

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form
Part B: Representation Form



Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**. We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Peter Leaver of Nurton Developments
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Q1. To which Main Modification (MM) does this representation relate?

MM:	37
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Q2. Do you consider the Main Modification is:

A. Legally compliant Yes: ☐ No: ☒

B. Sound Yes: ☐ No: ☒

(Please tick as appropriate).

Q3. Please give details of why you consider the Main Modification is or is not legally compliant or sound. Please be as precise as possible.

Your representation should relate only to the Proposed Main Modifications.

MM37 acts to clarify that the requirement of 74 ha, referred to in Policy SO4.2, is 'gross'. For ease of reference, this is cut and pasted below.

The Local Planning Authority will provide for up to 74 hectares (gross) of land for office manufacturing and distribution employment development during the period to 2040. This will provide for a range of sizes and types of employment to meet business needs and encourage inward investment, resilience and new investment and create a balanced portfolio of employment land. It will grow sectors which promote clean growth principles and renewable technologies.

However, this does not seem to be consistent with explanatory text provided in para 9.129. As proposed to be modified, this paragraph reads: -

6.130-6.129. The EDNA (2019-2024) recommends that a range of employment land of 46 to 69 ~~43~~ to 74 hectares (net) (65-94 ha gross) including flexibility and accounting for losses is made available during the period 2018-38-40 split between the following uses:

- 85% industrial/distribution and warehousing;
- 15% office Class E (g) (i)/(ii) office/ and D and Class E (g) (iii) light industrial.

Here it refers to the 74 ha as 'net'. The maximum 'gross' figure is given as 94 ha.

To be consistent, and to take account of future projected losses (as recommended explicitly by the EDNA), the figure in the policy for the requirement should be up to 94 ha and not up to 74 ha.

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If this is accepted, then it holds implications in respect of how the requirement is balanced by supply. The supply has four elements, as follows: -

- Completions (2018 to 2023) – 17.44 ha
- Allocations – 14.54 ha
- Site intensification – 15.91 ha
- West Midlands Interchange contribution – 10 ha

These total 72.18 ha.

This leaves a potential shortfall of up to 21.82 ha (i.e. 94 ha less 71.18 ha). How this shortfall is to be dealt is not commented upon by the draft Plan as proposed to be amended. It should be.

(Please continue on a separate sheet if necessary)

Q4. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of legal compliance or soundness matters you have identified at Q.3 above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. If you support the modification, please skip this question.

MM37 should refer to a provision for up to 94 hectares (gross) instead of 74 hectares (gross).

The plan should refer to how any shortfall between the requirement and supply will be met.

(Please continue on a separate sheet if necessary)

Q5. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification. Please comment in the box below.

None.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

Signature:

[Redacted Signature]

Date:

27.11.2025

For Office Use

Part B Reference