



# Cannock Chase Local Plan (2018-2040)

## Green Belt Topic Paper

December 2023



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# Executive Summary

This topic paper sets out the Councils approach to the consideration of Green Belt release through the Cannock Chase Local Plan (2018-2040).

Chapters 1 - 3 provide an introduction to the topic; including the history and context of the Green Belt in Cannock Chase and the policy context relating to Green Belt and the Duty to Cooperate. Evidence commissioned for the Local Plan relating to the green belt is outlined. This section details the mechanism for consideration of Green Belt release through Local Plans in national planning policy and what is meant by the term exceptional circumstances.

Chapters 4 and 5 examine the exceptional circumstances for Green Belt release to meet local development needs, but also to assist in conjunction with other neighbouring Local Authorities to contribute some dwellings to help address the issue of unmet needs in the wider Greater Birmingham and Black Country Housing Market Area. The process of identifying all reasonable alternatives to Green Belt release is explained against the tests set out in national policy. Where relevant, other parts of the evidence base are cited to provide more detail on how options were explored and exhausted. The case for Cannock Chase to contribute to meeting the shortfall of the Housing Market Area is examined.

The assessment of harm of Green Belt release is considered in terms of the contribution of sites to the five purposes of the Green Belt in Chapter 6. This shows that the nature of sites which have the least contribution, are often the more difficult sites to develop in terms of their current use. The consideration of how site selection of the Green Belt sites has been considered in support of the spatial strategy is outlined in Chapter 7.

The exceptional circumstances case for release of each Green Belt allocation is set out in Chapter 8. Any compensatory mitigation is detailed relating to the proposed site allocations. Justification for safeguarding sites in terms of removing land for the Green Belt to meet potential future development needs is described in chapter 9.

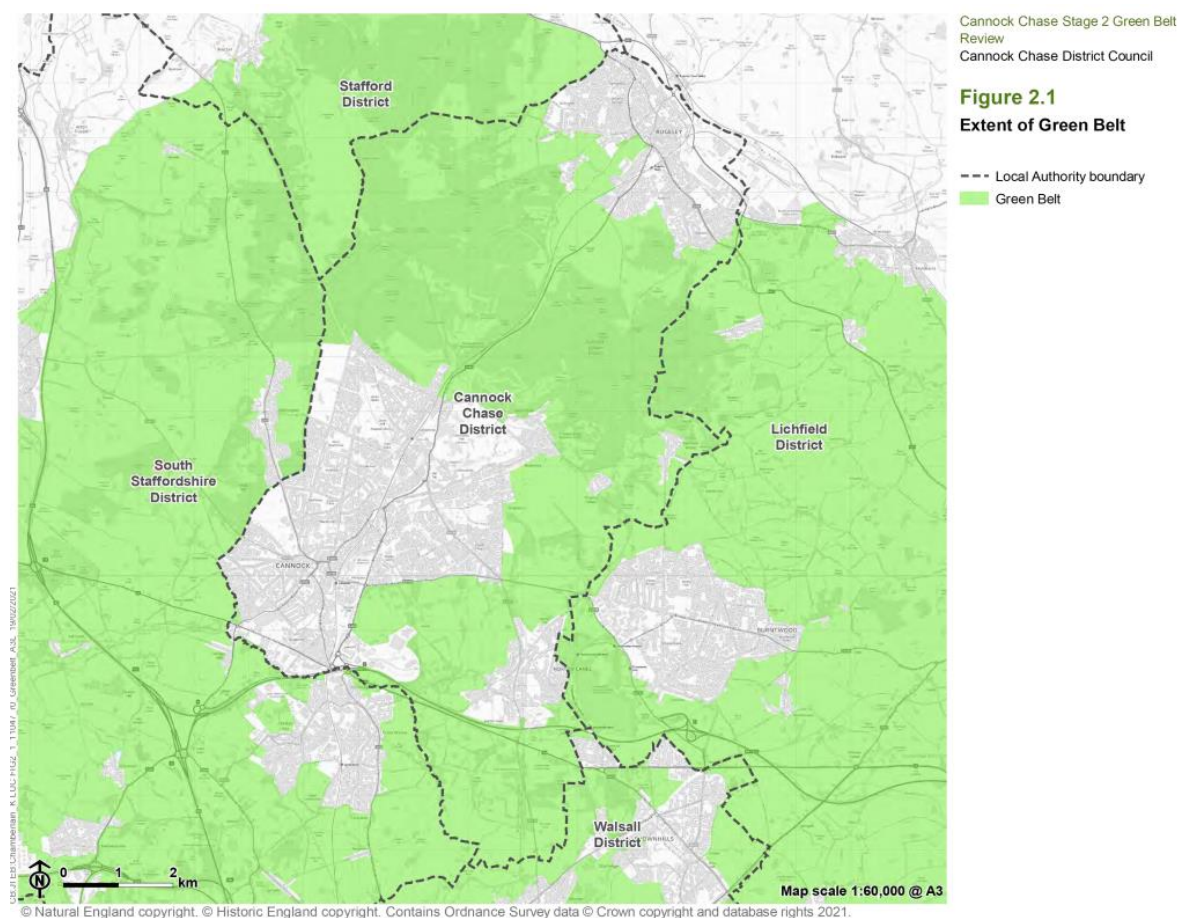
The final summary in Chapter 10 shows the culmination of Green Belt site selection with maps of proposed amendments to the Green Belt and a summary of how much land is proposed to be removed. The conclusion in Chapter 11 states that the Local Plan approach to Green Belt release is justified and that the plan has been positively prepared in meeting development needs.

# 1. Introduction

This Topic Paper sets out the exceptional circumstances which justify the proposals to release Green Belt land for development to meet development needs through the Cannock Chase District Local Plan (2018-40).

Cannock Chase District includes large areas of Green Belt land. **Figure 1** shows the location of Green Belt within Cannock Chase District. The Green Belt in Cannock Chase District comprises an arc of countryside to the north, north-east, east, south-east and south of the inset main urban area of Cannock, Hednesford and Heath Hayes. This provides separation from other inset settlements, including Rugeley to the north, Burntwood and Brownhills (within neighbouring Lichfield District) to the east, Norton Canes to the south-east, and Great Wryley (within neighbouring South Staffordshire District) to the south.

*Figure 1 The Green Belt around Cannock Chase District, Cannock Chase Green Belt Harm Assessment, LUC*



Approximately 4,830ha (61.2%) of Cannock Chase District is located within the West Midlands Green Belt. The Green Belt serves to maintain the openness of the rural-urban fringe, as well as the District's separate urban areas and their identities. The Green Belt is also a crucial feature of the District's overall character and provides a range of multifunctional benefits, including access to the countryside, ecological conservation, recreation, economic and tourism.

The Local Plan Pre-Submission Consultation proposes the release of 79 hectares of the Green Belt for development, which amounts to 1.6% of the current Green Belt area in Cannock Chase District.

## **2. History of the Green Belt in Cannock Chase**

The Green Belt in Cannock Chase District is part of the West Midlands Green Belt, which was created to prevent urban sprawl and keep land around towns and cities permanently open. Local authorities in the West Midlands first put forward proposals for a West Midlands Metropolitan Green Belt in 1955, and there were proposals for a Green Belt around the Birmingham conurbation put forward as amendments to development plans in the early 1960s. However, Green Belt proposals were not formally approved until 1975, when the Secretary of State approved the West Midlands Green Belt, although a quarter of this remained 'interim' and was only confirmed in later reviews of structure and local plans.

The West Midlands Green Belt covers approximately 900 square miles and extends between 6 and 15 miles from the built edge of the conurbation, surrounding Kidderminster, Bromsgrove, Redditch and Cannock, and reaching out to Rugby, Lichfield, Tamworth, Stratford, Warwick, Worcester, Bridgnorth and Telford. While some of these places are excluded from the Green Belt, villages are often 'washed over' by it.

The Green Belt has been successful in checking the sprawl of Birmingham, Wolverhampton and Coventry, preventing the merging of settlements, preventing encroachment into the surrounding countryside, and helping to preserve the setting and special character of the historic urban areas. The Green Belt is tightly drawn around settlements and has helped to encourage regeneration by directing development to brownfield sites within the major urban areas. However, some pockets of Green Belt at the urban fringe have been compromised and degraded by infrastructure projects such as roads and power lines, and other urban intrusions.

### 3. Policy Context

#### National Planning Policy Framework

The National Planning Policy Framework<sup>1</sup> (NPPF) states the following in relation to Green Belts:

*'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'* (para. 137).

*'Green Belt serves five purposes:*

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns from merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land' (para. 138).

The NPPF (Sept 2023) states that *'once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans'* (para. 140).

The NPPF (Sept 2023) also sets out the requirements regarding the *'exceptional circumstances'* where the release of land from the Green Belt for development could be justified, and explains that *'the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies'* and *'whether the strategy:*

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<sup>1</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.’ (para. 137).

The NPPF (Sept 2023) requires strategic policy-making authorities to ‘consider the consequences for sustainable development of channeling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. 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’. (para. 142)

The NPPF states that when defining Green Belt boundaries, plans should:

- a) *‘ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- b) *not include land which it is unnecessary to keep permanently open;*
- c) *where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) *be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent’* (para 143).

Chapter 11 ('Making effective use of land') of the NPPF (Sept 2023) requires local planning policies to 'promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions' (para. 119). The NPPF (Sept 2023) also states that 'Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site (para. 125).

## National Planning Practice Guidance

The NPPF's Green Belt policies are supplemented by additional National Planning Practice Guidance (NPPG). The guidance sets out some of the factors that should be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors are presented as a summary of some common considerations borne out by specific case law judgements. The NPPG states openness is capable of having both spatial and visual aspects.

The NPPG also elaborates on paragraph 142 of the NPPF which requires local planning authorities to 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 the remaining Green Belt land. The NPPG endorses the preparation of supporting landscape, biodiversity or recreational need evidence to identify appropriate compensatory improvements, including:

- 'new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.'

Neither the NPPF nor NPPG provide guidance on how to undertake Green Belt studies. However, the Planning Advisory Service (PAS) published an advice note (2015) that discusses some of the key issues associated with assessing the Green Belt.



The government plan to change the plan-making framework to align with the Levelling-up and Regeneration Bill. In December 2022 they released a revised version of the NPPF for consultation. This proposes some substantive changes with regard to Green Belt suggesting it may not require release to meet housing need. It also proposes increased flexibility in meeting housing targets. Transitional arrangements apply to plans at a late stage of production. The outcome of this consultation is not certain. The Cannock Chase Local Plan has been prepared in compliance with established legislation and national guidance.

## Exceptional circumstances

The NPPF stipulates that altering the boundaries of the existing Green Belt must be done through new or updated local plans and *'exceptional circumstances'* are required. Exceptional circumstances should be *'fully evidenced and justified, through the preparation or updating of plans.'* The NPPF states that, before Green Belt boundaries are redrawn, an authority must demonstrate that it has *'examined all other reasonable options for meeting its identified need for development'*, including making use of brownfield land, increasing the density of existing settlements and exploring whether neighbouring authorities can help meet its need. However, the NPPF does not define which circumstances can be considered exceptional.

The December 2019 judgement dismissing the High Court challenge to Guildford Borough Council's Local Plan, which de-allocated three major sites from the 'Surrey towns' Green Belt, provides some clarification on *'exceptional circumstances'*. The judge, Sir Duncan Ouseley, concluded that *'exceptional circumstances'* is a less stringent test than applied to planning applications for development that would normally be seen as inappropriate in the Green Belt, which requires *'very special circumstances'*. Furthermore, the judge ruled that no more than one individual circumstance was needed. In addition, the judge stated *'exceptional circumstances can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgement, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary'*.

## Green Belt Evidence

LUC prepared a Cannock Chase Green Belt Study in 2016 on behalf of Cannock Chase District Council. This was used to develop a clear understanding of how the land in the Cannock Chase Green Belt performed against the purposes of the Green Belt. A total of 65 parcels and five broad areas were identified covering the District.

The Green Belt Study demonstrated that the majority of the Green Belt in the District continues to serve its purposes very well. It was found that, alongside other national and international designations, it helps to maintain the identity of this part of the West Midlands.

The study highlighted that there are variations in the contribution that different parts of the Green Belt make to the purposes 1, 2, 3 and 4. In terms of purpose 5 (encouraging the recycling of urban land), it was concluded that the entire Green Belt has helped to meet this purpose historically and would continue to do so, noting that there remained some significant areas of previously used land in the urban areas.

Following the original study, CCDC commissioned LUC to prepare the Cannock Chase Green Belt Harm Assessment which was published in February 2021.

Case law, as established in *Calverton Parish Council v Greater Nottingham Councils & others (2015)*, indicates that planning judgements setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the 'nature and extent of harm' to the Green Belt and 'the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent'.

The purpose of this Green Belt Harm Study was to provide an assessment of the potential harm of releasing land from the Green Belt for development. The outputs, alongside wider evidence relating to other environmental/sustainability considerations, helped inform decisions regarding the relative merits of meeting the Council's development needs in different locations.

## Duty to Co-Operate

The duty to cooperate was introduced by the Localism Act 2011 and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities and county councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.

The Council has regular communication with Duty to Co-operate (DTC) partners on matters regarding the Local Plan and other areas of joint working such as cross boundary issues. The Council is part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) which comprises the following local authority areas: Cannock Chase; Lichfield; South Staffordshire; Tamworth; North Warwickshire; Stratford-on-Avon; Bromsgrove; Redditch; Birmingham; Solihull; Dudley, Sandwell, Walsall and Wolverhampton. The Council also has a Functional Economic Market Area which includes areas of South Staffordshire and Lichfield, Walsall, Stafford and Birmingham.

In February 2018, the Strategic Growth Study was published to provide a consistent independent assessment of the potential capacity of all fourteen authorities to accommodate the housing needs of the Greater Birmingham and Black Country Housing Market Area. This Study provided an update on the overall housing needs across the housing market area and the shortfall in supply, and an analysis of the potential options for addressing this shortfall. For Cannock Chase District, the Study identifies an area of 'proportionate dispersal' within which small urban extensions could be considered. The Study recommendations imply that Cannock Chase District should consider accommodating a minimum of 500 dwellings over the plan period to contribute to the shortfall.

The Duty to Cooperate Statement of Compliance (2023) provides greater detail on how the Council has worked with local authorities in the GBBCHMA to address cross boundary issues including delivering homes to address the housing shortfall. In accordance with the recommendations of the Strategic Growth Study, CCDC kept options under review and has agreed through the Regulation 19. Local Plan to plan for 500 homes more than the local housing need. The Study clarifies that if all members of the GBBCHMA planned for the minimum recommendation the shortfall would be addressed, therefore Cannock is meeting the duty in assisting to address unmet need.

## **4. Exceptional circumstances for releasing land to meet development needs**

The Local Plan must be positively prepared, providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs. Where this relates to housing, such needs should be assessed using a clear and justified method as set out in Paragraph 61 of the National Planning Policy Framework. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The application of the Standard Method produces a minimum housing requirement for the Cannock Chase District from 2018 to 2040 of 5,808. The standard method presents the baseline minimum figure for housing need, and the Council have sought to adopt the target derived from the standard methodology in the Local Plan from the outset in compliance with national policy and guidance.

The employment needs for the district are derived from the Cannock Chase Economic Development Need Assessment (EDNA) evidence originally produced by Lichfields in 2019 and updated in 2020 and again in 2024. The update recommended that Cannock Chase District's employment land OAN should comprise a range of between 43-74 ha net between 2018 and 2040 (including flexibility), and also suggested higher ranges, if required, to account for employment land losses. The approximate proportion of employment land uses is recommended to be 20% office 80% industrial/warehousing, showing the demand for B8 logistics in the District, uses which traditionally have greater land take requirements. The Employment Topic Paper (2023) sets out the justification for the final target of 74ha in the Pre-Submission Local Plan. As such, this document does not seek to repeat the justification for the employment land target but provided the exceptional circumstances case for sites which are required to meet the target resulting in Green Belt release.

ORS produced the Cannock Chase Gypsy and Traveller Accommodation Assessment 2019 which has been used to inform the need of Gypsy, Travellers and Travelling Showpeoples accommodation to 2038. Land for 15 pitches and 10 plots is not available on sites outside the Green Belt. The Gypsy and Traveller Topic Paper 2023 shows how all options were explored to accommodate Gypsy and Traveller need.

The Local Plan strategy satisfies the tests set out in the NPPF for examining all reasonable options for development. This section sets out the tests and details the process undertaken,

signposting to relevant evidence which demonstrates all reasonable alternatives to Green Belt release have been explored.

**(a) makes as much use as possible of suitable brownfield sites and underutilised land**

The Council has proactively explored all sources of sites within the district which could contribute towards meeting housing need. Residential and employment site options for the Local Plan were initially identified by the Council drawing on the Strategic Housing Land Availability Assessment (SHLAA) and Employment Land Availability Assessment (ELAA). The SHLAA and ELAA documents are the primary database for all sites that have been suggested for housing and employment development within the District. They provide an overarching assessment of a site's suitability, availability and achievability. All sites submitted through call for sites and the Local Plan consultations to date have been assessed in the annual updates to the SHLAA and ELAA, subject to meeting assessment criteria have been fed through to be assessed in more detail as described in this chapter.

To provide a more comprehensive and in-depth consideration of potential sources of sites and contributions to the housing target, the Council produced the Cannock Chase District Housing Development Capacity Study. The Development Capacity Study was originally published at Preferred Options stage (March 2021) and an updated version has been produced to support the pre-submission stage.

The study sets out evidence about the housing requirement and potential supply of land for housing in Cannock Chase District over the period from 2018 to 2038 (since extended to 2040). The Study considers the known sources of sites from the SHLAA and ELAA, but also looks at sites from other evidence sources.

The Capacity Study identified a range of sources of further potential capacity that are to be kept under continuous review through the annual SHLAA process, and as the Plan developed:

- Restricted and Excluded Sites in Alternative Uses
- Neighbourhood Plans
- Cannock Chase Open Space Review
- Housing Estates and Redevelopment

- Public Sector Surplus Land
- Reallocation of Existing Employment Land
- Review of Brownfield Land Register and the National Land Use Database
- Regeneration Sites Promoted for Residential Development
- Sites where Planning Applications were Refused or Withdrawn (2018-20)
- Contributions from Self Build Housing
- Potential Contributions from new Permitted Development Rights
- Contributions from Exception Sites
- Reviewing Density Assumptions
- Additional Potential Sites Identified During Study Process

There is a focus on identifying urban and previously developed land including land identified in the Brownfield Register and National Land Use Database, sites identified in the ELAA no longer suitable for employment, regeneration sites and previously developed areas ancillary to open space. This Topic Paper should therefore be considered in conjunction with the Development Capacity Study as this demonstrates how all sources of sites have been considered and explored.

The Development Capacity Study functions as the starting point to site selection as it identifies all potential sources of supply which then can be subject to the rigorous process of site assessment, comparison with the spatial strategy and consideration of the cumulative impact of allocating sites.

The Capacity Study at Preferred Options stage (March 2021) identified a confirmed capacity for 4,132 dwellings, and an additional potential capacity for 989 dwellings from sites which would require further constraints to be overcome. The total confirmed and potential capacity was therefore found to be a maximum of 5,121. This was insufficient to meet the total minimum housing requirement.

The Council originally consulted on a more detailed site assessment/selection methodology as part of the Local Plan Review Issues and Options consultation in 2019 which has been used to sift sites for allocation. The method has evolved as the Local Plan has progressed to Preferred Options and through to Pre-Submission stage shaped by comments at each stage of consultation. The Site Selection Methodology Topic Paper explains how all sites were assessed and how components of the evidence base were used to inform the site selection process. This includes the Integrated Impact Assessment which was produced by LUC

originally in May 2018, comprising Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), as well as Habitats Regulations Assessment (HRA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA). The IIA report was originally published to support the Preferred Option version of the Local Plan (March 2021) and has been updated to align with the Pre-Submission version.

The Development Capacity Study was updated for pre-submission stage to account for any change in terms of sources of sites and permissions in the intervening period. The study was refined to split the Green Belt and non-Green Belt site capacity finding that there is potential capacity for 6,421 dwellings on non-Green Belt sites and 6,747 dwellings on Green Belt sites. All non-Green Belt options fed into the site selection process. Whilst this presented potentially sufficient land to accommodate housing need in non-Green Belt locations, all sites were subject to filtering in both the Integrated Impact Assessment and the site selection methodology document. This filtering exercise determined that there were insufficient sites, compliant with the Local Plan strategy on non-Green Belt locations to meet the local housing need.

The need for accommodation for Gypsies and Travelling Showpeople has been explored, and the following sources were considered;

- Existing gypsy, traveller and travelling showpeople sites (potential for expansion/intensification)
- Site options considered via the Local Plan (Part 2) Issues and Options, as appropriate;
- New site options submitted via the Local Plan Review process;
- Sites within Cannock Chase District Council (CCDC)/Staffordshire County Council (SCC) ownership (public ownership may enhance deliverability); and
- Consideration of any site options available from a review of the updated Employment and Housing Land Availability Assessments (ELAA and SHLAA). In addition, discussions were undertaken with major landowners to ascertain if there were any other site opportunities not previously submitted to the SHLAA/ELAA.

The majority of the District's existing gypsy, traveller and travelling showpeople sites lie within the southern part of the District and in proximity to the A5 corridor, and evidence has continued to support an area of search to meet identified need in the south of the District around the A5. No land has been identified in this broad area which is not within the Green Belt capable of accommodating land for Gypsy and Travellers due to the lack of available land for this use combined with the tight boundary around the Urban area of Norton Canes

and Heath Hayes. It can be concluded that the Development Capacity Study, SHLAA and site selection work has exhausted opportunities for non Green Belt sites which could accommodate Gypsy and Traveller needs.

In terms of employment the Council monitors the completions, available supply and sites under construction in the ELAA annually. This assessment also looks in detail at the type of employment uses delivered, the average size of sites, the location where sites are being delivered, the planning status and the quality of sites available. The Council therefore have an in depth understanding of the employment supply in the district including an understanding of major employment locations (business parks), their availability and any deliverability issues. The ELAA contains detailed commentary on each employment land parcel and therefore, combined with sites explored in the EDNA, it is considered that all brownfield opportunities are known to the Council and would form part of the employment land supply if available.

**(b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and**

The Strategic Growth Study considered density across the HMA and explored the potential to increase densities and what impact this would have on reducing the housing shortfall. At that time Cannock Chase was delivering development at an average of 43dph (see Figure 1) which was mid-level comparative to other authorities in the HMA.

The analysis of density led to recommendations for the parts of the HMA with low average densities to set minimum densities at a higher rate but it was acknowledged rates higher than 50dph would be hard to achieve: *'GL Hearn considers that it is unlikely that the market would support densities of 50+ dph across the board given the nature of commercial demand and the need to provide a range of housing types and sizes. This is particularly relevant where our analysis has shown that the majority of the increases from applying the minimum density thresholds are seen in the historically lower-density areas of North Warwickshire, South Staffordshire, Lichfield and Stratford-on-Avon; where new build are also typically weighted towards detached housing which tends to lend more towards low density housing'*.



The report recommended adopting a minimum of 40dph for Birmingham and the Black Country authorities and 35dph for the rest of the HMA including Cannock Chase.

Figure 2 Densities of development built, GL Hearn Strategic Growth Study

LPA	Dwellings per hectare			
	1996-1999	2000-2003	2004-2007	2008-2011
<b>Birmingham</b>	37	46	82	67
<b>Bromsgrove</b>	19	22	31	28
<b>Cannock Chase</b>	31	25	41	43
<b>Dudley</b>	29	34	42	50
<b>Lichfield</b>	24	23	30	33
<b>North Warwickshire</b>	25	26	39	27
<b>Redditch</b>	29	30	55	45
<b>Sandwell</b>	36	40	55	52
<b>Solihull</b>	26	26	39	36
<b>South Staffordshire</b>	22	17	27	25
<b>Stratford-on-Avon</b>	22	26	33	21
<b>Tamworth</b>	27	33	45	46
<b>Walsall</b>	28	36	49	48
<b>Wolverhampton</b>	29	41	47	43
<b>HMA Average</b>	<b>27</b>	<b>30</b>	<b>44</b>	<b>40</b>

Source: CLG Live Table P232

A high proportion of the housing supply in the Local Plan derives from sites with some form of planning status and therefore the scope of increasing density from sites with planning permission is limited. The average density achieved by completed major residential developments over the period 2018 to 2022 was calculated by the SHLAA as 35.2 dph while sites that form part of the deliverable supply range in density from 17dph to 111dph with an average of 36.5 dph. This is on par with the recommended minimum threshold identified in the Strategic Growth Study.

At present sites that form part of the future capacity have been assessed using the density assumptions set out in the SHLAA which are based on monitoring data of previously achieved rates. Subject to discounts to inform the proportion of the site that will form the net developable area, the density assumptions used in the SHLAA 2022 are:

- Urban Town Centre 50dph;
- Suburban 35dph;
- Green Belt Urban Extensions 35dph;

- Rural Areas established settlement/village 20dph;
- Green Belt and AONB 15-20dph;

The Development Capacity Study identifies 12 sites in the town centre which will deliver in excess of 50 dph ranging from 57dph to 708dph. It concludes that no further capacity can be justified from raising density assumptions regarding the supply.

The site selection process has enabled detailed consideration of the potential density which could be achieved on each site earmarked for allocation. For the most part SHLAA averages have been used because these are demonstrably deliverable rates which are highly likely to result in a form and character of development which complements existing development and these rates for the Urban Town Centre, Suburban areas and Green Belt Urban Extensions is compliant with the recommendations of the Strategic Growth Study. Policy SO3.1: Provision For New Homes requires development to achieve an average site density of 50dph in Cannock, Rugeley and Hednesford town centres and 35dph in the suburban areas. New allocations in the plan are all in these areas where higher densities can be achieved.

It can be concluded that density of development has been afforded detailed consideration through the development of the Local Plan to achieve the highest rate practicable and appropriate for Cannock Chase.

**(c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.**

The Duty to Cooperate Statement of Compliance details how CCDC cooperated with neighbouring strategic authorities and identifies the cross boundary strategic issues

CCDC is part of a wider HMA CCDC cooperated with authorities in the GBBCHMA from the outset of plan production in determining development needs and options for addressing local needs and the wider housing shortfall. More detail is also provided in the subsequent section regarding exceptional circumstances for releasing land to meet the unmet needs of Greater Birmingham and the Black Country.

The regular meetings of the GBBCHMA Development Needs Group throughout the production of the plan enabled discussion and understanding of the position of each authority in terms of meeting housing targets and contribution to unmet need. The GBBCHMA Housing Need and Housing Land Supply Position Statements formalised local authorities position on housing need and supply at set points in time:

- GBBCHMA Housing Need and Housing Land Supply Position Statement no. 1 (February 2018)
- GBBCHMA Housing Need and Housing Land Supply Position Statement no. 2 (Sept 2018)
- GBBCHMA Housing Need and Housing Land Supply Position Statements no. 3 September 2020 (updated December 2021)

These documents were made publicly available, therefore it was clear to both CCDC and the public what targets were being planned for and what position authorities were in with regard to meeting their own local need and the unmet need of the HMA.

In December 2021, CCDC formally wrote to all local authorities in the GBBCHMA and authorities with a functional relationship outside the HMA as well as immediate neighbouring authorities to establish whether any were able to accommodate the unmet housing need of Cannock Chase. At the time this was stated as 1500 dwellings over the period to 2038. This figure included a 500 dwelling contribution to the unmet needs of neighbouring authorities. The letter also sought clarification as to whether neighbouring authorities had available land outside the Green Belt to accommodate employment uses or for accommodating Gypsy and Travellers to meet Cannock Chase development needs.

Responses were received from Lichfield District Council, Stafford Borough Council, Coventry City Council, Birmingham City Council and ABCA all stating that these authorities were unable to accommodate any of the housing shortfall for Cannock Chase, or to identify land to meet other needs and no further discussions were sought beyond the existing regular duty to cooperate meetings at that time. However, attention was drawn to new evidence produced by STANTEC and published in February 2021, entitled 'West Midlands Strategic Rail Freight Interchange Employment Issues Response Paper – Whose need will the SRFI serve?'. The report determined that 10ha of B8 land provided at the consented West Midlands Interchange within South Staffordshire District, could be apportioned to Cannock Chase.

South Staffordshire District Council sought further discussion, wanting to ascertain whether CCDC would be declaring its need as unmet through the plan process, or seeking to build an

exceptional circumstances case to release Green Belt land to meet housing need within the District. At the time South Staffordshire's emerging Local Plan was proposing to release Green Belt land to assist with addressing the unmet need of the Black Country and therefore were not considered to be in a position to address any unmet need from CCDC.

The Draft GBBCHMA Development Needs Group Statement of Common Ground, August 2022 summarises the position on unmet needs taken by each local authority within the HMA and those with a functional relationship with it. This is considered to be the most up to date formal position.

The Statements of Common Ground published on the CCDC website demonstrate that ongoing discussions have been held with neighbouring authorities and that none have been in the position to address the unmet need of Cannock Chase, except for an identified 10ha of employment land within South Staffordshire which formed part of the West Midlands Interchange.

## **5. Exceptional circumstances for releasing land to meet the unmet needs of Greater Birmingham and the Black Country**

Early in the development of the plan, CCDC worked with local authorities in the GBBCHMA to understand the position in relation to housing need and supply. Members of the GBBCHMA commissioned GL Hearn/Wood to provide an update on the overall housing needs across the housing market area and the shortfall in supply arising. It was published in February 2018 and provided an analysis of the potential options for addressing the shortfall. 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.

In terms of options for addressing the housing supply shortfall both on land outside the Green Belt and with Green Belt release. The Strategic Growth Study considered the following options:

- 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).

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. 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 to recommend a refined list of 11 options ('areas of search for strategic development') for local authorities to test through their Local Plans. It recommended 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. Cannock Chase District did not feature in terms of strategic areas of search but 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'. The

study recommended further testing via Local Plans using more detailed evidence at the local level to determine if these options were feasible and appropriate e.g. local Green Belt assessment findings and local infrastructure assessments. The study did not identify any 'areas for strategic development' within Cannock Chase District (on the refined list of 11 options).

The Strategic Growth Study offered a consistent independent assessment of the potential capacity of all fourteen authorities to accommodate the housing needs of the GBBCHMA. The Study recommendations implied Cannock Chase District should consider accommodating a minimum of 500 dwellings to contribute to the GBBCHMA shortfall (minimum suggested capacity for the 'proportionate 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' 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 indicated 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 Duty to Cooperate Statement of Compliance (2023) details how discussions regarding unmet need progressed during the course of plan production. To date there remains an identified shortfall and the Strategic Growth Study is the only consistent joint evidence which informs options for how members of the HMA can address the collective unmet housing need arising from Birmingham and the Black Country. CCDC considered options to accommodate unmet need for the HMA in the spirit of the Duty to Cooperate. This evidence set the context for the testing of options through the Local Plan and Sustainability Appraisal as set out in the following table taken from the Issues and Options document.

## 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).

**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.

The Association for the Black Country Authorities (ABCA), Birmingham City, Lichfield and South Staffordshire all supported the presentation of options which would address unmet need in their response to the Issues and Options consultation.

The Sustainability Appraisal (SA) at Issues and Options stage tested the options presented to address unmet need. It was unclear at that stage whether it would necessitate Green Belt

removal and therefore the criteria which were key to consideration were SA3: Previously Developed Land and SA9: Housing. The effects on other criteria were not known.

The SA highlighted significant negative effects for Options C and D in relation to SA3: Previously Developed Land, noting that those options were likely to result in a higher amount of greenfield land take being required over the plan period. The SA also highlighted the balance between providing for more homes which is generally positive, and whether options C and D are achievable:

*Each option would result in the delivery of housing to meet requirements in the District and as such a significant positive effect is expected in relation to SA objective 9: housing. The significant positive effect expected for Option A in relation to SA objective 9 is combined with a minor negative effect given that this approach would not help to address the wider need of the Greater Birmingham HMA. The significant positive effect expected for Options C and D in relation to SA objective 9 is likely to be combined with an uncertain minor negative effect. These options would support a particularly high uplift (34% and 54% respectively) above recent average delivery rates in the District and as such would help to address the unmet need of the Greater Birmingham HMA. However, the high levels of uplift required in the District may be difficult to achieve meaning the contribution to unmet need in the HMA may be overly onerous to meet in full.*

The results of the SA were therefore more positive in terms of option B than any higher growth scenario.

The work to exhaust all possible options for development was undertaken to inform the strategy at preferred options stage. It became clear that Green Belt release would be required to meet the local housing need in full within the district boundary and therefore additional Green Belt release would be required if CCDC was to assist in delivering housing to meet unmet need. This was an approach being considered across many authorities in the HMA and by neighbouring authorities adjacent to the HMA.

Work on site selection explored the three scenario's to address unmet need. It became apparent that any higher dwelling target would result in additional Green Belt release to address unmet need.

The authority considers that a contribution of 500 homes towards addressing the housing shortfall of the GBBCHMA (of which Cannock Chase is part of) is necessary to satisfy the Duty to Cooperate and is part of the justification of an exceptional circumstance for Green Belt release. It is the minimum contribution from Cannock Chase highlighted in the strategic growth study of which, all collective authorities in the HMA are recommended to consider



options to address the housing shortfall. This level of additional housing, and reasonable alternatives to that figure has been subject to testing through the Integrated Impact Assessment.

## How unmet need is addressed by the Local Plan strategy

The NPPF states that Plans are 'sound' if they are Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

As set out in the preceding section, Cannock Chase identified a contribution of 500 dwellings towards the unmet needs of Greater Birmingham and the Black Country. In order to consider the practical implications of providing housing to address unmet need beyond the authority boundary it is necessary to understand the functional relationship of how people commute daily and the patterns of migration. Without this there is no logic to addressing unmet need; for example if one authority offered to meet the housing need of an area on the other side of the country, however much additional housing was provided the actual need would not be addressed as the demand relates to that particular locality and housing market area. To address unmet need most effectively, development should be provided in locations nearest to the source of the housing need and with a demonstrable functional geography. This means housing should ideally be provided closest to where people want to locate but potentially are unable to because the housing supply is constrained.

The evidence which originally identified the housing market area for Greater Birmingham and the Black Country was produced in 2014 by Peter Brett Associates entitled 'Greater Birmingham and Solihull LEP Black Country Local Authorities Joint Strategic Housing Needs Study Stage 2 report' November 2014. The report justified the authorities of the HMA predominantly based on commuting flows and migration patterns which showed movements within the wider market area, the West Midlands and outside the West Midlands. The Study did not delve into the micro level therefore it does not show movements between each authority in the housing market area.

The Cannock Chase Local Housing Needs Assessment 2019 identifies the local housing need, but does not examine the functional geography of the HMA in any detail. The Strategic

Growth Study (2018) considers the options for increasing housing delivery over the whole HMA which highlight that some authorities are more constrained than others in delivering additional housing. It presents recommendations of options to address the housing shortfall but the pursuit of any option is deferred to individual authorities to explore through development of their Local Plan. For the purposes of plan formulation, it was therefore taken that housing delivery in any part of the housing market area can help to address the needs of the whole HMA. Therefore, it was not necessary for the CCDC Local Plan to specify whether the additional 500 houses would be to address unmet need of Birmingham or the Black Country.

The Council's Economic Development Needs Assessment (2019) looked at the functional geography of Cannock Chase in finer detail in order to define the Functional Economic Market Area (FEMA). The Assessment highlights the strongest relationships with adjoining authorities highlighted by ONS internal migration data shown in figure 3. The strongest migratory relationship is with South Staffordshire and Lichfield, followed by Walsall, Stafford and Birmingham.

*Figure 4 Cannock Chase In and Out Migration (2017), source: Cannock Chase Economic Development Needs Assessment, Lichfields 2019*

	In Migration		Out-Migration	
	Local Authority	Number of People	Local Authority	Number of People
Top Five In and Out Migration Authorities	Lichfield	810	South Staffordshire	730
	South Staffordshire	730	Lichfield	690
	Walsall	630	Stafford	450
	Birmingham	280	Walsall	310
	Stafford	220	Birmingham	140
<b>Total</b>	-	<b>4,130</b>	-	<b>3,870</b>

Source: ONS (2018) / Lichfields analysis

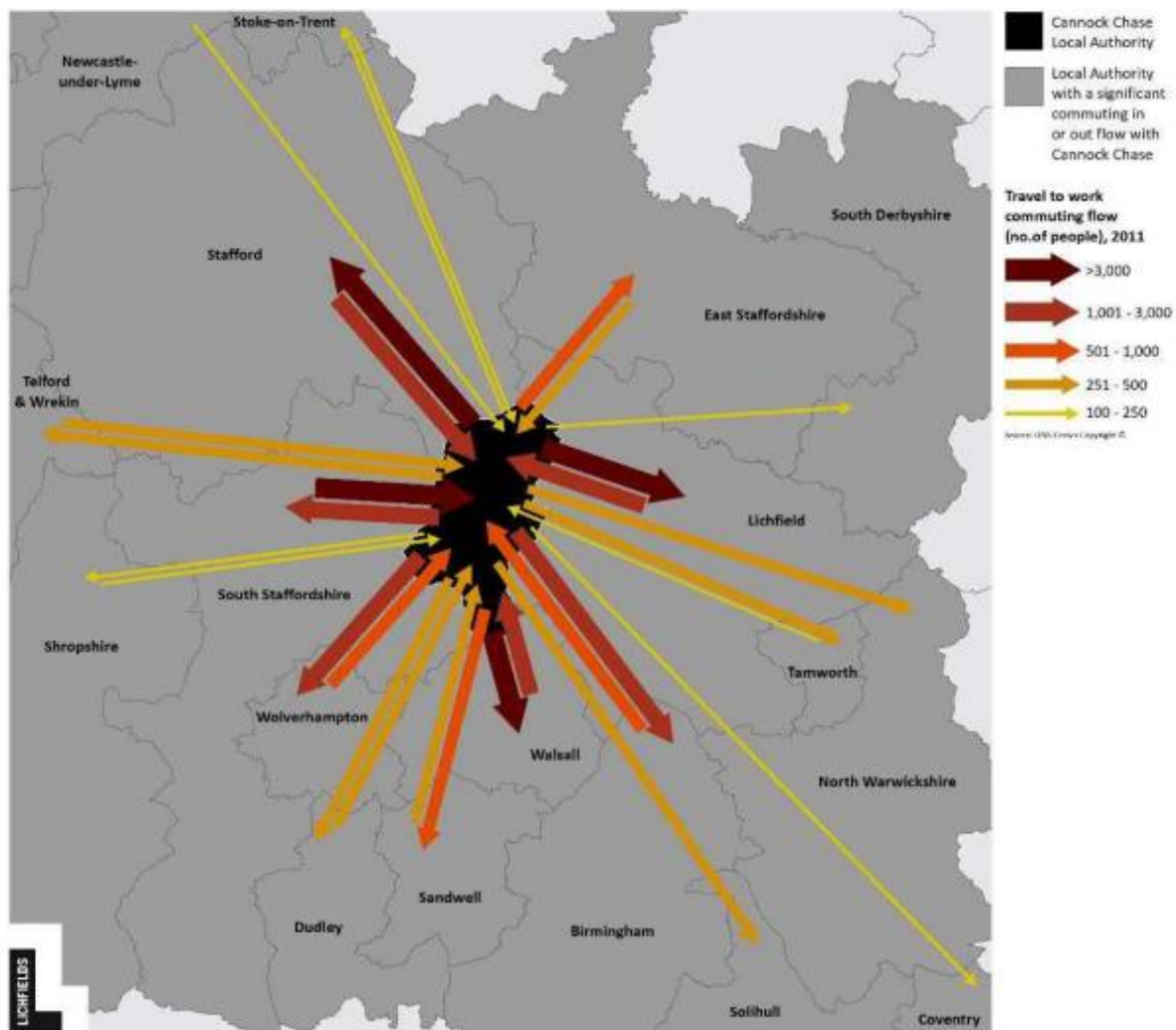
The Assessment identifies the strongest commuting patterns:

Top Out commuting destinations: Lichfield (4,285), Walsall (3,855), Stafford (3,420), South Staffordshire (2,472), Birmingham (2,035), Wolverhampton (1,567)

Top In commuting destinations: South Staffordshire (3,328), Lichfield (2,706), Walsall (2,243), Stafford (1,720), Wolverhampton (928)

This is best illustrated by figure 4 from the assessment where, perhaps unsurprisingly, the strongest commuting patterns are with adjacent authorities as well as a significant out commuting to the city of Birmingham.

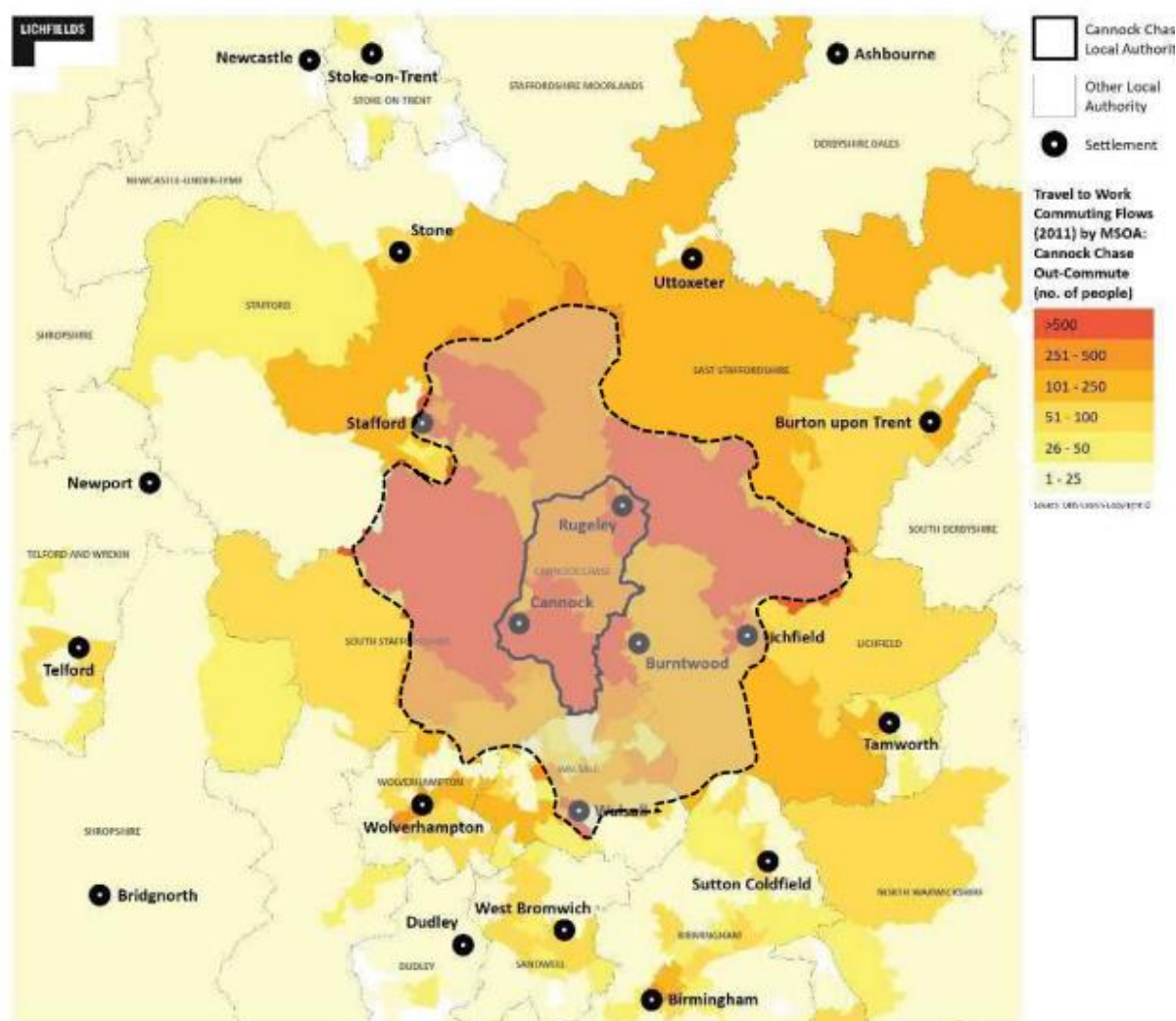
Figure 5 Cannock Chase Commuting Flows, source: Economic Development Needs Assessment, Lichfields 2019



Source: ONS Census 2011/Lichfields Analysis

Based on the methodology used by Lichfields to define the FEMA, it concludes that it is comprised of parts of all directly adjacent authorities (figure 5). Whilst the evidence supports a strong link with both Birmingham and the adjacent authorities, the defined area of the FEMA would support a greater functional geography in relation to employment with Walsall over Birmingham which is sited beyond the FEMA boundary. Walsall is a member of the Black Country Authorities.

Figure 6 Cannock Chase FEMA, source :Economic Development Needs Assessment, Lichfields 2019



Source: ONS (2011) / Lichfields analysis

## Greater Birmingham and the Black Country shortfall

The Birmingham Development Plan (BDP) was adopted in January 2017. This outlined that the City had the capacity to deliver 51,100 homes over the 2011-31 plan period, set against its objectively assessed housing need for 89,000 dwellings. The adoption of the BDP thus quantified the Birmingham shortfall or unmet need for 37,900 dwellings to 2031. The Inspectors Report for the BDP dated March 2016 acknowledged that the need could not be met in full within Birmingham and stated that the reasoned justification makes it clear that the Council will work with neighbouring authorities to secure additional provision to meet the overall need. The Inspector noted: 'it is not within my remit, in examining the BDP, to specify how much land should be allocated for development in any other LPA area. That would require a separate Local Plan, or plan review, examination in each case'. As such, this set

the context for cooperation between authorities in the HMA to contribute to addressing this shortfall, where possible.

The Greater Birmingham HMA Strategic Growth Study produced by PBL in Feb 2018 explored housing need and the supply position across the HMA. The Study presented options for authorities to consider which would address the combined housing need and shortfall through developing their respective Local Plan evidence.

The Draft 2023 GBBCHMA Position Statement calculates Birmingham's remaining shortfall as 2,053 dwellings. This figure relates to the adopted shortfall figure from the adopted Birmingham Local Plan.

Birmingham has since commenced the Birmingham Local Plan update which will review housing need between 2020-2042. The Issues and Options document was published for consultation in Oct/Nov 2022 and indicated a potential shortfall of 78,415 against the housing need target of 149,286. The update to the Local Plan is still at an early stage of development so this figure is likely to change as the plan develops.

At the time of adoption of the BDP, the Black Country were at the start of the Local Plan process. The Black Country Core Strategy Issues and Options Report, July 2017 suggested constraints in meeting its housing need in full within the Black Country urban area. The 2017 Issues and Options Report identified a shortfall of 21,670 dwellings in comparing supply within the urban area to the identified need. However, unlike Birmingham, the Black Country Plan was at the earliest stage of development and work would be undertaken as the strategy evolved to determine whether development needs could be met.

The Black Country released the Draft Black Country Plan 2039 (Reg.18) in August - October 2021. At that time the stated shortfall position was approximately 28,000 homes to 2039, taking into account that the land supply identified in the plan would only accommodate 63% of the overall housing target.

On 19<sup>th</sup> October 2022, a joint statement was released confirming development of the Black Country Plan had ceased, and the four individual councils in the Black Country would be producing individual Local Plans for their individual authority areas. As such, the plan process will be restarted and a formal position on housing targets, supply and any shortfall for any one of the four authorities is unclear.

CCDC has worked cooperatively with both Birmingham and the Black Country to assess the housing needs of the wider HMA and work collectively to try and address known shortfalls. Evidence detailed in this section has demonstrated that additional dwellings delivered in Cannock Chase will help to address unmet need in either Birmingham or the Black Country. The Council has remained open as the plan has developed in terms of the contribution to the shortfall. It was originally intended to assist Birmingham due to the conclusion of the Inspectors report on the BDP, which brought Councils within the HMA together to cooperate and develop further evidence to help address the remaining shortfall.

# Assessment of sites in the Green Belt

## 6. Consideration of Harm

The Cannock Chase Green Belt Study (LUC 2016) developed a clear understanding of how the land in the Cannock Chase Green Belt performed against the purposes of the Green Belt. A total of 65 parcels and five broad areas were identified covering the District. The Green Belt Study demonstrated that the majority of the Green Belt in the District continues to serve its purposes very well, and that it helps to maintain the identity of this part of the West Midlands.

The Study highlighted that the Green Belt has helped to encourage the recycling of urban land historically and would continue to do so. There were four areas of Green Belt and non-Green Belt land identified within the study area where infill development would be well contained by existing features within the landscape.

These included parcels of land in: Hednesford Hills, Fair Oak Academy, Rugeley, the southern edge of Norton Canes and the Cannock Extension Canal. This study provided a strategic overview of the performance of the Cannock Chase Green Belt but the parcel boundaries used in the study were not intended to reflect potential development areas or be used as a means of allocating land. There are also 'bigger picture' considerations that the methodology does not address, such as how to review Green Belt boundaries (to accommodate development) whilst minimising harm to the Green Belt as a whole.

The Council commissioned The Cannock Chase Green Belt Harm Assessment (LUC February 2021) in light of the evidence which indicated Green Belt release was likely to be required to meet housing need. This evidence was focused on the variations in potential harm to the Green Belt if land was released for development. The areas considered were not pre-defined but the method centred on examining land which, if developed, would result in an expansion to existing settlements.

The assessment assessed the contribution of each site to the five Green Belt purposes as defined in the NPPF to determine the likely harm to the Green Belt if a site were developed. The five purposes are as follows:

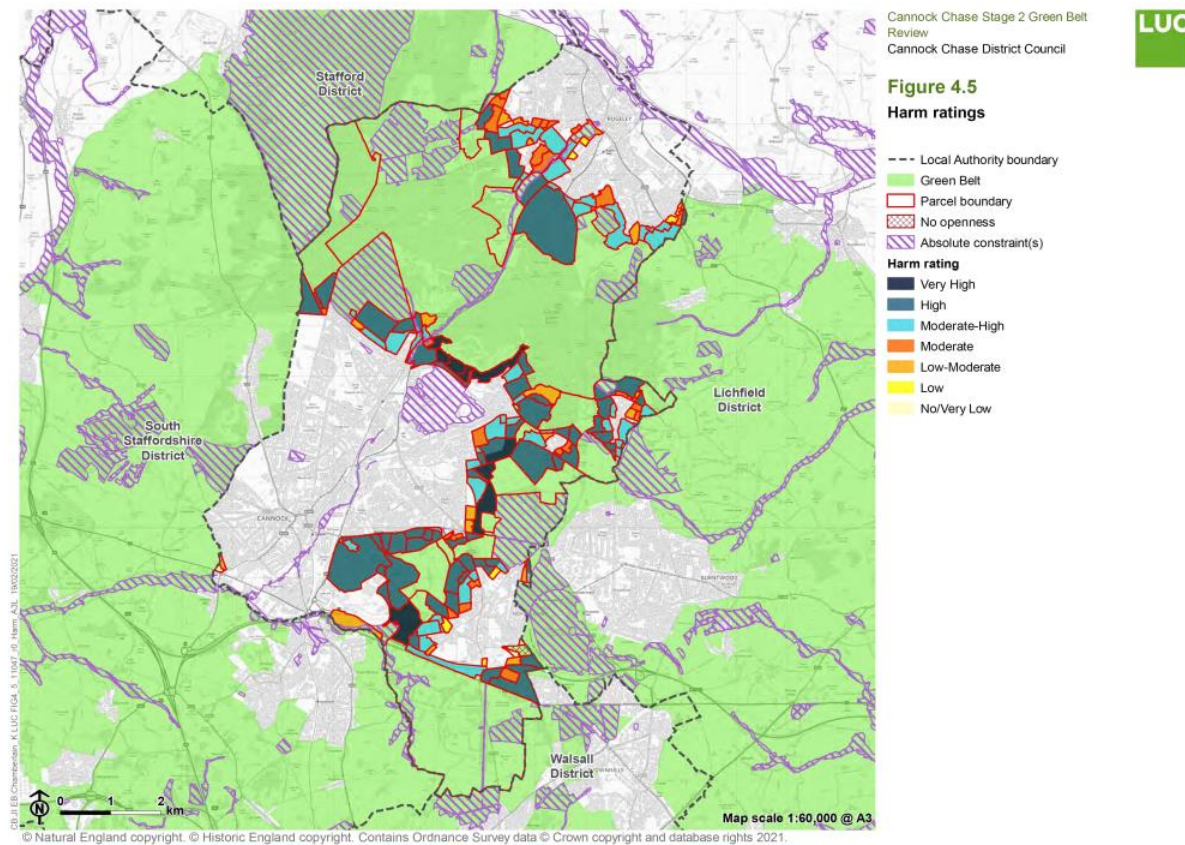
- To check the unrestricted sprawl of large built up areas.

- To prevent neighbouring towns merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The Green Belt Harm Assessment provides a Summary of Findings for 169 parcels of land (set out in Table 4.1 of the Assessment).

For each Green Belt Purpose, the 'Harm Ratings' contribution assessments ranged from 'Strong', 'Relatively Strong', 'Moderate', 'Relatively Weak', and 'Weak or No' contribution. The 'Overall Harm Ratings' assessments ranged from 'Very High', 'High', 'Moderate-High', 'Moderate', 'Moderate-Low', 'Low', and 'Very Low'.

Figure 7 Overall harm rating for the 65 parcels assessed in the LUC Green Belt Harm Assessment



When considering release of land from the Green Belt it is preferable to consider the parcels which contribute least to the 5 purposes of the Green Belt designation and therefore their removal would cause the least harm to the remaining Green Belt.



The consultants followed an approach where land adjacent to existing settlements were divided into parcels and assessed. This means the site boundaries do not always correspond with sites that were submitted for consideration for development. Ratings and supporting analysis were provided to show the contribution land makes to each Green Belt purpose and the impact on the integrity of the neighbouring land as a result of its release from the Green Belt. These two considerations are combined to give overall harm ratings in the study. Parcel and sub-parcels are defined to show the variations in harm.

Land parcels assessed as having a harm rating of 'no/very low', 'low' and 'low/moderate' from the Green Belt Harm Assessment are listed below alongside the result of their assessment in terms of site selection.

Table 1 Land parcels assessed as having a harm rating of 'no/very low', 'low' and 'low/moderate' in the Cannock Chase Green Belt Harm Assessment (LUC February 2021)

Settlement	Land Parcel Ref.	Area (ha)	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating	Harm Rating	SHLAA ref/s	Proposed Allocation
Cannock and Churchbridge	CA11	1.63	Weak/No	Weak/No	Weak/No	Weak/No	Equal Contribution	No/Very Low	C121	Yes - Allocation for residential development of 45 dwellings. New Ref: SH3
Cannock and Churchbridge	CA10	22.44	Moderate	Relatively weak	Moderate	Weak/No	Equal Contribution	Low-Moderate	CE19	No - considered for employment. Public landowner determined currently unviable and access constraints.
Cannock and Churchbridge	CA12	2.11	Moderate	Weak/No	Relatively weak	Weak/No	Equal Contribution	Low-Moderate	C121	Yes - Allocation for residential development of 45 dwellings. New Ref: SH3
Cannock Wood	CW4	0.97	Weak/No	Weak/No	Relatively strong	Weak/No	Equal Contribution	Low-Moderate	RE31	No - part of site unavailable (RE31), the majority of the site is built development in use (housing and activity centre)
Cannock Wood	CW9	3.20	Weak/No	Weak/No	Relatively weak	Weak/No	Equal Contribution	Low-Moderate	N/A	No - Recreation sports fields in active use

Hednesford	HE6	3.07	Moderate	Weak/No	Relatively weak	Weak/No	Equal Contribution	Low-Moderate	N/A	No - Playing field and playground in active use, not available.
Hednesford	HE12	5.69	Moderate	Weak/No	Moderate	Weak/No	Equal Contribution	Low-Moderate	N/A	No - Cannock Chase Enterprise Centre (business park) in active use
Hednesford	HE28	14.06	Moderate	Weak/No	Moderate	Weak/No	Equal Contribution	Low-Moderate	CE75, CE66, CE32	No - Cannock Wood Industrial Estate, built or with permission for employment uses
Norton Canes	NC6	1.06	Weak/No	Weak/No	Relatively weak	Weak/No	Equal Contribution	No/Very Low	N29	No - Sites are public play and open space serving completed development.
Norton Canes	NC7	2.44	Weak/No	Weak/No	Relatively weak	Weak/No	Equal Contribution	No/Very Low	N29	No - Sites are public play and open space serving completed development.
Norton Canes	NC2	2.89	Weak/No	Relatively weak	Relatively weak	Weak/No	Equal Contribution	Low	N/A	No - Norton Canes High School Playing Field in active use.
Norton Canes	NC12	1.40	Weak/No	Weak/No	Relatively strong	Weak/No	Equal Contribution	Low	N/A	No - small woodland site not submitted adjacent slip road for M6 Toll motorway services.
Norton Canes	NC19	3.99	Weak/No	Relatively weak	Moderate	Weak/No	Equal Contribution	Low	N15	No - Paddocks unavailable for development
Norton Canes	NC4	2.96	Weak/No	Moderate	Moderate	Weak/No	Equal Contribution	Low-Moderate	N78	No - contributes to biodiversity connectivity/ SSSI buffer

Norton Canes	NC9	3.96	Weak/No	Moderate	Relatively strong	Weak/No	Equal Contribution	Low-Moderate	N/A	No - Land unavailable, paddocks with large pond and pylon on site adjacent M6 Toll.
Norton Canes	NC14	2.00	Weak/No	Relatively weak	Moderate	Weak/No	Equal Contribution	Low-Moderate	N66	No - contributes to biodiversity connectivity/ SSSI buffer
Prospect Village	PV2	2.28	Weak/No	Relatively weak	Moderate	Weak/No	Equal Contribution	Low-Moderate	C122b	No - land unavailable, Prospect Village Hall and recreation area
Rugeley	RU32	0.61	Weak/No	Weak/No	Relatively weak	Weak/No	Equal Contribution	No/Very Low	N/A	No- unavailable - Chase View Community Primary School Playing Field
Rugeley	RU17	2.19	Weak/No	Weak/No	Weak/No	Relatively weak	Equal Contribution	Low	N/A	No - unavailable, Rugeley Leisure Centre Playing Fields in use
Rugeley	RU19	1.96	Weak/No	Weak/No	Relatively weak	Relatively weak	Equal Contribution	Low	R221	Yes - Former Hart School allocated for 145 dwellings
Rugeley	RU39	3.97	Weak/No	Weak/No	Relatively weak	Weak/No	Equal Contribution	Low	R29b	No - School playing fields in use
Rugeley	RU42	0.77	Weak/No	Weak/No	Moderate	Weak/No	Equal Contribution	Low	R29a	No - not preferred
Rugeley	RU5	4.69	Weak/No	Weak/No	Moderate	Weak/No	Equal Contribution	Low-Moderate	R106, R158	No - not preferred
Rugeley	RU6	2.54	Weak/No	Relatively weak	Relatively strong	Weak/No	Equal Contribution	Low-Moderate	R187	No - not preferred

Rugeley	RU10	1.40	Weak/No	Weak/No	Moderate	Weak/No	Equal Contribution	Low-Moderate	N/A	No - unavailable. Stone House, Barn and Cottage residential in use
Rugeley	RU16	12.80	Weak/No	Weak/No	Relatively weak	Moderate	Equal Contribution	Low-Moderate	N/A	No - flood Zone 3 and flood storage area
Rugeley	RU35	6.10	Weak/No	Relatively weak	Relatively strong	Weak/No	Equal Contribution	Low-Moderate	R126, R128,	No - rejected in detailed site selection.
Rugeley	RU40	2.82	Weak/No	Weak/No	Relatively strong	Weak/No	Equal Contribution	Low-moderate	R32	Yes - allocated for 33 dwellings
Wimblebury/Heath Hayes	WI14	5.29	Relatively strong	Moderate	Moderate	Weak/No	Equal Contribution	Low-moderate	N/A	No - in active use as allotments
Wimblebury/Heath Hayes	WI15	3.95	Moderate	Relatively weak	Relatively weak	Weak/No	Equal Contribution	Low-moderate	N/A	No - recreational fields and play area

Table 1 shows that very few sites assessed to have lower harm were able to be developed. Sites tend to have common considerations as to why their development would result in least harm, but these factors also limit the potential for development. In many cases the land is either developed, albeit at a low density or the land on site is not optimised. Where land is in use or not known to be available (not submitted), the land cannot be allocated for redevelopment. It also includes some green space in active use such as sports fields, play space and allotments. Sites which are partly developed or well related to existing development are often relatively small enclosed land parcels and whilst these may have the least harm, these parcels also yield limited development potential.

Parcels CA11/CA12 in Cannock, RU19 in Rugeley and parcel RU40 in Brereton, Rugeley have been selected for allocation. Four other parcels were further considered in the site selection process, but harm was not an overriding factor and overall these small parcels were not considered to meet the requirements to justify Green Belt release.

Whilst the contribution and harm rating of land within the Green Belt is an important factor when considering allocation, it is one of several factors which must be taken into account. The vast majority of land parcels had a harm rating of 'moderate – high' or above. Only 1.5% of land put forward had a harm rating of 'low' or 'no/very low'. This resulted in some areas having very few Green Belt release options which had lower harm ratings, even where these were optimal locations for growth.

*Table 2 Number and area of land parcels in each category of harm*

<b>Harm Rating</b>	<b>Land Parcels (number)</b>	<b>Land Parcels area (ha)</b>	<b>Percentage of land area</b>
<b>Very High</b>	<b>9</b>	<b>123.4</b>	<b>8.2%</b>
<b>High</b>	<b>59</b>	<b>829.8</b>	<b>55.1%</b>
<b>Moderate-High</b>	<b>46</b>	<b>325.1</b>	<b>21.6%</b>
<b>Moderate</b>	<b>25</b>	<b>101.8</b>	<b>6.8%</b>
<b>Moderate-Low</b>	<b>19</b>	<b>102.9</b>	<b>6.8%</b>
<b>Low</b>	<b>7</b>	<b>17.17</b>	<b>1.1%</b>
<b>No/Very Low</b>	<b>4</b>	<b>5.74</b>	<b>0.4%</b>

## 7. Consideration of Exceptional Circumstances

### Spatial Strategy

Following consideration of harm, another important determinant for Green Belt release was how sites would support the spatial strategy.

The spatial strategy has been refined through consultation stages of the Local Plan production. Options for housing growth were originally presented at Issues and Options Stage:

- *Option A: Urban Areas- use sites already identified for housing within the urban areas and explore opportunities for further housing on urban sites.*
- *Option B: Rugeley Power Station Option B1: Urban Areas and housing-led redevelopment of former Rugeley Power Station*
- *Option B2: Urban Areas and employment-led/mixed use redevelopment of former Rugeley Power Station*
- *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*
- *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*
- *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*

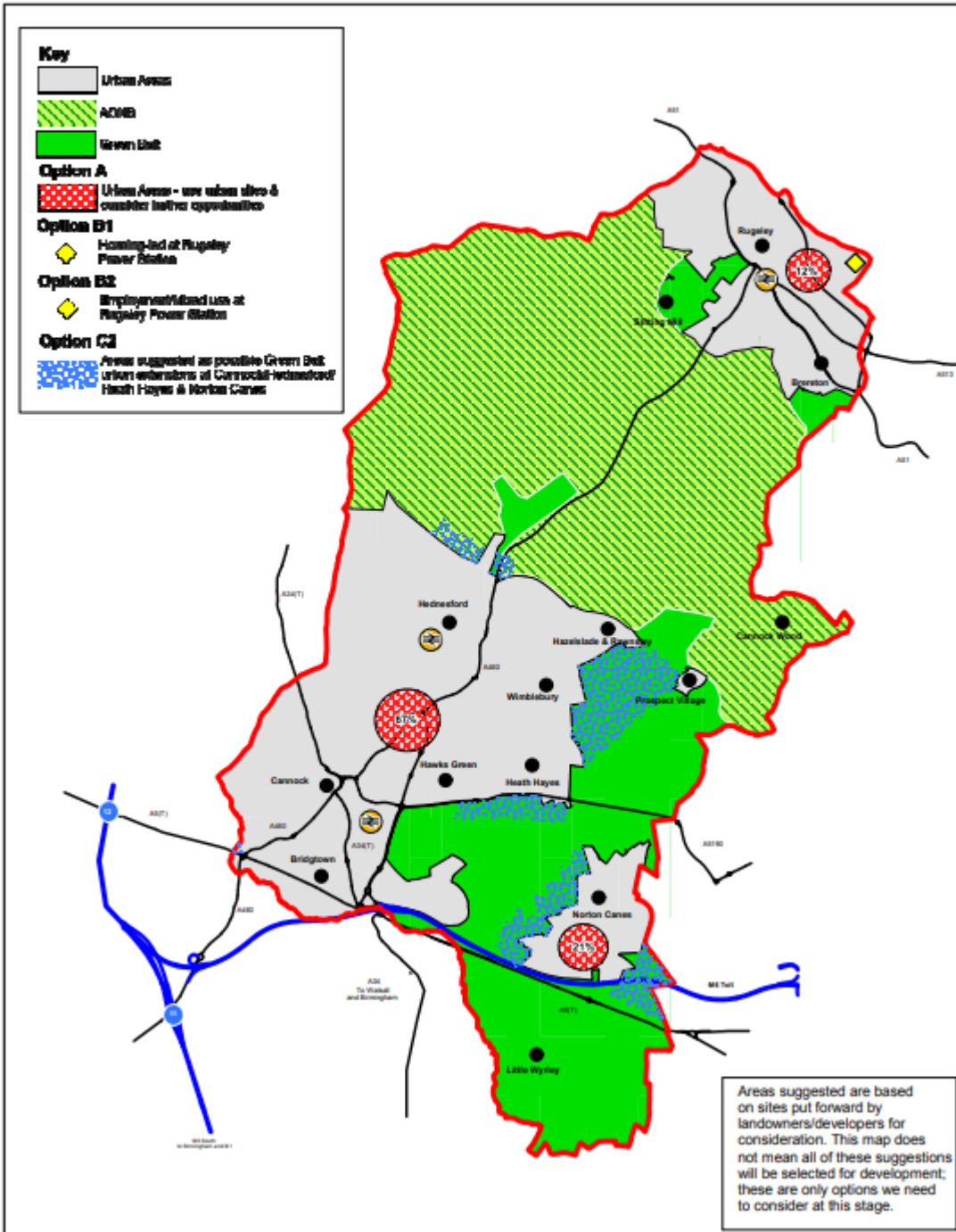
Options were subject to consultation and assessed in the Sustainability Appraisal. The response to the Issues and Options consultation showed that options which required Green Belt release were generally less favourable to the public, although were generally supported by the development industry as those options supported delivery of more homes. Options C1, C2 and C3 performed more poorly against sustainability criteria, particularly relating to biodiversity and geodiversity (SA1), pollution (SA2) and the historic environment (SA17) although they were scored highly towards housing (SA9). At that stage, the overall housing and employment targets were also subject to consultation, as well as the spatial approach to employment which was as follows:

- *Option A: Urban areas- use sites already identified for employment developments within the urban areas and explore opportunities for further supply on urban sites.*
- *Option B: Rugeley Power Station Option B1: Urban Areas and employment-led/mixed use redevelopment of former Rugeley Power Station*

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

There was mixed support for the options presented. The options were scored similarly in the SA to the housing options. Both Option C1 and C2 were found to be 'significantly negative' in terms of Biodiversity and Geodiversity, and Historic Environment. Option C2 was also assessed to have a 'significantly negative' effect on Landscape and Townscape.





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Figure 8 Diagram for option C2 in Cannock Chase Local Plan Issues and Options document (2019)

## Final Spatial Strategy

The assessment of options and results of consultation did not expressly highlight any one option as overwhelmingly preferable or more sustainable. Green Belt release was only ever intended to be considered if development needs could not be met through exhausting all other reasonable options. The strategy therefore developed in response to:

- the known development needs at that time which determined how much Green Belt release was required;
- aligning the distribution of development with the hierarchy of settlements to direct growth to the most sustainable locations; and
- taking into consideration planning completions and commitments since 2018 to ensure no one settlement had a disproportionate share of the growth.

The final spatial strategy most closely aligned with housing 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 (figure 8) and employment 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.

However, the final strategy for housing did slightly differ from the options presented in that some additional allocations have been made in Rugeley and land in Norton Canes for housing has been safeguarded as opposed to allocated for development in the plan period. Norton Canes has had a higher proportion of dwellings delivered to date, early in the plan period than Rugeley and other villages. There is less infrastructure in place to accommodate additional growth. The Council is supporting the Parish Council with their Neighbourhood Plan. Rugeley town is a more sustainable location for development than Norton Canes village in terms of services and facilities. In the Regulation 19. Local Plan, additional housing allocations were made in Rugeley and the decision was made to safeguard sites in Norton Canes which ensures the proportion of development fit with the overall Spatial Strategy.

*Table 3 Amount and percentage of dwellings to be delivered over the plan period in each location*

	<b>2018-2039 Total (calculated March 23)</b>	
<b>Area</b>	<b>Number of dwellings</b>	<b>Percentage of total dwellings (%)</b>

Cannock	3640	59%
Rugeley	1827	30%
Norton Canes	666	11%
<b>Total</b>	<b>6133</b>	

The following extracts from the Reg 19. Cannock Chase Local Plan highlight the final spatial strategy in terms of the planned distribution for development<sup>2</sup>

### **The Spatial Strategy for Cannock/Hednesford/Heath Hayes**

- Cannock, Hednesford and Heath Hayes will be the main priority area for new residential and commercial development.
- Hednesford is a designated Town Centre serving the retail and service needs of residents to the north east of Cannock. Opportunities to enhance the retail, commercial and residential offer will be prioritised.
- Heath Hayes is a designated Local Centre and provides small scale services to serve local needs.

### **The Spatial Strategy for Rugeley and Brereton**

- Rugeley is a designated Town Centre serving the shopping needs of its hinterland. • The introduction of residential and commercial units that respect the historic character of the Town Centre will be prioritised.
- The provision of approx. 1,000 additional homes within Cannock Chase District will be delivered through the larger cross boundary redevelopment of the former Rugeley Power Station.
- Brereton is a designated as a Local Centre serving local needs.

### **The Spatial Strategy for Norton Canes**

- Norton Canes has experienced significant growth since 2018 and corresponding infrastructure is yet to be delivered to accommodate the increased demand upon services such as education.

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<sup>2</sup> See Regulation 19. Pre-Submission Cannock Chase Local Plan (2018-2019) page 26-30 for complete Spatial Strategy

- Residential and commercial development opportunities will be prioritised within Norton Canes where they can make a positive and sustainable contribution to the growth of the district. The Council will safeguard land for future development and work with the Parish Council to deliver further housing growth where this enables the delivery of a further half FE primary school including, if justified, removal of land from the Green Belt. Land can only be released from the Green Belt through a development plan such as the Local Plan or Neighbourhood Plan.
- Norton Canes is a designated Local Centre serving local needs.
- The identity of Norton Canes as a separate settlement will be safeguarded and enhanced.

**The Spatial Strategy for Rural areas (Cannock Chase AONB and Rural north including Rawsley, Hazelslade, Prospect village, Cannock Wood and Slitting Mill)**

- These areas have potential for local enterprises to support and contribute to the education, preservation and enhancement of the important landscape, habitat and species and history of the area. The retention of existing employment and working landscape will be important to retain the local vibrancy of the area and support local services and facilities.
- Housing will be identified through neighbourhood plans reflecting local need and affordable housing provision as well as respecting the local character and infrastructure of the area.
- The alteration to the Green Belt boundary and the safeguarding of areas of land for future development recognises the constrained nature of the District and will give permanence to the Green Belt so the revised boundaries can endure beyond the plan period.

**Summary**

In accordance with the Spatial Strategy, Green Belt release should be considered first in Cannock, Hednesford and Heath Hayes as this will be the main priority area for new residential and commercial development. The designated Green Belt and Cannock Chase AONB boundary to the north of Hednesford and the Green Belt and tight administrative boundaries to the east of Hednesford and south of Cannock effectively constrain the potential for development.

Rugeley is also a sustainable location for development but is subject to a large cross boundary mixed use allocation on the former power station site. The delivery of this brownfield site for regeneration is the priority for development in this area and will ensure necessary infrastructure including new open space and educational facilities are provided to support population growth. Brereton is a local service centre and therefore potentially could be appropriate to support some development.

Norton Canes has already received a large amount of development proportionate to its role in the plan period. Between preferred options stage and the final pre-submission plan, proposed allocations on Green Belt land adjacent to Norton Canes were amended to safeguarded sites.

In principle, the rural area is not a sustainable location for Green Belt release, other than the minor exceptions permitted in national policy.

## 8. Site Allocations

This section outlines the exceptional circumstances case for the release of Green Belt sites in the Local Plan. It should be read in conjunction with the Site Selection Topic Paper and proformas for each site, which describe the process of site selection as well as the site characteristics and constraints in detail. Other Green Belt site options were considered and either rejected or identified as safeguarded land. For full details see the Site Selection Topic Paper.

References to compensatory mitigation relate to National Planning Practice Guidance, which states; 'where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land'.

### **SH1 South of Lichfield Road, Cannock**

**Site Area (both land parcels): 47.2ha, Net developable area 20ha on northern site**

**C118(a),**

**700 dwellings, density minimum 35dph**



- Northern site boundary area proposed for residential development of 700 homes.

- Southern part of the site (C116(b)) lies to the south of Newlands Lane and is being proposed as a country parkland to be delivered alongside the residential development. This comprises approx. 14.81ha and will remain within the Green Belt

### Exceptional Circumstances

**Housing Need** - There are insufficient non Green Belt sites to meet the spatial strategy requirements. This single allocation could deliver the contribution of 500 homes the plan is seeking to make towards the unmet housing needs of the GBBCHMA, in addition to 200 dwellings towards the housing needs of Cannock Chase. The site would provide 35% of the total dwellings as affordable housing, equating to 245 homes which is a substantial contribution. This is a sustainable location for development benefiting from walking and cycling access to a range of facilities, with an optimal level of development to provide new infrastructure including a new school. There are no non-Green Belt land options in this broad location that could accommodate a similar level of development.

**Compensatory mitigation** - In line with Paragraph 145 of the NPPF ; Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access. The provision of publicly accessible country parkland to the south of Newlands Lane, will provide a range of habitats including wet woodland. The community parkland would offer significant biodiversity benefits and provide enhanced recreational access to the countryside. The area will provide opportunities for public recreation, including dog walking in an informal natural setting and would have the capability of serving as an alternative area of local recreational space within walking distance to new and existing residential areas and potentially supporting the mitigation strategy for Cannock Chase SAC. Landscaping measures indicatively include retention of existing trees and hedgerows, a new block of native woodland planting, swathes of new heathland, a wet woodland area associated with Newlands Brook.

The proposal creates opportunities for green infrastructure corridors to enable links from the site to the wider proposed heathland enhancement corridor between Cannock Chase and Sutton Park, known as the Midlands Heathlands Heartlands Project. The proposal should contribute to nature recovery in line with the Cannock Chase District Nature Recovery Network Mapping Report produced by Staffordshire Wildlife Trust.

It is important to note that the community parkland is delivered in addition to the required on site open space provision on the northern part of the site where new houses will be located

(C116(a). The community parkland is therefore a fully additional benefit, beyond infrastructure and open space provision necessary to serve the development site.

**Infrastructure** - Provision of 1 new 2FE Primary School. The quantum of houses will result in the delivery of new education facilities as opposed to impacting on existing facilities. This is also in close proximity to proposed allocation SH2 and can therefore help alleviate pressure from cumulative development on the catchment area for Goosemoor Primary School and Five Ways Primary School. The site is within Norton Canes Parish and could also provide places for children living in Norton Canes, an area with limited supply of school places.

**Improving air quality and reducing congestion** - Five Ways junction on the A5190 is identified as an area of congestion and has been subject to an Air Quality Management Order (AQMA) since 2017 due to high levels of Nitrogen Dioxide from vehicle emissions. The Council has recently revoked the AQMA as air quality has improved (April 2023) but there remains issues with congestion, which would worsen with future growth. Proposed allocations SH1 and SH2 will provide proportionate funding arrangements to deliver the necessary improvements to Five Ways island, and a relief road is offered through delivery of site SH2 which will mitigate the impact of additional traffic through the junction.

### Green Belt Harm Assessment, LUC

The assessment considered the site to form 3 separate land parcels. As such the results of the assessment are not directly comparable, but it does consider the release of the broader parcel of land in this location to result in 'high' harm. This is on the basis area makes a strong contribution to safeguarding the countryside from encroachment and the area makes a strong contribution to checking the sprawl of the large built up area.

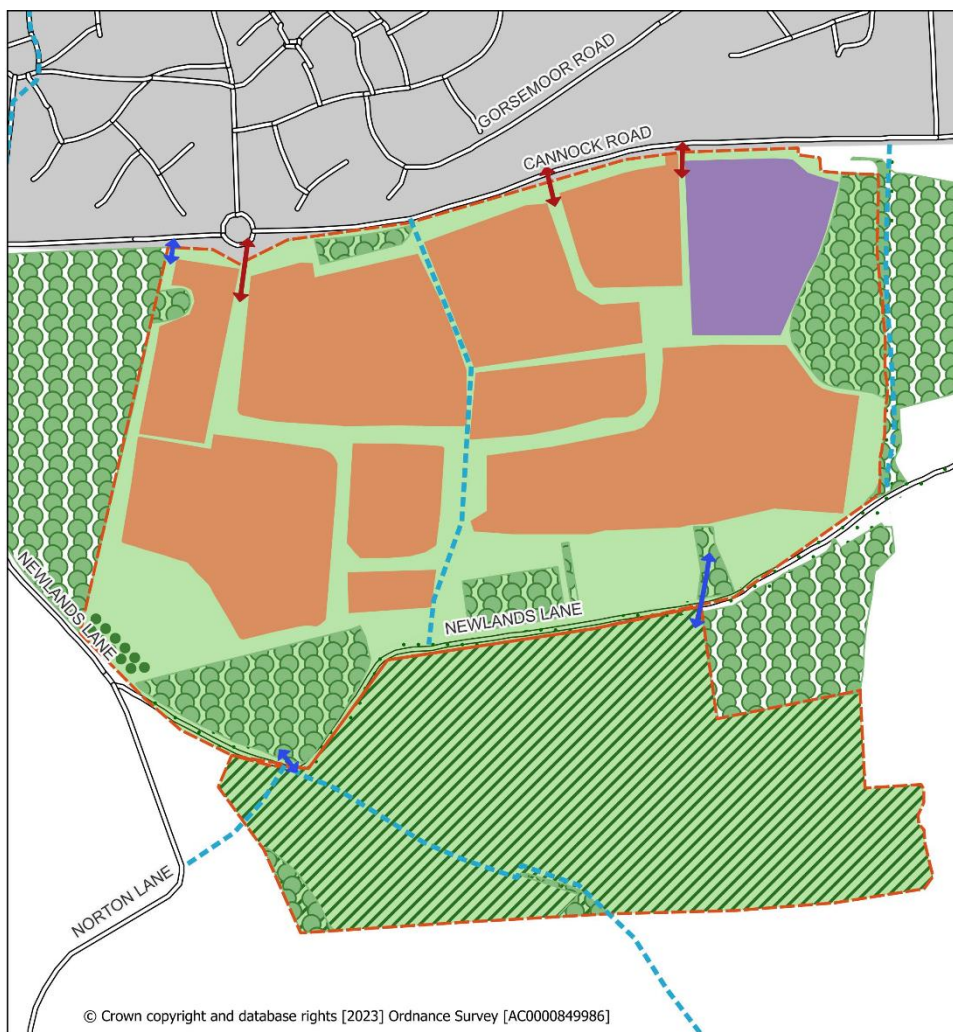
The study suggests there is opportunity to reduce harm of Green Belt release by the introduction of new woodland belts and/or small woodlands to the south and west. This would form a strong Green Belt boundary and would help reduce the impact of urban containment. This would also help enhance the coalfield farmlands landscape character, in accordance with landscape strategies set out in the Landscape Character Assessment for Cannock Chase (2016) and the AONB Landscape Character Framework (2017) (Green Belt Harm Assessment, LUC).

### Masterplan



The Indicative masterplan provided by the developer is shown in the following diagram. This is shown only to provide an indication of how the site could be designed, is subject to change and has no formal planning status at this point. The diagram does however illustrate how the scale of the site maximises the opportunity presented; for the number of houses that can be delivered and compensatory mitigation in the form of the country parkland. Importantly sufficient space is available to allow detailed consideration of landscaping and preservation of boundary features, where this would limit the visual, noise and other adverse impacts of new built development on the remaining Green Belt.

Figure 9 Concept diagram



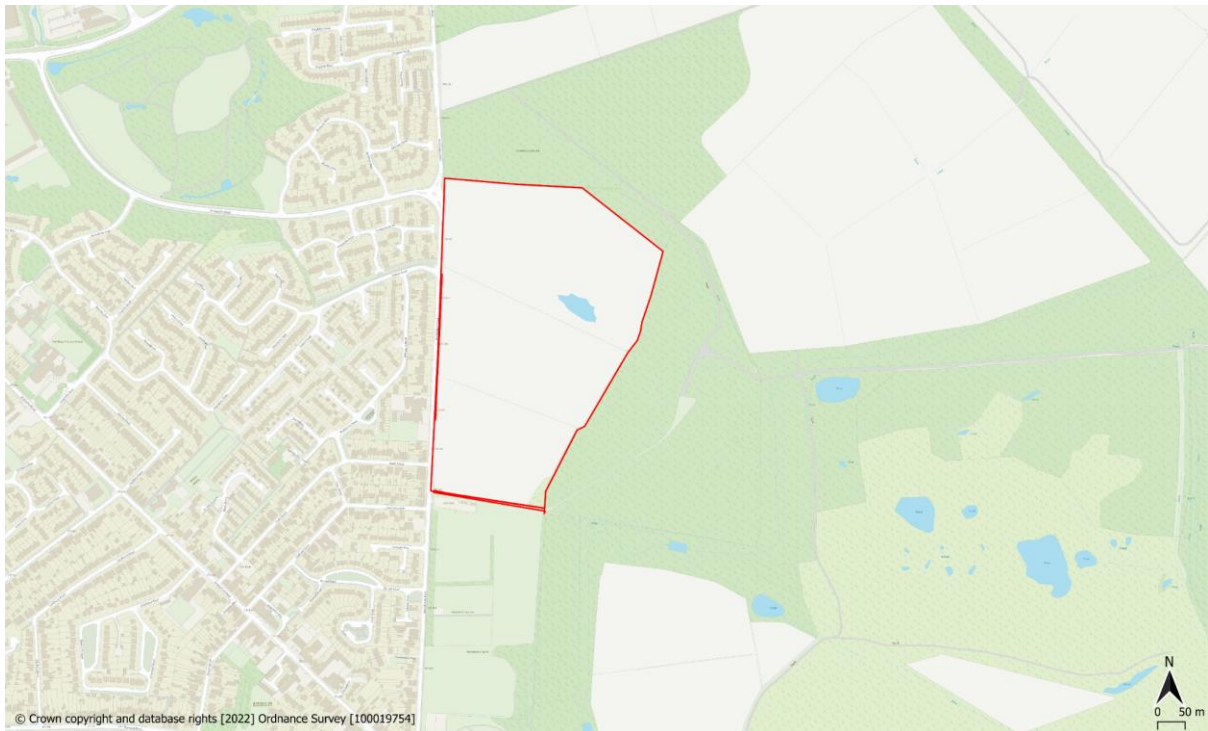
**Key**

- |                              |  |
|------------------------------|--|
| Site Boundaries              | Indicative Vehicular Access Points                         |
| Existing Streets             | Indicative Active Travel Access Points                     |
| Existing Urban Area          | Indicative Location for Enhanced Screening                 |
| Existing Area of Woodland    | Indicative Location for Residential Development            |
| Existing Areas of Open Space | Indicative Location for New Primary School                 |
| Existing Pond                | Indicative Location for Community Parkland                 |
| Existing PRoWs               | Indicative Location for Areas of Blue-Green Infrastructure |

## SH2 East of Wimblebury Road, Heath Hayes

Site Area: 18 ha Net developable area 10.2 ha

410 dwellings, density minimum 35dph



### Exceptional Circumstances

**Housing Need** - There are insufficient non Green Belt sites within close proximity to Cannock and Heath Hayes to meet the spatial strategy requirements. This single allocation could deliver the contribution of 410 homes the plan is seeking to make towards the meeting housing needs. The site would provide 35% of the total dwellings as affordable housing, equating to 143.5 homes which is a substantial contribution. This is a sustainable location for development benefiting from walking and cycling access to a range of facilities. There are no non-Green Belt land options in this broad location that could accommodate a similar level of development;

**Existing Safeguarded Land Allocation** - Part of the proposed allocation contains safeguarded land designated in the adopted 2014 Cannock Chase Local Plan, originally allocated for safeguarding in the 1997 Cannock Chase Local Plan. The justification for selection of the site was that it would form a natural rounding off to the residential area of Heath Hayes without being detrimental to the principles of the Green Belt. It was also stated originally that the proposed area would need to be serviced by a new road from Wimblebury Road to Burntwood Road and Norton Road. If only the area of land safeguarded was

developed this would reduce the level of housing delivered to 150 dwellings, reduce the potential infrastructure improvements associated with a higher level of development and would still result in Green Belt release. Developing part of the site is likely to weaken the contribution of the remainder of the land to the five purposes of the Green Belt. Extending the boundary of the site to encompass all the land available will provide a stronger visual defensible boundary from the remaining Green Belt as it is entirely bounded by established woodland to the north and east, by built development to the west and by Heath Hayes Park to the small southern boundary.

**Compensatory mitigation** - The woodland adjacent to the site is to be retained as Green Belt and should be subject to consideration as to the extent to which this could provide compensatory improvements to the environmental quality and accessibility of the Green Belt. The proposed public open space on the development site will link to existing Public Rights of Way through the woodland, extending the path so that it can be used as a circular walking route and potentially enabling improvements to the existing pathways. The indicative masterplan shows that a significant proportion of the north-eastern corner of the site will be laid out as public open space, which would help strengthen the boundary between new urban development and the remaining Green Belt to reduce the likelihood of any harm being caused to the wider Green Belt in line with recommendations in the LUC Green Belt Harm Assessment. Furthermore, the woodland presents a permanent defensible boundary to prevent further encroachment and urban sprawl. 56.2ha of land in this area is within the developer's control which optimises the potential to deliver further compensatory measures to the Green Belt beyond the immediate site boundary.

**Improving air quality and reducing congestion** - Five Ways junction on the A5190 is identified as an area of congestion and has been subject to an Air Quality Management Order (AQMA) since 2017 due to high levels of Nitrogen Dioxide from vehicle emissions. The Council has recently consulted on potential revocation of the AQMA as air quality has improved but there remains issues with congestion, which would worsen with future growth. Proposed allocations SH1 and SH2 will provide proportionate funding arrangements to deliver the necessary improvements to Five Ways island, and a relief road will be delivered from site SH2 through to A5190 east (Cannock Road through the proposed area of safeguarded land to the south east (Policy S1) which will divert traffic east of Five Ways junction.

**Infrastructure** - Contributions can be provided to increase the viability for delivering the new 1 FE Primary School on the proposed allocated site SH1.

### Green Belt Harm Assessment, LUC

The assessment considers the release of the land in this location to result in 'moderate-high' harm. This is on the basis area makes a relatively strong contribution to safeguarding the countryside from encroachment and the area makes a relatively strong contribution to checking the sprawl of the large built up area.

The study suggests there is opportunity to reduce harm of Green Belt release by the introduction of new woodland belts and/or small woodlands within the site to the north east. This would form a strong Green Belt boundary and would help reduce the impact of urban containment. This would also help enhance the coalfield farmlands landscape character, in accordance with landscape strategies set out in the Landscape Character Assessment for Cannock Chase (2016) and the AONB Landscape Character Framework (2017) (Green Belt Harm Assessment, LUC).

### Masterplan

**The Indicative masterplan provided by the developer is shown in the following diagram. This is shown only to provide an indication of how the site could be designed, is subject to change and has no formal planning status at this point.** The diagram shows how the site can link to the wider Public Rights of Way, and how the new open space can help to strengthen the north-east boundary between the site and the wider Green Belt.

Figure 10 Concept diagram



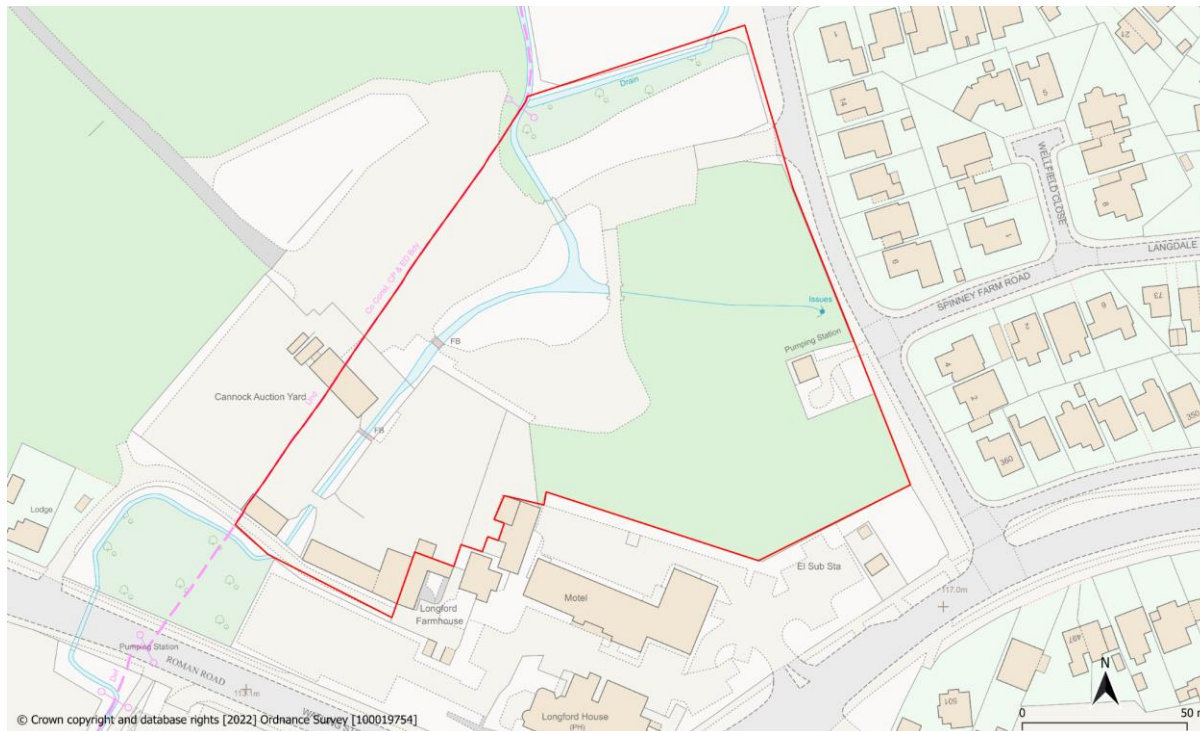
**Key**

- |                              |  |
|------------------------------|--|
| Site Boundaries              | Indicative Vehicular Access Points                         |
| Existing Streets             | Indicative Strategic Infrastructure Route                  |
| Existing Urban Area          | Indicative Active Travel Access Points                     |
| Existing Area of Woodland    | Indicative Active Travel Routes & Connections              |
| Existing Areas of Open Space | Indicative Location for Residential Development            |
| Existing Pond                | Indicative Location for Areas of Blue-Green Infrastructure |
| Existing PRoWs               |  |

## SH3 Land to rear of Longford House, Watling Street Cannock

Net developable area 1.18 ha

45 dwellings



### Exceptional Circumstances

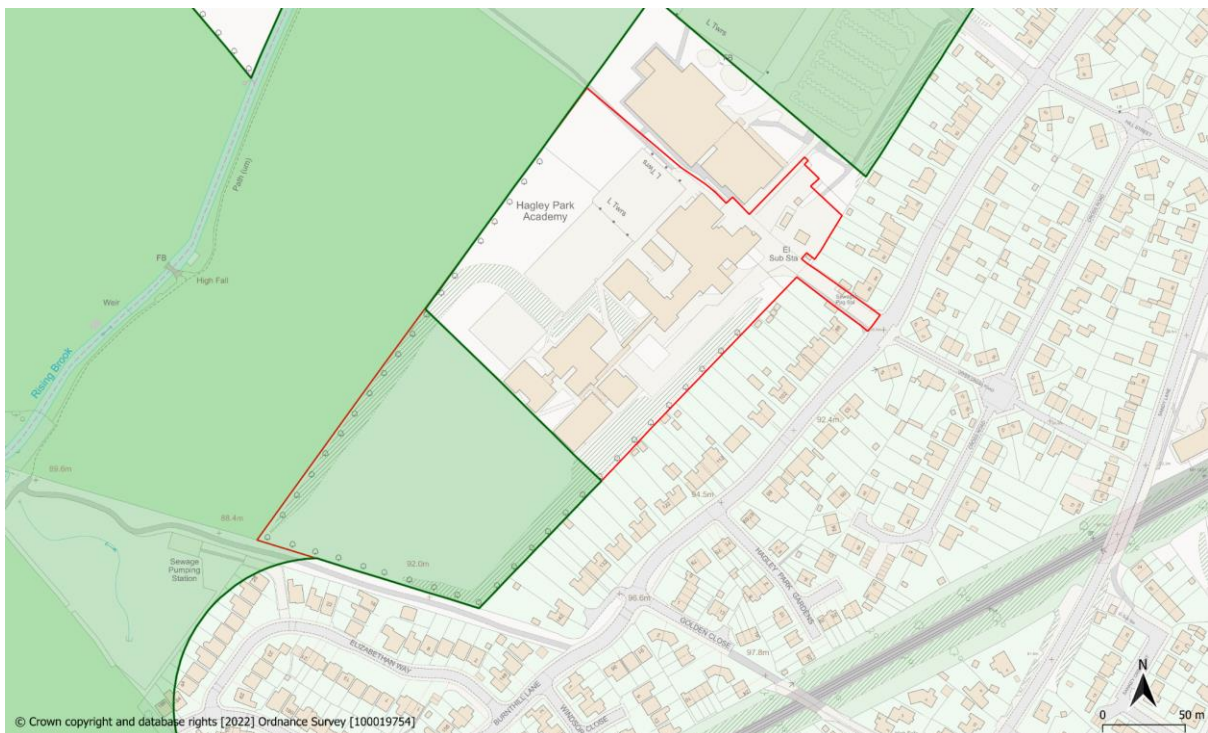
**Housing Need** - There are insufficient non Green Belt sites within close proximity to Cannock to meet the spatial strategy requirements. Although this single allocation could deliver only a modest contribution of 45 homes, its urban location allows for higher density development maximising the use of the land and will contribute to the delivery of affordable housing. This is a small brown field site in an urban location benefiting from walking and cycling to Cannock town centre with access to a range of facilities. There are insufficient non-Green Belt land options adjacent to Cannock town that could accommodate the level of development sought to address the District's housing need and support the centres hierarchy.

**Previously developed** -The NPPF states; 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. Proposed allocation SH3 fulfils both criteria, as it comprises a disused car auction site with buildings

and concrete hardstanding as well as some undeveloped grassed areas and it is adjacent to a bus stop on Wellington Drive (or a 20 minute walk to Cannock town centre).

**Limited harm** - The LUC Green Belt Harm Assessment determined that the site had low/no value contribution to the five purposes of the Green Belt in its overall conclusion for the site. The site is surrounded by development on three sides, and if redeveloped, use of the site could be intensified and the design of the site should be considered with the potential to improve the impact of the site on the remaining Green Belt, providing a more considered approach to the urban edge in this location with the potential to preserve and enhance any natural boundary landscape features.

**SH6 Former Hart School, (Hagley Park), Burnthill Road, Rugeley**  
**4.9ha (of which approximately 2 ha is within the Green Belt)**  
**145 dwellings**



### Exceptional Circumstances

**Housing Need** - There are insufficient non Green Belt sites within close proximity to Rugeley to meet the spatial strategy requirements, beyond the large scale allocation of the former Rugeley Power Station. This single allocation could deliver the contribution of 145 homes towards meeting housing needs including provision of affordable housing. The

majority of the site is not in the Green Belt and therefore only 1.95ha of the total 4.9ha is required for Green Belt release. The additional land in the Green Belt was formerly used as the school playing field, ancillary to the school site. Utilising this land for additional housing will optimise the redevelopment potential of the site as a whole and help to address housing need. This is a sustainable location for development benefiting from walking and cycling access to a range of facilities. There are no non-Green Belt land options in this broad location that could accommodate a similar level of development and it would optimise the use of a part previously developed site.

**Previously developed** -The NPPF states; 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. Proposed allocation SH6 fulfils both criteria, as it comprises half a developed site containing a former school as well as the ancillary former playing field and close bus stops on Sandy Lane (or a 10 minute walk to Rugeley town centre).

**Limited harm** - The LUC Green Belt Harm Assessment determined that the site had low contribution to the five purposes of the Green Belt in its overall conclusion for the site. The site is relatively enclosed from the wider Green Belt, being surrounded by built development on three boundaries. The site is bordered to the west by established hedgerow and trees which has the potential to be enhanced with additional native planting to soften the impact of urban development on the wider landscape of the Green Belt.

### **GT1 - Land at Cannock Wood Road, Rawnsley**

**0.4 ha**

**3 permanent pitches for Gypsy and Travellers**





### Exceptional Circumstances

**Accommodation need** - Contribute towards meeting the identified need for pitches through the Local Plan. There are no alternative existing Gypsy and Traveller sites in Cannock Chase in non-Green Belt locations, and there are no sites which could expand without developing in the Green Belt.

**Specific locational requirement** - The site forms an extension to an existing Gypsy and Traveller site on Cannock Wood Road. There is no alternative location that could meet the needs of the existing community.

**Limited harm** - The existing site is visible from the road, and the small extension is unlikely to alter the perception of openness of the Green Belt in this location. The site is heavily screened to the south and west by a dense belt of trees and shrubs, and public views are from the road which presents a durable boundary, limiting further expansion. The land will remain in the Green Belt and therefore will be subject to tight restrictions.

### Green Belt Harm Assessment, LUC

The site forms part of OA7 which represents outer areas beyond the settlement edges. The boundary of the site is a much larger parcel and therefore the results are not necessarily applicable, but it is noted that outer areas area parcels in general are considered to have a strong distinction from inset settlements and are open. The study states that small, isolated

areas of diminished openness, which might affect Green Belt contribution on a very localised scale, were not identified in the outer Green Belt.

It is not proposed to remove land from the Green Belt to accommodate the proposed 3 pitches.

## **GT2 - Land at Lime Lane, Little Wyrley**

**0.1 ha**

**2 permanent pitches for Gypsy and Travellers**



### Exceptional Circumstances

**Accommodation need** - Contribute towards meeting the identified need for pitches through the Local Plan. There are no alternative existing Gypsy and Traveller sites in Cannock Chase in non-Green Belt locations, and there are no sites which could expand without developing in the Green Belt.

**Specific locational requirement** - The site forms an extension to an existing Gypsy and Traveller site on Lime Lane. There is no alternative location that could meet the needs of the existing community.

**Limited harm** - The existing site is visible from the road, and the small extension is unlikely to alter the perception of openness of the Green Belt in this location. Views from the B4153 road frontage could be softened by the enhancement of native hedgerow on the site boundary. Public views of the site are from the road which presents a durable boundary,

limiting further expansion. The land will remain in the Green Belt and therefore will be subject to tight restrictions.

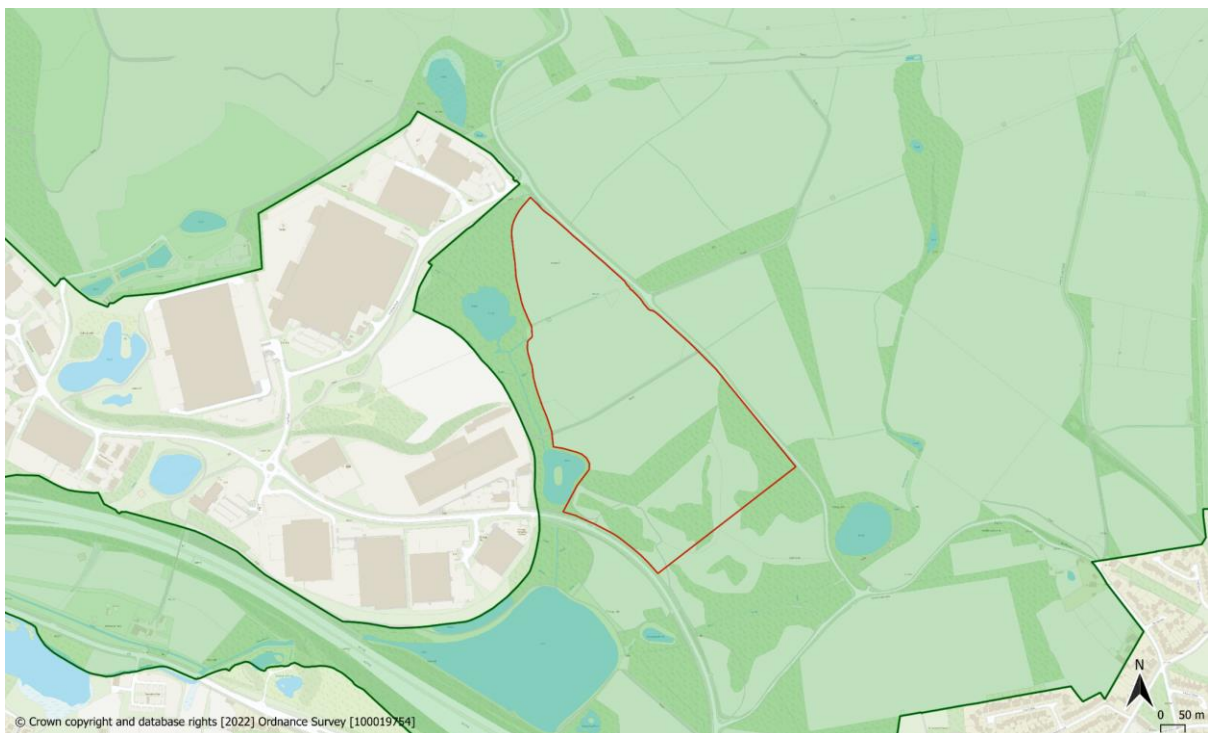
### Green Belt Harm Assessment, LUC

The site forms part of OA14 which represents outer areas beyond the settlement edges. The boundary of the site is a much larger parcel and therefore the results are not necessarily applicable, but it is noted that outer areas area parcels in general are considered to have a strong distinction from inset settlements and are open.

It is not proposed to remove land from the Green Belt to accommodate the proposed 2 pitches.

### **SE1 Kingswood Lakeside Extension 2, Norton Canes**

#### **21.5ha employment land**



### Exceptional Circumstances

**Employment need** - The allocation will ensure development needs for employment are met in the plan period, without this allocation there are insufficient sites in the urban area to meet employment needs.

**Deliverable and appropriate location for intended employment use** - 80% of development need of Cannock Chase is for industrial/warehousing. This site is desirable for

such use, offering scope for large logistic units to meet modern requirements and benefitting from existing access and colocation with similar employment uses.

**Access requirements** - When considering the impact of development on the Green Belt wider impacts resulting from the proposed change of use to the site require consideration. Employment development can have an adverse impact on the surrounding area in terms of the traffic generation, particularly from HGV's. Modern logistics operations may operate overnight which can also increase their adverse impact.

The proximity to the trunk road network and junction for the M6 Toll from this site and the use of the existing estate access will minimise lorries on minor roads in the surrounding Green Belt. Existing active travel links are already provided between the train station, retail areas and residential areas reducing the need to travel for employment. The site could improve access by public transport as there is potential for an additional bus stop to serve this part of the Business Park.

**Specific locational requirement** - Represents a logical extension to Kingswood Lakeside Employment Park, there are no other means of expanding the employment area, as to the south is the M6 toll and to the north is a large scale waste management site. This represents the final phase of expansion at the business park as there is no land remaining in future, which provides assurance of the permanence of the Green Belt following this last release of land from the Green Belt.

The surrounding area of the site will be safeguarded for a community park. This presents the opportunity for enhanced biodiversity and/or recreational access to provide compensatory mitigation, preserving and enhancing network of ponds and tree belts to the west and southern part of the site.

#### Green Belt Harm Assessment, LUC

This site has not been assessed on its own merits but as part of a much larger parcel of land containing agricultural land to the north. As such the results of the assessment are not directly comparable, but it does consider the release of the broader parcel of land in this location to result in 'high' harm. This is on the basis the area makes a strong contribution to safeguarding the countryside from encroachment and the area makes a strong contribution to checking the sprawl of the large built up area of Cannock.

The study suggests there is opportunity to reduce harm of Green Belt release by the introduction of new woodland belts and/or small woodlands within the site. This would form a strong Green Belt boundary and would help reduce the impact of urban containment. This would also help enhance the coalfield farmlands landscape character, in accordance with landscape strategies set out in the Landscape Character Assessment for Cannock Chase (2016) and the AONB Landscape Character Framework (2017) (Green Belt Harm Assessment, LUC).

### Site Allocation SE2 - Watling Street Business Park Extension 9ha



### Exceptional Circumstances

**Employment need** - The allocation will ensure development needs for employment are met in the plan period, without this allocation there are insufficient sites in urban area to meet employment needs.

**Deliverable and appropriate location for intended employment use** - Development will result in the regeneration of the existing site, improving the stock of employment units. 80% of development need of Cannock Chase is for industrial/warehousing. This site is desirable

for such use, offering scope for large logistic units to meet modern requirements and benefitting from existing access and colocation with similar employment uses.

**Access requirements** - When considering the impact of development on the Green Belt wider impacts resulting from the proposed change of use to the site require consideration. Employment development can have an adverse impact on the surrounding area in terms of the traffic generation, particularly from HGV's. Modern logistics operations may operate overnight which can also increase their adverse impact.

The site is already served by an access point which is used by commercial vehicles. The site has direct access to the strategic road network (A5) and is in close proximity to the trunk road network and junction for the M6 Toll. The use of the existing estate access will minimise lorries on minor roads in the surrounding Green Belt. The site will be limited to left hand turn only which will prevent congestion on the A5.

**Specific locational requirement** - Represents a logical extension to Watling Street Business Park and will result in regeneration of existing units which will improve the employment supply and make the most of existing employment land.

**Biodiversity Net Gain** - There is potential to deliver enhancements to the biodiversity and strategic green infrastructure links to the Cannock Extension Canal SAC and enhance the habitat connectivity to Wyrley Common, the SBI fronting the A5 and the dismantled railway line which forms the district boundary and is identified in the open space assessment as a landscape link.

### **Mitigation**

The scale of the site also offers opportunity to optimise the layout of the site in terms of considering the proposed uses, access, layout of development and any landscaping and the impact on the wider Green Belt. The southern boundary of site S5 provides opportunity to consider sensitive boundary treatments such as enhancing the existing natural hedgerow and treeline with native planting to soften the impact of built development on the wider landscape.

### **Green Belt Assessment Part 1, LUC**

The area was assessed in the original Part 1 Green Belt study which assessed larger parcels of land against the 5 purposes of the Green Belt. The parcel was defined as W2 and

was a low-mid performing site in terms of its contribution to the Green Belt. The Watling Street Business Park has encroached into the Green Belt at its western edge. Two large buildings and a large car park sit within the Green Belt. The buildings associated with these developments compromise the openness of the Green Belt to the west of the Business Park. It notes the rest of the parcel is free from development with good views of the countryside within the rest of the parcel and the wider countryside to the north and west.

#### Green Belt Harm Assessment, LUC

The site forms part of OA14 which represents outer areas beyond the settlement edges. The boundary of the site is a much larger parcel and therefore the results are not necessarily applicable, but it is noted that outer areas area parcels in general are considered to have a strong distinction from inset settlements and are open.

## 9. Safeguarded Land

The NPPF specifies that when defining Green Belt boundaries, plans should

*'...c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*

*d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;...'*

Proposed Policy SO7.6 Amendments to the Green Belt proposes the following sites as land safeguarded in the Green Belt:

- Site Allocation S1-East of Wimblebury Road, Heath Hayes (southern site) 11.4 ha
- Site Allocation S2 -Land at Newlands Lane, Heath Hayes, Cannock (former golf driving range) 4.8ha
- Site Allocation S3-Land to the west of Hednesford Road, Norton Canes 7ha
- Site Allocation S4-Jubilee Field, Watling Street 5.08ha

The justification for safeguarding this land is provided in the supporting text to policy SO7.6 and in the following section.

The Local Plan has been prepared positively in considering the longer term needs beyond the plan period. No change is proposed to the current use of the Green Belt land in these locations through the current plan other than the new relief road planned for site allocation S1 at Wimblebury Road. If these sites were to be developed in future, the exceptional circumstances case for further Green Belt release would need to be met for any site that has been safeguarded.



## Site Allocation S1-East of Wimblebury Road, Heath Hayes (southern site) 11.4 ha



### Justification

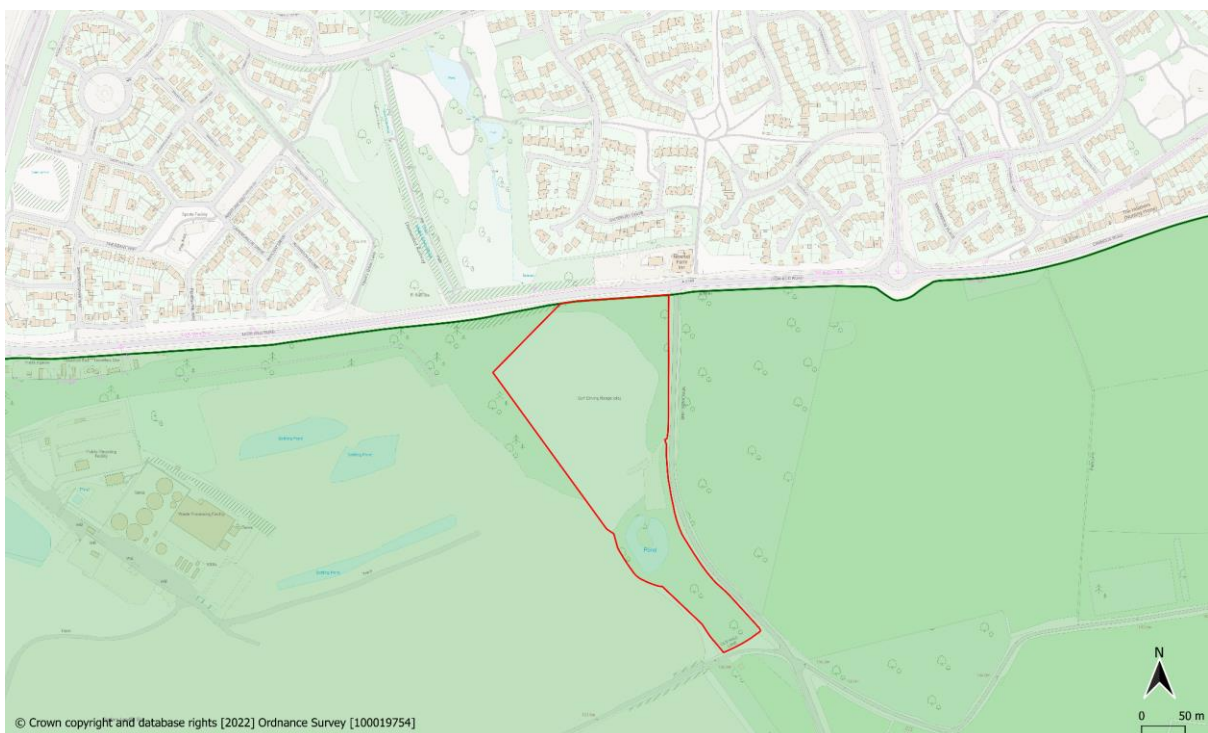
- Site Allocations S1-S3 are safeguarded to provide enhanced connectivity for active travel and biodiversity between Newlands Lane and Cannock Chase, including Fairlady Coppice, and across Hednesford road through to Wimblebury Road, Wimblebury mound and the former Bleak House open cast site and Chasewater and the Southern Staffordshire Coalfield Heaths SSSI.
- Site S1 has the potential to help with flood mitigation downstream in Norton Canes.
- Site S1 is already subject to a proposal for a new access road to serve site SH1 and SH2 and alleviate congestion on the Five Ways junction. As such, the site will already be subject to development which will likely alter the contribution of the site to the Green Belt. Safe access will be available to serve additional development.
- Site S1 can deliver compensatory mitigation by improving access to the adjacent woodland. It is linked to proposed allocation SH2 and therefore could offer the potential to promote active travel and deliver an enhanced recreational route connecting the existing Heath Hayes Park, the adjacent woodland and proposed country parkland in SH1 which will provide a local opportunity for accessing nature, helping to ease visitor pressure on more sensitive locations in Cannock Chase. The new link road promotes active travel through the site between Wimblebury Road and

open space to the south of Cannock Road and pedestrian links to PROW on Chasewater and the Southern Staffordshire Coalfield Heaths SSSI.

Potential to enhance habitat connectivity with the adjacent woodland, Chasewater and the Southern Staffordshire Coalfield Heaths SSSI.

- Site is of a sufficient size to accommodate any required infrastructure including a new primary school, if required.
- The site is located on the urban edge of Heath Hayes and is therefore in accordance with the Spatial Strategy of the Local Plan being one of the main priority areas for new residential development.
- The site is accessible to local services and facilities on Hednesford Road.

### **Site Allocation S2 -Land at Newlands Lane, Heath Hayes, Cannock (former golf driving range) 4.8ha**

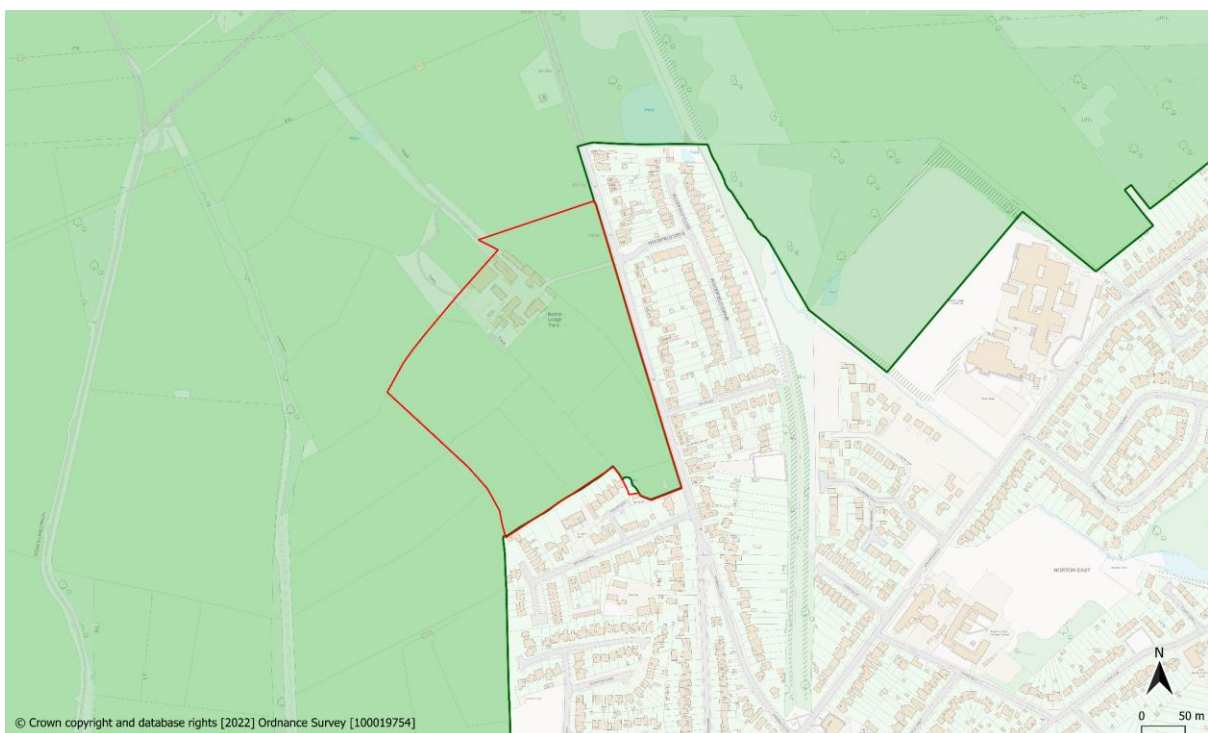


#### **Justification**

- Site Allocations S1-S3 are safeguarded to provide enhanced connectivity for active travel and biodiversity between Newlands Lane and Cannock Chase, including Fairlady Coppice, and across Hednesford road through to Wimblebury Road, Wimblebury mound and the former Bleak House open cast site and Chasewater and the Southern Staffordshire Coalfield Heaths SSSI.

- Site S2 has the potential in the long term to expand the green infrastructure to provide biodiversity links to the currently active landfill site on Lichfield Road as the areas which are reclaimed expand and the potential for future recreational access to the landfill site which should be investigated in subsequent reviews.
- The site is located on the urban edge of Heath Hayes and is therefore in accordance with the Spatial Strategy of the Local Plan being one of the main priority areas for new residential development.

### Site Allocation S3-Land to the west of Hednesford Road, Norton Canes 7ha



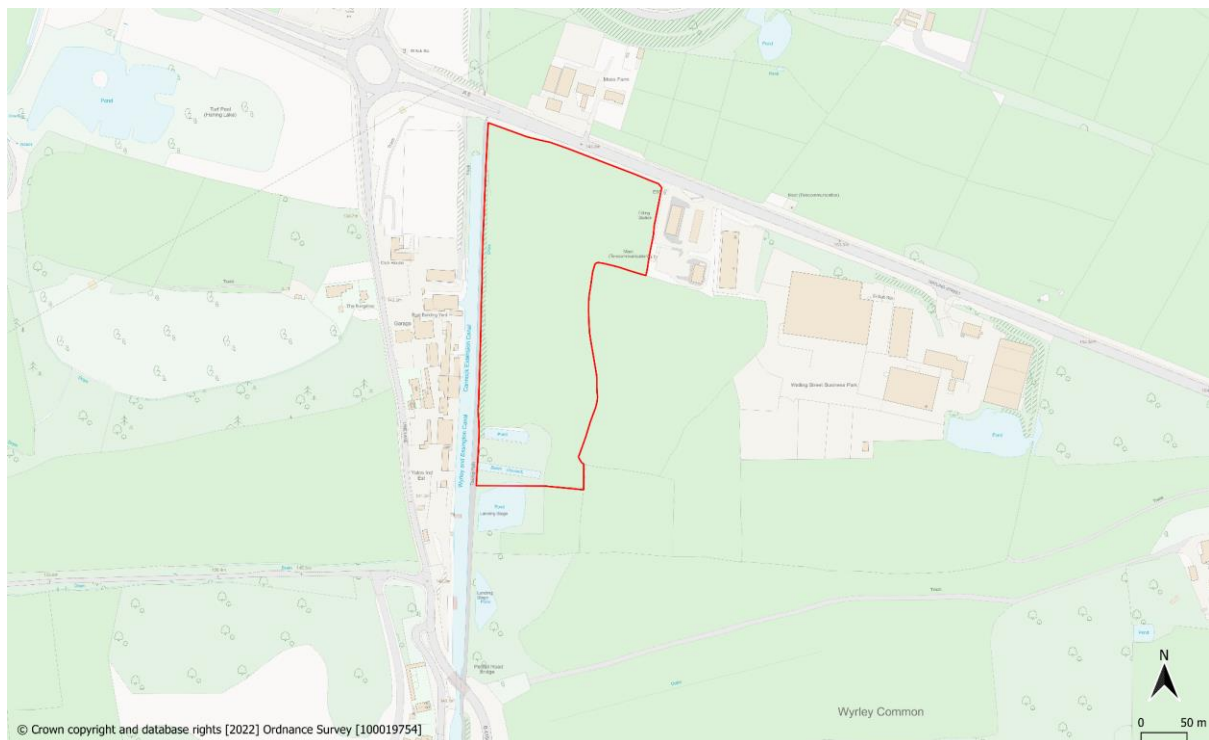
### Justification

- Site Allocations S1-S3 are safeguarded to provide enhanced connectivity for active travel and biodiversity between Newlands Lane and Cannock Chase, including Fairlady Coppice, and across Hednesford road through to Wimblebury Road, Wimblebury mound and the former Bleak House open cast site and Chasewater and the Southern Staffordshire Coalfield Heaths SSSI.
- Site is within close walking and cycling distance to local facilities on the edge of Norton Canes village and offers a sustainable location for development.
- The site boundary is adjacent to existing development to the east and south, and there is a pocket of built development on site at Norton Lodge Farm. New

development at this location would effectively round off the northern most extent of Norton Canes.

- The extent of land ownership provides opportunities for off site sustainable urban drainage and ecological and/or recreational enhancements to provide compensatory mitigation for the loss of Green Belt and biodiversity net gain.

### Site Allocation S4-Jubilee Field, Watling Street 5.08ha



### Justification

- Sites S4 combined with SE2 has the potential to deliver sustainable employment development, providing an extension to the Watling Street Business Park.
- The M6 Toll road, A5 and Watling Street Business Park affect the openness and amenity value of the Green Belt in this location.
- The site presents a logical extension to the business park providing up to 20,000m<sup>2</sup> employment floorspace with good access to the strategic road network.
- Sites S4 and SE2 have the potential to provide enhanced connectivity for recreation and walking and cycle routes along with a safe crossing between the area of the former Grove Colliery and Norton Canes village across the A5. There is potential to

deliver enhancements to the biodiversity and strategic green infrastructure links to the Cannock Extension Canal SAC and enhance the habitat connectivity to Wyrley Common, the SBI fronting the A5 and the dismantled railway line which forms the district boundary and is identified in the open space assessment as a landscape link.

## **10. Summary of proposed amendments to the Green Belt**

The site allocations total 54 ha and the safeguarded land totals 25 ha. This presents a combined total of 79 ha land proposed to be removed from the Green Belt through the Cannock Chase Local Plan (2018-2038). This equates to 1.6 % loss of Green Belt in the Cannock Chase District, representing a very small proportion of the Green Belt overall.

The maps overleaf shows the current Green Belt boundary and the second map shows the proposed amended boundary through the new Local Plan.

# Cannock Chase Council Green Belt

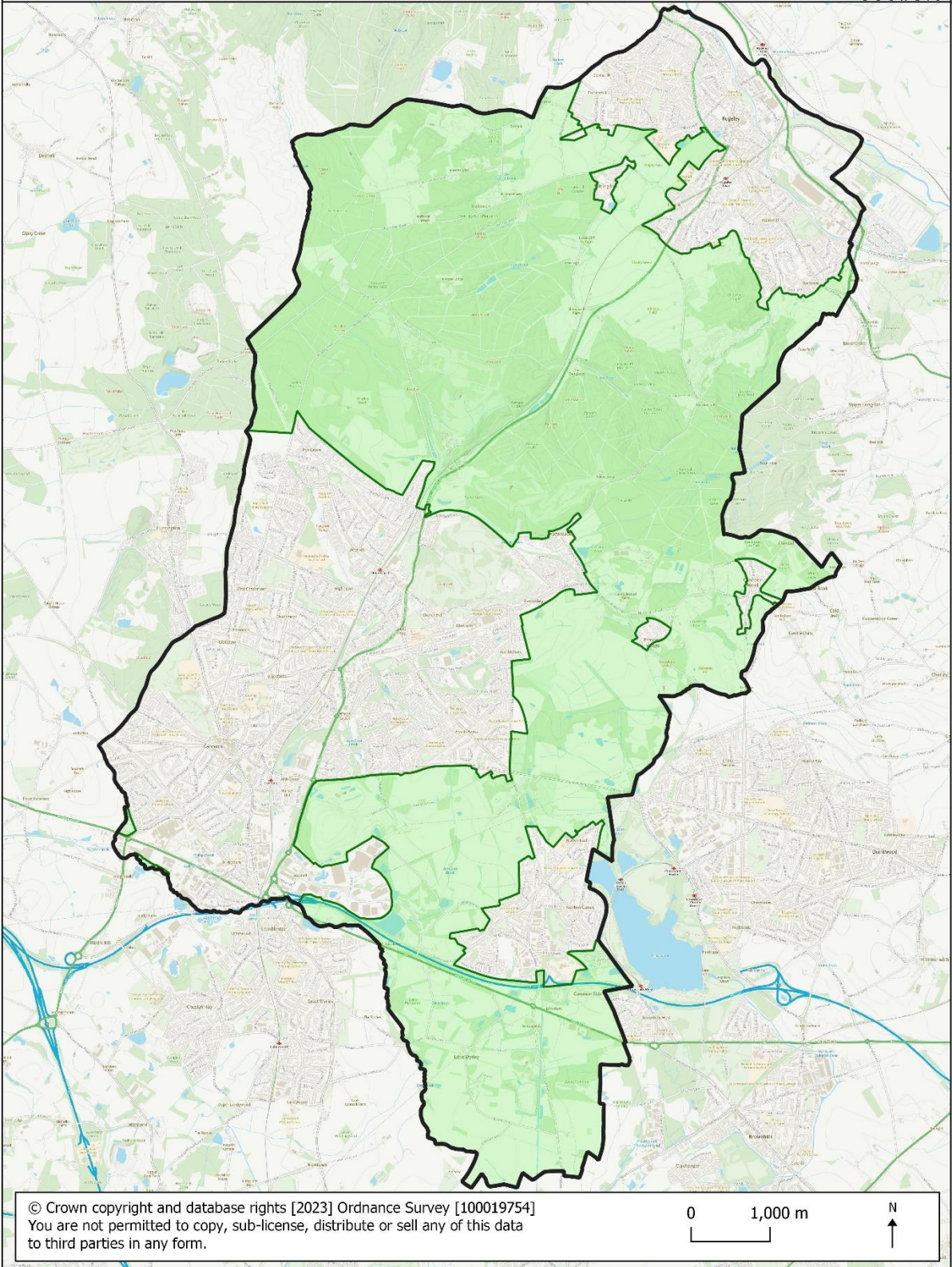


Figure 11 Map showing current Green Belt boundary

Cannock Chase Council  
Green Belt (Reg 19)

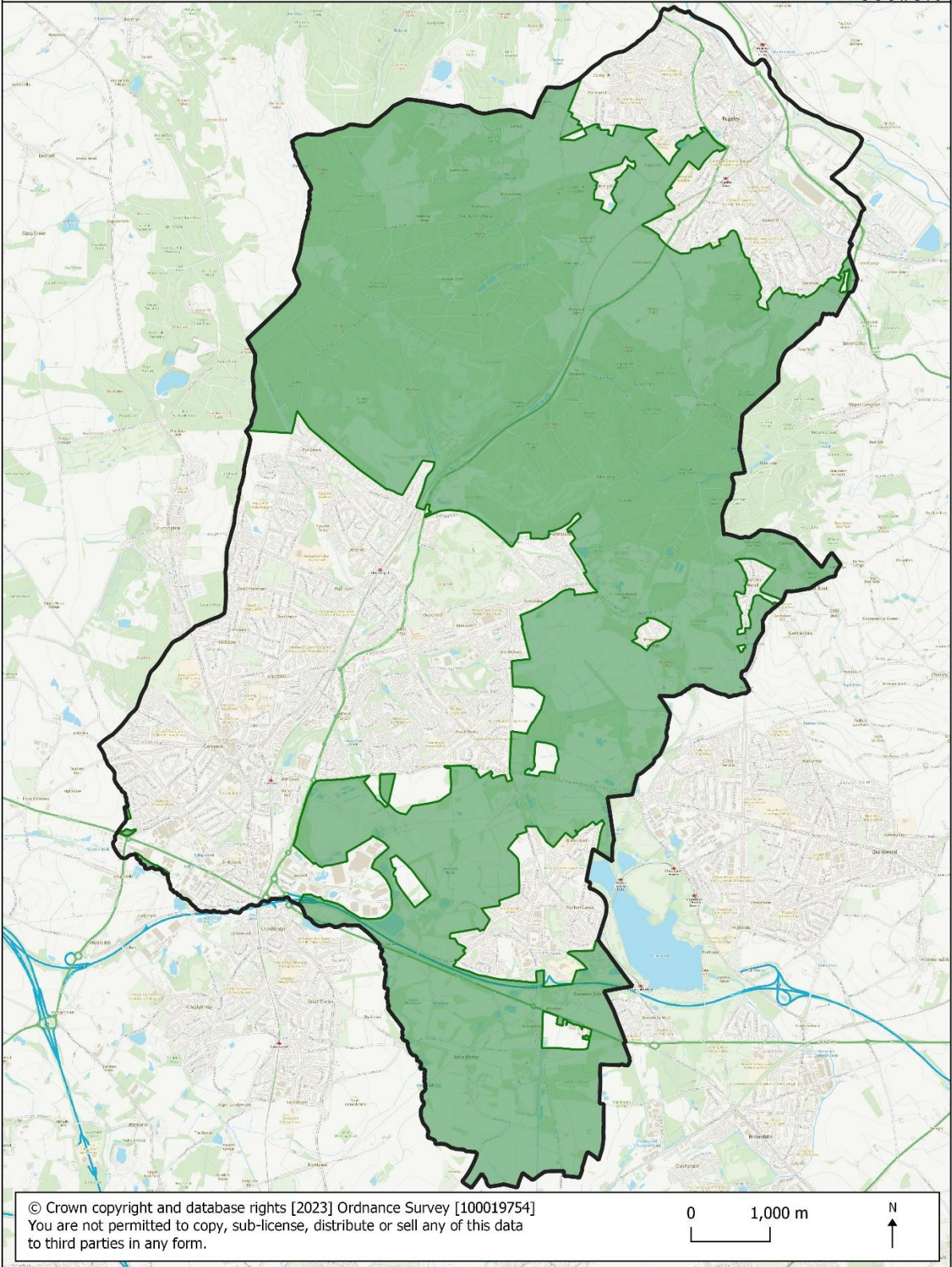


Figure 12 Map showing proposed amended Green Belt boundary

## **11. Conclusion**

The Cannock Chase Local Plan proposes removal of 79ha of land from the Green Belt to deliver housing and employment allocations which will meet development need between 2018-2040 as well as contributing towards the unmet housing needs of Greater Birmingham and the Black Country. Of the 79ha, 25ha of land will be safeguarded in case it is required to meet future development needs. In total this equates to a loss of 1.6% of the Green Belt in Cannock Chase District. The process for exhausting all reasonable options has been described, alongside links to further evidence produced which justifies the strategy.

The process of assessing sites in the Green Belt shows that consideration was given to the potential harm of removing sites and how the choice of sites supported the spatial strategy. The exceptional circumstance case for each site proposed to be removed from the Green Belt demonstrates why these sites are required and what compensatory mitigation will be provided. Safeguarded land has been identified in accordance with provisions in the NPPF which means that development needs in the longer term have been considered.

This Topic Paper demonstrates that the Local Plan approach to Green Belt release is justified and that the plan has been positively prepared in meeting development needs as well as the unmet need of Greater Birmingham and the Black Country.