Severn Trent	A water cycle study and supporting evidence from both the EA and water and waste water service providers could be used to set site specific policies on high sustainability or construction targets.
LPIO567	Taylor Wimpey (c/o Lichfields)	The Practice Guidance states that if a local planning authority applies a higher water efficiency standard they should establish a need through information gained from consultation with the local water company, the Environment Agency and catchment partnerships. No guidance is provided on the evidence to inform energy efficient standards, so standards over the building requirement would need to be justified by overarching, conclusive and up-to-date evidence establishing their need.
LPIO568	Staffordshire County Council	<p>Evidence could include:</p> <ul style="list-style-type: none"> <li>• Local Climate Change Scenarios. UKCP18 publishes regional scenario-based data</li> <li>• Whilst not strictly a local issue, construction standards should also be considered to required over and above regulations in terms of 'future proofing'</li> <li>• Local evidence such as health and wellbeing statistics could be considered to justify the need for construction which promoted healthier living and working.</li> <li>• Standards may include which relate to the heating, cooling and fuelling of a site.</li> <li>• Material availability (taking into account suitability for the application)</li> <li>• Evidence around the life cycle impacts of the construction including how the construction could be disposed of at the end of its life span</li> <li>• Lifetime building operational costs compared to the 'norm' in the area may also be beneficial</li> </ul>
LPIO569	Wright, T (c/o Pegasus Group)	If higher standards are to be required over and above those set by Building Regulations, these would need to be justified through local evidence e.g. the Council's climate change strategy or similar which provides local detail (for example relating to the domestic, commercial, transport sectors.)

Question 57 If specific standards are considered appropriate, should these be required on a certain threshold of site e.g. large sites only?		
LPIO570	Home Builders Federation	The HBF consider that specific standards are inappropriate (see HBF answers to Questions 55 & 56)
LPIO571	Richborough Estates Brownhills Rd & S of Cannock Rd (c/o Pegasus Group)	It is not considered that this should be the case as the need for any such standards would be likely to be the result of cumulative impacts as shown by any evidence produced. However, this would need to be carefully considered in the round as part of the work which will be needed in terms of viability.
LPIO572	Severn Trent	Both the size and consequential impact of the development alongside the context of its surrounding infrastructure and environmental constrains should be considered when defining specific standards in planning policy.
LPIO573	Taylor Wimpey (c/o Lichfields)	Any need established for efficiency standards should be applied to all sites regardless of size. Any requirements for efficiency standards must be tested through the Local Plan viability assessment work across a range of site sizes/typologies being tested.
LPIO574	Staffordshire County Council	No, whilst threshold of site may naturally limit the viability of some options this may not be the case for all. If standards are considered appropriate it may therefore be more prudent to apply them to all site unless it can be demonstrated, they cannot be achieved rather than an arbitrary cut off based on scale. Also factors such as location can more greatly affect the viability of specific standards than the size of the site. A location-based methodology may support greater application of sustainable construction. However, sustainable construction could look different for each application, by not restricting where this is applied, more opportunities and innovations would be achievable; rather than limiting the application.
LPIO575	Wright, T (c/o Pegasus Group)	It is not considered that this should be the case as the need for any such standards would be likely to be the result of cumulative impacts as shown by any evidence produced. However, this would need to be carefully considered in the round as part of the work which will be needed in terms of viability.
Question 58 Are there any new or emerging technologies that should specifically be taken into account in gathering the evidence?		
LPIO576	Canal & River Trust	The Trust wish to highlight the potential of the canal for heating & cooling for district heat network or individual schemes such as at allocated sites. We consider that heating and cooling schemes can be delivered without any adverse impact on biodiversity. 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. (In addition, the Trust also wish to highlight the potential for surface water drainage to the canal which could also be referenced in revised Policies.)
LPIO577	Cycle-R	<b>Option C</b> – however, looking at house building, Cannock would do well to institute requirements to match the German ‘Passiv-Hause’ policy. Creating energy neutral housing and an increase in zero carbon impact transport infrastructure – canals, cycle paths, electric vehicles (including public transport) and a strong rail infrastructure.
LPIO578	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Technology is constantly changing so the plan should be flexible in order to be able to adapt and respond accordingly.
LPIO579	Hughes, R	<b>Option C</b> – Require developments to adhere to sustainable and low carbon building standards

LPIO580	Lyons, O	I would give preference to <b>Option C</b> which involves updating the existing policy so as to reflect new evidence, but also requiring any new developments to meet specific building standards, including sustainable construction standards in terms of water efficiency, energy efficiency, low carbon and renewal technologies. Inclusion in the Local Plan now would force a transition and help pave a greener, sustainable future.
LPIO581	Staffordshire County Council	There are existing technologies which are rapidly reaching a stage where they will be more widely applicable such as smart technology, the internet of thin mgs, and battery storage. Construction should not limit the ability to integrate these technologies in the future. Modular designs allow for more adaptation. Consideration of the ability to integrate, for example, EV charging could mean building in the capacity at point of construction, even if not immediately viable.
LPIO582	Startin, P	<b>Option C</b> is the correct choice here. We are living in a time when construction advances are so fantastic, and greener ways of construction are becoming more obtainable, the Council has an obligation to push these standards through.
LPIO583	Wright, T (c/o Pegasus Group)	Technology is constantly changing so the plan should be flexible in order to be able to adapt and respond accordingly.
<b>Policy Development Contributions and Infrastructure</b>		
Question 59 Is there a need for continued overarching policy which sets out Council overall approach to developer contributions i.e. continuation or Policy CP2 (with updates to reflect changed national and local context)? If so, what updates should be made to the policy?		
LPIO584	Canal & River Trust	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. The Review offers the opportunity to reassess the mechanisms through which improvements to canal corridors are provided and ensure the impacts of developments on the canal network are mitigated. [...] Whilst CIL would allow for the funding of key infrastructure investments, as set out in a regulation 123 list, we believe there is a need for policy to identify that s.106 payments may be necessary to fund for improvements to accommodate the expected increased usage brought by specific developments onto our network [...].
LPIO585	Home Builders Federation	The new Local Plan should set out the contributions expected from development including the level and types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication etc. It is important that the Council understands and tests the influence of all inputs on viability as this determines if land is released for development. An updated viability assessment should be undertaken. The Council should continue to have an updated version of Policy CP2.
LPIO586	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	It is considered that adopted Policy CP2 needs significant updating to bring it into line with current Government policy and guidance, especially paragraph 34. Policy CP2 as adopted is very light-touch, as the detail is contained in SPD. It is not considered that this approach will be sufficiently robust in future especially given that there is an increased emphasis upon viability at the plan making stage. Where standards are to be set (e.g. open space) these should be articulated in policy rather than SPD so as to be able to inform local plan viability. It is also essential that where elements of the plan are dependent upon market conditions that in these cases the plan demonstrates the ability to be flexible linking to the most up to date evidence to ensure that it continues to remain viable

		<p>and deliverable over its lifespan.</p> <p>The intention to produce a Viability Assessment to inform the plan is welcomed and indeed will be an essential element of the evidence base as greater clarity is required in respect of all potential developer contributions. [...]</p>
LPIO587	Taylor Wimpey (c/o Lichfields)	<p>In accordance with the Practice Guidance, the Local Plan will need to clearly set out the contributions expected from development. This should include setting out the levels any types of affordable housing provision required, along with other infrastructure.</p> <p>Any policy requirements will need to be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of CIL and S106.</p> <p>Importantly for developers, policy requirements should be clear so that they can be accurately accounted for in the price paid for land. Policies will need to be realistic and ensure that the total cumulative cost of all relevant policies will not undermine deliverability of the Local Plan.</p> <p>The Local Plan will also need to take into account any national reviews of the developer contributions system, such as updates to CIL.</p>
LPIO588	Gladman	<p>Paragraph 34 of the NPPF makes it clear that Local Plan should set out the contributions expected from development including the levels and types of affordable housing required, as well as other infrastructure such as education, health, transport, flood and water management, green and digital infrastructure. An updated viability assessment should be undertaken to ensure that the cumulative development requirements do not render sites undeliverable.</p>
LPIO589	Wright, T (c/o Pegasus Group)	<p>It is considered that adopted Policy CP2 needs significant updating to bring it into line with current Government policy and guidance, especially paragraph 34.</p> <p>Policy CP2 as adopted is very light-touch, as the detail is contained in SPD. It is not considered that this approach will be sufficiently robust in future especially given that there is an increased emphasis upon viability at the plan making stage. As set out in these representations it is important that where standards are to be set these should be articulated in policy rather than SPD so as to be able to inform local plan viability.</p> <p>It is also essential that where the elements of the plan are dependent upon market conditions that in these cases the plan demonstrates the ability to be flexible linking to the most up to date evidence and to ensure that it contributes to remain viable and deliverable over its lifespan.</p> <p>The intention to produce a Viability Assessment to inform the plan is welcomed and indeed will be an essential element of the evidence base as greater clarity is required in respect of all potential developer contributions including affordable housing, CIL charges and potential site specific requirements.</p>
<p>Question 60 Do you have any comments on specific development contributions and infrastructure requirements that should be contained within strategic or non-strategic policies?</p>		
LPIO590	Canal & River Trust	<p>As per Question 59 re financial contribution.</p> <p>Improvements to the surfacing and signposting on these routes would be vital in order to increase their capacity and capability to accommodate additional users. We strongly believe that this should be referred to within Local Policy, as there is a significant risk that otherwise key walking and cycling routes in the District could become degraded at cost to both existing and future communities.</p> <p>We note that improvements to towpaths, mooring facilities and access points to our network in Rugeley Town Centre</p>

		<p>could significantly encourage and promote public access to our network; allowing the community to better access the wider Green Infrastructure Network, which we believe would provide benefits for health and wellbeing (see Question 12). The Trust is actively working with the Local Authority towards public realm improvements at Leathermill Lane and towpath improvements at Brereton, which could greatly assist in achieving these aims. We believe that the Local Plan should refer to these specific improvements, and measures to further promote links between the canal and the town.</p> <p>Delivery of the Hatherton Canal restoration would be desirable in order to meet the objectives of promoting tourism, leisure, economic regeneration, health wellbeing and green infrastructure. We therefore request that reference to the restoration aspirations, actively promoted by the Lichfield and Hatherton Canals Restoration Trust, are included in the Plan.</p>
LPIO591	Lichfield & Hatherton Canals Restoration Trust	We are please to note that the restoration of the Hatherton Canal has been mentioned as an appropriate programme to be supported.
LPIO592	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>Any requirements deemed to be essential should be included in strategic policy as they inform plan making which then sets the context for the decision-making process.</p> <p>The NPPF needs to be the starting point for determining strategic and non-strategic matters, however it should be borne in mind that disproportionate 'non-strategic' matters considered on a site by site basis could still potentially impact upon viability, and cumulatively could impact upon plan delivery therefore a pragmatic and reasonable approach needs to be taken, especially in terms of funding and delivery.</p> <p>The CFIL regulation 123 List along with the proportion of CIL allocated to neighbourhoods should be used to deliver non-strategic infrastructure, including leveraging in match funding from other sources.</p>
LPIO593	Taylor Wimpey (c/o Lichfields)	<p>The Local Plan should clearly identify infrastructure requirements on the basis set out by the Framework.</p> <p>As required by the Framework, infrastructure requirements should not undermine the deliverability of the plan. Any infrastructure sought, both district wide and site specific, therefore needs to be thoroughly tested through the Local Plan Viability Assessment work.</p>
LPIO594	Brindley Heath Parish Council	Roads – The Power Station development could see c.2300 new homes being built which would add c.4500 additional vehicles to this area so it is vital that the surrounding road system can cope. [...]
LPIO595	Historic England	We welcome consultation on developer contributions on page 113 and would request that heritage is added to the list of acceptable areas to fund, specifically issues such a heritage at risk, public realm improvements, conservation areas at risk such a shopfronts, signage, historic landscapes etc.
LPIO596	Inland Waterways Association	IWA supports the suggestion at para 13.13 of funds for the restoration of the Hatherton Canal.
LPIO597	Wright, T (c/o Pegasus Group)	<p>Any requirements deemed to be essential should be included in strategic policy as they inform plan making which then sets the context for the decision-making process.</p> <p>The NPPF needs to be the starting point for determining strategic and non-strategic matters, however it should be borne in mind that disproportionate 'non-strategic' matters considered on a site by site basis could still potentially impact upon viability, and cumulatively could impact upon plan delivery therefore a pragmatic and reasonable approach needs to be taken, especially in terms of funding and delivery.</p>

Question 61 Are there any developments which should be exempt from developer contributions (e.g. currently housing for the elderly is exempt from CIL)?		
LPIO598	Home Builders Federation	The Council should undertake an updated whole plan viability assessment. If any unviable sites and/or typologies are identified then these should be considered for exemption from developer contributions.
LPIO599	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	As the NPPG sets out criteria for exemptions from Developer Contributions, any local policy will need to establish where further exemptions could apply for example of the grounds of viability.
LPIO600	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	Clearly the adoption of CIL has an impact on development viability if applicable to specialist housing developments. In many ways the difficulties lie with the lack of flexibility and understanding of the range of housing types within the current Use Classes Order. <b>House of Commons report published in 2018:</b> CIL was also noted as being particularly onerous for developers of specialist housing, being a flat-rate sqm tax applying also the extensive shared areas such as restaurants, leisure facilities, communal lounges and larger wheelchair accessible corridors typical of extra care housing schemes. It may well be sensible to set out specific typologies where circumstances do exist that uses that do not fall to be assessed against general housing policies and triggering requirements such as affordable housing providing that may affect viability.
LPIO601	Wright, T (c/o Pegasus Group)	As stated in PPG, <i>'provision of affordable housing should only be sought for residential developments that are major developments. For housing development, major development is defined in the National Planning Policy Framework [...] or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.'</i> (Paragraph: 023 Reference ID: 23b-023-20190315, March 2019).

Question 62 Do you have any comments on the most recent updated Infrastructure Delivery Plan?

LPIO602	Canal & River Trust	<u>Page 15: Canals</u> <b>Trent &amp; Mersey Canal:</b> The Trust welcome the inclusion of works to the Trent & Mersey Canal towpath and the restoration of the Hatherton Canal; and believe that the content provided is an accurate reflection of the planned works. [...] We wish to highlight that the Trust has active plans to improve the canal towpath to the north of Rugeley, north of Leathermill Lane. Development in and around the Towers Business Park employment area, and new housing in Rugeley will likely increase demands upon this section of the towpath. In addition, the Trust has aspirations to improve mooring facilities along this stretch of towpath (including essential repairs to the canal wash wall) to improve visitor facilities to the town. 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. <b>Hatherton Canal:</b> We welcome the inclusion of this project in the Infrastructure Delivery Plan. 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.
LPIO603	Lichfield & Hatherton Canals Restoration Trust	It is not clear that our comments against an earlier issue of the Infrastructure Delivery Plan have been recorded in this most recent update. Our comments under the August 2018 consultation were submitted using the on-line form. Regarding the Infrastructure Delivery Plan, we commented as follows:

		<p>The IDP needs updating in respect of the Hatherton Canal restoration project. There is a need to engage with the two adjacent local authorities and with the Lichfield &amp; Hatherton Canals Restoration Trust to ensure proper and adequate through-route protection. It is also necessary to gain a better understanding of the funds which could be made available from or via the local authorities to enable the project to progress during the life of the present Local Plan. The IDP currently mentions boat movements as an issue likely to impact the Cannock Extension Canal SAC, this can now be deleted. There has been progress with land acquisition since May 2014.</p> <p><u>Page 12</u> As a minor point of correction on page 12, the Delivery Agency 'British Waterways' should now read 'Canal &amp; River Trust'</p> <p><u>Page 15</u> We welcome the inclusion of the restoration of the Hatherton Canal</p> <p><u>Page 22</u> We welcome the reference to the Hatherton Canal for possible flood risk alleviation benefits</p>
LPIO604	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The IDP has been updated but still contains information on infrastructure which has now been delivered. It needs refining to be shorter, sharper and focussed upon further requirements which are needed for plan delivery.
LPIO605	Severn Trent	<p><u>Surface Water and Sewer Flooding</u> We expect surface water to be managed in line with the Government's Water Strategy. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer. We believe that greater emphasis needs to be paid to consequences of extreme rainfall. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of sewers.</p> <p><u>Water Efficiency</u> We recommend that you consider taking an approach of installing specifically design water efficient fittings in all areas of the property rather than focus on the consumption of the property. This should help to achieve a lower consumption than the maximum volume specified in the Building Regulations. We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110litres of water per person per day.</p>
LPIO606	Sport England	Welcome the acknowledgement that the IDP will be updated to reflect the latest playing pitch and indoor facilities strategy.
LPIO607	Taylor Wimpey (c/o Lichfields)	The use of S106 obligations will need to be considered in the context of what is to be delivered via CIL and the Regulation 123 list. These should be no 'double counting' i.e. items of infrastructure should not benefit from both. Where possible, the IDP should identify the proposed allocations in the Local Plan to which individual infrastructure contributions will apply, and how this will be split proportionately where infrastructure serves a number of sites. This will ensure that the IDP is transparent and ensure that developers are aware of any obligations on them in bringing sites forward for viability reasons.
LPIO608	Cannock Chase AONB Partnership	Support for sustainable tourism and recreational management in the AONB within the Infrastructure Delivery Plan is welcomed to ensure that the AONBs qualities are protected and enhanced. In addition to identifying opportunities within the AONB, support for enhancements close to, but outside the AONB would be welcomed.

LPIO609	Environment Agency	Having reviewed the IDP it appears the detail of a number of water-based infrastructure needs have been drawn from the 2010 WCS, based on the figures within the Local Plan Part 1. We look for this to be updated in due course once more up to date information becomes available.
LPIO610	Highways England	<p>We have reviewed the revised draft version of the IDP. The Council intend to work with partners and stakeholders to gain an understanding of what infrastructure projects are already planned in the district and where there are existing deficiencies. This is welcomed.</p> <p>The updates to the IDP include reference to the following Highways England based studies/initiatives:</p> <ul style="list-style-type: none"> <li>• Churchbridge A5/M6T/A460/A34 junction study;</li> <li>• A5 Partnership</li> </ul> <p>This is noted, however, the referenced Churchbridge study is a past study as opposed to a current study. It is requested that all references to the 'Highways Agency' within the document are updated to state 'Highways England'. We also recommend that reference is made to the M54/M6 link road project; this scheme is now subject to a "Preferred Route Announcement". A Development Consent Order (DCO) application is expected to be forthcoming in due course, with completion estimated in 2024.</p> <p>It is of note that Midlands Connect are currently carrying out a study of the A5 corridor between M6 J12 and M1 J18. The purpose of this study is to focus on a series of transport improvements to accelerate growth in the corridor and the region. This study is expected to report imminently, and could play a role in the identification of any SRN mitigation required, hence will need to be incorporated into the IDP.</p> <p>Based on the results of our high-level analysis, traffic impacts arise throughout the SRN in the vicinity of the Cannock Chase District. As detailed elsewhere within this letter, further technical analysis will need to be carried out to identify the need for, location of, and form of any mitigation for the SRN.</p> <p>Accordingly, as the transport evidence base for the local plan evolves, it will be necessary to further update the IDP. This is likely to include the need to reference additional highway schemes on the SRN in order to mitigate the traffic impacts of the proposed developments.</p>
LPIO611	Historic England	We welcome the inclusion of public realm works, canal improvements and historic landscape works within the schedule.
LPIO612	Inland Waterways Association	<p><u>Canals (Page 15- Hatherton Canal)</u> S106. This column should be ticked to include contributions from any future development sites adjacent or close to the route.</p> <p>Please delete "and boat turning movements". Inclusion of the word "turning" makes no sense. Also, the issue of boat movements on the Cannock Extension Canal was considered at the Walsall Sites Allocation Plan examination, at which CCDC were represented.</p> <p>Natural England agreed that reference to boat movement restrictions were not justified and should be removed, which was subsequently done and the Plan adopted.</p>
LPIO613	Norton Canes Parish Council	The document suggests that health provision is satisfactory. However, the evidence is that GP practices are already struggling to cope with the number of people now residing in the village and any further increase arising from the committed housing schemes will only add to the pressure. The Health Centre on Brownhills Road is now a Community Hub for health provision such as community nurses and other health staff. The Parish Council would like to see the full building capacity used for primary care provision. Car parking at the building is also a major concern as patients are unable to park. We are not aware of any plans for GP surgeries to expand to cope with demand.



LPIO614	St Modwen (Watling Street) (c/o RPS Planning and Development)	St Modwen note that the IDP is a 'live document' and, as such, should be kept up to date as an ongoing requirement of the Local Plan Review process. Consequently, the details within it are likely to change as the policies and proposals evolve as the Local Plan Review progresses. That being said, as detailed in Appendix 3 of this submission, there is considerable amount of work the Council needs to do in order to flesh out the detail regarding the critical and non-critical infrastructure necessary to support the delivery of the Plan.
LPIO615	Wright, T (c/o Pegasus Group)	The IDP has been updated but still contains information on infrastructure which has now been delivered. It needs refining to be shorter, sharper and focused upon future requirements which are needed for plan delivery.
Question 63 Do you have any comments on the evidence required to ensure it reflect the infrastructure requirements of the new Local Plan? Are there any existing evidence base documents, strategies or action plans from relevant organisations that could help inform the Infrastructure Delivery Plan updates?		
LPIO616	Canal & River Trust	Should the Local Authority have any questions with regards to the projects mentioned in other questions please feel free to contact <a href="mailto:simon.tucker@canalrivertrust.org.uk">simon.tucker@canalrivertrust.org.uk</a>
LPIO617	Lichfield & Hatherton Canals Restoration Trust	We would welcome the opportunity to engage directly in discussion with Cannock Chase Council to ensure appropriate policy protection for those sections of the proposed through route for the Hatherton Canal that lies within the Cannock Chase District. We are also willing to work with the Council and with other relevant organisations such as the Inland Waterways Association and Canal & River Trust to ensure that the programme to restore the Hatherton Canals moves forward and the full range of benefits from that programme are identified, planned for, and supported. We would also mention the funding made available by Cannock Chase Council for the Water Supply Study for the restored Hatherton Canal. Once this study has produced the expected report, that document should form part of the evidence base referred to in this question.
LPIO618	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Infrastructure providers need to recognise the importance of their role and duty to engage early in the plan making process. Infrastructure requirements should be proportionate and directly relevant to the plan. They should not be used to retrospectively address previous deficiencies or underinvestment in provision. The IDP should be clear as to where funding for delivery will come from, how it will be accessed and whether it is dependent upon other sources including areas of risk.
LPIO619	Severn Trent	Within Severn Trent there are several sources of information you may find useful to appreciate our future plans; <ul style="list-style-type: none"> <li>• Water Resource Management Plan (2019) <ul style="list-style-type: none"> <li>▪ <a href="https://www.severntrent.com/about-us/future-plans/water-resource-management/wrmp-19-documents/">https://www.severntrent.com/about-us/future-plans/water-resource-management/wrmp-19-documents/</a></li> </ul> </li> <li>• Drainage &amp; Waste Water Management Plans <ul style="list-style-type: none"> <li>▪ Currently only a "lite" version exists as this is a new industry initiative and the first full version will become available in early 2022. You will be consulted on this as it develops.</li> <li>▪ <a href="https://www.stwater.co.uk/content/dam/stw/about_us/pr19-documents/sve_appendix_a9_drainage_and_wastewater_management_plan.pdf">https://www.stwater.co.uk/content/dam/stw/about_us/pr19-documents/sve_appendix_a9_drainage_and_wastewater_management_plan.pdf</a></li> </ul> </li> <li>• AMP7 (2020-2025) Business Plan <ul style="list-style-type: none"> <li>▪ <a href="https://www.stwater.co.uk/about-us/future-plan-2020-2025/your-opinions-matter/">https://www.stwater.co.uk/about-us/future-plan-2020-2025/your-opinions-matter/</a></li> </ul> </li> </ul>

LPIO620	Taylor Wimpey (c/o Lichfields)	Robust and up to date evidence will need to be provided to justify the infrastructure requirements within the Local Plan and any contributions sought. Where the Council is considering the use of existing documents to inform or form part of the evidence base, Taylor Wimpey considers that the Council should review these documents to ensure that they reflect the most up to date position on requirements and costs. As part of this process, the costs of such infrastructure will need to be clearly identified so that they can be properly tested through the Local Plan viability assessment work.
LPIO621	Historic England	We would welcome the preparation of a historic environment background topic paper, or some similar document setting out the approach taken for the historic environment and the assessment undertaken.[...]
LPIO622	Wright, T (c/o Pegasus Group)	NPPF Paragraph 16 (c) emphasises the importance of engaging with infrastructure providers (amongst others) in the plan making process. NPPF paragraph 25 sets out the need for clear engagement through the Duty-to-Cooperate. Infrastructure providers need to recognise the importance of their role and duty to engage early in the plan making process, being clear and transparent as to what is required and when and the justification for this. Infrastructure requirements should be proportionate and directly relevant to the plan. They should not be used to retrospectively address previous deficiencies or underinvestment in provision. The IDP should be clear as to where funding for delivery will come from, how it will be accessed and whether it is dependent upon other sources including areas of risk (e.g. funding bids).
Question 64 As an infrastructure provider, in what ways would you be able to best engage with the updates of the Infrastructure Delivery Plan on a regular basis?		
LPIO623	Canal & River Trust	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.
LPOI624	Lichfield & Hatherton Canals Restoration Trust	We feel it would be helpful, at this stage, to have a small number of nominated contacts within Cannock Chase Council and the Lichfield & Hatherton Canals Restoration Trust to ensure appropriate dialogue as felt necessary by either organisation. [...] In order to enable appropriate focus on 'our' item of Green Infrastructure we would want specific meetings with other relevant organisations represented as relevant which could include: Canal & River Trust, Inland Waterways Association, South Staffordshire District Council, Walsall Council
LPIO625	National Grid	Specific development proposals within the Cannock Chase area are unlikely to have a significant direct effect upon National Grid's electricity transmission infrastructure. Generally, network developments to provide supplies to the local distribution network are as a result of overall regional demand growth rather than site specific development. The local distribution network operator (Western Power Distribution) is responsible for operating the local electricity distribution network which supplies electricity from the national electricity transmission system direct to households and business. If new infrastructure is required in response to an increase in demand across the local electricity distribution network the operation (Western Power Distribution) may request improvements to an existing National Grid substation or a new grid supply point. I would advise that you contact Western Power Distribution in the first instance for your information. The gas distributor for your area is Cadent Gas. I would therefore advise you to contact Cadent Gas.

LPIO626	Severn Trent	<p>We welcome ongoing consultation and discussion around your infrastructure delivery plan and are open to how you wish to format this.</p> <p>Where appropriate we can provide a high level of insight into strategic elements of our capital programme which may address queries or concerns with water and waste water infrastructure across the district. Please use <a href="mailto:growth.development@severntrent.co.uk">growth.development@severntrent.co.uk</a> to contact us for correspondence of this nature.</p>
LPIO627	Arriva Midlands	<p>As a service provider in the local community, we endorse development initiatives which bring value to the Cannock Chase district. Our local bus network is predominantly commercial i.e. provided without subsidy, and we actively scope out future opportunities to adapt our network to meet changing demand – particularly where largescale development is taking place – in order that the Cannock Chase public network map is inclusive and our network sustainable.</p> <p>The biggest challenge we face in this respect is suitability of access to new sites for local buses and ensuring that suitable infrastructure is provided to match introduction of services to newly-developed areas. We would appreciate a clear communication at an early stage to ensure that due consideration is given to the vital facility of public transport at the development planning stage.</p>
LPIO628	Staffordshire County Council	<p>It is recommended that there is regular engagement with the County Council on the identification of the preferred package of highway and transport schemes to be included in an updated IDP. It is essential that there is consistency between the County Council’s Integrated Transport Strategy for Cannock Chase and IDP as both documents should be used as supporting evidence.</p>

**Neighbourhood Planning**

Question 65 Do you agree with the Council’s suggested approach to reflecting the importance of neighbourhood planning throughout the Local Plan policies, rather than retaining a separate and generic neighbourhood planning policy as at present?

LPIO629	Home Builders Federation	<p>The importance of neighbourhood planning should be reflected in the new Local Plan however, Neighbourhood Plans must be in general conformity with the Council’s Strategic policies (2019 NPPF para 29 &amp; Footnote 16). These strategic policies should be identified in the new Local Plan (see HBF answer to Q66).</p>
LPIO630	Richborough Estates (Brownhills Rd & S of Cannock Rd) c/o Pegasus Group)	<p>Yes, this approach is supported as Neighbourhood Planning is sufficiently addressed via national policy.</p>
LPIO631	Taylor Wimpey (c/o Lichfields)	<p>Should the Council take the suggested approach of reflecting the role and importance of neighbourhood planning by making reference to the opportunities for neighbourhood plans to support Local Plan policies across the whole plan, Taylor Wimpey considers that a specific Local Plan policy on Neighbourhood Plans is not required, as long as the policies in question align with the Framework and the Practice Guidance.</p>
LPIO632	Wright, T (c/o Pegasus Group)	<p>Yes, this approach is supported as Neighbourhood Planning is sufficiently addressed via national policy.</p>

**Approach to strategic and non-strategic policies and site allocations**

Question 66 Do you have any comments on the approach of separating the updated Local Plan policies into clear strategic and non-strategic elements, where necessary?

LPIO633	Bromford Housing Group Ltd (c/o PlanIT Planning and Development)	It is our view that the emerging Local Plan should make both strategic and non-strategic housing allocations.
LPIO634	Home Builders Federation	As set out in the 2019 NPPF the new Local Plan should make explicit which policies are strategic with a clear distinction between strategic and non strategic policies (para 21 & Footnote 13). The strategic policies of the new Local Plan should address the Council's identified strategic priorities for the development and use of land in the plan area (para 17). These strategic policies should set out an overall strategy for the pattern, scale and quality of development (para 20). The strategic policies should not included detailed matters (para 21) which should be set out in non-strategic policies (para 28).
LPIO635	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The NPPF sets out the context for determining strategic policies in particular paragraph's 20 to 23, and no strategic policies (paragraphs 28 to 30). Also see the response to Q60.
LPIO636	Taylor Wimpey (c/o Lichfields)	As a single Local Plan is being prepared, the Plan should explicitly state which policies are strategic policies. As required by the Framework, the strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. If the anticipated target adoption of the plan is delayed beyond September 2021, then the proposed 15year plan period should stretch beyond 2036 accordingly and sufficient land should be allocated to meet any need over this period.
LPIO637	St Modwen (Watling Street) (c/o RPS Planning & Development)	St Modwen would point out that the commentary presented under this heading in the IOD (paragraphs 13.23-13.33) relates almost exclusively to housing proposals. The IOD does make reference to ' <i>any...employment site of 5ha or greater</i> ' as a potential definition of a strategic site in the Plan, which St Modwen broadly concurs with.
LPIO638	Wright, T (c/o Pegasus Group)	The NPPF sets out the context for determining strategic policies in particular paragraphs 20 to 23, and non strategic policies (paragraphs 28 to 30). Please also see the response to question 60.

Question 67 Do you have any comments on the approach to considering the allocation of strategic sites and non-strategic sites in the Local Plan?

LPIO639	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	The identification of non-strategic sites should not be left to the Neighbourhood Plan process. It cannot be guaranteed that the Neighbourhood Plan process will identify a sufficient number of non-strategic sites to meet the overall housing requirement. Neighbourhood Plans will need to be prepared in general conformity with the emerging Local Plan. There will be a delay following the adoption of the Local Plan whilst Neighbourhood Plans are worked up. This will delay the delivery of housing within the District. It could also result in the potential for the Local Authority to have a 5 year housing land supply shortfall if Neighbourhood Plans are not progressed with the necessary allocations in place.
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LPIO640	Home Builders Federation	The allocation of strategic and non-strategic sites in the new Local Plan should bring forward sufficient land at a sufficient rate to address housing requirement in full over the plan period. The delegation to Neighbourhood Plans of the allocation of any non-strategic sites should not undermine the sufficiency of the Council's overall Housing Land Supply (HLS).
LPIO641	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The Council Recognise Paragraph 68 (a) of the NPPF. The NPPF is therefore clear that Cannock Chase Council should take forward sites of all sizes through the Local Plan review process or demonstrate through the Plan why this cannot be achieved.
LPIO642	Taylor Wimpey (c/o Lichfields)	To ensure transparency and ensure that the delivery of sites can be properly tested, Taylor Wimpey considers that the Local Plan should clearly identify both strategic and non-strategic allocations. Please also see Question 69 It is considered that the land at Wimblebury Road, Cannock should be allocated for residential development in the Local Plan.
LPIO643	St Modwen (West of Pye Green Road) (c/o RPS Planning and Development)	<u>Policy Position – Pye Green Road</u> As the council is aware, the site measures over @60ha and is allocated as a Strategic Housing Site under Policy CP6 within the Current Local Plan (Part 1). [...] St Modwen consider the site should continue to be recognised as a strategic site in the Local Plan Review, the level of housing suitable at the site is considerably in excess of 900 dwellings. In St Modwen's opinion, the increased housing can be provided whilst maintaining the level of open space (SANGS) over the site area. <u>Increased Capacity – Pye Green Road</u> 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, [...]. We are in the process of preparing an updated site wide masterplan and an associated land use table, which will demonstrate the whole site, is capable of delivering in excess of 900 dwellings allocated for the site.
LPIO644	St Modwen (Watling Street) (c/o RPS Planning and Development)	St Modwen consider that the identification of sufficient land to meet local needs, and unmet needs of adjacent areas, are very much 'strategic matters' and hence should be considered as 'strategic' policy issues for the Local Plan.
LPIO645	Wright, T (c/o Pegasus Group)	As the Council recognise, Paragraph 68 (a) of the NPPF states that <i>“Local Planning Authorities should identify, <b>through the development plan</b> and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, <b>through the preparation of relevant plan policies</b>, that there are strong reasons why this 10% target cannot be achieved.”</i> [emphasis added]. The NPPF is therefore clear that Cannock Chase Council should take forward sites of all sizes through the Local Plan Review process or demonstrate through the Plan why this cannot be achieved.
Question 68 Do you have any comments on the site threshold for strategic and non-strategic site allocations within the Local Plan?		
LPIO646	Home Builders Federation	Whatever site threshold is used by the Council to determine strategic and non-strategic sites 10% of the HLS should be provided on small sites.
LPIO647	Taylor Wimpey (c/o Lichfields)	Based on their experience of promoting sites through local plans across the country, Taylor Wimpey notes that a housing site providing a minimum of 150 dwellings is typically regarded as the threshold for a strategic site.

LPIO648	St Modwen (Watling Street) (c/o RPS Planning and Development)	The definition and application of thresholds (Q68) should not be the driver of the appropriateness or otherwise of allocating particular sites to address identified needs of the area. Rather, the critical issue is to ensure that sufficient land is identified (whether allocated or not) to enable the growth needs of the District to be adequately catered for. In this regard, the Council should not apply any threshold or criteria that would otherwise undermine the allocation of sufficient sites to address those needs through the Plan or relegate or delay the identification of sites unnecessarily to a lower order plan to be brought forward at some point in the future.
Question 69 Should sites with planning permissions and/or those that are already under construction be considered for allocation in the Local Plan?		
LPIO649	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	We have no particular concern with that approach. It must, however, be ensured that double counting does not occur. Sites which are granted planning permission prior to the base date of the Plan should not be counted as contributing to the emerging Local Plan's housing requirement. A more cautious approach must also be taken for sites that have been granted planning permission and the permissions have subsequently expired. An approved and lapsed planning permission should not be relied on unless there is clear evidence to indicate otherwise.
LPIO650	Home Builders Federation	Sites with planning permission, under construction and completed (since 2018) should be accounted for in the overall HLS of the new Local Plan. It is not necessary to allocate completed sites or sites under construction but these sites should be incorporated within settlement boundaries where these are reviewed (see HBF answer to Q18). Sites with planning permission but not yet started should be considered for allocation.
LPIO651	KGL Estates Ltd (c/o John Heminsley)	It is considered reasonable in principle to allocate sites which have planning permission but only if evidence indicates that the development will commence before the expiry of the permission. There's not considered to be a benefit in allocating sites where development is under construction and this should continue to be a role for the SHLAA.
LPIO652	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	No. there should be a 'monitor and manage' approach so if sites stall for any reason then others should be brought forward to ensure a consistent and reliable supply throughout the plan period.
LPIO653	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that sites with planning permission or under construction should not be allocated in the Local Plan. If this approach were to be taken, there is a risk that this may cause discrepancies in the housing supply calculations and could lead to the assumption that housing supply is greater than it actually is. Where sites with permission/under construction form part of a wider site which is proposed for allocation, the area with permission should be identified separately from the remainder of the allocation in the housing trajectory. The Local Plan Proposals Map should also clearly identify the part of the allocation which benefits from planning permission.
LPIO654	Historic England	[...]. Historic England require all sites being proposed for allocation to assess the impacts that development could have on the significance of heritage assets, including their setting, to be NPPF compliant, and this is an area that is always a challenge and we would welcome a discussion on this.
LPIO655	Lichfield District Council	LDC does consider that sites above a certain threshold with consent should be allocated as indicated. This would be consistent with its own approach in the recently adopted allocations DPD.
LPIO656	Wright, T (c/o Pegasus Group)	No. there should be a 'monitor and manage' approach so if sites stall for any reason then others should be brought forward to ensure a consistent and reliable supply throughout the plan period.

LPIO657	Association of Black Country Authorities (c/o Walsall Council)	Sites with planning permissions (that have not yet been implemented) should be allocated in the Local Plan, as circumstances might change and leave such sites without an allocation or commitment.
<b>Safeguarding future land for development and 'reserve' sites</b>		
Question 70 Should the Council consider identifying additional safeguarded land or reserve sites through the new Local Plan taking into account national policy and the local context? Are there any alternative approaches that the Council could take?		
LPIO658	Home Builders Federation	The Council should consider identifying additional safeguarded land and/or reserve sites in the new Local Plan. The new Local Plan should set out the circumstances for the release of such sites including triggers for under performance against planned housing delivery set out in the housing trajectory and 5YHLS.
LPIO659	KGL Estates Ltd (c/o John Heminsley)	Housing growth is likely to continue to be a major issue beyond the end of the plan period of 2036 and as significant land and major areas of green space network, so identifying safeguarded sites is considered to be an appropriate response in line with national policy not to alter GB boundaries at the end of each plan period. Further work would need to be done to identify the amount of safeguarded land required.
LPIO660	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Richborough Estates consider it necessary for the Council to identify 'safeguarded land' to meet development needs beyond the Plan period. The identification of safeguarded land should allow for Green Belt boundaries to endure for a minimum of 5 to 10 years beyond 2036. Safeguarded sites should be capable of being brought forward under a 'monitor and manage' approach should the plan be failing to deliver on its requirements, which should include an element on the delivery of housing shortfall of the GBBCHMA as a whole.
LPIO661	Severn Trent	There is the added benefit that safeguarded land provides visibility to those sites that sit somewhat further down the supply chain, this allow scenario testing for infrastructure partners to understand where future pressures may be and opens the door for conversations on these.
LPIO662	Taylor Wimpey (c/o Lichfields)	In order to ensure that Green Belt boundaries will not need to be altered at the end of the plan period, Taylor Wimpey considers that the Local Plan should identify safeguarded land. Taylor Wimpey also considers that the most effective way of ensuring sufficient housing supply is to identify 'Plan B' sites. In addition to allocating additional sites and identifying safeguarded land in the Local Plan a new policy should be introduced which provides a mechanism for its early review. Specific sites should be identified as 'Plan B' sites now. This will ensure that the Local Plan is flexible and can respond quickly to the potential non-delivery of committed sites and any other shortcomings in its housing land supply. It is crucial that the Council monitors its housing land supply position and where it is found to have fallen below an identified trigger point, it will permit these Plan B sites to come forward. This would ensure greater flexibility as it would remove the need for a formal plan review process to be undertaken if additional sites that are not allocated for housing are needed to boost the borough's housing supply. If there is a need for the release of Green Belt to provide sufficient 'Plan B' sites, these sites should be identified for release now. Without such a mechanism in place, the Local Plan may not deliver the significant boost in housing that is required to meet the needs of the Borough and any wider shortfall boost in housing that is required to meet the needs of the Borough and any wider shortfall from the GBBCHMA and the Government's objective of significantly boosting the supply of homes.

LPIO663	Bloor Homes Ltd (c/o Define Planning & Design)	NPPF Paragraphs 136 & 139 are considered. Therefore, to accord with the NPPF it is necessary for the Council to identify 'safeguarded land' to meet development needs beyond the Local Plan period, particularly given that housing need will continue to arise and the opportunities for development outside of the Green Belt in the District are extremely limited and finite.
LPIO664	Gladman	Gladman considers that the CCLP should identify both reserve sites and safeguarded land for future development needs. The identification of reserve sites would be advisable in the event that allocated sites do not come forward as expected and the Council is unable to demonstrate a 5year supply of housing land. [...] Identification of an adequate amount of safeguarded land in the CCLP will therefore avoid the need for further green belt releases in the next review of the Local Plan.
LPIO665	Wright, T (c/o Pegasus Group)	It is considered necessary for the Council to identify 'safeguarded land' to meet development needs beyond the Plan period. This is particularly important as housing need will continue to be identified beyond the plan period and opportunities for development outside of the Green Belt are finite. The identification of safeguarded land should allow for Green Belt boundaries to endure for a minimum of 5 to 10years beyond 2036. In addition, this approach is supported within national policy with Paragraph 136 of the NPPF. Safeguarded sites should be capable of being brought forward under a 'monitor and manage' approach should the plan be failing to deliver its requirement, which should include an element on the delivery of the housing shortfall of the GBBCHMA as a whole. This situation would need to be kept under review as a strategic matter, given that Local Plan policies have to be reviewed every five years to assess whether or not they remain up to date.
Question 71 If safeguarded land or reserve sites are necessary, how much capacity should be identified and should this be distributed in accordance with the overall preferred strategies for housing/employment development?		
LPIO666	Home Builders Federation	There is no numerical formula to determine the appropriate quantum of safeguarded land and/or reserve sites but where the HLS is highly dependent upon one or relatively few strategic sites and/or specific settlements/localities then greater numerical flexibility is necessary than if the HLS is more diversified.
LPIO667	KGL Estates Ltd (c/o John Heminsley)	Rather than consider the concept of reserve sites, flexibility in the plan to 2036 could be achieved by recommendations for phasing development which could be varied if allocated sites do not come forward within the anticipated timescales.
LPIO668	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The approach used by South Staffs Council through its Site Allocations Document is supported and it is recommended Cannock Chase Council adopt a similar approach.
LPIO669	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that there should be a sufficient supply to meet housing needs for at least 10years following the end of the plan period. It is considered that the overall distribution of safeguarded land should broadly align with the overall preferred strategy for housing and employment development.
LPIO670	Wright, T (c/o Pegasus Group)	The approach used by South Staffordshire Council through its Site Allocations Document (SAD) is supported and it is recommended Cannock Chase Council adopt a similar approach.
LPIO671	Association of Black Country Authorities (c/o Walsall Council)	Paragraph 13.34 refers to the national policy requirement to safeguard land for needs beyond the plan period when the Green Belt is reviewed. If the plan is to amend the boundaries of the Green Belt, including where necessary to help meet the need for housing and possibly employment land arising from the Black Country and Birmingham, there appears to be no option but to safeguard such land. The amount involved should be based on a projection of the requirement for the chosen plan period.



Draft methodology for site selection		
Question 72 Do you have any comments on our proposed site selection methodology?		
LPIO672	Bromford Housing Group Ltd (c/o Define Planning and Design)	<p>We have a number of concerns with the 2018 SHLAA and its conclusions on the suitability and the deliverability of sites and in particular site C64 – Land off Rawnsley Road, Hazelslade. It is suggested that the site is potentially suitable for a Green Belt allocation or a local green space designation without any explanation as to why this is the case. This conclusion does not appear to be supported by the Green Belt assessment. As part of the preparation of the emerging plan further SHLAA consultation should be undertaken including the opportunity to comment upon sites identified within the current SHLAA.</p> <p>In terms of Table 2 – The Site Selection Process, it is our view that Green Belt sites should only be considered for release where exceptional circumstances are identified. It is our view that exceptional circumstances will not be identified unless it is demonstrated that all suitable and sustainable non-Green belt sites identified by the SHLAA have been allocated for development in the first instance.</p> <p>The Council should also provide maximum flexibility within its overall housing land supply to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market.</p>
LPIO673	Home Builders Federation	<p>The HBF do not comment on the merits or otherwise of individual sites selected for allocation.</p> <p>When selecting housing sites for allocation the Council should select the widest possible range of sites by both size and market locations to provide suitable land for small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p> <p>The Council should also provide maximum flexibility within its overall HLS to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market.</p>
LPIO674	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>The assessment process is broadly supported and the ‘traffic light’ or RAG – rating method of scoring is considered appropriate provided that the process is open and transparent and allows for submitted information to be utilised in the rating process, enabling each site to be considered on its merits.</p> <p>It is essential that the site assessment criteria are considered ‘in the round’ rather than any particular order of importance, as it will be a combination of factors which contribute to the overall sustainability of a scheme. It is also vital to ensure that information relating to consideration of how the site contributes to Green Belt purposes is based upon the site boundaries. It is also imperative that ‘sustainability’ outcomes are considered in the round from all of the information submitted and not limited to the conclusions of the Sustainability Appraisal.</p> <p>Information is provided which demonstrates how land off Brownhills Rd, Norton Canes performs highly against the proposed criteria, providing the exceptional circumstances needed to release the site from the Green Belt, delivering a highly sustainable development within a sustainable settlement. It is vital that this information is used when assessing the site.</p>
LPIO675	Taylor Wimpey (c/o Lichfields)	<p>Taylor Wimpey welcomes the Council’s proposal to prepare a site selection methodology as this will help to ensure that the process of site allocation is dealt with in a transparent manner with a fully justified approach. More detailed comments on the Council’s proposed methodology for the site selection process are set out below.</p> <p><u>Stage 1: Establish Evidence Base</u></p>

		<p>TW would suggest that as well as a dwelling threshold, a minimum site size is also identified within the parameters for selecting sites.</p> <p><u>Stage 2: Establish a Pool of Sites and First Site Sift</u></p> <p>TW considers that sites with existing planning permission or in the early stages of construction should not be considered for allocation as development on these sites has already been established as acceptable in principle.</p> <p><u>Stage 3: Detailed Assessment</u></p> <p>The use of a traffic light system with associated commentary to pick up significant factors and evidence is generally supported. However, it is not clear, from the methodology proposed in the LPIO how the sites will be scored and taken forwards and what weight is given to each of the criteria in the tables. TW therefore considers that more detail needs to be provided to confirm how the traffic light ratings will be weighted.</p> <p>This stage of the assessment should also consider how each site aligns with the Council's chosen strategy for meeting overall housing growth.</p> <p>The identification of key locational/mitigation opportunities as part of the detailed assessment process is welcomed as sites are likely to be subject to some form of constraint that it may be possible to overcome through appropriate mitigation measures.</p> <p>An evidence base will need to be put together to ensure that sites are assessed against the appropriate evidence. TW considers that all of the sites being considered at the detailed assessment stage should be considered in the Sustainability Appraisal.</p> <p><u>Stage 4: Evaluation Stage</u></p> <p>Whilst it is appreciated that an element of professional judgement is always required in assessments of this nature, the detailed site assessment process at Stage 3 should be sufficiently logical and transparent to ensure that any judgements reached at Stage 4 are clearly justified.</p> <p>TW agrees with the suggested use of information gathered for sites recommended for selection to inform a policy for each site to ensure that appropriate mitigation, infrastructure and other site specific requirements are delivered when the site is developed.</p> <p><u>Stage 5: Public Consultation</u></p> <p>TW fully supports the proposed public consultation process to inform final site selection. It is essential that this consultation is undertaken in order to give those promoting sites an opportunity to review the Council's assessment as there may be issues identified in the site selection process to which solutions can be identified, but which the Council may not be aware of.</p>
LPIO676	Bloor Homes Ltd (c/o PlanIt Planning and Design)	<p>A staged site selection process is set out, and whilst that establishes a logical sequence for the process of assessing individual assessments, clearly it must also take account of the spatial strategy matters highlighted in respect of Question 17.</p> <p>Notably, whilst the Green Belt is an important policy consideration, the overall sustainability and deliverability of the identified options must be the determinative consideration. Account should also be taken of whether sites are geographically well placed to address unmet needs arising to the south of the District in the wider HMA.</p> <p>Otherwise, ensuring that the allocation sites are deliverable will be key to the Local Plan's soundness and on that basis the factors presented are suitable considerations for the selection of preferred sites. However, several of those factors are not definitive and may be improved or overcome directly through the spatial disposition of development on a site or developer contributions. These include local road network capacity, availability of public transport and the achievability of</p>

		vehicular/pedestrian access to individual sites. Similarly, factors such as landscape impact and sensitivity can be mitigated or improved through the implementation of a carefully designed landscaping scheme.
LPIO677	Briggs, T	<p>The proposals as drafted allow for the gradual slicing up of greenfield and/or AONB land over the course of several Plan periods. A greenbelt review will never add more land to greenbelt than it takes out, so it is obvious what the purpose of the review is.</p> <p>Rural development is counter intuitive to the stated wishes to protect green spaces, to reduce carbon emissions/travel etc. and to ensure residents have access to a good standard of facilities nearby.</p> <p><u>Table 2</u></p> <p>There needs to be far greater clarity on this point as methodology such as this would soon see many sites removed from greenfield designation, and all the stated aims of protecting greenbelt/AONB then come to nought as the land is no longer protected by those designations. Greenfield land appears particularly vulnerable here and such methodology would serve to miss the point of greenfield entirely.</p> <p><u>Stage 4</u></p> <p>I am also concerned as to the robustness of the 'professional planning judgement' reference in stage 4.</p>
LPIO678	Cannock Chase AONB Partnership	<p>Reference to NPPF Paragraph 172 (<i>"The Scale and Extent of development..."</i>) Sites for major development should therefore not be allocated in the AONB, unless there has been full consideration and assessment of the type of development and the site in question, as set out in Paragraph 172 (a), (b) and (c).</p> <p>A number of site options fall inside or in the setting of the AONB. If the Authority is minded that the principle of allocating sites within the AONB or its setting is not unacceptable, rather than rule this out at the 'first sift', it would be appropriate to locally define major development to ensure that the scale and type of development could be accommodated in these sensitive landscapes without detriment to the natural beauty of the AONB. Additionally, sites should only be put forward if they have been fully assessed in terms of landscape and visual sensitivity and there is confidence that impacts could either be avoided or mitigated. Should any sites be considered appropriate for allocation, guidance through an SPD or development briefs should set out expectations for the form and character of any potential development, along with any necessary mitigation enhancement in support of the AONB Management Plan.</p>
LPIO679	Historic England	<p>We are encouraged to see the inclusion of heritage in the list of constraints and benefits. I include a link to Historic England's Advice Note 3 on preparing site allocations and appropriate site selection methodology which we would be supportive of the Council following. Additionally, our Good Practice Advice documents are also a useful tool to assess how to prepare local plans with respect to the historic environment, including the issue of setting.</p> <p><a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</a></p> <p><a href="https://historicengland.org.uk/advice/planning/planning-system/">https://historicengland.org.uk/advice/planning/planning-system/</a></p>
LPIO680	Lichfield District Council	<p>Lichfield has reviewed the broad methodology set out on pages 123 to page 125 and generally supports the approach set out. Lichfield DC does suggest on page 123 that sites not being actively promoted should not be discounted unless it is supported by the evidence base through the District Council contacting the owners and establishing the situation.</p>
LPIO681	St Modwen (Watling Street) (c/o RPS Planning and Development)	<p>Row 6 in Table 2 defines one of the assessment factors '<i>Key locational criteria for specific development types</i>'. A sub-criterion to this refers to '<i>key additional factors for employment sites</i>'. Unfortunately, the Local draft methodology does not clarify what these factors might entail for the employment site options. To help clarify this omission, St Modwen would suggest that weight should be given to the potential for extensions to existing employment sites already within the Green Belt in the area of the search, compared with creating wholly new employment locations.</p>

		<p>The extension of current sites which exist within the Green Belt would be far more sustainable, due partly to existing links and established uses in the area, compared with releasing Green Belt land for wholly new employment sites. A new employment site in the Green Belt would be more likely to impact heavily on the surrounding countryside due to the new infrastructure requirements.</p> <p>By clarifying the methodology in this way, the selection process would properly recognise that extensions to existing employment sites would enable the economies of scale for existing infrastructure along with enabling expansion of existing businesses, pursuant to Plan Objective 4.</p>
LPIO682	Staffordshire County Council	<p><u>Transport</u>          In transport terms, the County Council supports the proposed methodology for site selection. The agreed package of measures to be included in revised policy must recognise potential constraints.          Transport accessibility analysis of site options can be provided by the County Council. The accessibility analysis needs to acknowledge that the most sustainable housing developments will enable walking and cycling access to both primary and secondary schools.          The County Council is working towards publishing the Staffordshire Local Cycling and Walking Infrastructure Plan. It is expected that the process that is developed through the LCWIP will help inform the appropriate mitigation measures required to deliver the emerging Preferred Option.          The County Council will provide advice on existing highway constraints at locations such as Five Ways junction and the impact of traffic generated from potential new development sites, to help inform the selection of the Preferred Option. Appropriate traffic appraisals will need to take account of emerging Midland Connect studies and the impact on the local highway network of strategic highways schemes such as M54/M6 link road.</p> <p><u>Ecology</u>          The inclusion of ecological constraints and considerations is welcomed.</p> <p><u>Minerals and Waste</u>          Previously we have commented on the need to include the safeguarding of waste sites in the consideration of site selection and similarly, the consultation document refers to safeguarding mineral resources. [...]</p>
LPIO683	Wright, T (c/o Pegasus Group)	<p>The assessment process is broadly supported, and the ‘traffic light’ or RAG – rating method of scoring is considered appropriate provided that the process is open and transparent and allows for submitted information to be utilised in the rating process, enabling each site to be considered on its merits.          It is essential that the site assessment criteria are considered ‘in the round’ rather than any particular order of importance, as it will be a combination of factors which contribute to the overall sustainability of a scheme. It is also vital to ensure that information relating to consideration of how the site contributes to Green Belt purposes is based upon the site boundaries and not any wider parcel within which it sits as this will provide an inaccurate and misleading picture.          It is also imperative that ‘Sustainability’ outcomes are considered in the round from all of the information submitted and not limited to the conclusions of the Sustainability Appraisal.</p>
LPIO684	Association of Black Country Authorities (c/o Walsall Council)	<p>We have no strategic comments to make about this question. We might wish, in future, to discuss its application to specific sites. We would also be happy to discuss the selection of sites in the work for the Black Country Plan.</p>

**Local Plan Review Sustainability Appraisal Issues and Options Assessment Consultation: Summary of Responses**

Rep ID No.	Respondent	Comment
<b>Overall/General Comments</b>		
SASc1	Canal & River Trust	<p><b>NE6: Jubilee Field, Lime Lane/Watling Street, Norton Canes</b></p> <p>This site is adjacent to the Cannock Extension Canal, which is registered as a SSSI. The Classification is, in part, due to the canal providing a habitat for Floating Water Plantain.</p> <p>SA Objective 1: We recognise and welcome the recognition that the site scores a double negative under part 1 of the SA objectives (page 533). This should help ensure that adverse impacts from the development on the SSSI are taken into account and can be fully assessed as part of the overall Local Plan assessment when determining which sites to bring forward, and what policies may apply to future site allocations.</p> <p>SA Objective 6: Due to the proximity of the site to the Cannock Extension Canal, we believe that the SA score should take into account the impact on the canal corridor, which forms part of the Strategic Green Infrastructure within the borough. The Green Infrastructure network associated with the canal forms a key part of the character and appearance of the Districts' landscape and townscape, and could be significantly impacted by the proposed development.</p> <p>SA Objective 13: The site is in proximity to the towpath of the Cannock Extension Canal, which would provide a key green link and access to open space for future employees of the site. Development of this site could, however, result in potential harm to the quality of this resource, contrary to the aims of the SA objective.</p> <p>There are risks that development of this site could result in additional demands on the use of the towpath (which lies alongside the site), which would result in greater erosion and liabilities for the owners and operators of this infrastructure. The Trust currently maintains our towpaths to a 'steady state' based on present use, which is presently relatively low. The towpath, is unpaved, and is liable to suffer from significant harm if user numbers increase substantially. The Canal is also a SSSI, which could be harmed by the additional use of the canal corridor, such as through the deposition of litter from users.</p> <p>We believe that these risks should be fully included in the assessment of the SA score. This is essential to ensure that the risks are taken into account in both determining whether to allocate the site, and determining what mitigation measures may need to be included within any future policy.</p> <p>Due to the identified risks to the existing green link and SSSI, we believe that the double positive SA score may require reassessment.</p> <p><b>CE19: Site between A5 and M6 Toll</b></p> <p>We note that the proposed site boundary of CE19 includes land identified as forming part of the potential Hatherton Canal restoration route, promoted by the Lichfield &amp; Hatherton Canals Restoration Trust (LHCRT). Unless development on site is adequately designed to mitigate against any adverse impact to the route, the allocation could threaten any future canal re-installment in this location.</p> <p>The LHCRT is working to reinstate the Hatherton Canal which, in combination with existing waterways, could promote leisure and tourism use of the local canal network with resulting benefits to the wider area. It would likely provide a future walking and cycling route for the community to utilise upon the new towpath.</p> <p>The Canal &amp; River Trust recognises the importance of waterway restoration projects and the broad range of economic, environmental, health and social impacts that they can bring. [...] We therefore support the aspirations of the LHCRT.</p> <p>We believe that SA Objective 13 should specifically refer to the safeguarded route, and should assess the potential impact</p>

on the provision of future infrastructure. There are risks that development on site could hamper future efforts to extend and enhance the leisure and recreational infrastructure that the canal restoration would bring to the community. We therefore request that, if this site is brought forward for allocation, site-specific policies should be incorporated to ensure that future development sets aside land appropriately to facilitate the canal restoration.

**CE20: Watling Street Business Park**

Although the justification under SA Objective 13 suggests that the site is 125m to the East of the Cannock Extension Canal, the boundary shown in the document in Map 4.2 shows that the western boundary of this proposed site would lie adjacent to the Cannock Extension Canal [...]. **We therefore advise that it should be amended to take account of the potential impact of development on the waterway, which could have a significant impact on the overall SA score.**

SA Objective 1: The site is adjacent to the Cannock Extension Canal SSSI, which is a habitat for Floating Water Plantain, a protected species. We believe that the assessment and SA score should be amended to fully reflect the potential impact of development upon the SSSI. This would help ensure that adverse impacts from the development on the SSSI are taken into account and can be fully assessed as part of the overall Local Plan assessment when determining which sites to bring forward, and what policies may apply to future site allocations.

We note that site NE6 has an SA score of double negative, which we believe may also apply to this site once the SSSI is taken into account.

SA Objective 6: [...], we believe that the SA score should take into account the impact on the canal corridor, which forms part of the Strategic Green Infrastructure within the borough. [...]

SA Objective 13: The site is in proximity to the towpath of the Cannock Extension Canal, [...]. Development of this site could, however, result in potential harm to the quality of this resource, contrary to the aims of the SA objective.

There are risks that development of this site could result in additional demands on the use of the towpath (which lies alongside the site), which would result in greater erosion and liabilities for the owners and operations of this infrastructure. [...]. The towpath is unpaved, and is liable to suffer from significant harm if user numbers increase substantially. [...].

We believe that these risks should be fully included in the assessment of the SA score. This is essential to ensure that risks are taken into account in both determining whether to allocate the site, and determining what mitigation measures may need included within any future policy associated with a future allocation.

Due to the identified risks to the existing green link and SSSI, we believe that the double positive SA score may require reassessment.

**NE11: Former Grove Colliery, Little Wyrley & NE8/N57 Wyrley Grove, Lime Lane, Little Wylrey**

The above sites are in proximity to the Cannock Extension Canal, which is registered as SSSI. [...].

SA Objective 1: We recognise and welcome the recognition that the site scores a double negative under part 1 of the SA Objectives (pages 582 and 579). This should help ensure that adverse impacts from the development on the SSSI are taken into account and can be fully assessed as part of the overall Local Plan assessment when determining which sites to bring forward, and what policies may apply to future site allocations.

SA Objective 13: The site is in proximity to the towpath of the Cannock Extension Canal, [...]. Development of this site could, however, result in potential harm to the quality of this resource (through damage caused by additional use), which could harm existing access, contrary to the aims of the SA objective.

We believe that these risks (e.g. erosion of footpaths) should be fully included in the assessment of the SA score. This is essential to ensure that the risks are taken into account in both determining whether to allocate the site, and determining what mitigation measures may need to be included within any future policy associated with a future allocation.

Due to the risk of the existing green link and SSSI, the double positive SA score may require reassessment.

**R18: Land at The Mossley, off Armitage Road, Rugeley**

The site is located adjacent to the Trent & Mersey Canal. The sole access to the site would likely be via The Mossley, which is accessed via a bridge over the Canal. Although not listed, the bridge itself is of heritage value, and we believe constitutes a non-designated heritage asset.

SA Objective 4: We agree that the effects of new housing development on the SA objective will depend, to a large extent, on the design of housing. We wish to highlight that the location of the site next to the canal offers an opportunity for the utilisation of our water for low-carbon energy production. [...]. We consider that heating and cooling schemes can be delivered without any adverse impact on biodiversity.

As a result, we would welcome reference to the potential opportunity as part of the assessment and any policy wording with respect to a future site allocation. This would help make the Local Plan more effective, as it would help ensure that decision makers are aware of this opportunity which is specific to sites in proximity to the District's waterways.

SA Objective 6: [...], we believe that the SA score should take into account the impact on the canal corridor, which forms part of the Strategic Green Infrastructure within the borough. [...].

It is essential that future development positively addresses the waterside space, so as to ensure that the community can utilise this asset positively.

SA Objective 11: The canal offers a key walking and cycling route, which could be impacted by development on this site. We believe that future development should positively address the waterfront to provide passive surveillance, which would help to reduce any fear of crime along our network.

SA Objective 13: The site is in proximity to the towpath of the Trent & Mersey Canal,[...]. Development of this site could, however, result in potential harm to the quality of this resource (through damage caused by additional use), which could harm existing access, contrary to the aims of the SA objective.

As a result, we believe that these risks (e.g. litter, damage to towpath structures) should be fully included in the assessment of the SA score. This is essential to ensure that the risks are taken into account in both determining whether to allocate the site, and determining what mitigation measures may need to be included within any future policy associated with a future allocation.

SA Objective 17: We are concerned that the sole vehicular access to the site could be via the canal bridge upon The Mossley. This bridge is of heritage value, and is limited to a single carriageway width. There is a significant risk that additional traffic brought by the development could result in vehicular collisions and parapet strikes upon the bridge, which would cause damage to the heritage asset. This is pertinent in this location due to the proximity of the bridge to Armitage Road, the narrow width of carriageway upon the structure, and the absence of any pavement for pedestrian use.

**We believe that an alternative access may be required in order to ensure that the bridge is not inadvertently damaged by the extra use that development on this site could bring.** The formation of a new access road from Wheelhouse Lane to the south or from the Industrial Estate to the north may be required and could offer a solution.

We advise that the SA score should take account of these risks to this bridge.

**TBP: Towers Business Park Employment Area (includes the sites RE2(a) and RE4)**

The site is bordered by the Trent & Mersey canal along its south-western curtilage boundary. Development here could have a significant impact upon the canal corridor, and we believe that the SA Assessment should aim to take account of any potential adverse impact to ensure that any impact can be effectively mitigated against should this site be brought forward.

		<p>SA Objective 4: We agree that the effects of new development on the SA objective will depend, to a large extent, on the design of any scheme that comes forward. We wish to highlight that the location of the site next to the canal offers an opportunity for the utilisation of our water for low-carbon energy. [...].</p> <p>SA Objective 6: Due to the proximity of the site to the Trent &amp; Mersey Canal, we believe that the SA score should take into account the impact on the canal corridor which forms part of the Strategic Green Infrastructure within the borough, the Green Infrastructure network associated with the canal forms a key part of the character and appearance of the Districts' landscape and townscape, and could be significantly impacted by the proposed development.</p> <p>It is essential that future development positively addresses the waterside space, so as to ensure that the community can utilise this asset positively.</p> <p>SA Objective 8: the canal towpath lies next to the site, and provides an uninterrupted, traffic-free route between the employment site and community in Rugeley and Brereton. We believe that account of this should be included in this justification. We believe that mitigation measures, such as additional signage, may be required in order to maximise the benefits of our network and to minimise any potential harm that could be caused by additional use of the canal towpath.</p> <p>SA Objective 11: The canal offers a key walking and cycling route, which could be impacted by development on this site. We believe that future development should positively address the waterfront to provide passive surveillance, which would help to reduce any fear of crime along our network.</p> <p>SA Objective 13: The site is in proximity to the towpath of the Trent &amp; Mersey,[...]. Development of this site could, however, result in potential harm to the quality of this resource (through damage caused by additional use, which could harm existing access, contrary to the aims of the SA Objective.</p> <p>As a result, we believe that these risks (e.g. litter, damage to towpath structures) should be fully included in the assessment of the SA score. This is essential to ensure that the risks are taken into account in both determining whether to allocate the site, and determining what mitigation measures may need included within any future policy associated with a future allocation.</p>
<p>SASc2</p>	<p>Richborough Estates (Brownhills Rd) (C/O Pegasus Group)</p>	<p>There are a number of inaccuracies relating to the site off Brownhills Road, Norton Canes which will have impacted upon current scoring. These are as follows.</p> <p>It is noted at this stage all assessment is undertaken assuming no mitigation. It is essential that mitigation is factored in, utilising the information submitted as part of these representations plus commitments to providing further technical evidence to ensure that the site is considered fairly and accurately.</p> <p>Objective 1: [...], a double negative/uncertain score is given, however this fails to take into account mitigation that could be provided on site, including the provision of open space to complement provision delivered as part of the adjacent Chasewater Grange development that will assist in internalising recreational pressures.</p> <p>Objective 2: [...] SA concludes a significant negative effect. Whilst it is acknowledged that the site is located close to an AQMA these give rise to issues which can be mitigated for to ensure that no negative impact results.</p> <p>Objective 5: [...] a minor negative effect is concluded, however mitigation would be incorporated which would result in an improvement to this score.</p> <p>Objective 9: the strong positive score is wholly supported as the site will deliver a range of homes to serve a range of needs.</p> <p>Objective 17: it is recognised that the site lies within the CHECZ-19 historic environment zone, however the site is the only element of this zone that lies to the north of the M6 Toll which now severs this zone. It should be noted that many of the important assets identified are remote from Richborough Estates' site with no inter-visibility between the site and identified</p>



		features including Wyrley Common and those to the south of the A5 Watling Street.
SASc3	Richborough Estates (S of Cannock Rd) (C/O Pegasus Group)	<p>There are a number of inaccuracies relating to the site at Land South of Cannock Road, Heath Hayes which will have impacted upon current scoring. These are as follows.</p> <p>Firstly map 4.1.2 does not reflect the accurate site boundary. The map attached at <b>Appendix 1</b> should be used. Sites C116 (a) and C116 (b) have been scored independently of one another, when in fact the two sites (with accurately redrawn boundaries) must be considered as a whole as C116 (a) will contain the built development and C116 (b) will provide the country park and establish the new permanent Green Belt boundaries as this part of the site will remain as Green Belt. Please see the attached vision document including masterplans for further information. To score the two sites separately is misleading and will skew the scoring in a way which is incorrect and misrepresentative.</p> <p>It is noted at this stage all assessment is undertaken assuming no mitigation. It is essential that mitigation is factored in, utilising the information submitted as part of these representations plus commitments to providing further technical evidence to ensure that the site (with boundaries corrected) is considered fairly and accurately.</p> <p>Objective 1: [...] an uncertain minor negative score is given, however with mitigation impacts upon the Cannock Chase SAC [...] as set out elsewhere in these representations this should result in a significant positive score for a combined site.</p> <p>Objective 2 [...] the SA concludes an uncertain significant negative effect. Whilst it is acknowledged that the site is agricultural (albeit not the best and most versatile agricultural land) and located close to an AQMA these are all issues which can be mitigated for to ensure that no negative impact results.</p> <p>[...] (Objective 3) a significant negative effect has been concluded. For (incorrectly drawn) site C116a it is stated that there is an expectation that the site would provide 700-937 homes, and for (incorrectly drawn) site C116 (b), 784 homes are sited. The SA states ‘there is little opportunity to re-use any materials any materials that already exist on site and will likely lead to the vast loss of greenfield land.’</p> <p>This statement and assessment is vehemently disputed by Richborough Estates. That as a <u>whole</u>, the site is being promoted for around 700 homes, <u>not</u> the 1700 implied by the assessment. The statement ‘vast loss’ is emotive rather than objective and wholly misleading, taking absolutely no account of the inclusion of the country park and significant level of green infrastructure. These are essential elements of the proposals and illustrate the reasons the site need to be assessed as a whole, utilising accurate information.</p> <p>Objective 5 [...] a minor negative effect is concluded, however mitigation would be incorporated which would result in an improvement to this score.</p> <p>Objective 9, the strong positive scoring is wholly supported as the site will deliver a range of homes to serve a range of needs. However the assessment states that there may be potential for gypsy and traveller provision as part of the development. Richborough Estates would wish to confirm that this does not form part of the site proposals. [...].</p>
SASc4	Environment Agency	We have reviewed the SA scoping report submitted in support of this consultation and have no observations to make at present.
SASc5	Highways England	<p>In relation to an earlier draft of the Sustainability Appraisal, Highways England set out the following:</p> <p><i>“It is noted that Appendix 1 of the document provides a table of all the plans policies and programmes relevant to the preparation of the Cannock Chase Local Plan and the SA. It is important to recognise that Circular 02/12 ‘The SRN and the delivery of Sustainable Development’ is highly materials, [...]. It also includes guidance on when new accesses to the SRN will be acceptable, the implications of traffic growth for plan making and policies for specific activities, including roadside facilities. Given the relevance of these policies to development plan decisions, [...] is a key document which</i></p>

		<p><i>should be referenced.”</i>          It is noted that the May 2019 version of the Sustainability Appraisal takes into account the previous comment made by Highways England. This is welcomed. [...].</p>
SASc6	Historic England	<ul style="list-style-type: none"> <li>• We support the inclusion of a specific objective for cultural heritage and in this case an objective that specifically aims to conserve and enhance heritage assets, including their setting.</li> <li>• Figure 2.1 on page 14 we appreciate is a standard table that sets out the likely effects for the objectives as a result of the policies or development options. However, we raise concerns about the ‘uncertain’ effect as there should be reasonable evidence available in order to make an informed decision about what the likely effects will be and what avoidance/mitigation measures can be put in place.</li> <li>• Paragraph 3.44 under this heading we would recommend including additional documents for the historic environment [...].</li> <li>• We are supportive of the heritage comments on page 28</li> <li>• In reference to Table 4.1 there were no specific sites identified within the local plan consultation May 2019 to comment on, however, we note that the Sustainability Appraisal has highlighted a significant number of sites with the majority of the effects identified as uncertain or negative effects for the historic environment. [...]. We would anticipate that the Council would prepare site assessment to justify the inclusion or exclusion of sites. [...].</li> <li>• Paragraph 4.57 we are cautious of using distances to judge likely effects for the historic environment. As you will be aware effects can occur directly to heritage assets or their setting and the significance of a heritage asset can be affected even where there is no visual link between a heritage asset and proposed development as well as where large distances occur between heritage assets and proposed development for such reasons, not exhaustive, as the topography [...]. As such we recommend that a site assessment is undertaken that assesses how proposed development will affect the significance of the identified heritage assets, including their setting, in line with the NPPF.</li> <li>• We are unclear how the judgements have been arrived at on page 43 and would recommend that we have sight of the full assessments for the sites and historic environment so that we can be confident that accurate judgements have been made. Paragraph 4.61 states that 25 sites are a negligible effect but based on the key used ‘o?’ actually relates to negligible or uncertain and as such we are uncertain as to what the likely effects are.</li> <li>• Page 47 we note that many of the proposed employment sites also show as pink/red in the SEA/SA assessment for the historic environment objective. Paragraph 4.105 our comments are the same as above, that we are cautious in using distances only to ascertain likely impacts [...].</li> <li>• Our comments are the same for the differing development uses throughout the Plan, as the same methodological approach has been applied.</li> <li>• We would question some of the judgements raised in the policy assumptions, such as paragraph 4.222 where it is stated that there would be positive effects for the historic environment as a result of green space and recreation site yet no details are known as to what these may be or how they would relate to the historic environment of the area and if they would be appropriate in a historic landscape context.</li> <li>• We welcome the reference to the consideration of historic environment evidence within the site assessment section. We note that a variety of documents are referenced [...], which we welcome. The Council has considered what heritage assets are within the proximity of the proposed development (distance only). However, we note that when it comes to making a judgement, it is often considered as uncertain due to issues such as design and layout in a future</li> </ul>

		<p>planning application. Historic England would consider a sound approach to be one that assesses the impact and considers what avoidance and mitigation measures could be put in place, if any. Where there are none it may be an unsuitable site for development and where there are some, then these should be brought forward into the local plan as design principles in site specific policies.[...].</p>
SASc7	Inland Waterways Association	<p><u>Appendix 3. Para 34</u> It is the Trent &amp; Mersey Canal at Rugeley not the Staffordshire and Worcestershire.</p>
SASc8	Natural England	<p>AONB Management Plan – Page 18 paragraph 3.8 – the Cannock Chase AONB Management Plan 2019-2024 has now been published so please refer to the updated version in the SA process.</p>
SASc9	St Modwen (West of Pye Green Rd) (C/O RPS Planning & Development)	<p>It is noted that the SA (2019) accompanying the plan includes at pages 30 and 31 the potential sites being considered for allocation. The land west of Pye Green Road clearly represents as ‘reasonable alternative’ for housing (as opposed to a mixed use site referenced as site C113 on Table 4.3) and should be included with the next iteration of the SA, based on the likely capacity for the site to deliver additional housing land over the plan period. Additionally, the evidence for the Allocation of the site in the Core Strategy and subsequent ES demonstrates the assessment of potential for significant negative effect for Objectives SA1, 2, 3 and 6 does not exist and should be screened out.</p>
SASc10	St Modwen (Watling Street) (C/O RPS Planning & Development)	<p>This iteration of the Sustainability Appraisal (SA), broadly equating SA Stage C, follows on from the SA Scoping Report (Stage A) published in June 2018 as part of the Issues and Scope consultation exercise. However, the scoring that has been undertaken [...] appears to broadly follow the SA scoring undertaken for the Local Plan (Part 2): Issues and Options, [...].</p> <p>RPS does not consider this to be a logical approach to take, given that the Plan period is now changed (end date 2036, not 2028) and that the evidence base has been largely updated in terms of assessing housing and employment needs and land supply,[...]. The result is a ‘hangover’ of SA assessments relating to the consideration of reasonable alternative sites, particularly regarding employment site options.</p> <p>In relation to the employment site options, the summary of SA scoring for each of those sites (Table 4.2 in the IIA) is presented below, as an extract. An initial consideration of the scoring of the sites taken as a whole, illustrates that against the SA environmental objectives (SA1 to SA8) all the sites scored negatively to a lesser or greater extent. [...]. This therefore requires a realistic and pragmatic application of these findings when the Council comes to select its preferred site options.</p> <p><b>SA Scoring applied to Watling Street Business Park (CE20)</b></p> <p><u>SA Objective 2</u></p> <p>[...], the site has scored positively and negatively across the SA objectives. Nonetheless, RPS has issues with a number of negative scores assigned to CE20.</p> <p>With respect to air quality, this due to proximity to an AQMA. [...]</p> <p>The Council’s own Air Quality Annual Status Report 2018 notes that, <i>“Levels at the A5 Watling Street hotspots have shown some decrease in recent years, [...]. It has previously been hoped that if improved pollution levels were sustained, the AQMA designation for the A5 could be revoked. However, 2017 monitoring results have demonstrated this is not yet the case. [...].”</i></p> <p>However, the only site in the graph that measured exceedances of the objective in 2017 is not adjacent to the A5 but located in the recently declared AQMA 3 (Five Ways Island). Measured concentrations at the closest tube to the site, WS 268, were below the objective in 2017, as they have been in all previous years with the exception of 2016. [...].</p>

Based on this, it is unreasonable to determine the impact of development of a particular site (including CE20) upon air quality should be based purely on proximity to an AQMA. There are two reasons for this; firstly, the presence of an AQMA does not necessarily mean that the air quality objectives are being exceeded; secondly, concentrations are anticipated to reduce during the plan period.

In relation to CE20 specifically, there are very few properties located adjacent to roads that would be affected by any changes in traffic. Furthermore, monitoring near to one of the few properties that could be affected indicates that the annual mean nitrogen dioxide objective has been achieved for a number of years, with the exception of a single year (2016) which was a high pollution year due to meteorological conditions.

Consequently, it is considered that the SA scoring is overly pessimistic and does not adequately represent the available evidence, and there is not a credible score. Accordingly, RPS consider that the SA score should be changed from '-' to '0' or '?'.

SA Objective 3

The score of '-' ignores the fact that the site would not be brought forward as 'stand-alone' employment development, but as part of an expansion of an existing business park. [...]. Therefore, on the basis of the reasoning applied in the IIA, an expansion of an existing development would clearly offer opportunities for some reuse or remodelling of those premises and would also result in a larger brownfield site once development has taken place, utilising the brownfield land already in-situ.[...]. Accordingly, RPS consider that the SA score should be changed from '-' to '0/-?'.

SA Objective 5

The IIA (page 512 refers) identifies the site as being 'outside Flood zone 3'. [...]. RPS agrees with this score, as this does not properly reflect the available evidence on flood risk on the site. [...] extent of the site based on flood map provided by the Environment Agency mapping system, the site is in fact outside both Flood Zone 2 and Flood Zone 3. Accordingly, given the site is located in Flood Zone 1 and so not at risk of fluvial flooding, RPS consider the score should be reduced from '-' to '0'.

SA Objective 6

[...]. RPS does not agree that a moderate sensitivity to development in general terms equates to an adverse (and thus negative) impact on a specific landscape. [...], there are no designated valued landscapes in the vicinity of the site and therefore we do not consider it justified to score the site as harshly as the IIA does. Accordingly, RPS consider that the SA score should be changed from '-?' to '?' given no approved scheme is in place at this time.

SA Objective 8

[...]. On the matter of public transport, whilst it is acknowledged that the SA scoring does not take into account mitigation measures at this stage (but will have to prior to selecting the preferred option sites, it is clear that opportunities exist to promote measures to encourage sustainable transport in accordance with already adopted Local Plan policies (Policy CP10) [...]. Consequently, it can be assumed that such measures would be needed (subject to viability) in order to facilitate policy-compliant development.

On the matter of cycle routes, the site is contiguous with an existing business park that is directly adjacent to a major transport where cycle provision could likely be accommodated into the footpath network. Furthermore, a shared pedestrian/cycle route does run along the northern side of A5 Watling Street, [...]. The location does therefore provide viable cycle links to local residential areas. Accordingly, RPS consider that the SA score should be changed from '-' to '0'.

SA Objective 14

The IIA has scored the site '-' as a significantly negative impact due to a perceived lack of access to local community

		<p>facilities in the area and impact on 'isolation'. This again is relation to a perception of lack of access to public transport. RPS consider the issue of isolation to be over-stated in relation to the site and ignored the fact that there are two public houses (Toby; and Crown at Brownhills) and a social club (Yates Sports &amp; Social Club), all within 800m or so of the site [...]. In addition, Cannock Chase (Chasewater) Country Park is located within easy access to the north of the A5. Accordingly, RPS considers that the SA score should be changed from '- ' to '- ' or '-/+ '.</p> <p><u>SA Objective 15</u></p> <p>The IIA has assigned a score of '+' to the site. RPS does not agree with this score as this clearly under-states the contribution that the site (c.5ha in area) could make towards addressing the acknowledged shortfall in employment land supply in Cannock Chase up to 2028, a factor not referred to in the SA summary for the site. Accordingly, RPS consider that the SA score should be changed from '+' to '++'.</p> <p><b>Re-appraised SA scoring – Watling Street Business Park</b></p> <p>Based on the foregoing analysis, it is clear that site described as 'Watling Street Business Park' (CE20) scores relatively highly when compared with the other employment site options appraised in the IIA, demonstrating that the Site has good sustainability credentials for accommodating development. Accordingly, RPS have demonstrated (alongside separate evidence submitted at this stage) that the Watling Street Business Park would represent an appropriate location that the Council should give real consideration to in the next iteration of the Local Plan review, which is anticipated to cover the preferred selection of employment sites.</p>
<p>SASc11</p>	<p>Wright, T (C/O Pegasus Group)</p>	<p>The Upper Birches Farm site was assessed in the Sustainability Appraisal under Reference R112: Land between the Rising Brook and Hednesford Road, Rugeley.</p> <p>It is noted at this stage all assessment is undertaken assuming no mitigation. It is essential that mitigation is factored in as site assessment is undertaken, [...] to ensure that the site is considered fairly and accurately.</p> <p>Objective 1: [...] a negative/uncertain score is given, however this fails to take into account mitigation that could be provided on site, including the provision of open space to mitigate for impacts on Cannock Chase SAC, [...]. A positive score should therefore be given.</p> <p>Objective 2: [...] the SA concludes a significant negative effect. Whilst it is acknowledged that the site is in agricultural use it can deliver net gains locally including providing an alternative location for users of Cannock Chase to keep them away from the most sensitive areas i.e. the SAC.</p> <p>Objective 3, as per Objective 2 it is acknowledged that this is a greenfield site but it could deliver significant net gains. The figure of 68homes is incorrect [...] <b>Appendix 3</b> shows how between 210 and 245 homes could be accommodated.</p> <p>For Objective 5 the SA states that R112 will have a minor effect [...]. The site is entirely within Flood Zone 1 which is acknowledge in the SA and it is not clear why this minor negative score has been given, as such it is disputed.</p> <p>Objective 6 [...]. It notes that the site is located within SF07 (Ancient Settled Farmlands), which is stated as having a moderate level of sensitivity to development. However, the SA concludes that an '<i>overall significant negative effect is expected on this SA objective.</i>' We strongly disagree with this assessment.</p> <p>Pegasus Group have conducted a Landscape Appraisal of the site which is contained at <b>Appendix 2</b>. The conclusions of this appraisal are clear that the northern part of Upper Birches Farm is capable of accommodating development given it is well related to the existing settlement and would be acceptable in landscape and visual terms. This evidence points to a different conclusion than the Council's SA and the is asked to Council consider the submitted Landscape Appraisal when undertaking any further assessment of this site.</p> <p>The client intends to provide part of the site as a Country Park which would establish a permanent and defensible</p>

		<p>boundary to the South of Rugeley. [...].</p> <p>It is considered that a landscape led scheme could be provided on site which would mitigate the impacts of the development on the Cannock Chase AONB. [...]. The masterplan shows how the development could be designed to retain key views across the site to the wider AONB beyond, [...]. As a result it is considered that a positive score should result. We agree with the findings of the SA in relation to objectives 8-10, [...], although the capacity needs amending to reflect this submission. [...].</p> <p>In relation to objective 12 of the SA, it is stated that there will be a minor negative effect with regards to the aim [...]. Although the nearest GP to the site (Sandy Lane Surgery) is located in excess of the 600m threshold, the GP can easily be accessed by the bus route serving Hednesford Road. [...] and performs favourably in this objective.</p> <p>Objective 13 [...], with the site performing well in this category. As discussed previously there is potential to explore the provision of a Country Park [...], therefore it is considered that this site has the potential to perform even higher than the score indicated on objective 13 of the SA.</p> <p>Objective 14 is supported: it is agreed the site is an excellent location for accessing community services and facilities.</p> <p>Objective 17 [...]. The SA lists a number of listed buildings within the parcel of land assessed. However, the land area we are proposing for housing contains no Listed Buildings or other heritage assets. It is therefore considered that residential development on this site would not lead to any negative impacts on designated heritage assets. Furthermore, there would be a positive impact from the reinstatement of historic field patterns, boundaries and hedgerows to the site [...].</p>
SASc12	Lichfield & Hatherton Canals Restoration Trust	<p><u>Page 508 – regarding site CE19, also paragraph 4.97 which refers to this site</u></p> <p>We refer specifically to the site identified as CE19 between the M6 Toll and the A5. The projected route for the Hatherton Canal runs across this area so the necessary provision of space to accommodate the canal is an important constraint on the development of this area of land. The plan to construct the canal in this area should be presented as a positive – this location is particularly attractive for businesses offering appropriate hospitality, leisure, or boating-related services.</p>

Local Plan Review Habitat Regulations Assessment Scoping Report Consultation: Summary of Responses		
Rep ID No.	Respondent	Comment
<b>Overall/General Comments</b>		
HRASc1	Lichfield & Hatherton Canals Restoration Trust	<p><u>Paragraph 4.10</u> As a point of information, the water level in the Cannock Extension Canal is managed by Canal &amp; River Trust as the navigation authority for the Canal and other canals connected to it.</p>
HRASc2	Inland Waterways Association	<p><u>Page 32 Local Transport Plans</u> Reference to “supporting a limit on the levels of boat traffic on the Cannock Extension Canal” relates to now discredited and withdrawn representations from Natural England (see IDP response). This text should be removed from the report.</p>
HRASc3	Natural England	<p>The scoping assessment sets out a methodology for further stages of assessment to assess if significant effects are likely to occur, either alone or in combination. It also takes into account recent rulings such as the interpretation of the Habitats Directive in the case of People over Wind and Sweetman vs Coillte Teoranta (ref: C-323/17). We have no particular comments to make on the scoping assessment and look forward to the next iteration of the report.</p>
HRASc4	St Modwen (Watling St) (C/O RPS Planning & Development)	<p>The following European-designation sites are within 15km of Cannock Chase District:</p> <ul style="list-style-type: none"> <li>• Cannock Chase SAC – within and adjacent to the District;</li> <li>• Cannock Extension Canal SAC – within and adjacent to the District;</li> <li>• Pasture fields Salt Marsh SAC – c.6km away;</li> <li>• Midland Meres and Mosses (Phase 1) Ramsar Site/ West Midland Mosses SAC – c.8km away;</li> <li>• Mottley Meadows SAC – c.13km away; and</li> <li>• River Mease SAC – c.13km away.</li> </ul> <p>The above sites therefore fall within the 15km threshold zone of influence in terms of their proximity to Watling Street Business Park. The SAC in closest proximity to the site is Cannock Extension Canal SAC. [...].</p> <p><u>Assessment Assumptions</u> In terms of air pollution, the screening criteria set out in Natural England are if a plan or project would lend to a change in Annual Average Daily Traffic (AADT) vehicle flow of more than 1,000 total traffic or 200 HDV on roads within 200m of the SAC, either alone or in combination. The HRA Scoping Report notes that (paragraph 4.4 refers), “Traffic forecast data (based on the planned level of growth) will therefore be needed to determine [...]. An assessment will also be undertaken to identify which European sites lie within 200m of the strategic road network.” In addition it states: <i>“Potential effects will also be considered if there is any significant development identified in the plan that would cause aerial emissions...”</i> (Paragraph 4.5). In relation to the Watling Street Business Park site, traffic data used in modelling air quality in November 2017 indicated that the screening criteria would not be breached by the proposed development of site CE20 in isolation. The modelling of air quality based on this data indicated that an employment development at Watling Street Business Park could lead to a change annual mean nitrogen oxides concentration and nutrient nitrogen deposition that would exceed 1% of the critical level/load within the site boundary, but not in the area of open water (which is where the water plantain species is located). Consequently, in terms of impact on the Cannock Extension Canal SAC, the available data suggests the proposals on the site are not likely to cause adverse impact on the integrity of this European site.</p>