

Appendix 5

Responses to consultation comments received on the Cannock Chase Green Belt method statement

Phases 1 and 2 of the consultation process are recorded below in **Table 1** and **Table 2**, respectively. The far right hand column of the tables summarise LUC's responses to the consultation comments on behalf of the Council and any appropriate amendments that were been made to the method statement. Note that the responses to the Phase 1 consultation represent a point in time during the ongoing development of the Green Belt Review methodology and in some cases the approach has evolved further in response to the Phase 2 consultation, as set out in Table 2.

Table 1 – Phase 1 Consultation

Contrary to the view of some consultees, the Green Belt Review will not identify land for development; its role to provide evidence on the relative performance of Green Belt parcels against the purposes of the designation as set out in national planning policy. In deciding whether any changes to current Green Belt boundaries should be made, and if so, where these changes should take place, the Council will consider the evidence of the Green Belt Review alongside a wide range of other planning and sustainability considerations; for example the availability of development land in relation to need, character and sensitivity of the landscape, and the proximity of land parcels to existing services, facilities and transport links. Should the Council conclude that changes to the Green Belt are required, these changes and any allocations of land for development will take place through the Local Plan process.

Ref. no.	Respondent	Comments Summary	Response to Comments
1	Armitage with Handsacre Parish Council	Object to the release of any green belt land at the Brereton Hill, Brereton, Rugeley, as this would have a detrimental effect on Longdon's Parish our Parish if this land was used for building new homes.	Comments at this stage were invited on the assessment methodology and definition of parcel boundaries for assessment. The methodology will be applied consistently to Green Belt parcels, as set out in the Method Statement. This representation does not relate to methodology; however, CCDC will note the comments when considering Green Belt for potential release.
2	Birmingham City Council	At present, local authorities within the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and the Black Country Authorities are gathering evidence through Phase 3 of the Strategic Housing Needs Study. This will inform a further iteration of the GBSLEP Strategic Plan for Recovery and Growth, which will consider the distribution of development that cannot be met within Birmingham's administrative boundaries. As this work is yet to draw conclusions, it is not possible to determine whether Cannock Chase is a reasonable option for helping to meet this requirement. This, however, does not detract from the need for Cannock Chase	Noted.

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>Council to continue with its technical work and the approach is firmly supported by the City Council, particularly as it is consistent with the work being undertaken through Phase 3 of the aforementioned Strategic Housing Needs Study.</p> <p>In terms of land parcels, as the City Council does not share an administrative boundary with Cannock it has no specific comments to make at this stage.</p>	
3	Brereton and Ravenhill Parish Council	<p>BRPC is opposed to any removal of land from the Green Belt in the northern part of Cannock Chase District that is in the parishes of Brereton and Ravenhill and Rugeley and in the northern half of Brindly Heath parish. There has been substantial house-building...that meets the needs of our local area. There is still undeveloped brownfield land that is not in the Green Belt...BRPC considered that the Chase Area of Outstanding Natural Beauty and the gaps between (1) Brereton and Armitage and (2) Rugeley and Slitting Mill need to retain the protection of a Green Belt boundary to prevent neighbouring communities from merging into one another.</p> <p>BRPC is of the firm view that there are no exceptional circumstances justifying a removal of land from the Green Belt in the north of the district. On the contrary, the substantial house-building in and serving our part of the district is a strong reason for maintaining our current Green belt boundaries.</p>	<p>Comments at this stage were invited on the assessment methodology and definition of parcel boundaries for assessment. The methodology will be applied consistently to Green Belt parcels, as set out in the Method Statement. This representation does not relate to methodology; however, CCDC will note the comments when considering Green Belt for potential release.</p>
4	Brereton and Ravenhill Heritage Committee	<p>The Heritage Committee fully supports the comments submitted by Brereton and Ravenhill Parish Council in respect of the [Cannock Chase Local Plan Part 2 – Green Belt Review].</p>	<p>Comments at this stage were invited on the assessment methodology and definition of parcel boundaries for assessment. The methodology will be applied consistently to Green Belt parcels, as set out in the Method Statement. This representation does not relate to methodology; however, CCDC will note the comments when considering Green Belt for potential release.</p>
5	Brindley Heath Parish Council	<p>This Council has as its main objective, the protection of the AONB and the SSSI's within. We trust that whatever the evaluation process used, there will be no attempt to migrate any development into the AONB, or reduce it in any way. The AONB is very small in comparison to the range of activities it supports and could not sustain any reduction.</p> <p>We strongly object to the development along Bower Lane and the island of land between the bypass and Wolseley Road. This Green Belt land forms an attractive</p>	<p>Comments at this stage were invited on the assessment methodology and definition of parcel boundaries for assessment. The methodology will be applied consistently to Green Belt parcels, as set out in the Method Statement. The representation does not relate to methodology; however, CCDC will note the comments when considering Green Belt for potential release.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>entrance to the town of Rugeley and development would form an ugly mass at high level ruining the rural aspect. Further, it would encourage infill applications stretching to Wolseley Bridge.</p> <p>Etching Hill has been totally overdeveloped and the existing Green Belt boundaries are important open areas – Etching Hill itself, the playing fields, the cricket pitch and the farm land.</p> <p>Rugeley...still has brownfield sites available and it is these which should be investigated.</p> <p>Slitting Mill is a hamlet of merit and is an important aspect of Cannock Chase. Any attempt to infill back to Rugeley Town would be a serious breach of Government advice in the National Planning Policy Framework.</p> <p>With the massive development of Armitage almost to the Rugeley Bypass, there is a serious threat of losing any clear delineation between Rugeley, Armitage and Longdon if the Green Belt is attacked.</p> <p>We trust the outcome of this exercise will be to leave the AONB and Green Belt as it is, and give more serious thought to brownfield sites of which there are many.</p>	
6	Brocton Parish Council	<p>...we are...primarily concerned with the Green belt which includes the area of Cannock Chase County Park and AONB between Cannock, Rugeley and our own Parish of Brocton.</p> <p>...proposals to develop any part of this area should be strongly resisted for the following reasons:</p> <ul style="list-style-type: none"> • This area of Green Belt forms a natural corridor giving separate identify to the urban areas and the villages and hamlets around it. • The area contains Sites of Special Scientific Interest and Conservation Areas which should be protected from any imbalance of habitat that any development may create. • The area provides an immensely important visitor and leisure amenity which is well used by a very wide population base including many visitors from the West Midlands conurbations and which is currently well managed by the Cannock Chase AONB Partnership. <p>We note that the judgement included in your consultation document does portray a</p>	<p>Comments relate to AONB both within and beyond Brocton PC area.</p> <p>CCDC will note the comments when considering Green Belt for potential release.</p> <p>The proposed Green Belt Review methodology reflects the presence of environmental assets such as Conservation Areas insofar as these are relevant to Green Belt purposes. Such designations will also be considered separately by the Council in the Local Plan process.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		similar view to our own relating to this area of Green Belt land and we trust that this decision will be upheld and there will be no intent to permit development of any part of it.	
7	Burntwood Action Group	<p>Having read your "Method Statement" we are not convinced that your review will in fact pose any threat to the designation of land to the west of Stables Way and we can see the logic in Cannock Chase and Lichfield District agreeing policy for the future of the whole parcel between Heath Hayes and Stables Way. Our view is that this parcel of land, as Green Belt, prevents the coalescing of Heath Hayes and Burntwood.</p> <p>...we understand LDC's consternation at your consultant's suggestion to consider part of Lichfield District land in your assessment and endorse their concern.</p> <p>It was of interest to read of your decision to NOT use the very restrictive definition of 'large built-up areas' used by the LDC. We made strong representation against the LDC's definition as it made impossible to classify as 'important' in restricting urban sprawl any parcel of land to the north of Burntwood, because it does not restrict Burntwood coalescing within the West Midlands conurbation. The fact that Burntwood itself is a large built up area carried no weight.</p> <p>We are confident that you will see no benefit in including Lichfield District land in your Green Belt Review and look forward to the two District Councils working together to preserve the Green Belt, which fulfils a vital role in preventing the two Districts coalescing.</p>	<p>Agree it is appropriate for the two District Councils to consider Green Belt land between Heath Hayes/Norton Canes and Burntwood together.</p> <p>It has been agreed with Lichfield District Council that Parcels LI2 and LI3 will be reviewed by Lichfield District Council in their Green Belt review. Parcel LI1 to be reviewed by CCDC.</p>
8	Burntwood Town Council	Cannock Chase Council...reminded of the interpretation of the Green Belt namely to prevent neighbouring towns merging into one another and that Burntwood Town Council would not agree to any Green Belt sprawl/joining up with Norton Canes and Heath Hayes or anything close to the boundary of Chase Terrace.	Noted. Coalescence (preventing neighbouring towns merging) is one of the five Green Belt purposes set out in the methodology (and NPPF).
9	Carter Jonas LLP (Rep. Mr F Dorsett)	<p>Our client's site, Land at Rawsley Road, comprises a roughly triangular shaped parcel of land bounded by Rawsley Road to the southwest...approximate area of 2.5Ha.</p> <p>Purpose I – existing Green Belt boundary along Rugeley Road and Rawsley Road north thereof, together with the AONB boundary north of the railway embankment,</p>	Information provided by consultee will be noted by LUC in assessing relevant parcels.

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>already provides an effective limit to the outward expansion of the urban area. Furthermore, the existing boundary is clearly defined whilst allowing for limited expansion of the urban area.</p> <p>Purpose II – the Council’s assessment that the inclusion of land between Rawnsley Road and Rugeley Road within the Green Belt would not help prevent neighbouring towns from merging into one another and that this purpose is NOT MET, is accepted.</p> <p>Purpose III – the existing Green Belt and AONB boundaries already give adequate protection to the open countryside. Although the land between Rawnsley Road and Rugeley Road is greenfield, it cannot be considered as open countryside because it is almost completely surrounded by development. To the north, there are residential properties on alternate sides of Rugeley Road and to the south there are residential properties on the southwest side of Rawnsley Road. To the east, the gap between the existing development at Westgate and Hazel Drive owes its existence mainly to the Bentley Brook and the former railway embankment. The latter, although wooded, is not a natural feature. Furthermore, the gap is considered tenuous due to its maximum width of approximately 45m. The gap to the west, between the residential curtilages fronting Rawnsley Road and Rugeley Road, is also considered tenuous as it is approximately only 50m wide.</p> <p>Purpose IV – the Council’s assessment that inclusion of the land between Rawnsley Road and Rugeley Road within the Green Belt would not help preserve the setting of a historic town and that this purpose is NOT MET is accepted.</p> <p>Purpose V – the Council’s assertion that all potential Green Belt sites have a role in assisting urban regeneration by encouraging the recycling of derelict and other urban land is disputed. The combination of the district’s overall housing requirement, its legacy of brownfield land and the extent of the existing Green Belt, means that the allocation of sites with relatively low potential yields for housing would not impact on the Council’s ability to secure the release of sufficient brownfield to meet its regeneration initiatives. Indeed, it could be argued that the inclusion of sites such as the land between Rawnsley Road and Rugeley Road within an expanded Green Belt could stifle necessary development by restricting the supply of smaller sites.</p> <p>...The almost inevitable result would be that a further review of Green Belt boundaries will be required at the end of the period covered by the emerging Local</p>	

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>Plan. It is therefore considered that the proposed inclusion of land between Rawnsley Road and Rugeley within the Green Belt is contrary to paragraph 80, as its inclusion is likely to result in the proposed and existing boundaries of the Green Belt not being secure beyond the plan period.</p> <p>Paragraph 85 of the NPPF states that Green Belt boundaries should be clearly defined, using physical features that are readily recognisable and likely to be permanent. The existing Green Belt boundary in the Rawnsley / Hazelslade area follows the northeast edge of Rawnsley Road as far south as its intersection with Rugeley Road. At this point, the boundary turns northeast and then east to follow either the edge of Rugeley Road itself, or the rear boundaries of the residential properties to the north. As a result, the existing Green Belt boundary is clearly defined...the proposed boundary to the extended Green Belt would not be clearly defined. This is especially so at the eastern end, where rather than running along the western edge of Westgate, the proposed boundary is shown as following the western edge of the adjacent play area. Although currently delineated by a hedgerow, this is not continuous and it is not necessarily a permanent feature in the landscape.</p> <p>The Green Belt boundary within Cannock Chase was last reviewed in 2010, as part of the decision making process for the Core Strategy. The recommendation of this review was to include the land between Rawnsley Road and Rugeley Road within the Green Belt.</p>	
10	Barton Wilmore (Rep. The Church Commissioners for England)	<p><u>Land at Bleak House Landscape and Visual Appraisal and Green Belt Review</u></p> <p>Useful definitions:</p> <ul style="list-style-type: none"> • <i>Openness</i> is taken to be the degree to which the area is unaffected by built structures. It is considered that, in order to be a robust assessment, this should be considered from first principles, i.e. acknowledging existing structures that occur within the area, rather than seeing them as being 'washed over' by the existing Green Belt designation. • <i>Sprawl</i> is taken to be disorganised and unattractive extension to developed areas (perhaps lacking coherent, robust or defensible boundaries). <p>CCGGBR has divided the Site into four land parcels, which are considered to be too large a delineation, and very likely to be considered to make a considerable</p>	<p>It is accepted that smaller parcels would provide greater flexibility. However, LUC has been commissioned to carry out a strategic review of all of the Green Belt in the District and the parcel sizes are deemed to be consistent with assessment at this scale. CCDC will consider detailed, site-specific issues when considering Green Belt for potential release.</p> <p>The numbering of methodological tasks contained an error and has been corrected.</p> <p>Criterion 1a has been clarified in Table 1.1 of the Method Statement to clarify the assessment of ribbon development in relation to Purpose 1.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>contribution to the purposes of the Green Belt, given the structure of the CCGBR scoring method...This judgement is due to the open character of the parcels and their measured distances between existing settlement patterns. The method does not provide enough flexibility to address the type of surrounding settlement patterns, the detail of the landform across the site and the vegetation structure. By the review method choosing to delineate the site into four parcels it has created very large areas which are highly likely to contribute to the Green Belt purposes, as opposed to trying to release smaller areas of land to balance additional housing within the District and the aims of the Green Belt.</p> <p>The CCGBR is aiming to present the contribution of the land parcels based on the first four of the purposes of the Green Belt, in addition to specific considerations relevant to the District. This LVA recommends that the criteria and value associated of Item 1a Ribbon Development of the CCGBR are clarified as to the role of the parcel in preventing ribbon development.</p> <p>There is no task 5 stated; and this is assumed to be an omission. It is recommended that CCGBR clarify the status of Task 5.</p> <p>CCGBR will present the above information and prepare an interim report. This LVA considers that the interim report should be made available to The Church Commissioners for England and to ensure that a Site visit of the land parcels is undertaken to fully understand the landform and the relationship of the various parts of the Site to the surrounding area and settlement patterns. A site visit and site access can be arranged via the Commissioners managing agents, Smith Gore.</p> <p>The LVA has identified that the landscape structure is weak across the site, and that the northern and western parts of the site provide an opportunity for development set within a robust landscape framework. The effects of development in these parts of the site are considered to be localised, and in combination with retaining the open character of the eastern and southern parts of the site would not result in harm to the Green Belt, with the relationship between the existing settlement patterns adjacent to Cannock Wood Road and Sevens Road being maintained.</p> <p>Given the size of the parcel delineation, the review method is too broad to establish parts of the site which could be released from the Green Belt and therefore is detrimental to the purpose of the Green Belt review. Additionally, a cumulative scoring method would be more appropriate to reduce the automatic judgement of a</p>	<p>Detailed Landscape and Visual Assessments are more appropriately considered by CCDC when making judgments on potential release of Green Belt land and during development management decisions.</p> <p>As noted in LUC's overarching response, the study is limited to providing evidence that will form part of CCDC's decision on whether to release or expand Green Belt in the District.</p> <p>Paragraph 1.52 of the method statement has been revised to state that all parcels and broad areas identified in the District will be visited.</p> <p>Paragraphs 1.52 and Table 1.1 in the method statement outline an amended cumulative scoring system.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>land parcels being considered to make a considerable contribution on the basis of the triple plus score (+++) .</p> <p>It should be strongly requested that as part of the review process, field work of the site is undertaken to understand the landscape character across the site, and how the differing parts of the Site have the opportunity to successfully accommodate residential development within a robust landscape framework.</p> <p><u>Accompanying Letter on Green Belt Review Method Statement</u></p> <p>...we are concerned that the Green Belt Review indicates an objective in defining the Study Area as identifying “selected areas of land outside the Green Belt for possible future inclusion in the Green Belt.”</p> <p>We are...concerned that the variation in terms of the sizes that the parcels the land is divided into will not be conducive to the Green Belt Review. Whereas 3 parcels of land under the Commissioners’ ownership are considered to be reasonably appropriate in size, as set out in the enclosed site plan, the largest parcel is considered to be too large for the purposes of the assessment and should be divided further...we consider that in order to appropriately address the parcel of land in respect of the contribution it makes to the Green Belt, the land parcel should be defined further, based on field lines found within the current land parcel... It is our view that the parcel of land in its entirety would make a contribution to the Green Belt and would therefore be identified as land that is inappropriate for release from the Green Belt. We consider that the parcels assessed in their current form are not conducive to the intended identification of the appropriate release of Green Belt land. These conclusions are drawn from the sheer scale and extent of the site area...</p> <p>The Method Statement advises at paragraph 2.9 that site visits will not be undertaken to inform the assessment of the Green Belt. We strongly object to this approach and consider that it is crucial that site visits are undertaken, particularly where larger parcels are identified.</p>	
11	Barton Wilmore (Rep. Taylor Wimpey (UK) Ltd.)	<p>Similar to rep above:</p> <p>Boundary of parcel 1 (safeguarded land) not considered robust. Detailed assessment should make greater clarification of criteria and value of Item 1a (ribbon development). Recommend site visits for parcels 1, 2 and TW site due to specific character and land use; no scoring method ratio is provided to define threshold</p>	<p>Consultee assessment information will be noted in LUC assessment of relevant parcels insofar as it is relevant to the Green Belt review methodology.</p> <p>Criterion 1a has been clarified in Table 1.1 of the Method Statement to clarify the assessment of ribbon development in</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		between contributing categories; recommend scoring is revised to be based on a cumulative system; no task 5 stated – recommend clarification; Interim report of GBR should be made available to TW and site visits undertaken; assessment of these sites suggests these parcels may be judged to make a considerable contribution to the GB, contradicting Local Plan designation and Landscape Character Assessment findings. Suggest TW site forms its own parcel. Recommend clarification of how a judgement will be reached if parcel does not score triple plus score.	<p>relation to Purpose 1.Paragraph 1.52 of the method statement has been revised to state that all parcels and broad areas identified in the district will be visited. Paragraphs 1.52 and Table 1.1 in the method statement outline an amended cumulative scoring system.</p> <p>The extent of parcels C14 and C15 has been amended. The original parcel C15 which contained land not currently designated as Green Belt has been incorporated into a new parcel C14 which extends to the edge of the woodland to the north and east, containing three large rectangular fields. The land directly to the south, containing outdoor sports pitches, an allotment and playground has been defined as parcel C15. Broad Area 3 therefore extends further west into land previously contained within the original parcel C14.</p>
12	The Coal Authority	Having reviewed the document, I confirm that we have no specific comments to make at this stage.	Noted.
13	David Edwards	<p>...writing to express my alarm at the proposed changes to the green belt which surrounds the area.</p> <p>I object most strongly to any such changes and believe this would spoil the area for all local residents.</p> <p>I urge you to discontinue such proposals forthwith.</p>	Comments at this stage were invited on the assessment methodology and definition of parcel boundaries for assessment. The methodology will be applied consistently to Green Belt parcels, as set out in the Method Statement. The representation does not relate to methodology; however, CCDC will note the comments when considering Green Belt for potential release.
14	Peter Colman	Peter Colman has drafted a review of the 'land adjacent to Batesway WS151PX, shown on the review map as Brereton Hill'. This representation will be reviewed during the assessment of relevant Green Belt parcels.	Consultee assessment information will be noted in LUC assessment of relevant parcels insofar as it is relevant to the Green Belt Review methodology.
15	Environment Agency	<p>The Environment Agency has reviewed the Method Statement...and has no objections to the methodology for the Green Belt review as submitted.</p> <p>We welcome section 1.23 which states that the areas proposed for being taken out of the Green Belt have been screened for floodplain and eliminated from the</p>	<p>Noted.</p> <p>The Green Belt review should focus only on how parcels contribute to the Green Belt purposes; therefore, the role of the constraints mapping process has been revised. Areas</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		proposals.	<p>containing primary constraints –Internationally and Nationally designated wildlife sites, Scheduled Monuments, Flood Zone 3 are no longer eliminated from review, but used to illustrate the planning context for the review. All Green Belt within the District of Cannock Chase will be assessed.</p> <p>Primary constraints will be considered alongside the findings of the Green Belt review as part of the wider evidence base for the Local Plan.</p>
16	English Heritage	<p>Paragraph 1.23 – it is unclear as to why the review is proposing to exclude these sites from the review unless the Council considers that they have a Green Belt function. We would welcome clarification on this.</p> <p>It is unclear why Scheduled Monuments are specifically referenced within this section. The Green Belt review should focus on how sites contribute to the function of Green Belt, as identified in national policy/guidance.</p>	<p>We agree with English Heritage’s comment that the Green Belt review should focus only on how parcels contribute to the Green Belt purposes; therefore, the role of the constraints mapping process has been revised in paragraph 1.6 of the method statement. Areas containing primary constraints – Internationally and Nationally designated wildlife sites, Scheduled Monuments, Flood Zone 3 are no longer eliminated from review, but used to illustrate the planning context for the review. All Green Belt within the District of Cannock Chase will be assessed.</p> <p>Primary constraints will be considered alongside the findings of the Green Belt review as part of the wider evidence base for the Local Plan.</p>
17		<p>2a) What is the definition of ‘settlement’ within this review? The Green Belt guidance relates to ‘towns’.</p> <p>2b) We are concerned about the inclusion of this criterion as some developments such as a motorway could score a ‘+’ which could then encourage development up to its boundaries. This would no longer preserve the ‘openness’ of the Green Belt, one of its functions.</p> <p>3a) It may be in certain cases that there are no urbanising influences within the site itself, however there may be urbanising influences in the land parcel that separates</p>	<p>Criterion 2a – In LUC’s view, the Green Belt purpose of preventing neighbouring towns merging into one another is relevant for distinct settlements of all scales – cities, towns and villages. No change proposed to assessment criterion.</p> <p>Criterion 2b has been omitted from Table 1.1 in the revised method statement – The issue of preventing encroachment on the open countryside is addressed in criterion 3b.</p> <p>3a – Disagree. We consider that countryside can exist at a</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>the site from the open countryside and therefore we consider that the urbanising influences of neighbouring parcels of land should also be considered.</p> <p>3b) It is not clear which boundary this criterion is assessing. We consider that it should firstly consider the boundaries on the urban edge and if these are not significant or permanent then the ones on the open countryside side of the site. The urban edge side should score more highly.</p> <p>4) We do consider that it is a positive aim to assess heritage assets and historic features within this section, however the function of Green Belts, as identified in the introduction relates to historic towns within the Cannock Chase authority.</p>	<p>variety of scales and that it is appropriate to consider a parcel bordered by urbanising influences as countryside.</p> <p>3b – Agree. It is intended that in applying this criterion consideration will be given to the whether the boundary lies in close proximity to/adjacent to the urban edge or within the open countryside. The text associated with this criterion has been revised in Table 1.1 to make it clearer how this criterion will be assessed in the review. 4 – Agree. Criterion has been revised accordingly in Table 1.1 of the revised method statement.</p>
18	Equality and Human Rights Commission	<p>The Commission does not have the resources to respond to all consultations, but will respond to consultations where it considers they raise issues of strategic importance.</p> <p>Local and other public authorities have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of their policies and decisions on people sharing particular protected characteristics. We provide advice for public authorities on how to apply the PSED, which is an on-going legal obligation and must be complied with as part of the planning process. Thus, the PSED is the mechanism through which public authorities involved in the planning process should consider the potential for planning proposals to have an impact on equality for different groups of people. To assist, you will find our technical guidance here.</p>	Noted.
19	M. J. Pope (Design Consultant)	<p>...include in your review land at the above location at Etching Hill. It is considered that this should be deleted from the Green Belt to enable residential development. (See map enclosed.)</p>	The site is included in the review.
20	M. J. Pope (Design Consultant Rep. Mr Till)	<p>Request include land at Bower Lane in GBR and request release from GB (in Stafford BC area).</p>	The site is included in the Review.
21	Gladman	<p>Gladman remind the Council that its Green Belt review should be undertaken in a clear and consistent manner. Decisions to release land from the Green Belt should</p>	Comments summarised in paragraphs 1-3 are noted.

Ref. no.	Respondent	Comments Summary	Response to Comments
	Developments	<p>not be politically driven, rather they should be based on the findings of a full, robust and comprehensive assessment.</p> <p>The methodology states that selected areas of land outside the Green Belt will be considered for possible future inclusion in the Green Belt. Gladman remind the Council that new Green Belt should only be established in exceptional circumstances in accordance with paragraph 82 of the Framework. The Council must ensure that any additions to the Green Belt add to the longevity of the designation and have full regard to their intended permanence not only for the current plan period but for the future plan period.</p> <p>When reviewing Green Belt boundaries, the Council also need to ensure that they take into account the need to promote sustainable patterns of development as required by paragraph 84 of the Framework.</p> <p>Gladman contend to the Council's application towards the five purposes of Green Belt. If a parcel achieves a triple plus score against a single purpose of the Green Belt, it will be judged to make a 'considerable contribution' to the purposes of Green Belt and no further assessment on that land parcel will be required. In order to perform a full and robust review of the Green Belt, the Council must ensure that each parcel is tested against all five purposes of Green Belt. Failure to do so will not provide a thorough and robust assessment and would be contrary to the requirements of the Framework. An approach such as the one presented will result in the failure to release potentially suitable and sustainable sites from the Green Belt, which may be able to serve the Districts housing and economic needs.</p>	<p>Re: comments summarised in paragraph 4, the scoring system has been amended to a cumulative one. Paragraphs 1.43 and 1.44 and Table 1.1 of the method statement have been amended accordingly.</p>
22	Great Wyrley Parish Council	<p>The Parish Council assumes that as stakeholders, South Staffordshire Council has been consulted on the review and feel sure that the Director of Planning will already have pointed out that the land referred to as the parcel of land along the A5 Watling Street is located in South Staffordshire and not in Cannock Chase District... why has Cannock Chase Council identified a parcel of land outside of their jurisdiction for a detailed assessment and on what basis was this particular parcel of land selected?</p> <p>The Parish Council is, however, most concerned that there seems to have been blurring of the boundary between South Staffordshire and Cannock Chase Districts as there is a parcel of land which appears to situated almost entirely located in has incorrectly been included the Cannock Chase Local Plan (Part 2) - Green Belt</p>	<p>CCDC officers have met with SSSDC officers re: parcel C22 and SS1. C22 and SS1 have been merged in to a new parcel, C22, which has been extended westwards to the edge of Church Lane, a boundary which is considered to be more permanent and readily recognisable. Discussions between the District Councils are ongoing.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		Review.	
23	Heath Hayes Football Club	It is Heath Hayes Football Clubs wish that the clubs ground and related access should be treated as a separate entity.	<p>It is accepted that smaller parcels would provide greater flexibility. However LUC has been commissioned to carry out a strategic review of all the Green Belt in the District and the parcel sizes are deemed to be consistent with assessment at this scale. CCDC will consider detailed site-specific issues when considering Green Belt for potential release.</p> <p>As a result of incorporating a cumulative scoring system in to the Table 1.1 of the method statement, criterion 3c has been omitted in order to ensure that all purposes are equally weighted in the assessment. The features assessed under criterion 3c are considered in the assessment of criterion 3a.</p>
24	Heath Hayes & Wimblebury Parish Council	The Council has no objections.	Noted.
25	Hednesford Town Council	In particular the Council is interested in the detailed assessment of Hednesford Hills and will look forward to contributing to the review process with a view to securing further protection for this important local area.	Noted.
26	Hawksmoor (Rep. J S Holdford & Sons)	<p>We agree with the overall approach taken to the Green Belt Review...we feel that it is important that existing Green Belt boundaries are altered in order to identify areas of safeguarded land to accommodate long-term development needs well beyond the current plan period in accordance with the NPPF.</p> <p>...We agree that excluding sites from assessment is a reasonable approach to take.</p> <p>...our client's site known as Turf Field, Watling Street, Norton Canes...is not identified for detailed assessment. We disagree with this approach as we believe this site is non-contentious and given its location between the M6 Toll and Watling Street we believe it does not fulfil any Green Belt function.</p> <p>...we wish to comment on an area within the land to the West of Pye Green Road...the Planning Inspector's Report considered in great detail [this land] and</p>	<p>Additional parcel added for detailed assessment to the south of Norton Canes in between the A5 and the M6 Toll.</p> <p>Re: comments summarised in the final paragraph we agree. The scoring system has been amended to a cumulative one. Paragraphs 1.43 and 1.44 and Table 1.1 of the method statement have been amended accordingly.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>conclusively demonstrated the land should be removed from Green Belt. Therefore there is no justification for reviewing the site again. Secondly the site has a planning application approved for 700 dwellings [and] an uplift in the allocation [to 900 dwellings] was secured through the examination. As a result there is clearly no basis for putting this land back into the Green Belt.</p> <p>...we would like to see in Task 4, all the sites assessed against all the purposes of the Green Belt (excluding purpose 5) instead of 'if a parcel achieves a triple plus score against a single purpose, it will be judged to make a considerable contribution to the purposes of Green Belt and no further assessment of that land parcel will be required'.</p>	
27	Lichfield District Council	<p>...the Council...has fundamental concerns of principle over the inclusion of land parcels within Lichfield District...The inclusion of these areas is strongly opposed by Lichfield District Council. It is considered that their inclusion is unnecessary, unproductive, and will be unhelpful to the District Council in carrying out further work on the Lichfield District Local Plan Allocations document. The Method Statement does not include any specific indication of why it was felt necessary to include areas outside the Cannock Chase District boundaries. Neither does it acknowledge that Cannock Chase has no responsibility for, or policy control over these areas.</p> <p>In general terms the Council supports the proposal to carry out a Green Belt review in your area...The general approach to the analysis is supported, including the use of both broad brush and detailed assessment as appropriate and the definition of the levels of contribution to Green Belt objectives, which is similar in concept to that adopted within Lichfield District. It is noted that there are broad references to defensible boundaries and to 'straddling' the District boundary, but there is not further justification for this for this reasoning nor are specific parcels referenced in this respect (although the re 'detailed' maps provided indicate that this reference may relate to parcels LI1 and LI2. It is considered that these are weak reasons, compared to the issue of local authority responsibility. [Lichfield District Council...would strongly remind CCC, Lichfield District Council will be responsible for undertaking such technical reviews of land falling within its own administrative boundaries...It is considered that the Green Belt parcel analysis would be better simply referring to a wider context.</p>	<p>Re: the role of the green belt in preventing sprawl of the West Midlands, the strategic role of the Green Belt within Cannock Chase District will be drawn out via the assessment of the Broad Areas.</p> <p>Agree with comment about how the assessment will deal with 'historic towns'. Criterion 4a in Table 1.1 of the method statement has been revised accordingly. .</p> <p>Detailed assessment is proposed for parcels adjacent to settlement boundaries, which in this case in Burntwood.</p> <p>The reason for requesting information on cross boundary brownfield sites is to ensure LUC awareness of any potential development sites which may affect context for assessment.</p> <p>It has been agreed with Lichfield District Council that Parcels LI2 and LI3 will be reviewed by Lichfield District Council in their Green Belt review. Parcel LI1 to be reviewed by CCDC. Therefore, parcels LI2 and LI3 have been omitted from the overview map.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>It is noted that the land parcel (LI3) selected to the north west of Burntwood does not straddle the local authority boundary, and is proposed for detailed analysis whilst the adjacent land, which is wholly within Cannock Chase is proposed for a higher level, broad brush approach. This appears particularly incongruous due to the differences in the approach between the two land parcels and again Lichfield District Council strongly objects to this approach.</p> <p>...it is suggested that that the role of Green Belt in preventing the outward sprawl of the West Midlands into the District may justify more specific reference.</p> <p>In addition more justification and definition of how the assessment will deal with 'historic towns' as referred to in the NPPF, alongside other historic and important elements within the land parcels that might be related to smaller settlements.</p> <p>The NPPF policy of positive uses of Green Belt, which are particularly relevant to Cannock Chase, might be more specifically referenced, for example within the high level assessments.</p> <p>Your consultants, LUC, have asked for information on significant brownfield sites and development proposals that might be relevant although the reasoning behind this is unclear. {Brownfield developments underway in LDC include those in Burntwood (1.2km away) and East of Rugeley (within 1km).</p>	
28	P.G. MacPherson-Smith	Objection in Brereton.	Comments at this stage were invited on the assessment methodology and definition of parcel boundaries for assessment. The methodology will be applied consistently to Green Belt parcels, as set out in the Method Statement. The representation does not relate to methodology; however, CCDC will note the comments when considering Green Belt for potential release.
29	Pegasus Group (Rep. Richborough Estates)	<p>... it is important that in assessing the contribution that each land parcel makes to the purposes of the Green Belt it does not disregard smaller parcels of land within these broader land parcels which are suitable for development.</p> <p>It is important that work undertaken on the Green Belt Review is sufficiently flexible to ensure a mix of sites of different types and sizes in different locations can be delivered without the constraint of Green Belt designation in order to meet the</p>	It is accepted that smaller parcels would provide greater flexibility. However, LUC has been commissioned to carry out a strategic review of all of the Green Belt in the District and the parcel sizes are deemed to be consistent with assessment at this scale. CCDC will consider detailed site-specific issues when considering Green Belt for potential release.

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>Districts housing requirements. The methodology for this Green Belt review should give appropriate consideration to individual sites rather than merely assessing those broader land parcels identified within the Methodology Paper.</p>	<p>Only smaller settlements have defined boundaries in Local Plan (Part 1) and these are not the focus for new development.</p>
30	Pegasus Group (Rep. Mr Tony Wright)	<p>...it is important that in assessing the contribution that each land parcel makes that consideration is given to the potential for smaller portions (within the broader land parcels) are also considered and are not discounted if lower scores are achieved against the criteria set out at Table 1.1. Indeed our clients' site forms part of one of the parcels of land identified for detailed assessment at the south western edge of the existing urban settlement boundary of Rugeley and Brereton. We believe that whilst some of this land parcel (identified for assessment) may serve the purpose of Green Belt, there are clearly parts closer to the settlement boundary (of Rugeley) that would not. Failure to give further consideration to these smaller sites (within the identified land parcels to be assessed) would be unsound.</p> <p>In assessing the defined land parcels (as set out in the methodology paper) and making broad judgements of these land parcels there is concern that sustainable sites that have the ability to contribute towards meeting the Council's future housing requirements will be overlooked if they fall within a larger area of land which may be considered to contribute to the purposes of Green Belt and therefore not considered for release (from the Green Belt).</p> <p>It is therefore requested that further consideration is given to how the parcels of land are currently defined are assessed, or indeed, the extent of the actual parcels of land themselves and whether some of the larger parcels of land identified within the methodology paper are subdivided into small land parcels for a more accurate/thorough Green Belt review.</p>	<p>It is accepted that smaller parcels would provide greater flexibility. However, LUC has been commissioned to carry out a strategic review of all of the Green Belt in the District and the parcel sizes are deemed to be consistent with assessment at this scale. CCDC will consider detailed site-specific issues when considering Green Belt for potential release.</p>
31	Rugeley Town Council	<p>RTC is opposed to any removal of land from the Green Belt in the northern part of Cannock Chase District that is in the parishes of Rugeley and Brereton and Ravenhill and in the northern half of Brindley Heath parish.</p> <p>RTC considers that the Chase Area of Outstanding Natural Beauty and the gaps between (1) Rugeley and Slitting Mill and (2) Brereton and Armitage need to retain the protection of a Green Belt boundary to prevent neighbouring communities merging into one another.</p>	<p>Noted.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
32	South Staffordshire Council	<p>Considering that this review is to directly inform Cannock Chase District's allocation of safeguarded land, it is our firm view that this review should in the first instance focus on parcels of Green Belt within Cannock Chase District. This should involve a detailed assessment of all Green Belt land within Cannock Chase District to identify sufficient capacity to meet the safeguarded land requirement. We strongly oppose the approach proposed whereby an arbitrary parcel of land within South Staffordshire is subject to detailed assessment, whereas considerable areas of land within Cannock Chase District are not given the same consideration and are only subject to a 'descriptive assessment'.</p> <p>Notwithstanding this Council's strong opposition to the principle of Cannock Chase Council undertaking a review of Green Belt land within South Staffordshire, we also question how this arbitrary parcel of land in South Staffordshire has been selected and justified. The methodology states '<i>selected areas straddling the boundary with neighbouring authorities were parcelled up for assessment against the Green Belt purposes</i>'. No further explanation is given as to why the parcel of land along the A5 (Watling Street) has been chosen.</p> <p>South Staffordshire Council also objects to the mechanism by which this parcel of land is being considered by Cannock Chase District Council. To consider land outside of your district to meet your housing need, and outside the housing market sub area upon which the Local Plan Part 1 is adopted, is a strategic decision and wholly inappropriate for a Green Belt Review and should be considered (and examined) in a policy document. If land outside of your district, and outside of your agreed housing market sub area is required to deliver the Local Plan part 1, it should have been considered under the correct Duty to Cooperate mechanism and South Staffordshire Council should have been formally engaged from the outset during plan preparation and prior to adoption.</p> <p>The extent of the parcels of Green Belt identified could accommodate both our Core Strategy housing and safeguarded land requirement several times over. Therefore, at the present time, there is no intention to review additional Green Belt land within South Staffordshire. However, it is accepted that there may be land capacity issues in the MUA – with capacity within the Black Country most pertinent to South Staffordshire. Therefore it is recognised that a review of our Local Plan may have to consider further Green Belt release and we have already acknowledged that this may require a comprehensive review of Green Belt in South Staffordshire and the</p>	<p>CCDC officers have met with SSSDC officers re: parcel C22 and SS1. C22 and SS1 have been merged in to a new parcel, C22, which has been extended westwards to the edge of Church Lane, a boundary which is considered to be more permanent and readily recognisable. Discussions between the District Councils are ongoing.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>Black Country. This is the correct mechanism for reviewing any further Green Belt land within South Staffordshire which might be required to deliver housing in adjoining authorities or in addition to development set out in existing adopted Local Plans and Core Strategies, Cannock Chase included.</p>	
33	Staffordshire County Council	<p><u>Cannock Chase AONB</u></p> <p>The proposed methodology appears to be appropriate. It is noted that Cannock Chase AONB was not included as an absolute constraint, but the methodology highlights that its designation should inform judgements on the purposes and potentially on the size and shape of Green Belt parcels. This should be considered during the assessment process where appropriate and clarified during Task 7: Site visits; to ensure that modifications to the Green Belt do not inadvertently give rise to potential detrimental impacts on the AONB.</p> <p><u>Historic Environment</u></p> <p>It is not clear what data sets the consultant has used/will use in assessing 'To preserve the special character and setting of historic towns' as part of the Green Belt Review Criteria. In the example 'Parcel to the west of Prospect Village', the parcel is bordered by a dismantled railway. This information appears on Ordnance Survey mapping of the area, the Staffordshire Historic Environment Record (HER) retains a considerably more detailed and up to date database of heritage assets and this may be of use in developing a more detailed understanding of historic character in a particular parcel. Many such records relate to buried archaeological remains but some (i.e. earthworks, significant areas of historic landscape character) may have an important role to play in informing this assessment.</p> <p><u>Mapping</u></p> <p>For information, the available mapping (Figure 2) holds few points of reference and little annotation (i.e. Prospect Village) and it was difficult to identify the parcel being assessed. The consultant should carefully consider how mapping is used and may wish to simplify their mapping or make use of more than one map per parcel in preparing the assessment.</p> <p><u>Ecology</u></p>	<p>It is not proposed that consultees would be involved in Stage 6 of the Review. The Assessment is intended to be an impartial exercise carried out by the consultants, independently of both the Council and other stakeholders, in order not to skew the results.</p> <p><u>Cannock Chase AONB</u></p> <p>Landscape quality in general and the special characteristics of the AONB in particular are more appropriately considered by CCDC when making judgments on potential release of Green Belt land parcels and during development management decisions.</p> <p><u>Historic Environment</u></p> <p>Criterion 4a in Table 1.1 of the method statement has been amended to clarify how historic towns will be identified.</p> <p><u>Mapping</u></p> <p>The mapping will show greater detail when parcels are being assessed.</p> <p><u>Ecology</u></p> <p>The Green Belt Review will not be subject to Habitats Regulations Assessment because it will be an evidence base document rather than policy.</p> <p>Potential impacts of development on ecology assets form part of the planning judgement that CCDC will exercise as part of their decisions on whether to release particular parcels of land</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>The constraints identified in s.1.23 miss some important designations for protection of environmental assets. They do not include Local Nature Reserves – a statutory designation which defines their function as for the protection of nature. Schedule 11 (12) of the Natural Environment and Rural Communities Act 2006, which replaced Section 15 of the National Parks and Access to the Countryside Act 1949, describes a ‘nature reserve’ as: land managed solely for a conservation purpose, or land managed not only for a conservation purpose but also for a recreational purpose, if the management of the land for the recreational purpose does not compromise its management for the conservation purpose. Local Wildlife Sites (Sites of Biological Importance) of County importance, are described by the White Paper for the Natural Environment as fundamental to the conservation of biodiversity and essential for maintenance of coherent ecological networks. NPPF s.117 states that planning policies should identify and map components of the local ecological networks. NPPF s.118 states that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland..... unless the need for, and benefits of, the development in that location clearly outweigh the loss; removal of Green Belt designation from such habitats might be seen to invite development.</p> <p>Some identified parcels for review are subject to constraints identified in s. in s.1.23 and appear unsuitable for removal from Green Belt without compromising legal protections and/or local environmental quality. Consideration needs to be made as part of the review of impacts on Cannock Chase and Cannock Extension Canal Special Areas of Conservation (SAC), in line with the Conservation of Habitats and Species Regulations 2010. Some Figure 1 parcels are immediately adjacent to Cannock Chase SAC and within 400 metres of the site. Habitats Regulations Assessment of the impact of new residential development on Cannock Chase SAC resulted in a package of mitigation measures, one of which is that no new residential development would be permitted within 400 metres of the SAC. Land already approved as open space as mitigation of impacts on the SAC is included in the review. It is assumed that Habitats Regulations Assessment will be carried out and that changes detrimental to either SAC will not be made.</p> <p>Hednesford Hills, part of the Chasewater and Southern Staffordshire Coalfield Heaths Site of Special Scientific Interest is included as a parcel for review, this appears illogical as s.1.23 has already screened such sites out. A substantial number of Sites of Biological Importance are included in the review. Where these</p>	<p>from the Green Belt.</p> <p>Any development allocations or development management decisions with the potential to affect European Sites of Nature Conservation Interest will be subject to HRA, as appropriate.</p> <p>Site specific information provided by consultee will be noted in LUC assessment of relevant parcels insofar as it is relevant to the Green Belt Review methodology.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>are within parcels under consideration it may not be feasible to exclude them but where they are on the edge of parcels, especially where they are linked to other areas of environmental importance, retained in Green Belt, it would be logical to also retain these as Green Belt, for their intrinsic value and as buffers protecting lands of higher importance.</p> <p>The example of Prospect Village includes two Sites of Biological Importance. One – Prospect Village Field – is identified as contributing to Green Belt purposes. The other - Sevens Road – is a well-used public access site subject to a Forest of Mercia planting scheme, and a key ecological link between the Cannock Chase and Chasewater heaths.</p>	
34	Sport England	<p>...wish to emphasis our main concern around the mixed interpretation of NPPF regarding outdoor sport in the green belt.</p> <p>Whilst in principle outdoor sport is considered an opportunity to enhance the greenbelt (clarified in pars 81) and that new buildings associated with outdoor sport can be regarded as appropriate (par 89), there is a loop hole in the wording and an appeal has successfully argued that whilst new buildings are appropriate the change of use of agricultural land to playing field is not.</p> <p>Clearly, green belt is very important for sports delivery and we would not wish any changes to green belt boundaries to prejudice sport in any negative way if this can be avoided.</p>	<p>Noted. Assessment criteria for Green Belt purposes 1 and 3 reflect the need to avoid urban sprawl and safeguard the countryside from encroachment. This is deemed to adequately reflect the NPPF in relation to safeguarding Green Belt for all countryside uses, including recreation.</p>
35	RPS (Rep. St Modwen)	<p>It is our view that the following elements need to be considered within the criteria:</p> <ul style="list-style-type: none"> • <i>To check the unrestricted sprawl of large built-up areas</i> – In locations adjoining the main built up areas of the existing settlements, where the Green Belt serves a particularly important function in restricting sprawl, it is recommended that there should be consideration of whether land is contained by existing/proposed built development and as such whether future development could help to 'round – off' the existing built urban form of the major settlements. Development of land that would help to infill these parcels would be preferable to that which represents a major encroachment/sprawl into the Green Belt. It is recommended that the scoring could be along the lines of - Land bounded to only a single side 	<p>Re. the Green Belt purpose '<i>To check the unrestricted sprawl of large built-up areas</i>' it is LUC's view that this is adequately covered by the two proposed criteria and that the merits of 'rounding-off' of the settlement edge are a matter for the site allocations process. For clarity, the definition of sprawl used in the method statement has been amended in Table 1.1 of the method statement to '<i>the spread of an urban area into neighbouring countryside</i>'.</p> <p>Re: preventing neighbouring towns merging, the proposed cumulative scoring system outlined in Table 1.1 gives consideration to the narrowing of gaps of more than 2km by</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>(++) land bounded to two or three sides (+)</p> <ul style="list-style-type: none"> • <i>To prevent neighbouring towns merging into one another</i> – It is recommended that within (a) the location of parcel and distance between neighbouring settlements, consideration should also be given as to whether development of the parcel would result in a narrowing of the gap between nearby built up settlements. The recommended scoring could be – Narrowing (++) , not narrowing (+). <p>There are two additional steps that are recommended to ensure the analysis of the land parcels is considered in line with common practice and the requirements of the NPPF. They are considered essential to fully appraise each parcel and as yet have not been included within the methodology put forward by LUC.</p> <ul style="list-style-type: none"> • A Strategic land review to assess whether sufficient land will be set aside for residential/employment uses should be undertaken. It is submitted that an up-to-date study of employment and housing land provision is required to establish whether there is insufficient housing/employment land available on brownfield sites within the District and as such whether some Green Belt land will need to be released for this purpose. • Review of Green Belt History to consider whether sites have been previously removed or added to the Green Belt to ensure that there are no decisions contrary to those considered necessary in the past. <p>The scoring mechanism, as included within the Method Statement, does not seem particularly transparent. It would be helpful to know how the scoring of a parcel of land against the criteria used translates to concluding how considerable a contribution the parcel makes. At present, whilst there is no objection to the principle of the scoring and grading proposed, without the detail of how one relates to the other it is not possible to fully comment on the methodology. It is also unclear how the scoring system will work in relation to those sites that are proposed for inclusion within the Green Belt – if there will be a hypothetical 'likely contribution' for these parcels, this will need to be robustly presented. RPS would be willing to discuss this with officers further or even sit on a steering group to consider such important matters.</p> <p>Further representations on Land West of Pye Green Road and Land adjacent to Watling Street Business Park.</p>	<p>scoring corresponding land parcels as '0'.</p> <p>Re: strategic land review, this will form part of the CCDC's decision-making as to whether land should be released from the Green Belt. Existing evidence documents (SHLAA/ELAA) include mapped brownfield sites within the District.</p> <p>Re: the review of Green Belt History, LUC has been commissioned to carry out a strategic review of all of the Green Belt in the District. The planning history of specific parcels is more appropriately considered by CCDC alongside other detailed, site-specific issues when considering Green Belt parcels for potential release.</p> <p>The scoring system has been amended to a cumulative one. Paragraphs 1.43 and 1.44 and Table 1.1 of the method statement have been amended accordingly. Site-specific information will be noted in LUC assessment of relevant parcels insofar as it is relevant to the Green Belt Review methodology.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
36	Stafford Borough Council	<p>My purpose in writing to you is to object to a parcel of land within the administrative boundary of Stafford Borough, north of Bower Lane, Rugeley, being identified and assessed...the Plan for Stafford Borough [adopted June 2014]...states that existing Green Belt boundaries will be maintained, including on the north side of Rugeley, in line with Government policy...I see no justification or evidence to demonstrate the reason for identifying or assessing Green Belt areas beyond the boundary of Cannock Chase, within Stafford Borough...</p>	<p>Comments at this stage were invited on the methodology and definition of parcel boundaries for assessment. The methodology will be applied consistently to Green Belt parcels, as set out in the Method Statement.</p> <p>CCDC and SBC offers have met to discuss parcels ST1 and ST2 to the north of Rugeley. Parcel ST1 has been extended to the west and south to the woodland which is considered a more readily recognisable boundary. Parcel ST1 of land will be considered as a broad area and subjected to a broad descriptive assessment rather than a detailed assessment using the assessment criteria outlined in Table 1.1 of the method statement. Parcel ST2 is received planning consent for development and has therefore been removed.</p>
37	T. A. Jones	<p>I am opposed to any removal of land from the Green Belt in the northern part of Cannock Chase District that is in the parishes of Brereton and Ravenhill and Rugeley and in the northern half of Brindley Heath parish.</p> <p>The Cannock Chase Area of Outstanding Natural Beauty and the gaps between (1) Brereton and Armitage and (2) Rugeley and Slitting Mill need to retain the protection of a Green Belt boundary to prevent neighbouring communities merging into one another. In particular if there is more building between Brereton and Armitage, there will be a continuous, straggly, built-up area from the western side of Etchinghill to the eastern side of Handsacre.</p> <p><u>Lime Land Traveller Site</u></p> <p>The district council has been rightly searching for land for Traveller site provision along the A5 corridor. An obvious site for this is expansion of the existing site in Lime Land (the B4154), to the north of Pelsall. This is close to facilities of Pelsall, but does not impact on anybody's residential amenity.</p> <p>It would be sensible to remove this site together with some land for expansion, perhaps an addition 50% from the Green Belt and in accordance with PPTS specifically to allocate it as a Gypsy and traveller site only. If this is not done now the opportunity to do so may be lost for years.</p>	<p>Comments at this stage were invited on the assessment methodology and definition of parcel boundaries for assessment. The methodology will be applied consistently to Green Belt parcels, as set out in the Method Statement. The representation does not relate to methodology; however, CCDC will note the comments when considering Green Belt for potential release.</p> <p>Re: the Lime Land Traveller Site, site specific information will be noted in LUC assessment of relevant parcels insofar as it is relevant to the Green Belt Review methodology.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
38	Walsall Council	<p>...it is unclear why some of the parcels indicated for detailed assessment in figure 1 have been chosen...the parcels for detailed assessment shown in figure 1 do not seem to follow [the criteria in paragraphs 1.26 and 1.30.</p> <p>For example, the area south-west of Norton Canes south of the M6(T) is as close to the existing built-up area as the area to the south-east, but is not included. An area of York's Bridge within Cannock Chase is also included: we presume this is in response to a call for sites exercise. The latter area in Walsall has been subject to a call for sites in relation to our Site Allocation Document (the plan provided with this submission included land within Cannock Chase District), we were not aware of a separate submission in respect of the area in Cannock Chase. York's Bridge does not adjoin any built-up area of Cannock Chase district. Any potential for development of this site would only appear possible as part of the larger site within Walsall. The land within Walsall is all subject to green belt policy and the adopted Black Country Core Strategy does not envisage a review of the Black Country's Green Belt.</p> <p>The parcels also seem to include areas in South Staffordshire, Stafford and Lichfield. We wonder how it is expected that the review will deal with land that is within the administrative areas of other local planning authorities.</p>	<p>There is a small linear land parcel to the south west of Norton Canes to the North of the M6 Toll Motorway, which will be subject to detailed assessment. However, we acknowledge that this is not clear from the overview map provided in the Method Statement. A clearer overview map will be published in the final report.</p> <p>There is already a Gypsy and Traveller site at Yorks Bridge.</p> <p>CCDC have met with neighbouring authorities re: parcels which cross the District's boundary and an approach has been agreed.</p>
Further representations²⁰			
39	South Staffordshire Council	<p>[the Council]... asked for my opinion on your new proposed Green Belt 'parcel' in South Staffordshire north of the A5. My comments are made as an officer of the Council, purely related to what constitutes a parcel of Green Belt in the landscape setting; and notwithstanding the Council's objections and opposition to Cannock Chase Council looking at a land in South Staffordshire for future Green Belt release. In particular, our objections were made as the South Staffordshire land seems to be in advance of a full consideration of Cannock's Green Belt and the wider South-East Staffs sub HMA, and in advance of a robust justification for this area only. I attach our original comments for your reference.</p> <p>In terms of the parcel you have proposed, it is a triangular area of land comprising a</p>	<p>Parcel C22 has been extended to road boundaries that are judged to provide permanent, defensible boundaries. South Staffordshire Council's rationale for the suggested further extension of the parcel further is based on landscape character which would be inconsistent with LUC's parcel definition method and, if followed, would also raise the new question of why the additional field to the north west had not been included in the expanded parcel.</p>

²⁰ The following additional consultee comments are based on discussions and correspondence between the Council and stakeholders subsequent to the 10/11/15-19/12/15 consultation on the method statement

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>number of medium and large sized fields. Its boundaries are defined by A5 Watling Street, Wellington Drive and Poplar Lane. Wellington Drive forms the edge of the parcel with the urban area of Cannock to the east.</p> <p>The character within the 'triangle' is different to that north, beyond Poplar Lane where there is a reasonably strong field pattern and smaller scale landscape. Within the parcel, there is less survival of hedgerows and fields are larger. The structure and pattern of the landscape is therefore weaker than the area to the north of Poplar Lane. This lends justification to Poplar Lane forming the parcel's northern boundary.</p> <p>Poplar Lane extends from the urban area in a south-westerly direction to the point where it meets the A5. The area beyond the southern part of Poplar Lane (i.e. to the west) retains similar characteristics to the proposed parcel. Consequently, the justification for the whole of Poplar Lane forming the parcel boundary is somewhat weaker. Further to the west beyond Church Lane, character changes again so it is unclear why the area between Church Lane and Poplar Lane has not also been included in the parcel.</p> <p>The A5 is a major transport corridor and therefore provides a strong boundary to the southern edge of the parcel. Beyond this, to the south, the landscape character is formed by less regularity and the presence of watercourse-related vegetation, in contrast to the area within the parcel. This therefore lends justification to the A5 forming the southern parcel edge.</p> <p>To summarise, the parcel should include an additional field to recognise the character in the local landscape. See attached.</p>	

Table 2 – Phase 2 Consultation

Ref. no.	Respondent	Comments Summary	Response to Comments
40	Stafford Borough Council	<p>...This Council continues to object to an area of land within the administrative boundary of Stafford Borough, north of Bower Lane, Rugeley, being identified and assessed as part of the Green Belt Review for Cannock Chase's Local Plan Part 2. Furthermore I note with concern that this area has been significantly extended since</p>	<p>CCDC feel that inclusion of that parcel in the study is appropriate, notwithstanding that SBC remain in complete control within their own boundary. Discussions with SBC are</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		the previous consultation last year...	ongoing.
41	Walsall Council	Officers have considered the documents you have made available in the light of the comments submitted previously on behalf of Walsall. I can advise we have no further comments.	Noted.
42	Historic England (formally English Heritage)	<p>...We welcome acknowledgement of our comments and a response to the queries we raised.</p> <p>We have additional comments at this stage, relating to Green Belt Purpose criterion 4 in Table 1.1 on Page 8. We consider that it is also important to recognise the setting of heritage assets, such as conservation areas and the contribution that setting makes to the significance of heritage assets rather than only assess whether a land parcel is within or adjacent to a heritage asset. We request that the criterion is amended to take account of setting. Additionally, there may be other heritage assets, including undesignated heritage assets, that make a contribution to the 'setting and special character of historic towns'. This criterion should take account of this.</p> <p>If you require further information about the setting of heritage assets, please see Good Practice Advice Note 3: The Setting of Heritage Assets.</p>	<p>The study does not represent a comprehensive historic landscape study; it is a strategic assessment of the performance of parcels of land against the Green Belt purposes. The assessment against purpose 4 (to preserve the setting and special character of historic towns) is proportionate and appropriate to a Green Belt study.</p> <p>Should the council conclude that there are exceptional circumstances for making alterations to the existing Green Belt, these changes, including any allocations of land for development, will be taken forward through the Local Plan-making process. This process includes a statutory requirement for Sustainability Appraisal of the Local Plan. This will involve detailed appraisal of the significant effects of preferred site allocations made by the Plan and their 'reasonable alternatives' against a comprehensive set of sustainability objectives, including those relating to the historic environment. This process together with the Council's development management process should ensure that potential adverse effects of development on the historic environment are identified are taken into account.</p> <p>Taken together, these and other evidence studies provide the necessary evidence base to appraise and arrive at the most sustainable pattern of development possible.</p>
43	Barton Wilmore (Rep. The Church Commissioner)	<p><u>The Purpose of the Green Belt Review</u></p> <p>Paragraph 1.2 of the introduction to the representation states "The purpose of CCDC's RMS remains to review areas of land within the District to determine the extent to which they meet the purposes of the National Planning Policy Framework</p>	<p>This Green Belt study assesses the relative performance of parcels of Green Belt against the five purposes of Green Belts, as set out in the National Planning Policy Framework (NPPF). The study does not identify land for removal from or</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
	s for England)	Green Belt designation and the potential for appropriate release of land and potential future development.”	<p>addition to the Green Belt. Such decisions need to be taken in the context a wider evidence base to establish whether exceptional circumstances exist for removing land from the Green Belt (or adding land to it) and the sustainability of spatial development options. The relative performance of Green Belt parcels may form part of such a review.</p> <p>This Green Belt study complements other studies on other issues, such as housing capacity, biodiversity and landscape, cultural heritage and employment and infrastructure needs. Together, the studies provide the necessary comprehensive evidence base to appraise and arrive at the most sustainable pattern of development possible.</p>
44	Barton Wilmore (Rep. The Church Commissioners for England)	<p><u>Defining the Study Area</u></p> <p>Whilst we support the approach that the Green Belt Review will cover all Green Belt in the District, we remain concerned that the Green Belt review will include in the study:</p> <p>“Selected areas of land outside the Green Belt for possible future inclusion in the Green Belt.”</p> <p>As outlined in our previous response, we consider that the focus should remain solely on the identification of Green Belt land that is suitable for release.</p>	<p>Para. 79 of the NPPF states “the essential characteristics of Green Belts are their openness and their permanence”. Para. 83 states that “once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”</p> <p>Therefore, when the exceptional circumstances arise for a Green Belt review, it is appropriate to review both Green Belt and non-Green Belt land to ensure that the long term integrity of the Green Belt is maintained.</p>
45	Barton Wilmore (Rep. The Church Commissioners for England)	<p><u>Land Parcel Identification and Broad Area 4</u></p> <p>Our Client’s land has been divided into three separate parcels of land for detailed assessment and one for broader assessment. We are particularly encouraged by the delineation of C13, as this parcel of land is considered to have the potential to successfully accommodate residential development due to it being guided by the relative size of adjacent developed areas and by the surrounding natural and man-made features. We consider the three parcels of land (PV4, PV5 and C13) noted for</p>	<p>This Green Belt study focuses on the land that adjoins the large built-up areas of the District, including settlements, strategic employment sites and gypsy and traveller sites, because these locations are likely to offer the most sustainable locations for new development, in line with the spatial strategy set out in the Council’s Core Strategy.</p> <p>Parcels have been defined to provide a framework for detailed assessment within these locations by reference to the most</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		<p>detailed assessment are appropriate in size.</p> <p>However, we are concerned that the remainder of our Client's land which has been classified as Broad Area 4 is no longer being considered for detailed assessment. As outlined in our previous response, our Client's land will naturally make a contribution towards the Green Belt regardless of the features found within the parcel due to the extent of the site within Broad Area 4. Therefore, we consider that in order to thoroughly assess the potential of releasing land from the Green Belt, the land parcel Broad Area 4 should be defined further, based on the methodology of delineating Green Belt boundaries by the physical features outlined in paragraph 1.32 of the Revised Method Statement. It is considered that this would allow for a more precise assessment and definition of Green Belt land.</p> <p>The delineation of the central part of the Site as Broad Area 4 (formerly the central and southern parts of Parcel 1 in the 2014 CCGBR) is not considered to achieve an appropriate assessment. This is because it automatically assumes that this part of the Site make a considerable contribution to the Green Belt purposes. This board approach does not take account of the variance in the landscape character and value across Broad Area 4, which includes woodlands and Cuckoo Bank, a SSSI. The LVA for Parcel 1 demonstrated that these features provided defensible boundaries to the western and southern edges of the central part of the Site, which aided in enclosing and containing the Site from within the wider landscape. As a result, and in combination with a robust new landscape framework, the central part of the Site was considered capable of accommodating residential development.</p> <p>Therefore, it is requested that the central part of the Site, (formerly the central and southern parts of Parcel 1 in the 2014 CCGBR) be removed from Broad Area 4 and retained for detailed assessment. Should this not be actioned, then it is requested that more information is provided on the broad assessment criteria.</p>	<p>readily recognisable and permanent physical features in reasonably close proximity to the existing edges of the built-up areas. Paragraph 85 of the NPPF states 'When defining boundaries, local planning authorities should...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent'.</p> <p>The boundaries used to define parcels PV4, PV5, C13 and C14 are considered to be the most appropriate physical features available. Moving beyond these boundaries in order to incorporate a proposed development site in its entirety would be inappropriate and inconsistent with the parcelling approach taken across the rest of the District.</p> <p>The following text has been added to the method to provide more information on how the Broad Areas will be assessed:</p> <p><i>"Following the definition of parcels of land adjacent to the Districts' large built up areas and inset settlements, the remaining areas of Green Belt have been divided into broad areas. The broad areas represent the largely open and undeveloped countryside which extends from the large built-up areas to the outer edge of the Green Belt.</i></p> <p><i>It is anticipated that these broad areas of Green Belt are likely to make a considerable contribution to Green Belt purposes. For this reason, and because there is no current development strategy that focuses growth in these areas, it was not deemed necessary to divide the broad areas into small parcels for detailed assessment. Instead, a broader, more descriptive approach to assessment will be used to answer whether each Broad Area meets each of the purposes of Green Belt:</i></p> <p><i>1. To check the unrestricted sprawl of large built-up areas</i></p> <ul style="list-style-type: none"> <i>• Does the Broad Area protect open land from sprawl from large built-up areas, i.e. have significant areas/route ways within the Broad Area been developed?</i>

Ref. no.	Respondent	Comments Summary	Response to Comments
			<p>2. To prevent neighbouring towns merging into one another.</p> <ul style="list-style-type: none"> • Does the Broad Area prevent the merging of settlements? <p>3. To assist in safeguarding the countryside from encroachment.</p> <ul style="list-style-type: none"> • Does the Broad Area have the characteristics of countryside or has it been significantly affected by encroachment of urbanised built development? <p>4. To preserve the setting and special character of historic towns.</p> <ul style="list-style-type: none"> • Does the Broad Area contribute to the setting and special character of Cannock or Rugeley? <p>A detailed commentary will be provided for each of these questions in relation to:</p> <p>a. how different parts of the broad area contribute to the Green Belt purposes; and</p> <p>b. the broad area as whole.</p> <p>Professional judgement, with detailed commentary will be used to conclude whether the Broad Area is making a High, Medium, Low contribution to the Green Belt purposes."</p>
46	Barton Wilmore (Rep. The Church Commissioners for England)	<p><u>Landscape sensitivity, visual sensitivity and landscape value</u></p> <p>We reiterate the findings of the LVAGBR, which was prepared on behalf of the Commissioners to appraise their land in terms of landscape sensitivity, visual sensitivity and landscape value, that the site is considered to have medium landscape sensitivity and medium visual sensitivity due to the scale of residential development surrounding the northern, eastern and western edges of the site. In addition, the landscape of the site is considered to be low, therefore, if as recommended the land parcel Broad Area 4 were to be defined further based on the natural and man-made features i.e. field lines indicated, there is a strong possibility that the assessment of the contribution of Broad Area 4 make to the Green Belt</p>	<p>The Green Belt designation is not a landscape designation preserving landscape character, sensitivity or value. While these issues are important and should be considered as part of the appraisal of a Plan's site allocations they are not relevant to a study concerned solely with assessing land against the Green Belt purposes.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
		would be more precise.	
47	Barton Wilmore (Rep. The Church Commissioners for England)	<p><u>Site Visits</u></p> <p>CCDC have confirmed that all parcels and broad areas will be visited. This is welcomed as part of the process of establishing and understanding the Site specific landscape character and visual amenity as part of the scoring process.</p>	<p>The Green Belt designation is not a landscape designation preserving landscape character, sensitivity or value. The landscape will only be considered as far as it is relevant to the Green Belt purposes (e.g. the physical form of the landscape).</p>
48	Barton Wilmore (Rep. The Church Commissioners for England)	<p><u>Scoring Method</u></p> <p>[The] change to the scoring method is welcomed, as it is considered to provide a more flexible approach; however it should be clarified if there is intended to be a proposed threshold in the scoring criteria and the contribution that the Site makes to the purpose of the Green Belt.</p> <p>It is requested that CCDC clarify if there is to be a defining threshold to the scores and what totals result in a considerable contribution to the purposes of the Green Belt.</p>	<p>No scoring thresholds are being defined in the Green Belt study.</p> <p>For each parcel adjacent to a large built-up area, a score of between 0 and 4 will be assigned for each purpose.</p> <p>The NPPF does not require all the purposes of Green Belt to be met simultaneously. Indeed, parcels of land can make a significant contribution to the Green Belt purposes without performing all of the purposes of Green Belt simultaneously. Parcels' scores against each of the Green Belt purposes will therefore be clearly recorded so that the contribution of all parcels against all Green Belt purposes can be examined.</p> <p>The scores will also be aggregated across all the purposes as a practical way of summarising overall and relative contribution to the Green Belt purposes.</p> <p>Parcel scores will be presented graphically to indicate the contribution each parcel makes to the Green Belt purposes.</p>
49	Barton Wilmore (Rep. Taylor Wimpey (UK) Ltd.)	<p><u>The Purpose of the Green Belt Review</u></p> <p>Paragraph 1.2 of the introduction to the representation states "The purpose of CCDC's RMS remains to review areas of land within the District to determine the extent to which they meet the purposes of the National Planning Policy Framework Green Belt designation and the potential for appropriate release of land and potential future development."</p>	<p>See response to this point under ref. 42 English Heritage.</p>

Ref. no.	Respondent	Comments Summary	Response to Comments
50	Barton Wilmore (Rep. Taylor Wimpey (UK) Ltd.)	<p><u>Scoring Method</u></p> <p>[The] change to the scoring method is welcomed, as it is considered to provide a more flexible approach; however it should be clarified if there is intended to be a proposed threshold in the scoring criteria and the contribution that the Site makes to the purpose of the Green Belt.</p> <p>It is requested that CCDC clarify if there is to be a defining threshold to the scores and what totals result in a considerable contribution to the purposes of the Green Belt.</p>	See response to this point under ref. 48 Barton Wilmore (Rep. The Church Commissioners for England)
51	Barton Wilmore (Rep. Taylor Wimpey (UK) Ltd.)	<p><u>Broad Area 4</u></p> <p>The remainder of the Site is no longer proposed for a detailed assessment and has been classified as Broad Area 4. This automatically assumes the area makes a considerable contribution to the Green Belt purposes and a boarder descriptive approach will be used, considering the Green Belt in the wider context of the West Midlands Green Belt. More explanation of this assessment criterion should be provided.</p>	See response to this point under ref. 45 Barton Wilmore (Rep. The Church Commissioners for England)