

# **CANNOCK CHASE LOCAL PLAN REVIEW**

## **LOCAL PLAN PREFERRED OPTIONS (FEBRUARY 2021)**

### **LAND SOUTH OF CANNOCK ROAD, HEATH HAYES**

#### **ON BEHALF OF RICHBOROUGH ESTATES**



**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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## 1.0 INTRODUCTION

- 1.1 These representations are made by Pegasus Group on behalf of Richborough Estates Limited to the Cannock Chase Local Plan Review, Regulation 18 Preferred Options Consultation (February 2021). This representation relates to land south of Cannock Road, Heath Hayes, which Richborough Estates is promoting for a residential led, mixed-use development (see Site Location Plan at **Appendix 1**).
- 1.2 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:
- a) **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.
  - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
  - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.3 The Cannock Chase Local Plan (Part 1) is currently the statutory development plan for Cannock Chase Council and forms the principal basis for which development is promoted and controlled. The Plan was adopted on 11<sup>th</sup> June 2014 and covers the period 2008 to 2028.
- 1.4 It was originally intended to follow the Local Plan (Part 1) with a Local Plan (Part 2), which would consider site allocations and development management policies. However, National Planning Policy dictates that Local Plans are reviewed every five

years, which means that the Local Plan (Part 1) would be due to be reviewed in 2019. As such, the Council considered that an update of some of the key Local Plan (Part 1) policies would be necessary. The Council therefore decided to cease work on Local Plan (Part 2) instead beginning work on a new Local Plan. It is anticipated that the new Local Plan will be adopted in 2023 and cover the period to 2038.

- 1.5 The Council consulted on the first stage of the new Local Plan in July / August 2018, and Richborough estates submitted representations to the Issues and Scope consultation accordingly. This was followed by the issue and options consultation in May – July 2019. Again, Richborough Estates submitted representations to the emerging Local Plan document including the Sustainability Appraisal.
- 1.6 Richborough Estates supported the proactive approach being taken by the District Council to ensure an up-to-date Plan is prepared and to ensure that growth is planned. However, concerns were raised in respect of the importance of the District in contributing not only meeting the unmet need arising from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) but also in supporting its own local economic growth ambitions as well as these of the two Local Enterprise Partnerships (LEPs) and those of the West Midlands Combined Authority (WMCA).
- 1.7 The representations also requested that the 2016 Green Belt Study was updated to support the new Local Plan (LP).

## 2.0 THE DISTRICT CONTEXT

- 2.1 Richborough Estates is generally supportive of the identified District Profile. The Profile reflects the requirement to utilise the National Planning Policy Framework (the Framework) and the Standard Method to calculate housing need within the district. This approach is supported rather than utilising the Cannock Chase Local Housing Needs Assessment (2018 – 2038). In addition, recognition of the shortfall in the Greater Birmingham and Black Country Housing Market Area (the GBBCHMA) and the need for Cannock Chase to contribute towards the meeting the shortfall is supported.
- 2.2 However, the Profile needs to incorporate the growth ambitions of the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and the Staffordshire and Stoke LEP. The Council is a member of both LEPs and they both show clear support for housing growth and delivery. Similarly, the Council's role as a non-constituent member of the West Midlands Combined Authority (WMCA) and the commitment of the WMCA to deliver homes at an accelerated rate should be recognised.
- 2.3 The District Profile identifies Cannock Chase District as having a greater employment rate than both the regional and national average. In order to respond to this factor, the District Profile should recognise that the Standard Method does not consider economic growth and, therefore, housing provision should be considered in excess of the Standard Method, which should be treated as a minimum in order to support growth within the district and to ensure a balance between jobs and homes provision. This will promote sustainable travel patterns as well as sustainable communities, having good access to both employment and housing.
- 2.4 In recognition of the Council's acknowledged role as a member of the Greater Birmingham and Solihull Local Enterprise Partnership LEP, the Staffordshire and Stoke LEP and also of the West Midlands Combined Authority (WMCA), all of which have considerable economic growth ambitions, as well as the local economic growth aspirations contained in the Council's own corporate plan, greater recognition should be given to the ability of the District to meet not only the unmet housing

need arising from the GBBCHMA but also in support of its own local growth agenda and those of the two LEPs and those of the WMCA.

- 2.5 The profile recognises the importance of the Green Belt in having a number of roles but particularly in maintaining the openness and the rural/urban fringe on the edge of the West Midlands conurbation. Richborough Estates acknowledges this but in recognition of the Preferred Options approach to release certain sites from the Green Belt, the District Profile should recognise that development in certain locations can have significant sustainability benefits which can provide the exceptional circumstances necessary to amend Green Belt boundaries.
- 2.6 Richborough Estates acknowledges that a new Green Belt Harm Assessment has been produced in conjunction with the emerging local plan. Comments on the Green Belt Harm Assessment are set out later in this document.
- 2.7 The profile identifies the principle urban areas within the district. These consist of Cannock/Hednesford/Heath Hayes, Rugeley/Brereton and Norton Canes. Richborough Estates supports the recognition of these principle urban areas however greater emphasis should be given to their role in delivering sustainable development in the context of them being the main centres of population and with the greatest range of facilities and transport opportunities.
- 2.8 In terms of the Wider Context and how the Local Plan fits into the broader more strategic framework, support is given to the Council recognising the Local Plan's role in delivering some key objectives from bodies such as the two LEPs, the WMCA and the GBBCHMA. This should also refer to the objectives of these organisations and in particular their growth aspirations.
- 2.9 At paragraph 4.10 the document refers to discussions with duty to corporate partners and the potential assistance to meet Cannock's housing need and ongoing dialogue in relation to the wider Housing Market Area short fall. Whilst support is given for the need to address the short fall in the wider Housing Market Area, concern is raised relative to the suggestion that the Council is seeking assistance to meet its own housing needs. There is no evidence to establish that the Council cannot meet its own housing requirements, as well as contributing towards meeting

the short fall in the wider Housing Market Area, and on this basis this element of paragraph 4.10 should be omitted as not being justified.

## 3.0 LOCAL PLAN POLICY OPTIONS

### **Strategic Objective 1: Delivering High Quality Development that is distinctive, attractive, and safe**

3.1 It is noted that the context for preparing the policies relating to Objective 1 has included taking on board the proposed revisions to the NPPF published in January 2021. This includes such considerations as:

- Referring to the term 'beautiful' in response to the Building Better; Building Beautiful Commission's Findings
- The role that neighbourhood planning groups can have in regard to design policies
- Preparation of design guides or codes which reflect local character and preferences
- Reference to giving communities a greater say in the design standards set for their area

3.2 Some caution should be exercised in preparing a local plan based on what are potential changes to the Framework and are subject to consultation, as these changes may not necessarily be taken through to be adopted as national policy. However, the Local Plan's approach in taking on board other changes including to the Town and Country Planning (Use Classes) Regulations 2020, which have been enacted, are supported as representing the current regulatory framework. Similarly, a recognition of the extension to permitted development rights as set out in the Preferred Options is supported.

3.3 The Spatial Strategy for the District has set out the number of bullet points over pages 25-29 of the Local Plan Preferred Option document. Whilst the general approach of the Spatial Strategy, in particular to focus development on the most



sustainable locations it should identify the settlements which are the most sustainable. These would consist of:

- Cannock Chase/Hednesford/Heath Hayes
- Rugeley and Brereton
- Norton Canes

3.4 The strategy for Cannock Chase/Hednesford/Heath Hayes should make reference to the proposed allocations south of Lichfield Road, Heath Hayes and the benefits that can accrue from a sustainable urban extension in this location.

3.5 The Spatial Strategy for Rugeley and Brereton should also make plain that it constitutes the second most sustainable location in the District and also identified that there is potential for Green Belt release to allow for sustainable housing development.

3.6 The approach for Norton Canes similarly identifies that there is potential for Green Belt release to deliver sustainable residential development.

3.7 In addition, the Spatial Strategy should not be left to supporting text within the broader document. It should be set out in its own strategic level policy identifying the three settlements which are the most sustainable and their overarching objectives relative to new development including the potential for Green Belt release to deliver sustainable development.

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

3.8 Richborough Estates are supportive of the general approach and that the Policy does refer to public benefits and the potential for mitigation to limit harm. However, the policy could be developed further to recognise that suitable sensitive

development can result in improvements to existing heritage assets.

- 3.9 Policy S01.2 relates to enhancing the quality of the built environment. It refers to the need to retain and enhance the distinct and separate character of each of the District's settlements. This approach has some inconsistency with the recognition in other parts of the local plan that Cannock/Hednesford/Heath Hayes have to an extent merged to become a single settlement and therefore a more homogeneous character. The policy should be refined further to make clear that different approaches to character may be required depending on the location within the District.

Question 2: Do you support the preferred policy direction to enhance the quality of the building environment?

- 3.10 In general terms and subject to the caveats set out above the approach taken in the local plan is supported.

Question 3: Should the preparation of local design codes be based on the character areas that were included in the Cannock Chase Design SPD?

- 3.11 The SPD identified twenty character areas, not all of which will be in locations where they'll be any significant development. An approach which targeted those parts of the district where development is likely to come forward would potentially be a better focus for resources.

- 3.12 Policy S01.3 deals with the need to deter and reduce a fear of crime.

- 3.13 Richborough Estates have no specific comment on Policy S01.3.

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

- 3.14 Richborough Estates support this approach.

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**Strategic Objective 2: To create community infrastructure and healthy living opportunities**

- 3.15 This objective deals with safeguarding existing community infrastructure and providing new community infrastructure, safeguarding the health and amenity of local communities, providing active leisure and sports facilities, providing healthy living opportunities and increasing physical activity and providing opportunities for allotments and local food growing.
- 3.16 Policy S02.1 deals with safeguarding community infrastructure. It also states that new development will contribute towards new community infrastructure to meet the needs arising from the development. It sets out criteria which the Council will use to determine whether existing community infrastructure can be lost. It also refers to new provision in the context of new development.

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

- 3.17 Richborough Estates considers this policy needs to be further refined to make a distinction between those portions of dealing with the loss of existing community facilities and those elements dealing with the provision of new community facilities associated with development proposals. The Policy needs to refer to major development contributing towards new community infrastructure where no current capacity exists and where directly and proportionally applied to the proposed development and in accordance with the CIL Regulations or their equivalent successors. However, it would also be appropriate, subject to the above tests, to give greater recognition to the opportunity to provide for new facilities in association with new housing developments. This can be illustrated through the Preferred Options identification of site SH1 in Heath Hayes as a potential housing site. This will deliver significant community facilities in the form of a new school, and country park all of which could be significant benefits to the existing community in Heath Hayes. The policy should give recognition in general terms to new housing development being able to deliver additional community facilities which can meet the needs not only of new residents but also of the existing community, meeting current gaps in infrastructure provision. In the case of a facility such as a country

park this could be meeting the needs of a substantial part of the district.

- 3.18 Policy S02.2 deals with safeguarding health and amenities. It requires that development provides satisfactory light, outlook and privacy, be accessible to all the community and demonstrate how the proposal will contribute to the Green Space Network and achieve the lowest carbon emissions.

Question 6: Do you support policy direction to the safeguard health immunity?

- 3.19 Whilst the general approach of the policy is supported certain elements either repeat what is set out in other policies (the requirements of Policy S08.2 which is separately objected to) or are too vague to be meaningful (reference to avoiding unacceptable on-site or off-site risk or harm). In addition, reference to achieving the lowest carbon emissions that can be achieved lacks any evidential basis or method of assessment. This should be deleted.

- 3.20 Subject to the revision set out above a general approach in supported.

- 3.21 Policy S02.3 deals with the provision of active leisure and support facilities. The policy seeks to improve sport and leisure facilities in the context of increased demand as a result of new development. It also seeks to promote walking and cycling and require links into the Green Space Network. The policy also sets out criteria to protect the existing facilities.

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

- 3.22 The reference to contribution to improvement to sports/leisure facilities being linked to where additional demand is created is welcomed. However, it also should reference capacity exists so as to be compliant with national policy. Finally, not all sites are likely to be directly linked to the Green Space Network so this element should be qualified.

- 3.23 Policy S02.4 deals with providing opportunities for healthy living and activity. The

policy seeks to integrate major development proposals into the existing walking and cycle network.

Question 8: Do you support the preferred policy direction to provide opportunities for healthy living and activity?

3.24 In general terms Richborough Estates support the approach, however some elements of the policy are unclear. One criterion refers to providing infrastructure that will enable sport and physical activity to take place inside and around buildings. It is unclear what this policy criteria is aimed at achieving, particularly the reference to 'around buildings'. This requires further clarification. As above the contention that all sites can link to the Green Space Network needs amendment. Sites in the Cannock Town Centre, for instance, are unlikely to link to the Green Space Network.

3.25 Policy S02.5 deals with allotments and community food growing. It provides general support for the provision of allotments and protects existing allotments and community food growing sites.

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

3.26 Richborough Estates supports the overall objective set out in the policy. Reference could be given to support being given for new developments which can deliver additional allotments/community food growing sites. In particular it is new housing development that is the potential delivery mechanism for new facilities of this type and this ought to be recognised in the policy.

### **Strategic Objective 3: Providing for Housing Choice**

3.27 Strategic Objective 3 seeks to deliver a sufficient supply of homes to provide for housing choice and ensure all people are able to live in a decent home which meets their needs. The objective identifies the following key items:

- Facilitating sustainable housing provision

- Delivering sufficient housing to meet the District's own need and an appropriate and sustainable contribution to the wider housing market area shortfall
- Helping meet local needs for affordable dwellings
- Providing housing choices for an ageing population
- Catering for the needs of different groups in the community.

3.28 The objective set out does not reflect the Government's overall objective for housing which is to significantly boost the supply of homes. This should be reflected in the overall wording of the Strategic Objective 3.

3.29 The document sets out the various scenarios for housing provision set out in the Issues and Options Consultation of 2019. There are four options ranging from not providing any contribution towards meeting unmet need across the wider housing market area to potentially contributing 2,500 dwellings. Richborough Estates had previously commented that the 2,500 dwelling contribution was the most appropriate, should be set as a minimum requirement and should also be boosted in conjunction with the economic growth ambitions of both the District Council and the LEPs of which it is a member. The consultation document acknowledged that the majority of respondents considered the higher levels of growth included in Option C (contribution towards 1,500 dwellings towards the shortfall) and Option D (a contribution of 2,500 dwellings towards the shortfall) were the options which received most support.

3.30 In terms of housing mix policy options, the 2019 Issues and Options Consultation proposed four options. This included continuing with the current policy approach of encouraging appropriate mix of housing sizes, types and tenures on a district wide basis or alternatives towards specific percentages of housing on sites. Richborough Estates make clear that Option A of continuing with the current policy approach was the most appropriate and that recognition should be given to the larger sites being able to provide a broader mix of accommodation.

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## Housing Supply (2018-2038)

3.31 The Council's approach is to utilise the standard method to calculate its minimum housing requirement which comprises of 275.8 dwellings per annum.

3.32 The Council then identified the breakdown of its outstanding housing supply as follows:

- The standard method provides a requirement of 5,516 dwellings over the period 2018-2038
- Between 2018-2020 1,124 dwellings have been completed therefore reducing the requirement to 4,392 dwellings<sup>1</sup>
- The SHLAA identifies a further 1,359 dwellings which with adjustments relative to the Council's five-year housing land supply position (including windfalls of 54 dwellings and non-implementation discount of 28 dwellings) would provide 1,385 dwellings. This reduces the requirement to 3,007 dwellings
- The SHLAA identifies further major and minor sites which could deliver a further 1,623 dwellings during the plan period. This reduces the requirement from 3,007 dwellings to 1,384 dwellings.

3.33 The supporting text within the Preferred Option document references the contributions which are proposed to be made by South Staffordshire District Council (4,500 dwellings) and Lichfield District Council (2,665 dwellings) towards the shortfall in the GBBCHMA. The supporting text also notes that the Association of Black Country Authorities (ABCA) are preparing a Joint Local Plan and have identified a shortfall of 29,260 dwellings between 2019-2038. Finally, the supporting text acknowledges that in order to contribute towards this shortfall in the wider housing market area both South Staffordshire District Council and

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<sup>1</sup> 1,124 dwellings equates to delivery of 562 dwellings per annum

Lichfield District Council will need to utilise Green Belt sites.

3.34 Policy S03.1 identifies that a minimum of 5,516 dwellings will be provided for within the Plan (276 dwellings per annum) with a further 500 dwellings to meet the unmet needs of neighbouring areas. It indicates new housing allocations are concentrated within the existing urban areas or within planned expansion to the urban areas in accessible and sustainable locations.

3.35 The Policy goes on to identify strategic housing allocations which comprise of:

- SH1 south of Lichfield Road, Cannock approx. 875 dwellings
- SH2 east of Wimblebury Road approx. 410 dwellings
- SH3 land to the rear of Longford House, Watling Street, Cannock approx. 40 dwellings
- SH4 land east of the Meadows, Armitage Lane, Brereton approx. 33 dwellings
- SH5 land to the west of Hednesford Road, Norton Canes approx. 175 dwellings

3.36 It is noted that allocation SH1 is comprised of several individual sites, including Land South of Cannock Road, as promoted by Richborough Estates. Given that there is no restriction preventing these sites coming forward at different times, is submitted that the Local Plan should be clear as to the respective obligations and infrastructure requirements of each individual site, to ensure that the impact of the allocation as a collective is fully mitigated. Indeed, to this end, each individual site should have its own allocation number and policy wording, some of which may be interlinked.



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

- 3.37 Richborough Estates support the general approach of Policy S03.1 in providing to meet the objectively assessed local needs for Cannock District and also contributing towards the unmet needs in neighbouring areas. However, utilisation of the standard method alone does not take account of the need to address the economic growth aspirations of both the Local Plan itself, the District Council and its membership of the two principal LEPs. The level of housing provision set out in Policy S03.1 should include an uplift to take account of these economic factors.
- 3.38 In addition, the level of contribution being made towards meeting the undersupply in the wider housing market area of 500 dwellings is considered inadequate in the context of neighbouring authorities, the sustainability of the District and in particular some of the settlements within it and the need to meet that unmet housing need as close as possible to where the need is being generated, i.e. the West Midlands conurbation. Cannock Chase District is located immediately adjacent to the conurbation, is relatively sustainable with good transport links into the conurbation and could meet a higher proportion of the unmet need in a manner which would be more sustainable than it being met in further distant locations.
- 3.39 There is limited evidence available to substantiate how the 500 dwelling contribution has been identified. As a comparison it is notable that for the period 2018-2020 the supporting text within the Local Plan Preferred Options identified that the District had completed 1,124 dwellings which equates to an annual delivery of 562 dwellings. This single year of completions exceeds the amount of contribution towards the unmet needs of the GBBCHMA. It is clear from both the comparison with the single year of completions and the contributions being made by others in similarly constrained Green Belt locations (South Staffordshire DC and Lichfield DC) that the contribution by Cannock Chase is not proportionate.
- 3.40 The supporting text of Policy S03.1 includes Table A (sites under construction), Table B (sites which already have planning permission, are already allocated or

have a resolution to grant planning permission for housing) and Table C (additional sites from the Development Capacity Study). With regards to Table C these all represent in effect windfall sites which the Council have already made an allowance for in their housing supply and as a consequence could result in double counting. Furthermore, the veracity of the Development Capacity Study is open to some debate when it includes numerous sites which are still in operation for alternative uses which may prohibit their potential redevelopment for housing, e.g. the Beecroft Road car park, Danilo Road car park or Park Road bus station. There is significant doubt that a large number of their sites will come forward in the LP period.

3.41 The policy also fails to identify any remedial measures that would result if housing did ever fall below targets and the Council were not able to establish a five-year supply. Policy S03.1 should deal with this issue based on the principles established in the Spatial Strategy however, the Spatial Strategy is not set out clearly within any of the Local Plan documents<sup>2</sup>. This would be necessary to provide a clear foundation to both the approach within the Local Plan itself and circumstances when housing delivery may be falling short of the requirement. Whilst the plan identifies the key and most sustainable settlements within the District this ought to be set out in a specific overarching policy. The settlements identified should be referred to and are:

- Cannock/Hednesford/Heath Hayes
- Rugeley/Breton
- Norton Canes

3.42 Lastly, it is not clear why the Council is utilising 2018 as a base-date for the Local Plan. Given that the Plan is not anticipated to be adopted until 2023, it will therefore already be five years into the plan period upon adoption. Indeed, if this date slipped further and the Plan was adopted past 2023 the Plan will have less than 15 years

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<sup>2</sup> See comments earlier in these representations

to run. Moving the plan-period forward to 2019-2039 would reduce this risk.

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

3.43 In accordance with the Duty to Cooperate, which still remains, the Council must do its utmost to assist in meeting unmet needs across the housing market area. For the reasons already set out above the identification of 500 additional dwellings is insufficient and disproportionate contribution towards meeting the unmet needs of the GBBCHMA. There is little evidence to substantiate why 500 dwellings is considered an appropriate contribution and in the absence of this and detailed evidence to substantial that any increase should result in significant harm, the figures should be increased to that set out in the initial Issues and Options document of 2,500 dwellings.

3.44 The Council should demonstrate how it has arrived at any figure through the preparation and maintenance of one or more Statements of Common Ground (SoCG) with neighbouring authorities identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters.

Question 12: The large strategic allocations at south of Lichfield Road and east of Wimblebury Road will need to address the congestion issues at Five Ways Island and will require a new primary school, are there any other infrastructural requirements they or any other strategic allocations should address?

3.45 As the principal promotor of the allocation south of Lichfield Road, Richborough Estates support its identification as a strategic allocation. In addition, the Richborough site already makes provision for both a primary school and this has been demonstrated in the promotional documentation already submitted to earlier versions of the Local Plan. In addition to these the site will also deliver a country park on land to the south of the main housing area. This will have significant benefits not just for the immediate locality of Heath Hayes but for large portions of the District. It would also have a role in reducing pressure from areas such as the Cannock Chase SAC. Finally, options are being considered for improvements at the Five Way Island which should assist in alleviating current levels of congestions.

Contributions can be sought in conjunction with any planning application made for the site.

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

- 3.46 As set out above the inclusion of land within Table C is queried. This includes numerous sites within the urban areas which are still fully operational and the likelihood of them becoming available for alternative housing development over the LP period is open to conjecture. As a result the overall provision of housing within the Plan, as it is reliant on Tables B and C, is questioned.

Question 14: In the next iteration of the Plan we will develop sites specific allocation policies. Are there any local infrastructural requirements for sites in Tables B and C should address?

- 3.47 Any infrastructural requirements should be proportionate and reasonable in the same way that infrastructure requirement for the larger strategic allocations must also be. They must also be subject to detailed viability appraisal.

### **Preferred Policy – Housing Choice**

- 3.48 The Local Plan Preferred Options identifies that the most favoured option relative to housing mix was to retain the flexible approach currently being utilised by the Council but was not overly prescriptive.

- 3.49 However, the Preferred Policy Direction as set out in the Preferred Options sets out a prescribed mix for market housing, affordable housing and affordable housing/home ownership (including those aspiring to home ownership). This runs counter to those responses made in the previous consultation exercise nor is evidence provided to substantiate that the previous approach resulted in housing which did not meet established needs.

- 3.50 In addition, the Preferred Policy Direction identified within Table D provides a

prescriptive framework for each of the separate housing tenures. For affordable housing (rented and shared ownership) it identifies 8% provision within four plus bedroom accommodation and 5% for affordable housing/home ownership, however for market housing it identifies that there is no requirement at all for dwellings of four or more bedrooms. The justification for this is in a single sentence set out in paragraph 6.207. This is not sufficient to provide the prescriptive breakdown in size relative to each tenure sector. In particular, there can be no circumstances whereby there is no demand at all for market housing of four or more bedrooms.

- 3.51 In addition, by only permitting new private housing in smaller dwellings will mean a significant proportion of the housing market (larger family homes) will not be met at all. This could have ramifications for the demographic make up of the District, resulting in a further increase in the proportion of the community who are, for instance elderly, as they require smaller housing and the policy focuses on providing these.

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

- 3.52 The proportion of affordable dwellings is identified at 20% with 80% of this for rent and 20% for intermediate housing or other routes to affordable home ownership. The Government have identified in the NPPF (para 64) that they are seeking to provide 10% of all new units across the board as available for affordable home ownership. The approach set out in the Preferred Policy Direction in the LP would not deliver this requirement. The Policy Direction identifies that 20% of the total would be affordable and of this one fifth would fall within the intermediate housing bracket which would include routes to affordable home ownership. Rather than delivering 10% of the total this would deliver only 2% falling within the intermediate bracket and even if this was given entirely over towards the Government's proposed requirement for affordable home ownership would not deliver 10%.
- 3.53 The Government's Changes to the Current Planning System (ended on 1st October 2020) and the Government's consultation on Draft Revisions to the NPPF (ended on 27th March 2021) also propose further changes to facilitate the delivery of First Homes. The Council's proposed affordable housing tenure mix should be amended to accord with national policy.

Question 16: Do you support to approach to encouraging homeworking?

- 3.54 The approach to homeworking seems to consist of a flexibility of 4% in regard to market housing size restrictions if superfast broadband connections are provided. This would allow 76% of the total market housing to be within the three-bedroomed sector rather than the 72% prescribed in Table D. As set out above the whole approach to prescribing the size of market housing is flawed and this minor amendment is unlikely to foster provision of superfast broadband.
- 3.55 Policy S03.3 sets out the Council's approach for delivering high quality housing. The Council's approach has been to target larger homes consistent with the Nationally Prescribed Space Standards and to require developers to provide for households with health problems or disabilities. The Council's justification derives from the Local Housing Needs Assessment that states that 60% of all new housing should be suitable for the needs of households with health problems or disabilities. The Council goes on to state that this could be through the provision of single level accommodation such as bungalows and ground floor flats or through the provision of dwellings which comply with Part M4(2) or Part M4(3) of the Building Regulations or can be easily adapted to meet these standards. The explanatory text goes on to indicate that the 60% provision of new housing to meet the needs of households with health problems or disabilities reflect future forecasts and deficiencies in the existing housing stock. It also supports the need for a target of 13% of all housing to meet M4(3) Category 3 requirements and a 47% of all housing to meet M4(2) Category 2 requirements.
- 3.56 The explanatory text also explains that the Nationally Described Space Standards will assist the Authority in attracting greater numbers of people to work from home which will assist the Council in achieving its zero carbon ambitions.
- 3.57 Richborough Estates supports the objective of delivering high quality design and resilience and providing adequate space to achieve good living standards. However, objection is raised to providing a minimum of 60% of new homes to be suitable for households with health problems or disabilities. The justification to the Policy refers to the SHMA and the need to remedy deficiencies in the existing housing stock. This suggests that households not suffering from health problems/disabilities will

need to utilise existing housing stock whilst 60% of new stock is designed for people who have health problems. The policy is also unclear as, whilst the policy text itself refers to 60% of the total number of units being suitable for households with health problems/disabilities, it is the supporting text which provides clarity of what this actually means and is defined as being 13% of all housing meeting M4(3) Category 3 housing and 47% meeting M4(2) Category 2 housing.

- 3.58 The Local Plan Preferred Options has made reference to the need for viability assessment to take place through the plan making process. However, no information is currently available which has assessed the potential impact of the requirement of Policy S03.3 on viability.

Question 17: Do you support the Preferred Policy Direction for delivering high quality housing?

- 3.59 Richborough Estates support the principle of delivering high quality housing however some of the approach set out in Policy S03.3 can have potentially significant implications. The requirements to meet with M4(2) Category 2 requirements and M4(3) Category requirements of the Building Regulations may have implications for the viability of some developments. This does not appear to have been assessed. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011-20150327). It is also worth noting that have a development made up of 60% bungalows and flats would very likely not deliver a high-quality scheme based on design best practice.

#### **Strategic Objective 4: Creating A Vibrant Local Economy and Workforce**

- 3.60 Strategic Objective 4 deals with the economy and employment land. It sets out a number of key issues but does not refer to the Local Plan making sufficient provision for employment development within the area. It also does not refer to the need to support economic growth nor does it refer to local industrial strategies. The objective should be reworded to provide a more positive context for economic growth within the District and development of employment land.

- 3.61 As part of the Issues and Options consultation the Council identified a number of potential options. Richborough Estates supported Option A which sought to consider utilising sites already identified for employment development within urban areas and exploring opportunities for further supply on urban sites, Option B1 using an employment led mixed use redevelopment of Rugeley Power Station and Option C1 focusing on the Green Belt around Kingswood Lakeside and other existing employment areas. In particular, representations made on behalf of Richborough Estates noted that the expansion of Kingswood Lakeside would provide further employment opportunities to future residents of a potential housing allocation on land south of Lichfield Road, Heath Hayes, encouraging sustainable travel between the two sites. Similarly, the representations noted that this approach for employment development would enable a balanced strategy for the District as Rugeley's economic growth needs would be assisted by the employment-led redevelopment of Rugeley Power Station.
- 3.62 It is also noted that the Cannock Chase Economic Prosperity Strategy sets out an ambitious vision for the District whereby it could be a leader in the West Midlands in championing clean growth principles. The supporting text also refers to an over reliance on manufacturing, skill and trades and elementary occupations in comparison to regional and national averages. Whilst it is acknowledged that there is little support to continue with a reliance on elementary occupations, it is not clear why skilled trades would fall into the same categorisation as a negative current circumstance. In addition, the supporting text also notes that the Association of Black Country Authorities (ABCA) have indicated that there is a potential shortfall of employment land within their administrative area and ask whether Cannock Chase could deliver employment land in excess of local needs.

Question 19 – Do you support the Preferred Policy Direction to safeguard existing provision for employment use?

- 3.63 Policy S04.1 seeks to safeguard existing employment areas for employment uses. It sets out a range of criteria which will be utilised when assessing whether an employment site could be lost to alternative uses. As drafted, it is unclear whether all of the seven criteria set out within Policy S04.1 have to be met to allow employment land to be used for alternative purposes. This needs to be addressed.



It is assumed that not all the criteria should be met, for instance Criterion 5, which states that there will be demonstrable benefits arising from the proposal including improvements to local residential and environmental amenity, could in its own right be a sufficient reason to allow the reuse of an employment site for other purposes.

- 3.64 In terms of new employment provision, the EDNA (2019) recommended that a range of employment land between 46-66 ha should be made available during the plan period. Policy S04.2 has developed this further to indicate that the Council will provide for up to 50 ha of employment land for new development during the LP period to 2038. The policy also identifies 27 ha of land across 12 sites which would be protected for employment purposes.

Question 20: Do you support the Preferred Policy Direction to provide land for new employment uses?

- 3.65 In view of the supporting context for economic growth in the District, including the Council's own economic strategy, it is unclear why when the evidence base identifies a need for employment land between 46-66 ha, the Council has sought to utilise only 50 ha within Policy S04.2. In addition, it is not clear why the policy is drafted to provide for "up to 50 ha" as this would be seemingly provide a ceiling on new employment development. This would be inconsistent with the policy context.
- 3.66 It is noted that Rugeley Power Station is included in employment site allocation E5 and this is supported. However, the approach has not identified land adjacent to the Lakeside employment area as a new employment location. This is a missed opportunity bearing in mind the success of the Lakeside development and its potential to support other growth aspirations in the Plan and allow complementary development to deliver sustainable development, particularly in the context of the new housing allocation on land south of Cannock Road, Heath Hayes.
- 3.67 Policy S04.3 deals with sustainable tourism and the rural economy. It sets out that support will be given to proposals in suitable locations within the rural areas of the District to support the rural economy and safeguard and enhance the character and openness of the rural area.

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Question 21: Do you support the Preferred Policy Direction to develop sustainable tourism and the rural economy?

- 3.68 In general terms support is given to the approach set out in the Policy S04.3 however clarity should be given within the Policy to make clear whether the appropriate and proportionate expansion of existing employment sites would be sufficient to outweigh other policy restrictions such as the Green Belt. As drafted the proposal would need to protect the Green Belt, which could run counter to the objective of allowing for the expansion of existing employment sites within the rural area. The policy should make clear which of these strands of policy takes precedent.
- 3.69 Policy S04.4 deals with live/work units. It states such development will be encouraged.

Question 22: Do you support the Preferred Policy Direction to support the development of live/work units?

- 3.70 No objection is raised to the approach but currently most dwellings can accommodate homeworking without the need for bespoke live/work units and therefore the benefits of the approach may be limited.

Question 23: Do you support the Preferred Policy Direction to provide for local employment and skills?

- 3.71 Policy S04.5 deals with the provision of local employment and skills. This states that major development, where over 54 full-time equivalent jobs would be created during the construction phase and/or by proposed occupiers, will be accompanied by an Employment and Skills Plan. It states the Employment and Skills Plans will be secured through a legal agreement. The explanatory text indicates that one of the objectives of the policy is to support the contribution to achieving net zero carbon development by reducing the need to travel for employment during the construction and occupancy stage of the development. It is unclear how the policy approach will secure this objective bearing in mind that if local people were

employed during the construction phase of the development, once the development was completed they would either have no further employment or would need to travel further afield to another construction site. As a result, the contribution of this approach to achieving a zero-carbon economy must be doubtful. Richborough Estates support the general principal of securing opportunities for local people during the construction phase of development but this needs to be realistic and practical bearing in mind most of those engaged in construction have to travel from construction site to construction site.

### **Strategic Objective 5: Supporting the Provision of Sustainable Transport and Communications Infrastructure**

- 3.72 Strategic Objective 5 deals with sustainable transport and communications infrastructure. It seeks to manage the need to travel by providing for major new development in locations that can provide access for all sections of the community. It also requires the clustering of the development of services and facilities in locations that can provide convenience access for all sections of the community.
- 3.73 Policy S05.1 deals with accessible development. Amongst other things the policy identifies that proposals should set out, as appropriate, how and when the development will contribute to the delivery of the reduction in reliance on the private car by locating a development where it can provide a full choice of sustainable travel options, co-locate shopping, education and leisure facilities in convenient "hubs", and layouts should provide the capacity for public transport access. The policy also refers to development which individually or cumulatively causes an unacceptable impact on the highway network, will not be supported.

#### Question 24: Do you support the Preferred Policy Direction for accessible development?

- 3.74 The test contained within the policy that developments which individually or cumulatively cause an unacceptable impact on the highway network is not consistent with the approach set out in the NPPF. The NPPF test is a severe impact and that is the test that should be used in the policy.

3.75 Policy S05.2 deals with communication technologies and states that all major development proposals will demonstrate how they will deliver digital connectivity. The policy refers to measures such as facilitating technologically advanced methods of communication, providing and future proofing infrastructure that is required to enable access to high quality and resilient digital connectivity and increasing the use of technology to established integrated journey planning and travel information.

Question 25: Do you support the Preferred Policy Direction to improve communications technologies?

3.76 Richborough Estates endorse the general approach but question whether this is an area where land use planning can assist in promoting the use of new and emerging technologies. Whilst new housing developments will incorporate fibre broadband connectivity, it is difficult to envisage how developers and housebuilders in particular will provide many of the aspects of Policy S05.2. In particular how the proposal will increase the use of technology to establish integrated journey planning is difficult to reconcile. Similarly, how development will facilitate technologically advanced methods of communication to allow remote working is also nebulous.

3.77 Policy S05.3 deals with low and zero carbon transport. It states all major development proposals will contribute to the reduction in the reliance of carbon intensive modes of transport by supporting the take up of ultra-low emission vehicles, hydrogen vehicles, developing electric vehicle charging networks, accelerating the uptake of low emission taxis and buses, investing in cycling and walking and moving freight from road to rail.

Question 26: Do you support the Preferred Policy Direction to deliver low and zero carbon transport?

3.78 Richborough Estates supports the objective to reduce reliance on carbon intensive modes of transport however again it is difficult to foresee how a Local Plan document and its implementation through the development management process will ultimately support the take up of ultra-low emission vehicles as described in the Policy. Similarly, other vehicles, such as hydrogen vehicles, have yet to be

demonstrated as viable and in particular it is not evident that hydrogen vehicles will be the most sustainable future replacement for carbon-based vehicles.

- 3.79 Other elements of the policy refer to supporting changes to the road network where they are related to the reduction in environmental impacts and the enhancement of public transport. Whilst such changes can be supported, they can result in other adverse impacts such as an increase in congestion and other associated negative air quality impacts. The policy needs review to address this potential conflict.
- 3.80 Policy S05.4 deals with maintaining and improving the transport system. It sets out various measures which will be promoted to achieve improvements in the existing transport network. One of the items detailed is enabling demand responsive transport services such as taxis to provide mobility at times and locations where timetabled public transports services are not sustainable.

Question 27: Do you support the Preferred Policy Direction to maintain and improve the transport system?

- 3.81 Generally Richborough Estates supports the approach set out in the policy however it should be noted that taxis already provide mobility in lieu of public transport services. That is the type of service that taxis provide.
- 3.82 Policy S05.6 refers to safeguarding recreational footpath and cycle routes. The policy protects those routes shown on the proposal map from development.

Question 29: Do you support the Preferred Policy Direction to safeguard the proposed routes of recreational footpath and cycle ways?

- 3.83 Richborough Estates generally support the approach taken to new footpath and cycle ways.
- 3.84 Policy S05.7 deals with parking provision. It states all major development proposals will make appropriate off-street parking in accordance with the relevant local design code and an assessment of the anticipated demand arising, scope for

encouraging alternative means of travel, provision that will be made for private and public transport charging points, impact that parking might have on road safety and residential amenity and provision of adequate and conveniently placed for parking for people who have a disability or restricted mobility.

Question 30: Do you support the Preferred Policy Direction for parking provision?

- 3.85 The approach in the Local Plan is not consistent within the NPPF in that, as proposed, the parking standards would not be contained within the Local Plan document and therefore would not be subject to examination. In addition, paragraphs 105 and 106 of the NPPF states that maximum parking standards should only be set where there is a clear justification that they are necessary for managing the road safety network. Evidence should be included that demonstrates that parking standards are necessary, and these should be included within the Local Plan to provide certainty to developers upfront. Any standards that are developed should be clear and not onerous.

### **Strategic Objective 6: Creating Attractive Town and Local Centres**

- 3.86 Strategic Objective 6 and the subsequent policies of S06.1, S06.2, S06.3, S06.4, S06.5, S06.6 and S06.7 relate to town centres.
- 3.87 Richborough Estates have no comment to make on the above policies or supporting text.

### **Strategic Objective 7: Protecting and Enhancing the Natural Environment**

- 3.88 Strategic Objective 7 deals with the protection and enhancement of the natural environment. It seeks to minimise impact on and provide net gains for biodiversity. The policy refers to highest degree of protection been given to the protected landscape of the Cannock Chase Area of Outstanding Natural Beauty and the Green Belt. In terms of this objective it is not clear how the Green Belt has been identified as having any "protected landscape" character. Green Belt designation is a policy tool rather than a recognition of landscape. The objective should be amended to

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remove reference to the Green Belt and its "protected landscape".

- 3.89 Policy S07.1 states development proposals will support the protection, conservation enhancement and restoration of designated biodiversity sites. It also indicates that development that results in the loss or harm to SAC, ancient woodland, ancient trees or veteran trees will need to demonstrate there are imperative reasons for overriding public interest.

Question 40: Do you support the Preferred Policy Direction to protect, conserve and enhance biodiversity and geodiversity?

- 3.90 Richborough Estates supports the general principles set out in Policy S07.1. However, there is a typographical error in defining "*imperative reasons **for** overriding public interest*" rather than what it is intended to say which is "*reasons **of** overriding public interest*". In addition, the approach of utilising "*imperative reasons of overriding public interest*" is inconsistent with the guidance in the NPPF. Para 172 of the NPPF sets out this test against conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty. It does not extend to veteran and ancient trees on sites located beyond these areas.
- 3.91 It is unreasonable to conclude that the removal of, for instance, a single veteran tree would potentially need to be supported by the same evidence as a requirement to maintain the nation's health, safety, education or environment or to be associated with the economic or social benefits on a nationally significant infrastructure project. This approach is disproportionate. The Local Plan should be amended accordingly.
- 3.92 Policy S07.2 deals with biodiversity net gain. It states that major development proposals will provide a net gain in biodiversity, the net gains in biodiversity will be designed to support the delivery of a district wide biodiversity network and the level of biodiversity net gain will be proportionate to the type, scale and impact of development.

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Question 41: Do you support the Preferred Policy Direction of net gains in biodiversity through development?

- 3.93 Richborough Estates supports the general principles set out in Policy S07.2, however the policy refers to the level of net gain being proportionate to the type, scale and impact of the development. This approach is unsatisfactory in being too vague to provide developers with certainty as to what their proposal must deliver in regard to biodiversity. In particular, how each of the specified criteria (type, scale and impact) will influence the level of biodiversity net gain is unclear. Should the proposal have a significant impact on road congestion would it need to deliver a significant improvement in biodiversity. The policy is unclear as drafted and needs to be limited to the biodiversity net gains associated with the proposal. As drafted a proposal which, within extent of a site delivered a biodiversity net gain would still have to contribute to other aspects of biodiversity which were off-site.
- 3.94 The Council's policy approach to biodiversity net gain should not deviate from the Government's proposals as set out in the Environment Bill.
- 3.95 Policy S07.3 deals with Special Areas of Conservation (SAC). It states development will not be permitted where it would lead directly or indirectly to an adverse impact upon a SAC and the effects cannot be mitigated. The policy goes on to indicate that to ensure that the Cannock Chase SAC is not harmed all development that results in a net increase in dwellings within a 15 km radius must take all necessary steps to avoid or mitigate any adverse effects upon the SAC's integrity.

Section 42: Do you support the Preferred Policy Direction for the Special Areas of Conservation?

- 3.96 In general terms, Richborough Estates support the general approach however recognition could be given within the policy to the mitigation measures which can be delivered through Local Plan proposals. This could include recognition of the country park associated with allocation of Land South of Lichfield Road, Heath Hayes (see Chapter 4 of this Representation). The development of country park in conjunction with the housing allocation would not only mitigate the impact of the allocation itself but also reduce impact on the Cannock Chase SAC from existing



residents. The benefits of such an approach should be recognised in the policy or supporting text.

- 3.97 Policy S07.4 deals with protecting and enhancing landscape character. It identifies that development proposals will protect, conserve and enhance landscape character by, amongst other things, protecting and conserving local distinctiveness, scenic qualities, rural openness and sense of place. It also refers to protecting, conserving and enhancing the Cannock Chase Area of Outstanding Natural Beauty and the Green Belt. The policy states all major development proposals must be supported by a landscape and visual assessment.

Question 43: Do you support the Preferred Policy Direction to protect, conserve and enhance landscape character?

- 3.98 In general terms Richborough Estates support the policy approach. However, a landscape and visual impact assessment cannot be justified for all major developments, especially located within an entirely urban context. As a result the policy needs amendment which only refers to development proposals which are likely to have an impact on landscape and visual character requiring the support of a landscape and visual assessment.

Question 44: Do you support the Preferred Policy Direction to protect, conserve and enhance the Cannock Chase Area of Outstanding Natural Beauty?

- 3.99 Richborough Estates have no comment to make on this policy area.

- 3.100 Policy S07.6 deals with protecting, conserving and enhancing the Green Belt.

- 3.101 It states that development will protect the character and openness of the Green Belt. It also states in association with the large strategic site allocations at south of Lichfield Road, Cannock, land indicated in the proposal map will be safeguarded to allow for the delivery of a country park.

Question 45: Do you support the Preferred Policy Direction for protecting,

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conserving the Green Belt?

3.102 Richborough Estates support the recognition of the country park associated with the site allocation of land south of Lichfield Road, Cannock. The policy should make clear that the country park will deliver significant benefits which will mitigate the impact resulting from the loss of Green Belt via the housing allocation.

**Amendments to the Green Belt**

3.103 Policy S07.7 identifies amendments to the Green Belt proposed in the Local Plan. These are identified as in the following locations:

- South of Lichfield Road, Cannock
- East of Wimblebury Road
- Land to the rear of Longford House, Watling Street, Cannock
- Land east of the Meadows and land north of Armitage Lane, Brereton
- Land to the north of No. 2 Hednesford Road, Norton Canes
- Site between A5 and M6 Toll, Norton Canes
- Turf Field, Watling Street

3.104 The policy goes on to indicate that the further changes to the Green Belt boundary, if required, would be made through a formal review of Local Plan policies or through a neighbourhood plan. In all cases appropriate mitigation would be made to compensate for the loss of Green Belt land. This would include new or enhanced green infrastructure, woodland planting, landscape and visual enhancements, improvements to biodiversity, a new and enhanced walking and cycle routes and improved access to new or enhanced existing recreational and playing field

provision.

3.105 The supporting text states the Green Belt performs many functions including strengthening local distinctiveness, enhancing access to the natural open space and opportunities to protect and enhance the SAC. It recognises the policy context in the NPPF which indicates that in the exceptional circumstances where Green Belts can be amended, the impact of doing so can be offset through compensatory improvements to remaining Green Belt land.

Question 46: Do you support the Preferred Policy Direction to amendments to the Green Belt?

3.106 Richborough Estates supports the amendment to the Green Belt proposed south of Lichfield Road/Cannock Road, Heath Hayes, Cannock. This amendment will deliver a significant and sustainable new residential development which is necessary to meet local housing need and also contribute towards the wider shortfall within the housing market area. In addition, it will also provide significant benefits through the delivery of a country park, so delivering the compensatory Green Belt enhancement set out in the policy and the NPPF.

3.107 The policy does indicate that further amendments to the Green Belt could be required in the future and this would be achieved through another review of the Local Plan or through a neighbourhood plan. The NPPF establishes that Green Belt boundaries should only be altered in exceptional circumstances and that wherever a need for change to Green Belt boundaries has been established through strategic policies, detailed amendment to those boundaries may be made through non-strategic policies including neighbourhood plans.

3.108 Reference has been made in these representations that there may be need for additional Green Belt boundary revision to accommodate the levels of growth commensurate with the District's position in the housing market area and to meet enhanced levels of housing provision associated with additional growth in employment, should the aspirational strategies set out by the LEPs and the District Council's own employment strategy be fulfilled. On this basis Policy S07.7 should include a strategic component to demonstrate that in certain key locations

associated with the most sustainable settlements Green Belt, boundaries can be amended to allow for additional growth.

3.109 In addition, further consideration should be given to the Council's economic and employment objectives and whether further Green Belt release should be required to facilitate these aspirations. This could include land associated with the Lakeside employment area.

3.110 Policy S07.8 seeks to protect, conserve and enhance the Green Space Network. The policy indicates that sites which form part of the Green Space Network will receive the highest degree of protection from development. Criteria are set out which would protect the areas from inappropriate development and the policy also indicates that development of new homes should contribute to the delivery of provision for sports, physical activity and leisure. The policy sets out that development proposals will, in accordance with the relevant local design code, set out how opportunities for healthy living and active travel will be created and enhanced by linking to or adding to the Green Space Network.

Question 47: Do you support the Preferred Policy Direction to the Green Space Network?

3.111 Richborough Estates largely supports the strategy to provide for open space within the District however elements of the policy are not consistent with national policy and could hinder development opportunities. In particular, the policy suggests as a principle that new homes should contribute to the delivery of sports, physical activity and leisure. This blanket requirement is not supported in national policy where development proposals should only contribute towards improvements to green infrastructure and other sports related facilities if there is a lack of capacity to adequately cater for the demand resulting from the proposed development. The policy requires amendment to make clear that such contributions would only be necessary where justified and will be proportionate and reasonable in all respects. In addition, there may be occasions when development proposals are in locations some distance from the nearest part of the Green Space Network. In such

circumstances contributions towards enhancements of a facility which would be a significant distance away from the development site, may be deemed to lack the direct relationship with the development proposed and therefore would fail the requirements of the CIL Regulations.

3.112 Finally, the suggestion that new homes should contribute towards the delivery of sports, physical activity and leisure does not directly relate to the Green Space Network, as these elements could be indoor facilities. This requirement should be amended to make clear what contributions have been sought and the necessary caveats to them.

3.113 Strategic Objective 8 sets out the Council's approach to deliver a green future and in particular to increase the production of low and zero carbon energy and heat, promote sustainable building design and offset/mitigate any carbon emissions. It also identifies the need to reduce flood risk, avoid air, water, soil, noise and light pollution and make most efficient use of previously developed land.

3.114 The supporting text notes that many respondents indicated that standards for energy efficiency should be left to the Building Regulations.

3.115 Policy S08.1 deals with low and zero carbon energy and heat production. It states such proposals will be supported where it can be demonstrated that the impacts from the construction, operation and decommissioning of solar and windfarms can be mitigated, the impacts of the development proposals on designated landscapes, heritage assets and the natural environment and on local amenity have been assessed and shown to be acceptable. The policy goes on to indicate development proposals to install LZC energy and heat production into build infrastructure will be supported where it can be demonstrated that the installation promotes good design and in accordance with the relevant local design code, the installation has been designed to allow adaptability to new LZC technologies that may emerge, the installation is informed as a result of consultation with the communities and there are appropriate plans in place to remove the installation at the end of its lifetime.

Question 48: Do you support the Preferred Policy Direction to lower carbon energy and heat production?

3.116 Richborough Estates have no objection to the policy approach, but it should be noted that whilst the supporting texts refers to the County Council's proposal to adopt a presumption in favour of low and zero carbon technologies, the policy introduces a number of tests which would potentially inhibit the delivery of such renewable energy facilities.

3.117 Policy S08.2 deals with achieving net zero carbon development. It states all development proposals should strive to achieve the highest level of building performance standards for energy use and achieve the lowest carbon emissions that can practically and viably be achieved. It states all major developments will deliver in priority order:

- Zero carbon emission development
- Low carbon emission development with on-site mitigation to achieve net zero carbon emissions
- Low carbon emission development with off-site mitigation to achieve net zero carbon emissions
- Low carbon emission development with compensatory emissions to an appropriate carbon offsetting fund to achieve net zero carbon emissions.

3.118 The policy also states all major developments proposals will include evidence in a sustainability statement that the development has achieved the lowest carbon emissions that could practicably and viably be achieved.

Question 49: Do you support the Preferred Policy Direction to achieve net zero carbon development?

3.119 The policy as drafted seeks to achieve zero carbon emissions in all major developments. This goes beyond any requirement set out in the NPPF or any other relevant policy guidance. There is no evidence that this approach has been subject to any form of viability appraisal and it could be a significant overwhelming burden

to the delivery of the development aspirations also set out in the plan. There is limited, if any, evidential basis that the circumstances in Cannock Chase District require all new development to be carbon zero. On this basis the policy is objected to and should be deleted.

3.120 Policy S08.3 deals with sustainable design. It sets out that the new design will meet the requirements of Policy S08.2 in achieving net zero carbon development. It also states proposals should maximise opportunities for on-site production and use of low and zero carbon energy and heat, incorporate or link to low and zero carbon energy and heat systems, take account of changes in the weather as a result of climate change, protect and improve existing woodlands and habitats, provide a contribution to the creation of urban forests, woodlands and street trees, conform to the relevant local design code and make efficient use of previously developed land. Proposals should utilise materials with a low environmental impact, provide electric vehicle recharging infrastructure, meet or exceed standards set out by the Home Quality Mark and all non-residential development should meet or exceed BREEAM excellent rating.

Question 50: Do you support the Preferred Policy Direction to secure sustainable design development?

3.121 The policy goes beyond any national or other relevant policy objective and is not supported by evidence. Reference to all development meeting the requirements of Policy S08.2 is objected to. There is no evidence that the policy has been subject to any form of viability assessment to establish what impact it would have on potential development. As drafted the policy requires contributions which may not be justified such as providing contributions to the creation of urban forests, woodlands and street trees when a development may be providing elements on site.

3.122 It includes reference to making efficient use of previously developed land when not all sites will involve in previously developed land. As drafted the policy is unjustified, not supported by national or local policy and not supported by any evidence base.

3.123 Policy S08.4 deals with managing flood risk. It states that the Local Planning Authority will direct development away from areas of highest risk of flooding. All major development proposals will incorporate sustainable water management measures to reduce water use and increase its reuse, minimise water runoff and ensure that it does not increase flood risks or impact on water quality elsewhere. The proposal should reduce the risk of flooding and maximise flood protection by incorporating various features. All major development proposals on sites which fall within Flood Zones 2 or 3 will need to be supported by a comprehensive and deliverable strategy to minimise flood risk, provide flood resilient measures, provide sufficient space for drainage and flood alleviation and promote the safety of people in consultation with the emergency planning services.

Question 51: Do you support the Preferred Policy Direction to managing flood risk and water quality?

3.124 Richborough Estates have no further comment to make on this issue.

3.125 Policy S08.5 deals with avoiding air, water, soil, noise and light pollution.

3.126 The proposal sets out all major development proposals and will set out how any air, water, soil, noise and light pollution that may arise from the development will be avoided. It states the impact on air quality and on air quality management areas should be assessed and where it is not possible to avoid adverse impacts proposals must mitigate any impact through measures contained within Air Quality Action Plans, transport plans and through green infrastructure provision. Water quality should be protected and development will not be permitted without confirmation that the existing or improved sewage and wastewater treatment facilities can accommodate the new development. Sewer resources should be protected and safeguarded. Public lighting and signing should be designed and maintained in a way that will limit the impact of light pollution on local amenity, nature conservation and intrinsically dark landscapes and skies. The noise environment should be maintained and improved through good design.

3.127 Question 52: Do you support the Preferred Policy Direction to avoid air, water, soil, noise and light pollution?



3.128 The policy approach refers to development proposals which will cause unacceptable on-site or off-site risk or harm to human health or the natural environment, not being permitted. This requirement is difficult to establish. Any proposal can have some impact on the natural environment and the scale of this impact should be assessed rather than a blanket requirement that states any unacceptable impact will result in a refusal. Provision of water and waste water facilities is subject to a separate legal framework and there is no need for the policy to refer to improved sewage and waste water treatment facilities.

3.129 Policy S08.6 deals with brownfield and despoiled land. It states that development proposals, where appropriate and in line with the provisions of the local design code, will prioritise the use of suitable brownfield land for homes and other uses and make efficient use of underutilised land and buildings particularly within designated settlement boundaries.

Question 53: Do you support the Preferred Policy Direction to brownfield and despoiled land and underutilised buildings?

3.130 Richborough Estates supports the use of brownfield land however the policy should be amended to make clear that it relates to developments of such sites and should not be applied against greenfield sites, whereby contributions could be sought to deliver improvements to other PDL sites. As drafted the policy could potentially be applied to any proposal rather than specifically applied to proposals involving the reuse of previously developed land.

3.131 The remaining portion of the Preferred Options document relates to minerals and waste and Richborough Estates have no comment to make on this issue.

## 4.0 LAND SOUTH OF CANNOCK ROAD, HEATH HAYES

- 4.1 Richborough Estates is promoting land south of Cannock Road, Heath Hayes (see Site Location Plan at **Appendix 1**), as a residential led scheme with the potential to deliver a new primary school. In addition, land to the south of Newlands Lane is identified as a new Country Park. Richborough Estates supports that the site identified as a draft allocation in the Preferred Options consultation document and supports the release of the site from the Green Belt to the south of Cannock Road to allow for delivery of the site.
- 4.2 The site being proposed for allocation is split into two parts. The first part of the site, approximately 32.45 hectares in size, is being proposed for a residential-led scheme. It lies to the south of Cannock Road, Heath Hayes, and is bounded by Newlands Lane to the south, and existing woodland areas to the east and west.
- 4.3 The second part of the site lies to the south of Newlands Lane and is being proposed as a country park to be delivered alongside the residential development. This comprises approximately 14.81 hectares.
- 4.4 The site currently comprises pastoral farmland with some areas used for seasonal crop production. It is not considered to represent best or most versatile agricultural land, however further detail can be provided if required. The land is interspersed with connecting native hedgerows and bounded by mixed species woodland blocks.
- 4.5 The landform of the site gently falls from north to south with a topographical range of approximately 171 AOD to 159 AOD (Above Ordnance Datum i.e. height relative to the average sea level).
- 4.6 The site boundaries and immediate surroundings comprise:
- To the north, the site adjoins the existing residential edge associated with Cannock Road (A5150), including the Severn Trent compound to the north-east

- To the east – the boundary is well defined by a mixed woodland block, a Public Right of Way and the north – south route of Newlands Brook
- To the south – the site adjoins the vegetated Newlands Lane which has been closed to traffic
- To the west – the boundary is formed by a mixed woodland block with Newlands Lane beyond

### **Promotional Document**

4.7 The Promotional Document attached at **Appendix 2** sets out the following detail of the site:

- Planning Policy context including demonstration of the Exceptional Circumstances required to release the site from the Green Belt
- Sustainability credentials of the site
- Local facilities, amenities and services
- Access and sustainable transport
- Heritage and Archaeology
- Landscape and Visual
- Ecology
- Air quality
- Odour

- Indicative masterplan and design principles

### **Deliverability**

4.8 The site is a suitable area for housing as there are no physical, technical or environmental constraints preventing its development. The Framework requires Local Planning Authorities to maintain delivery of housing land to meet their housing targets. To be considered deliverable, a site should be:

- Available. A site is considered available when there is confidence that there are no legal or ownership problems.
- Suitable. A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities; and
- Achievable. A site is considered achievable for development where there is a reasonable prospect that housing will be delivered on the site within five years, and in particular, development of the site is viable.

### **Availability**

4.9 Richborough Estates have a legal agreement in place with the landowners and are in a position to progress with the promotion of the site for residential led development.

4.10 If the site is to be successfully allocated for development and removed from the Green Belt, Richborough Estates would seek to develop the site immediately, which would contribute considerably to the District's housing supply. By way of a recent example, Richborough promoted two Green Belt allocations through the South Staffordshire Site Allocations Plan and both were granted outline permission shortly after that plan was adopted and the sites removed from the Green Belt.

4.11 With its extensive highway frontage there is the ability to have at least two housebuilder outlets running at the same time, thus increasing the delivery of plots and at the same time increasing housing choice for purchasers.

### **Suitability**

4.12 The site is suitable for residential development for the following reasons:

- It offers a suitable location for development and can be brought forward immediately following an allocation;
- It would form a natural extension to the established area of Heath Hayes;

### **Achievability**

4.13 The site has been fully assessed in terms of its environmental considerations and it has been demonstrated that the delivery of the site is achievable and deliverable, and a team of technical consultants has been appointed to support the delivery of this site moving forward. Where technical constraints are identified, Richborough Estates will provide appropriate mitigation and invest in the site to ensure delivery.

4.14 Richborough Estates has reviewed the economic viability of the proposals in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Cannock. These considerations have been analysed alongside cost factors associated with the site, including site preparation costs and site constraints. Richborough Estates can therefore confirm that the site is economically viable and therefore achievable.

### **Key Benefits**

4.15 Development of the site will contribute to building a strong, responsive and competitive economy, as well as providing social and environmental benefits. In particular, the delivery of new homes at the site will bring the following benefits:

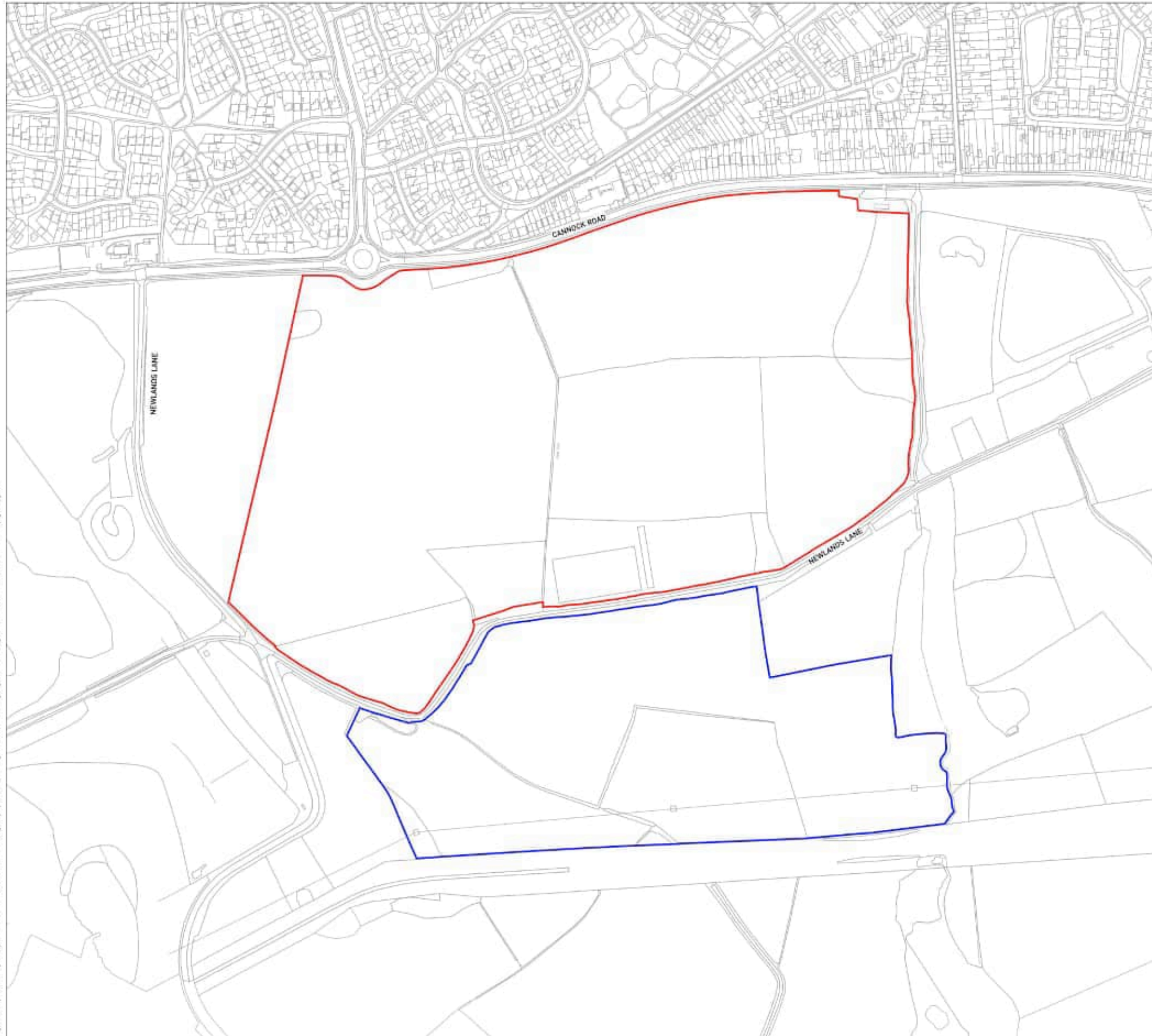
- Much needed affordable housing.
- Introducing new housing choice.
- New school.
- Additional spend in the local economy.
- Direct construction jobs and indirect related construction jobs.
- New recreation opportunity via the Country Park opening up private land for public use by existing and new residents, as an alternative to using Cannock Chase.
- Biodiversity net gain.

## 5.0 CONCLUSION

- 5.1 Richborough Estates is supportive of the Local Plan Preferred Options document in the main, subject to a number of amendments and clarifications set out within this Representation.
- 5.2 Richborough Estates is also supportive of the allocation of land south of Cannock Road, Heath Hayes for residential-led development. The site is sustainably located adjacent to the existing urban area of Cannock/Hednesford/Heath Hayes which is identified as the main focus for development within the adopted Local Plan Part 1. This site is available and deliverable, as identified through the submission of the Promotional Document at Appendix 2 to this Representation.
- 5.3 Exceptional circumstances exist to justify the release of appropriate and sustainable sites located within the Green Belt. These circumstances include the significant un-met housing need arising from both within Cannock Chase District and the GBHMA, combined with the fact that around 60% of the District lies within the West Midlands Green Belt and around 30% lies within the Cannock Chase Area of Outstanding Natural Beauty. Furthermore, it has been recognised through the recent examination of a number of Local Plans that Green Belt release should not be avoided at the overall detriment to sustainability, resulting in an a less sustainable distribution of development as required by the overarching vision for the Local Plan, as well as the NPPF.
- 5.4 Richborough Estates welcomes the opportunity to continue to comment upon the Local Plan Review. If the Council requires any further information in respect of the site to assist in the accurate assessment of the site, this can be provided upon request.

# APPENDIX 1





**KEY**

- SITE LOCATION  
32.448 HECTARES  
80.178 ACRES
- ADJACENT LAND WITHIN APPLICANTS CONTROL  
14.813 HECTARES  
36.603 ACRES



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# LAND OFF CANNOCK ROAD, HEATH HAYES, CANNOCK - SITE LOCATION PLAN





LAND SOUTH OF CANNOCK ROAD  
**HEATH HAYES**

P R O M O T I O N A L   D O C U M E N T

Prepared by Pegasus Group on behalf of Richborough Estates

APRIL 2021 | P17-0407\_03A



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INTRODUCTION & DOCUMENT PURPOSE		PLANNING POLICY CONTEXT		SITE AND SURROUNDINGS OVERVIEW		ENVIRONMENTAL CONSIDERATIONS OVERVIEW		VISION		INDICATIVE MASTERPLAN & DESIGN PRINCIPLES		DELIVERABILITY & CONCLUSIONS	

THIS DOCUMENT IS DESIGNED TO BE VIEWED AS A3 DOUBLE SIDED



# 1

## INTRODUCTION AND DOCUMENT PURPOSE

### INTRODUCTION

1.1 The land south of Cannock Road, Heath Hayes, represents a logical and appropriate extension to the existing urban area of Cannock and Heath Hayes. The site is sustainable and well located for a residential – led scheme, with the potential to deliver community facilities including a new primary school. In addition, land to the south of Newlands Lane is identified as a new Country Park.

### RICHBOROUGH ESTATES

- 1.2 Richborough Estates is a responsible and specialist strategic land promotion business founded with the aim of working in partnership with landowners. Our projects are located throughout the country ranging from residential schemes of around 50 dwellings to large urban extensions, including sites located within the Green Belt.
- 1.3 Richborough Estates oversees the entire planning process from start to finish and works closely with local communities, Planning Officers and key stakeholders to create the most mutually beneficial schemes. Richborough is seeking to apply this approach to the proposed development which is the subject of this Promotional Document.
- 1.4 Richborough Estates has an interest in the land at Cannock Road. The extent of land controlled by Richborough is shown on the Location Plan on Pages 6 of this document.

### DOCUMENT PURPOSE

- 1.5 Cannock Chase District Council is currently consulting on a Local Plan Review Preferred Options document. It is clear from this document that not all of the development required will be able to be accommodated without some Green Belt release, particularly given that the District sits within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) for which there is a significant housing shortfall.
- 1.6 This Promotional Document demonstrates that the site to the south of Cannock Road in Heath Hayes will form a logical and sustainable extension to the Cannock and Heath Hayes urban area and that exceptional circumstances exist to justify its removal from the Green Belt.
- 1.7 It presents an analysis of the site and its surroundings and sets out in detail the case for the removal of the site from the Green Belt. This includes a review of the current and emerging planning policy position and an assessment of the site against the five purposes of the Green Belt contained in the National Planning Policy Framework ('The Framework'). This is followed by a commentary on the sustainability merits of the site.
- 1.8 This document also sets out the Vision for the site, informed by a consideration of the constraints and opportunities and an Indicative Masterplan demonstrating how the Vision can be achieved through a well designed scheme. The document concludes with a concise summary of the site, the proposed development and its key benefits.
- 1.9 Overall, this Promotional Document presents a strategic and sustainable site that is suitable for allocation for a residential-led development in the new Local Plan.





## INTRODUCTION

2.1 There is an exceptionally strong case to support amendments to the Green Belt boundary in Cannock Chase district and for releasing the site for residential development supported by the appropriate social, physical and environmental infrastructure.

## SUMMARY OF PLANNING POLICY AND GUIDANCE

### NATIONAL PLANNING POLICY

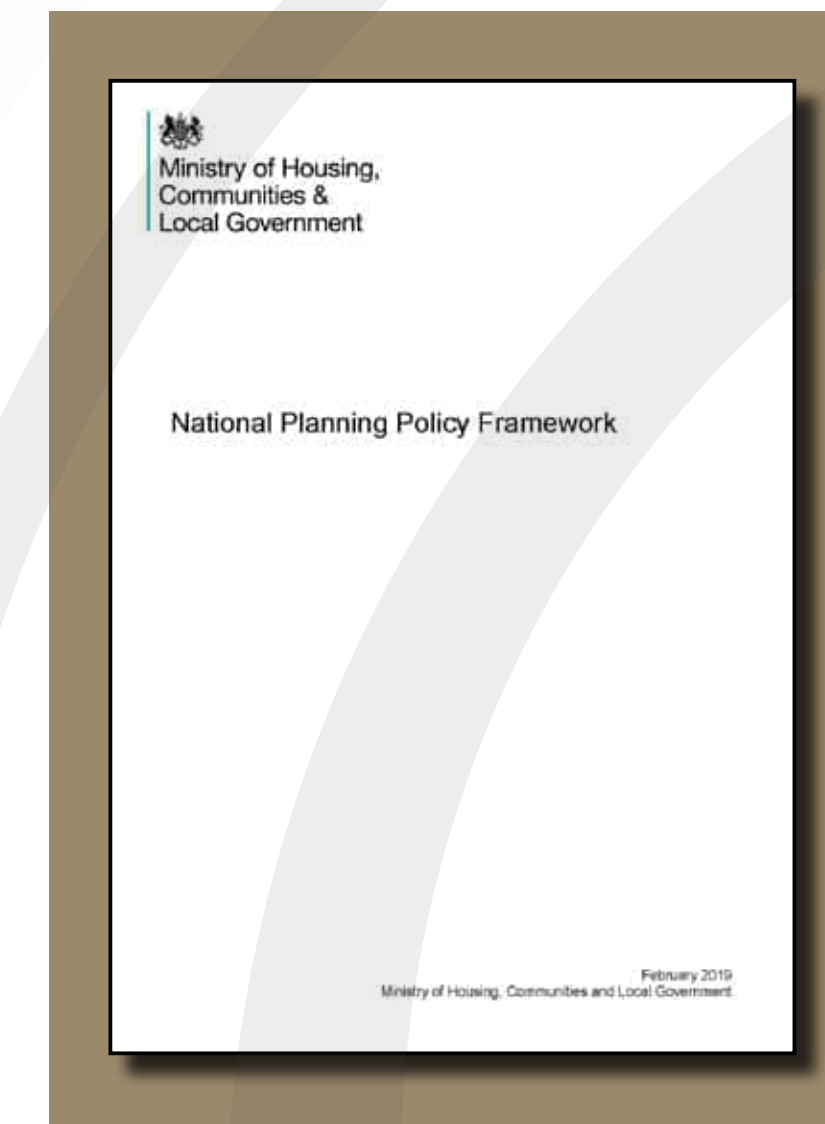
2.2 In February 2019, the Government published a revised National Planning Policy Framework ('Framework'). Central to the Framework is a presumption in favour of sustainable development which runs through both plan making and decision taking (paragraph 11). The Framework also seeks to boost the supply of housing and requires local authorities to plan positively for objectively assessed needs and maintain a sufficient supply of housing land.

2.3 Paragraph 136 of the Framework states that once the general extent of the Green Belt has been approved it can only be altered in 'exceptional circumstances' through the plan-making process. It states that 'strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period'. There are exceptional circumstances which justify alteration to the Green Belt boundary in Cannock Chase district and this site offers an opportunity to release Green Belt in a sensitive and sustainable manner without harming its purposes and functions as set out in paragraph 134 of the Framework. This is covered in more detail later in this chapter.

2.4 Sustainability will be a key consideration in justifying the release of the site from the Green Belt. Paragraph 8 of the Framework states that sustainable development has three overarching objectives: economic, social and environmental. The proposed development accords with these objectives, contributing to building a strong, responsive and competitive economy, supporting strong, vibrant and healthy communities and by continuing to protect and enhance the natural, built and historic environment.

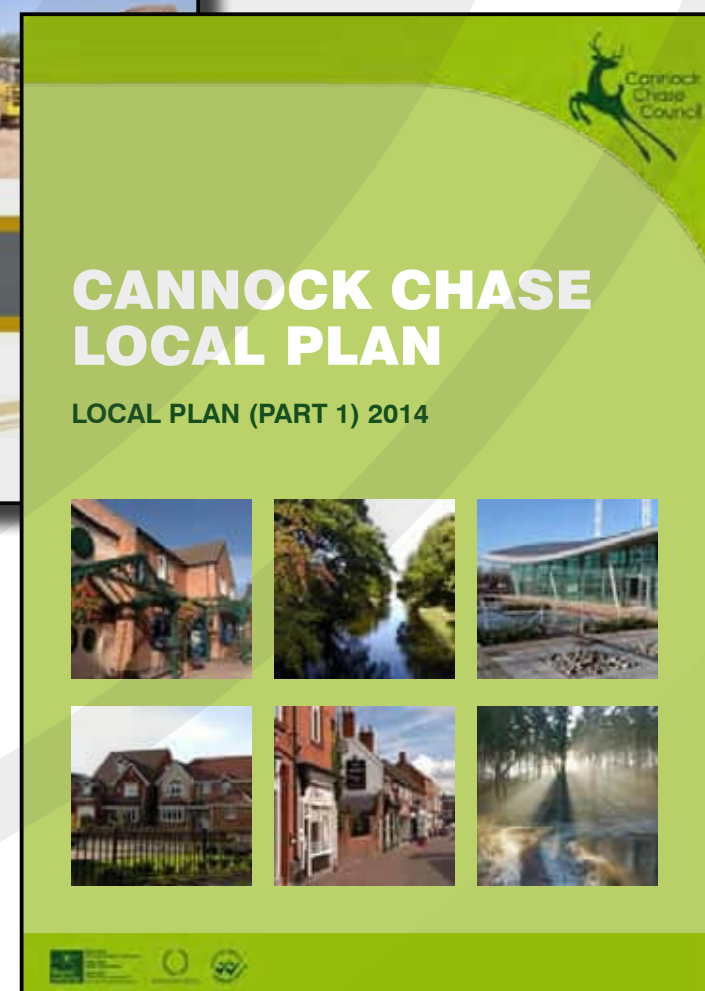
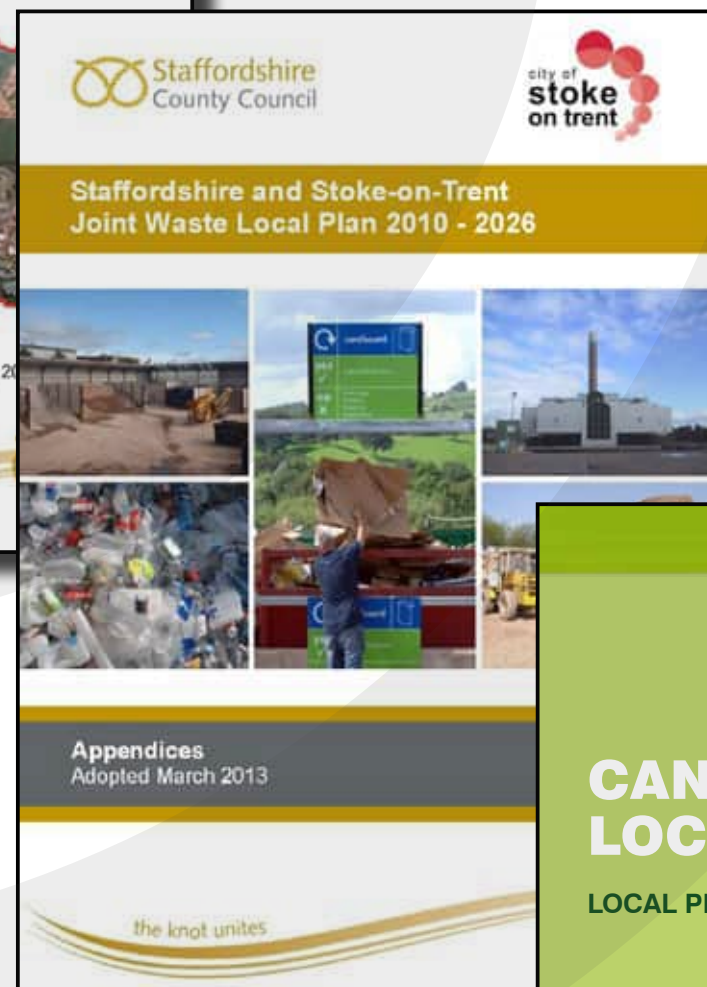
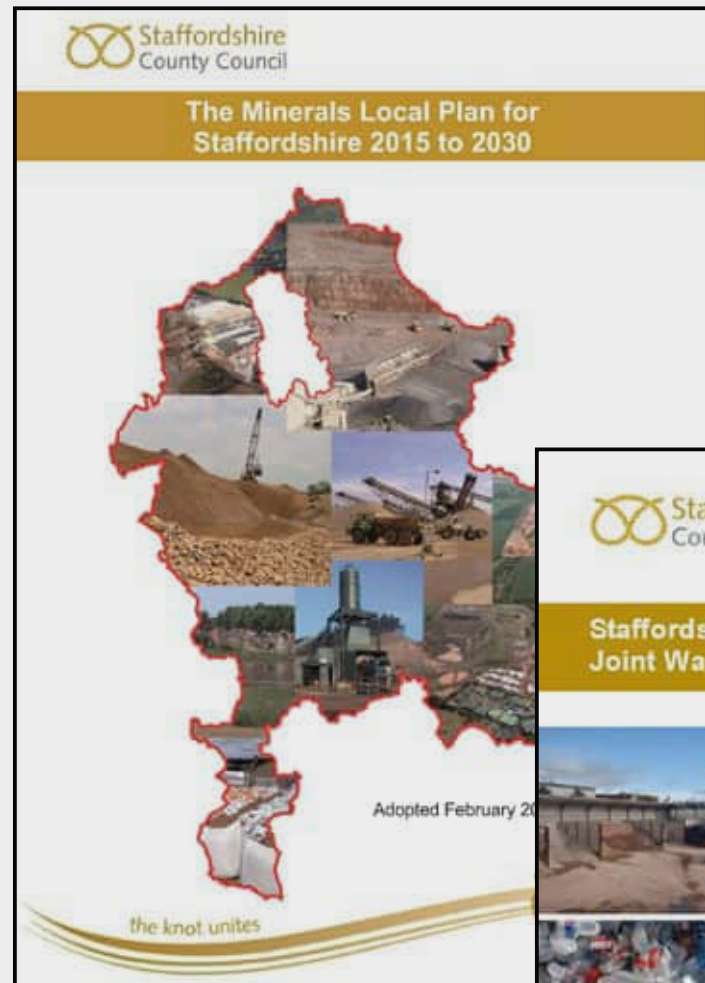
2.5 Chapter 5 of the Framework sets out how local authorities should significantly boost the supply of homes, emphasising the importance of ensuring a sufficient amount and variety of land, (paragraph 59) with consideration of site supply and mix taking into account their availability, suitability and likely economic viability (paragraph 67).

2.6 In defining 'sufficient supply', Paragraph 60 of the Framework clearly states that the Standard Methodology set out in national planning guidance provides the minimum figure, and that in addition to this figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. This is a crucial issue for Cannock Chase district as it sits within the Greater Birmingham and Black Country Housing Market Area, for which there is a significant housing shortfall. Much of this arises from Birmingham where the adopted Local Plan demonstrates its reliance upon other Local Authorities to help deliver its need under the statutory Duty to Co-operate. It is therefore clear that the district will need to take further growth over and above the minimum shown by the standard method.



2.7 Chapter 8 of the Framework promotes healthy and safe communities. The site provides an excellent opportunity for a well planned residential-led development designed to promote social interaction, which is safe and accessible and which supports healthy lifestyles. The delivery of a country park to the south of the proposed residential areas, in addition to maximising the benefits from the existing and proposed additional woodland areas, provides real opportunity for sport and recreation. The site as a whole would provide a range of safe and attractive cycling and walking routes both within the development and linking to the existing communities, facilities and employment opportunities beyond. This accords with Chapter 9 of the Framework, which promotes sustainable travel. The site also offers opportunities for the provision of a primary school if needed, and potentially other community facilities.

2.8 Making effective use of land is the aim of Chapter 11 of the Framework. It is clear that the district cannot accommodate all of its development needs without using some Green Belt, and it is therefore vital that selected sites are highly sustainable and can offer wider benefits including habitat creation or improved public access to the countryside. This site offers major opportunities for increasing biodiversity (which also accords with Chapter 15 of the Framework) and for increased public access, especially by the creation of the country park to the south. It offers significant potential for high quality design (as set out in Chapter 12 of the Framework), delivering a range of densities, having regard to the many benefits of its setting.



### DEVELOPMENT PLAN

- 2.9 The current Development Plan comprises:
- Cannock Chase Local Plan 2006-2028 (Part 1) (adopted June 2014)
  - Staffordshire and Stoke-on-Trent Joint Waste Local Plan 2010-2036 (adopted March 2013)
  - Minerals Local Plan for Staffordshire 2015-2030 (adopted February 2017)
- 2.10 The Council adopted the Cannock Chase Local Plan (Part 1) in 2014. This was due to be followed by a Part 2 plan which would focus upon site allocations, but work on this ceased in February 2018 to enable a review of the Local Plan as a whole to proceed.
- 2.11 The interactive policies map identifies the following designations of relevance to the site:
- Green Belt
  - Neighbourhood area (Norton Canes, designated 10th January 2018 and in the early stages of preparation by the community)
  - Site of Biological Interest (to the eastern edge of the proposed country park)
  - Proposed Recreational Footpath and Cycle Route to the south of the proposed country park, linking Norton Canes to the east with Norton Lane and Kingswood Lakeside employment site to the west.
- 2.12 The Minerals Local Plan Policy 3 designates extensive parts of the district for minerals safeguarding and states that evidence is needed prior to determination of the planning application to demonstrate existence, quantity, quality and value of the resource, showing how the benefits of the development would outweigh the benefits of the underlying mineral.
- 2.13 Policy 2.3 of the Staffordshire and Stoke-on-Trent Joint Waste Local Plan shows the site to be located adjacent to a broad location (covering most of the built up area of Cannock, Hednesford and Heath Hayes) for supporting a network of sustainable waste management facilities.

### EMERGING LOCAL PLAN

- 2.14 To respond to changes in Government policy and the changed local context in terms of the shortfall in the GBBCHMA the District Council is progressing a Local Plan review; a key aim of which is to ensure that it can maintain a good supply of deliverable sites until at least 2036. This process began with an initial Issues and Scope consultation undertaken in summer 2018, followed by an Issues and Options Consultation in May 2019. The current stage of consultation identifies the District Council's 'Preferred Options' for growth, which presents a number of detailed policies as well as site allocations. The Preferred Options consultation document sets out eight strategic objectives which reflect the National Planning Policy Framework. These set the context within which the policies will be formulated and are:
1. To deliver high quality development that is distinctive, attractive and safe;
  2. To create community infrastructure and healthy living opportunities;
  3. To deliver a sufficient supply of homes to provide for housing choice and ensure all people are able to live in a decent home;
  4. To encourage a vibrant local economy and workforce;
  5. To support the provision of sustainable transport and communications infrastructure;
  6. To create attractive Town and Local Centres;
  7. To protect and enhance the natural environment;
  8. To support a greener future.

- 2.15 The proposed development will help to deliver a sound and balanced spatial strategy which fulfils all objectives, but in particular will address objectives 1, 2, 3, 5, 7 and 8. It will provide a wide range of housing options delivered as an attractive, safe and well designed development with significant open spaces and opportunities for walking, cycling, sport and recreation and increased biodiversity. The significant levels of green infrastructure and opportunities for active and sustainable travel will be able to mitigate for impacts upon the nearby Air Quality Management Area at Five Ways junction, should mitigation be required.
- 2.16 The standard methodology figure for minimum housing need is currently 276 per annum which is a significant increase on the requirement of the adopted local plan figure of 241 per annum. The standard method calculation as set out in national planning practice guidance includes an uplift for market signals and affordability. It does not, however, include any additional calculation to meet neighbouring housing needs or any economic aspirations for further growth that the district may have.
- 2.17 In addition to consideration of how the housing need might be accommodated as set by the standard method, the Preferred Options consultation document shows a commitment to helping to deliver 500 dwellings of the significant housing shortfall in the wider GBBCHMA of which it forms part.

- 2.18 The HMA comprises fourteen local authorities across the West Midlands: Birmingham, Bromsgrove, Cannock Chase, Dudley, Lichfield, North Warwickshire, Redditch, Sandwell, Solihull, South Staffordshire, Stratford on Avon, Tamworth, Walsall and Wolverhampton. These authorities have collectively published a Strategic Growth Study as part of their respective Local Plan evidence bases. The study identified a cumulative total shortfall of around 60,000 homes across the HMA up to 2036. The study presents options for accommodating the shortfall and clearly concludes that Green Belt release will be needed. The study proposes a series of potential solutions and areas of search for the individual local authorities to explore further through their own local plans.
- 2.19 For Cannock Chase District the study recommends it accommodates growth via 'proportionate dispersal', i.e. small urban extensions of 500 – 2,500 dwellings, and it includes the vicinity of Cannock as a preferred area of search. This site clearly falls within this definition and provides an ideal opportunity to deliver the recommendations of the evidence base in a location which is geographically well placed to serve the needs of the HMA. It is clear that the district will not be able to accommodate the growth needed as part of a balanced spatial strategy without Green Belt release, and that the most sustainable options will be prioritised. Sustainability is considered in more detail later in this section.



### THE CASE FOR GREEN BELT RELEASE

2.20 Paragraph 137 of the Framework sets out an approach for determining whether exceptional circumstances exist for the release of Green Belt. It requires that the local authority makes as much use as possible of suitable brownfield sites and underutilised land, and that development density is optimised across the plan as a whole. The Issues and Options document (May 2019) made clear in its options for meeting overall housing growth that urban sites (even taking into account the use of some open spaces, changing the use of some existing employment sites, and increasing densities) would not be likely to meet even the minimum levels of growth needed.

2.21 The Framework also requires that any determination of exceptional circumstances needs to have been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development. This has already been done through the joint working and production of the Strategic Growth Study across the HMA. Local Plans need to be taking this evidence forward collectively to avoid an endless cycle of development being pushed from one local authority area into another as a result of disaggregated discussions on a sub-HMA level, which would potentially result in fragmentation of the HMA partnership and consequential failure to deliver the housing required.

2.22 It is clear, therefore, that exceptional circumstances exist for Green Belt release at both the strategic and at the district level. Having established this, it is necessary to demonstrate why exceptional circumstances exist for releasing this specific site and how it can be allocated without undermining the role of the Green Belt.

2.23 Firstly, it is necessary to consider the five purposes of Green Belt as set out in Paragraph 134 of the Framework and how the site performs against each of these. The Council published a Green Belt Study, Part 1, in 2016, which considered wider land parcels within the District, followed by a further study, March 2021, which contains detailed assessments for smaller land parcels. In the March 2021 study, the site comprises several assessment parcels (ref: CA4, CA5, WI21, WI23), whilst the country park falls within parcels CA6 and OA12.

2.24 The study identifies that, collectively, parcels CA4, CA5, WI21, WI23 do not perform as strongly in respect of the five green belt purposes when compared to other parcels within the District, making them an appropriate option for green belt release. Furthermore, the 14.81 hectares of adjacent land to the south of the site is being proposed for a country park. This accords fully with Paragraph 138 of the Framework which states that plans should 'set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land'. The site will allow for increased access to countryside and will include the creation of connecting woodland blocks, wet grassland and wet woodland, as well as having the potential to link to the wider area beyond in terms of habitat connectivity.

### IN SUMMARY

2.25 It has been demonstrated in this section that there is a need to accommodate an increased amount of housing in the district and there are exceptional circumstances to justify the need for Green Belt release to accommodate this as part of the Local Plan review. This is a well located and exceptionally sustainable site, which would help to achieve a balanced spatial strategy and which would not prevent the Green Belt from functioning effectively against the five purposes of Green Belt as defined in the National Planning Policy Framework.





# 3

## SITE AND SURROUNDINGS OVERVIEW

### THE SITE

- 3.1 The site being proposed for allocation is split into two parts. The first part of the site, approximately 32.45 hectares in size, is being proposed for a residential-led scheme. It lies to the south of Cannock Road, Heath Hayes, and is bounded by Newlands Lane to the south, and existing woodland areas to the east and west.
- 3.2 The second part of the site lies to the south of Newlands Lane and is being proposed as a country park to be delivered alongside the residential development. This comprises 14.81 hectares, approximately. A Site of Biological Interest abuts the lower eastern edge of this part of the site.
- 3.3 The site currently comprises pastoral farmland with some areas used for seasonal crop production. It is not considered to be the best or most versatile agricultural land, however further detail can be provided if required. The land is interspersed with connecting native hedgerows and bounded by mixed species woodland blocks.
- 3.4 The landform of the site gently falls from north to south with a topographical range of approximately 171 AOD to 159 AOD (Above Ordnance Datum ie height relative to the average sea level).

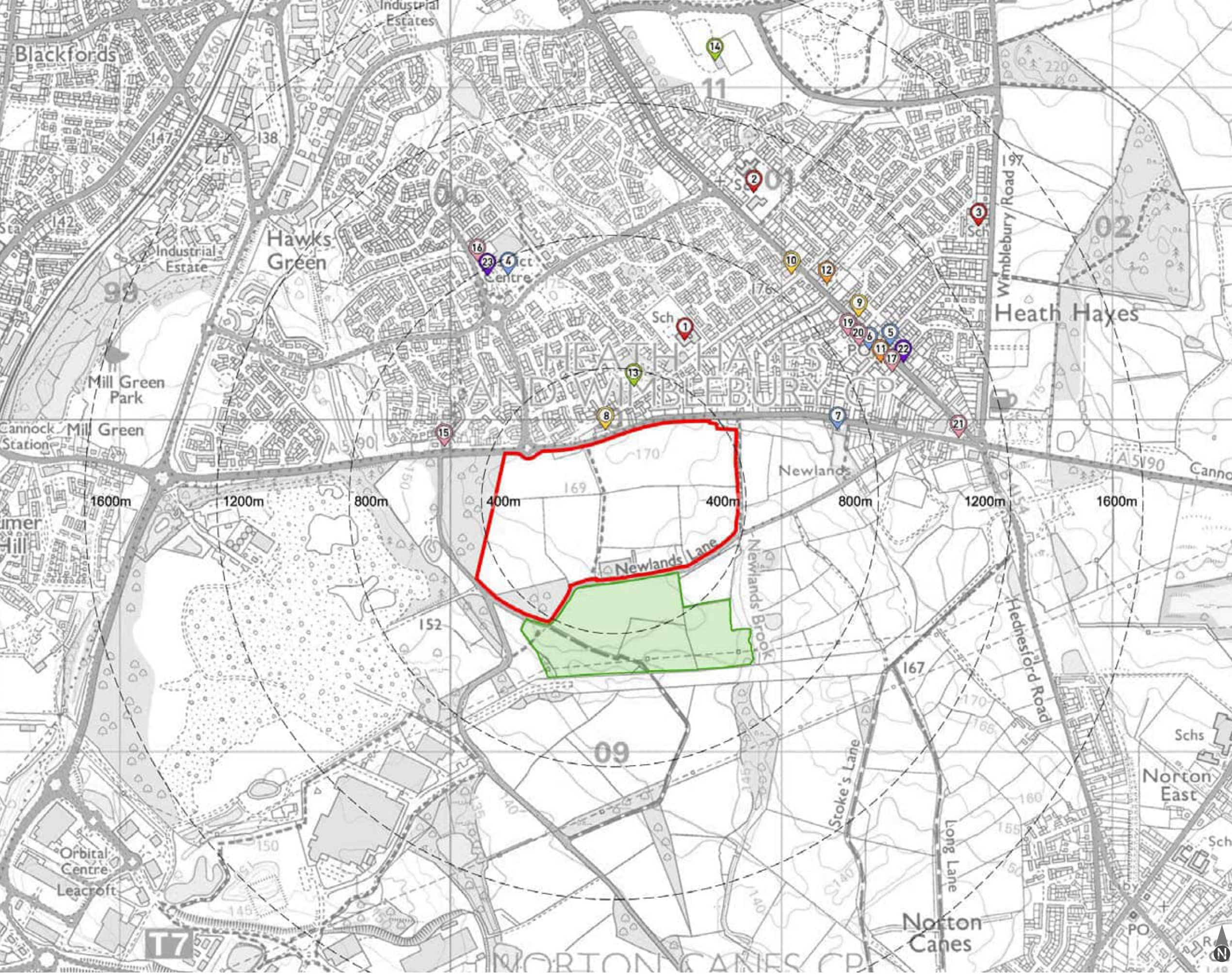


### SURROUNDING AREA

- 3.5 The site boundaries and immediate surroundings comprise:
  - To the north, the site adjoins the existing residential edge associated with Cannock Road (A5150), including the Severn Trent compound to the north-east
  - To the east – the boundary is well defined by a mixed woodland block, a Public Right of Way and the north – south route of Newlands Brook
  - To the south – the site adjoins the vegetated Newlands Lane which has been closed to traffic
  - To the west – the boundary is formed by a mixed woodland block with Newlands Lane beyond
- 3.6 The site and its surrounds present a unique opportunity to deliver much needed housing in an attractive and sustainable setting, with all necessary infrastructure and local services, and excellent access to existing local services and facilities







LOCAL FACILITIES PLAN | NOT TO SCALE

- Key**
- Site Location
  - Proposed Country Park
- Education**
- 1 Gorsemoor Primary School
  - 2 Five Ways Academy
  - 3 Heath Hayes Academy
- Shops**
- 4 Tesco/Tesco Fuel
  - 5 Spar
  - 6 Heath Hayes Post Office
  - 7 Texaco Fuel
- Healthcare**
- 8 The Heathers Care Home
  - 9 Bains Pharmacy
  - 10 Heath Hayes Health Centre
- Places of Worship**
- 11 Bourne Methodist Church
  - 12 St. John's Church
- Leisure**
- 13 Gorsemoor Road Park
  - 14 Hednesford Town Football Club
- Public Houses & Restaurants**
- 15 Newhall Farm
  - 16 Winding Wheel Pub/Restaurant
  - 17 Jasmine Tandoori & Balti
  - 19 Tennents Craft Bakery
  - 20 Heath Hayes Fish Bar
  - 21 Five Ways Inn
- Community**
- 22 Heath Hayes Library
  - 23 Hayes Green Community Centre

# 4

## ENVIRONMENTAL CONSIDERATIONS OVERVIEW

**LOCAL FACILITIES, AMENITIES & SERVICES**

4.1 A range of local facilities near to the site are noted below; these include (but are not limited to):

- Newhall Farm = 580m - 7min walk
- The Heathers Care Home = 530m - 10min walk
- Gorsemoor Road Park = 595m - 11min walk
- Gorsemoor Primary School = 870m - 14min
- Heath Hayes Health Centre = 1.2km - 17min walk
- Spar = 1.2km - 15min walk
- Heath Hayes Post Office = 1.2km - 16min walk
- Bourne Methodist Church = 1.2km - 16min walk
- Jasmine Tandoori & Balti = 1.2km - 16min walk
- Bains Pharmacy = 1.2km - 16min walk
- Heath Hayes Fish Bar = 1.2km - 16min walk
- Tennants Craft Bakery = 1.2km - 16min walk
- Texaco = 955m - 12min walk
- Tesco = 1.0km - 13min walk
- Winding Wheel pub/restaurant = 1.0km - 12min walk
- Heath Hayes library = 1.2km - 16min walk

- 4.2 Facilities such as Newhall Farm, The Heathers Care Home and Gorsemoor Road Park are within an 800m walk of the centre of the development site; this distance is within the distance that Manual for Streets (MfS) refers to as a walkable neighbourhood (800m).
- 4.3 It is also noted that the site is located approximately 1.5km away from the Mill Green Designer Outlet Village which is under construction and due to open in 2020.
- 4.4 Three schools are in proximity to the proposed development; including Gorsemoor Primary School, Five Ways Primary School and Heath Hayes Academy and these are within the 2km preferred maximum walking distance recommended in the IHT Guidance (Table 3.2 Guidelines for Providing for Journeys on Foot).
- 4.5 Gorsemoor Primary School is positioned approximately 870m to the north of the proposed development. Five Ways Primary School is 1.5km northeast of the site, off the B4154.
- 4.6 The Heath Hayes Academy is located approximately 1.8km northeast of the site at Wimblebury Road. Access and movement





EXISTING ROAD LAYOUT ADJACENT TO SITE | NOT TO SCALE



PROPOSED SITE ACCESS | NOT TO SCALE

## ACCESS

- 4.7 The access strategy for the site is likely to be dependent upon the eventual scale of development proposed.
- 4.8 The access strategy will require the provision of two points of access which will serve a residential street layout. It is intended that dwellings will have allocated off-road parking provided on driveways and/or garages.
- 4.9 Initial consideration has also been given to the provision of a new signalled crossing on the A5190 Cannock Road to assist those crossing to/from the site, to access local facilities and the wider sustainable transport network and services. There are three possible locations for the roundabout access: a potential fourth arm off the existing A5190/Heath Way roundabout; a new three-arm roundabout about 120m-130m (centre to centre) to the east of the Heath Way roundabout; or a new three-arm roundabout considerably further to the east.
- 4.10 The ideal location would be the first option – as a fourth arm off the existing roundabout. If this is possible we envisage that a priority junction would also be provided for the site, with that junction located to the east along the A5190.
- 4.11 In respect of the first option, the scale of the existing roundabout may need to be increased to accommodate any fourth arm off the roundabout and its associated traffic flows. To inform any such modifications to the roundabout the junction would need to be tested with existing turning counts and forecast development traffic flows. It is also very likely that any priority junction would be required to provide a right turn ghost island layout and, although not shown, the plan allows sufficient width for such a layout.
- 4.12 The site access will include a 2.0m footway either side of any access to connect to the existing footway network. It will be necessary to provide a crossing of the A5190 Cannock Road and this will almost certainly be a signalled crossing towards the western end of the site.

## SUSTAINABLE TRANSPORT

### Walking

- 4.13 There are two local roads in the immediate vicinity of the proposed development; the A5190 Cannock Road and Newlands Lane.
- 4.14 To the north of the proposed development, the A5190 Cannock Road has a 40mph speed limit and wide footways both sides of the carriageway for pedestrians.
- 4.15 To the west of the site, Newlands Lane has no footways and a 60mph speed limit. To the south of the proposed development, the road is not open to vehicular traffic.
- 4.16 East of the proposed development, Newlands Lane is a residential road with varying footway widths of 1.5m to 2.0m either side of the carriageway.
- 4.17 There are two Public Rights of Way (PRoWs) in proximity to the proposed development. The two paths route from north to south. One PRoW passes through the development site centre; the second is at the eastern edge of the proposed development.
- 4.18 The site access will include a 2.0m footway either side of any access to connect to the existing footway network. It will be necessary to provide a crossing of the A5190 Cannock Road and this will almost certainly be a signalled crossing towards the western end of the site to provide convenient access to existing services and facilities.

### Cycling

- 4.19 Approximately, 1.8 miles (2.9km) to the east of the proposed development, National Cycle Network (NCN) Route 5 routes south along Miners Way and links Heath Hayes to Brownhills, Pelsall and Walsall. From Miners Way, cyclists may also travel east to Burntwood and Lichfield.
- 4.20 Highways in proximity to the proposed development are subject to 40mph and the national speed limit (60mph for cars). As a result, it is likely that only more proficient cyclists will use these roads. Newlands Road to the south and east of the development are considered safe and suitable for use by even less experienced cyclists.

### Bus

- 4.21 Bus services can be accessed from the Gorsemoor Road (Nursing Home) and Heath Way (Rochester Way) bus stops; these stops are positioned within a 500m walk of the centre of the proposed development. Both sets of bus stops provide access to the number 61 bus service; the 61A bus only stops at Rochester Way.
  - 4.22 The 61 and 61A buses provide weekday services to destinations including Cannock, Hazelslade, Burntwood and Lichfield.
  - 4.23 The 61 bus provides a weekday service at a frequency of one bus every 60 minutes between Cannock and Lichfield. This bus also operates at weekends; once every 60 minutes on a Saturday.
  - 4.24 The 61A is a less frequent bus service to stop in proximity to the proposed development. This bus operates at a 2 per day frequency, there is one morning bus and a single bus in the afternoon.
- ### Rail
- 4.25 The closest railway station to the site is Cannock railway station. The station is 1.7 miles (2.7km) to the west of the proposed development. Cannock station has two platforms and a station car park. The car park provides two accessible spaces for Blue Badge holders.
  - 4.26 Cannock station provides West Midlands Trains rail services to destinations including Hednesford, Tame Bridge Parkway, Rugeley Trent Valley and Birmingham New Street. Direct trains arrive/depart to destinations at a frequency of 1-2 every 64 minutes.



## EXISTING RESIDENTIAL CHARACTER/ PATTERN

- 4.27 Existing residential development to the north of the site along the northern edge of Cannock Road is a mixture of mainly inter-war and post-war housing, mainly semi-detached and set back from the road behind low brick walls or hedges. There are a few terraced industrial-Victorian dwellings especially towards the eastern end which are set much closer to the edge of the pavement. Modern (1980s / 1990's) detached homes mark the site of a large housing estate of that same era, towards the traffic island at the western end of the road. The adopted Design Supplementary Planning Document (Heath Hayes and Wimblebury Character Area) cites the strong frontages of low brick walls and hedges along Cannock Road as being a particular feature of this area.



## LANDSCAPE AND VISUAL

### POLICY CONTEXT

- 4.28 The site is not subject to any national landscape designations, nor has ever been considered for such. The site lies within the Green Belt.
- 4.29 The site is situated within the Cannock Chase district of Staffordshire, located to the eastern periphery of Cannock and to the immediate south of the established Heath Hayes residential suburb. Applicable local policy objectives address the need to conserve and enhance the landscape of the Green Belt and the green infrastructure of the District.
- 4.30 Footpath 'Norton Canes 25' runs through the centre of the site north to south and footpath 'Heath Hayes and Wimblebury 10' runs adjacent to the eastern site boundary. A network of public rights of way are present across the wider landscape.

### CONTRIBUTIONS TO GREEN BELT

#### *Cannock Chase Green Belt Study (March 2021)*

- 4.31 A review of the site's performance and suitability for release is summarised below in relation to the recent Cannock Chase Green Belt Study Part 2 and the principal Green Belt objectives as set out within the NPPF (the Framework). Reference to the key purposes of Green Belt land with consideration of the NPPF is provided.
- 4.32 Cannock Chase District Council's Green Belt Study Part 1 considered only broad areas, with the site and its surroundings within parcel C17. However, the recent (March 2021) Part 2 looks at parcels in more detail. As seen on the plan extract (right), the site boundary (yellow) spans 4 parcels; CA5, WI21 and part of parcel WI23. Part of the eastern edge is within WI22, although this area is woodland and is being retained as part of the proposed scheme. The proposed Country Park to the south would remain as part of the Green Belt so no further consideration is given to the parcels in which it is located. Tyler Grange have undertaken a site-specific assessment of the contribution that the site makes against the Green Belt purposes as described within the study. Green Belt purposes as described within the study:

### Purpose 1 - To check the unrestricted sprawl of large built-up areas

#### *Green Belt Study Judgements*

- 4.33 Parcel CA5: "Land is open and is adjacent to the large built-up area of Cannock. There is strong distinction between the parcel and the inset area, which increases the extent to which development would be perceived as sprawl of the large built-up area. Overall the area makes a strong contribution to checking the sprawl of the large built up area."
- 4.34 Parcel WI21: "Land is open and is adjacent to the large built-up area of Cannock. The parcel has some relationship with the inset area, but also a degree of distinction from it. Overall the area makes a relatively strong contribution to checking the sprawl of the large built up area."
- 4.35 Parcel WI23: "Land is open and is close to the large built-up area of Cannock. There is strong distinction between the parcel and the inset area, which increases the extent to which development would be perceived as sprawl of the large built-up area. Overall the area makes a strong contribution to checking the sprawl of the large built up area."

#### *Purpose 1 Site-Specific Assessment*

- 4.36 Whilst the commentary for the three parcels described above consider a relatively strong contribution to Purpose 1, they do not consider the three areas which comprise the entire site boundary as a whole, which links the site to the adjacent developed edge.
- 4.37 The site is adjacent to the built-edge of Heath Hayes, is contained within woodland features and mature hedgerow boundaries restricting sprawl and also cannot be considered ribbon development.



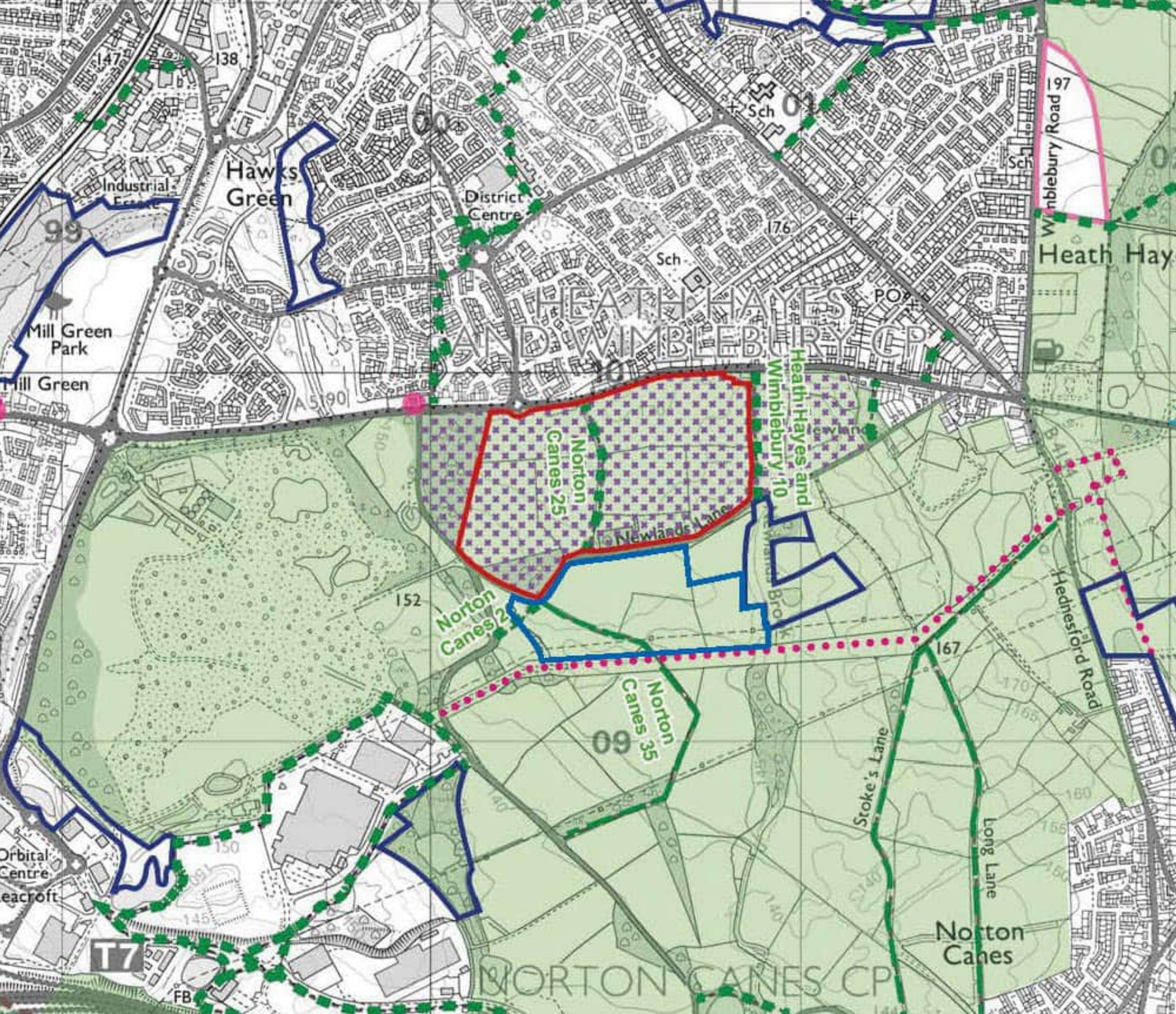
### Purpose 2 - To prevent neighbouring towns merging into one another

#### *Green Belt Study Judgements*

- 4.38 Parcel CA5: "Land is open and there is a wide gap between Cannock and Burntwood. Urbanising development at Norton Canes reduces gaps but there are some significant separating features, including Chasewater and undulating land. Although the settlement gap is robust, there is strong distinction between the parcel and the inset area, which increases the extent to which development would be perceived as narrowing the gap. Overall the area makes a moderate contribution to preventing the merging of neighbouring towns."
- 4.39 Parcel WI21: "Land is open and there is a wide gap between Cannock and Burntwood. Urbanising development reduces gaps but there are some significant separating features, including Chasewater and undulating land. The parcel has some relationship with the inset area, but also a degree of distinction from it. Overall the area makes a relatively weak contribution to preventing the merging of neighbouring towns."
- 4.40 Parcel WI23: " Land is open and there is a wide gap between Cannock and Burntwood. Urbanising development reduces gaps but there are some significant separating features, including Chasewater and undulating land. Although the settlement gap is robust, there is strong distinction between the parcel and the inset area, which increases the extent to which development would be perceived as narrowing the gap. Overall the area makes a moderate contribution to preventing the merging of neighbouring towns."

#### *Purpose 2 Site-Specific Assessment*

- 4.41 The above commentary for the 3 parcels describes how the development could be perceived as reducing the gap between neighbouring towns of Burntwood and Cannock, although it recognises there is a wide gap separating the two in which Tyler Grange are in agreeance with. Not only is the gap almost 2.5km, the existing built edge of Heath Hayes, Cannock continues to extend along the north of Cannock Road for almost 1km, reducing the possibility of reducing the perceived visual gap.
- 4.42 With the notable presence of intervening hedgerows and scattered woodlands, there is no real sense of any visual connection between Heath Hayes and Burntwood, as the vegetation acts as a strong visual and physical feature of separation.
- 4.43 The site lies adjacent to the settlement of Heath Hayes along the A5190 (Cannock Road). In terms of the merging of settlements, a key consideration is the strength and permanence of existing boundaries. As set out above, the site is both physically and visually contained by layers of vegetation, with no real intervisibility. The sequential users of Cannock Road and Newlands Lane will not obtain clear intervisibility between the two settlements. Instead, road users experience the settlement context in the form of the established residential edge. Additional housing would be visible, but the depth of vision is already limited for road users by hedgerow vegetation. Importantly, the sense of travelling from one distinct area to another will not be lost.
- 4.44 Further physical growth of Heath Hayes in this location, when considered in accordance with the promotion of a sensitive development that retained and enhanced boundary features, would be largely inconspicuous in the surrounding landscape, given the settlement backdrop, landform and surrounding landscape character context which assists in diminishing any perception of coalescence.



LANDSCAPE PLANNING ANALYSIS AND PUBLIC RIGHTS OF WAY | NOT TO SCALE

- Site Boundary
- Proposed Country Park Boundary
- Cannock Chase District Council Local Plan (2014)
- District Boundary
- Green Belt: Policy CP1
- Safeguarded Land for Possible Development Post 2020: Policy CP0
- Proposed Recreational Footpath / Cycle Route: Policy CP10
- Sites of Biological Interest: Policy CP12
- Sites of Special Scientific Interest: Policy CP12
- Cannock Chase Strategic Housing Land Availability Assessment (2018):
- Green Belt, A.O.N.D. & Restricted Sites (C116a: Land South of the A5190, Lichfield Road, Heath Hayes)
- Public Rights of Way:
- Footpaths
- Driveways
- Other Designations:
- Listed Buildings (Close to the site)

- Purpose 3 - To assist in the safeguarding of the countryside from encroachment**  
*Green Belt Study Judgements*
- 4.45 Parcel CA5: "Land is open countryside. There is strong distinction between the parcel and the inset area, which increases the extent to which development would be perceived as encroachment on the countryside. Overall the area makes a strong contribution to safeguarding the countryside from encroachment."
- 4.46 Parcel WI21: " Land is open countryside and the parcel has some relationship with the inset area, but also a degree of distinction from it. Overall the area makes a relatively strong contribution to safeguarding the countryside from encroachment."
- 4.47 Parcel WI23: "Land is open countryside and there is strong distinction between the parcel and the inset area, which increases the extent to which development would be perceived as encroachment on the countryside. Overall the area makes a strong contribution to safeguarding the countryside from encroachment."
- Purpose 3 Site-Specific Assessment*
- 4.48 Whilst the 3 parcels judgements above consider a strong contribution to Purpose 3, they do relate to wider parcels (WI23) and the development of areas away from the developed edge. Although it recognises that the parcels have some relationship with the inset area, it considers a degree of distinction from it, however the site is adjacent to the urbanising influence of Heath Hayes along the northern boundary of the site.
- 4.49 The existing framework of vegetation and limited number of public receptor locations reduces the perceived sense of openness; and, the limited intervisibility between the site and the surrounding settlements emphasises the degree of containment that currently exists. The character of the landscape is somewhat transitional with obvious urban fringe components; and, there is little sense that it represents an extensive tract of open countryside. It is certainly not a remote or tranquil site even if the site itself is considered open.
- 4.50 The retention and enhancement of the framework of boundary vegetation, and the delivery of characteristic development response would further limit the extent to which proposed built form would introduce uncharacteristic features into the landscape, thus any sense of visual encroachment into the wider open countryside would be reduced.

- Purpose 4 - To preserve the setting and special character of historic towns**  
*Green Belt Study Judgements*
- 4.51 All parcels make an equivalent judgement to this purpose, stating "The parcel does not contribute to the setting or special character of any historic towns."
- Purpose 4 Site-Specific Assessment*
- 4.52 Tyler Grange are in agreement with the Council's findings.
- Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land**
- 4.53 All parcels make an equivalent judgement to this purpose stating that "All Green Belt land is considered to make an equal contribution to this purpose."

**SUITABILITY FOR RELEASE FROM THE GREEN BELT**

4.54 Whilst the wider land to the east and south of the site contributes to providing separation between settlements and retaining openness, the site itself is more suitable for release with the strong, defensible Green Belt boundaries and characteristic woodland and hedgerows surrounding the site. As set out above, the site makes a limited contribution to the purposes when considering the contained nature of the site and permanent, defensible boundaries, highlighting the opportunity for development to incorporate these.

- DEFINITION OF ROBUST NEW GREEN BELT BOUNDARIES**
- 4.55 As set-out at paragraph 139 on the NPPF, when defining Green Belt boundaries, plans should 'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent'.
- 4.56 As recognised by the Council's Green Belt Study, the existing settlement to the north of Cannock Road comprises a hard built edge defined by residential dwellings and garden fences with views into the site. The western boundary is defined by dense woodland, with the southern and eastern boundary defined by mature tree and hedgerow planting. The retention and enhancements of these boundaries would provide strong, defensible boundaries that serve to limit development on all 4 edges. These are illustrated on the Opportunities and Constraints Plan.
- 4.57 These reinforced boundaries would provide a soft transitional edge to the settlement, as well as forming robust new Green Belt boundaries to contain the built edge and retain the openness of the remaining Green Belt and its role in separating settlements.



#### OPPORTUNITIES FOR THE ENHANCEMENT OF LAND RETAINED IN THE GREEN BELT

- 4.58 In addition to requiring the release of Green Belt land to be clearly defined by robust new Green Belt boundaries, the NPPF also considers at paragraph 138 that plans should, '...set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.'
- 4.59 As illustrated on the Landscape Opportunities and Constraints plan outlined in blue, land to the south of the site could be utilised for a new Country Park. This would include allowing public access to the area with the retention and enhancement of existing field boundaries, areas of woodland and tree planting and hedgerows all whilst improving recreational facilities.
- 4.60 Further benefits as a result of a proposed Country Park could include additional native woodland planting, wet woodland creation, orchard planting and the re-establishment of heathland habitats and wet grassland that could better reflect the local landscape character.

#### LANDSCAPE CHARACTER

- 4.61 The characterisation process is a non-value judgement process; therefore, classifying landscapes into distinct areas does not suggest that one character area is more sensitive than another or valued by people more or less.
- 4.62 The landscape character appraisal process reviews the wider landscape character type at a national level, explores more detailed character features at a district/local level and analyses site-specific land use that informs local distinctiveness and sense of place. This promotion document considers the local, site-specific character features and context as identified by Tyler Grange LLP through fieldwork. From this we can identify the relevant characteristics and important site features to retain.
- 4.63 At a regional level, within the Cannock Chase District's Review of Landscape Character Assessment (2017), the site is identified as being located within the (Planned) Coldfield Farmlands landscape character area. However, the site's northern boundary lies adjacent to the urban character area.













- 4.64 The key characteristics of the (Planned) Coldfield Farmlands include:
- "Low rolling plateau;
  - Restored opencast sites with immature landscape features;
  - Pockets of planned farmland enclosed by thorn hedges/fences;
  - Patches of secondary woodland on older restored sites;
  - Wet heathland character in less disturbed areas;
  - A vacant landscape lacking in settlement, often adjoining a well defined urban edge;
  - Large scale urban elements including pylons major roads and distribution warehouses; and,
  - Heathy origins strongly evident throughout".
- 4.65 The character of the area is considered by the assessment to be 'Moderate' as the rolling plateau landform is not particularly prominent and the remaining semi-natural vegetation only contributes to a moderate strength of character.
- 4.66 The condition of the area is considered by the Assessment to be 'Moderate' due to the fact that although the overall condition of the landscape is one of decline, the original distracting factors including the open cast mining are no longer active.

#### SITE-SPECIFIC CONTEXT LANDSCAPE CHARACTER

- 4.67 The hedgerow to field boundaries to provide containment and structure and are also characteristic features within the local landscape. They should be retained and enhanced where possible to strengthen the containment of the site and filter the new development and existing built edge.
- 4.68 Urban influence to the north of Cannock Road provides existing built form character to the site edge. Development fronting Cannock Road should respect the character of existing properties that are set back from the road frontage, retaining good quality tree stock.
- 4.69 Large woodland blocks to the west, south and east should be retained and enhanced to emphasise the landscape character whilst maintaining the physical and visual containment of the site within the wider landscape.
- 4.70 Field parcels are irregular-shaped and expansive with a small number of internal hedgerows to separate them.



CONSTRAINTS AND OPPORTUNITIES | NOT TO SCALE

-  Site boundary
-  Potential country park boundary
-  Potential development parcels suitable in landscape and visual terms
-  Recommended areas of open space provision
-  Recommended areas of woodland and wet woodland planting
-  Retained woodland
-  Retained and enhanced hedgerows
-  Development edges to take into account relationship with adjacent Green Infrastructure Corridors and retained woodland
-  Watercourse: Newlands Brook
-  Low point
-  Existing Public Rights of Way
-  Pumping Station

### OPPORTUNITIES AND CONSTRAINTS

4.71 In response to both desktop work and fieldwork investigations, a series of landscape opportunities and constraints have been identified. They have been established as clear 'landscape-led' principles to shape emerging development options for the site.

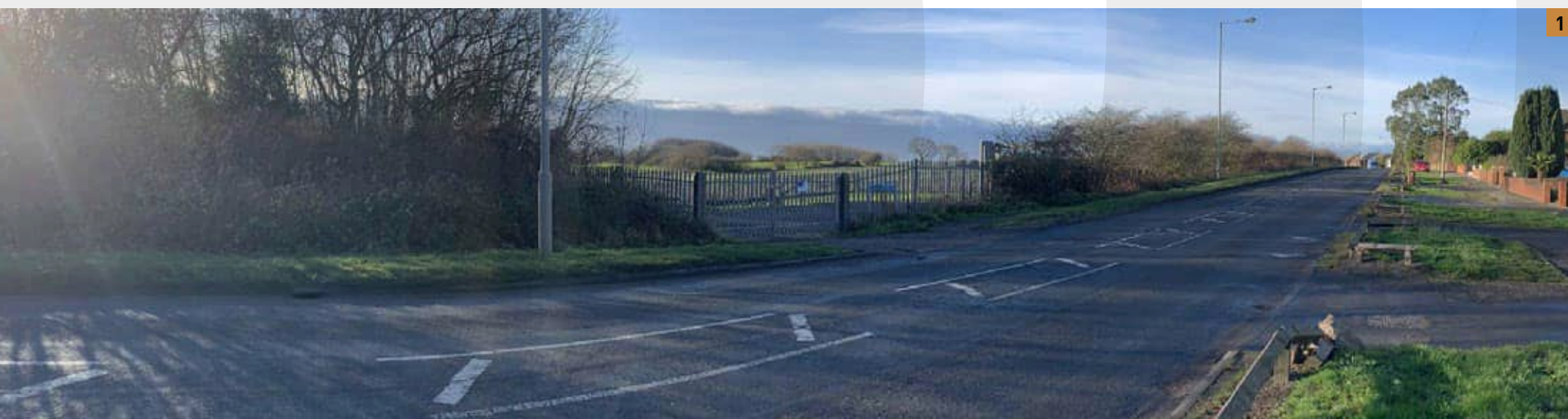
4.72 The principal landscape themes identified as illustrated on the Landscape Opportunities and Constraints Plan include:

1. The retention of the woodland blocks to the south west and to the east adjacent to PRoW 'Heath Hayes and Wimblebury 10';
2. All internal and boundary hedgerows to be retained and enhanced with the development frontage onto Cannock Road to be considered. Particular attention should be paid to the central hedgerow adjacent to PRoW Norton Canes 25 which divides the site, as well as the main corridor that runs perpendicular from this path towards the retained woodland block to the east. These hedgerows could be incorporated as part of areas of public open space providing Play opportunities and Green Corridors;

- The low points of the site are identified within the woodland block to the south west and just off Newlands Lane towards the south east around 160m AOD which are anticipated to incorporate drainage features;
  - With the removal of the site from Green Belt, we anticipate the robust boundary for release will be adjacent to Newlands Lane, highlighting the additional woodland area in the south western corner of the site as a feature to aid in filtering views towards the development from the south and west;
3. An additional woodland block within the southwest corner of the site would filter intervisibility with the off-site distribution sheds at Hickling Road; and

4. In relation to paragraph 138 of the revised NPPF which states that development plans should, "set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land", the area identified by the blue line could directly respond to this point. The retention and enhancement of the area as a Country Park incorporating existing PRoWs, would provide an additional positive argument to the removal of the red line boundary from Green Belt. The Country Park could incorporate informal recreational opportunities and the creation of wet grassland/wet woodland and heathland habitats 1 as identified within SPD.





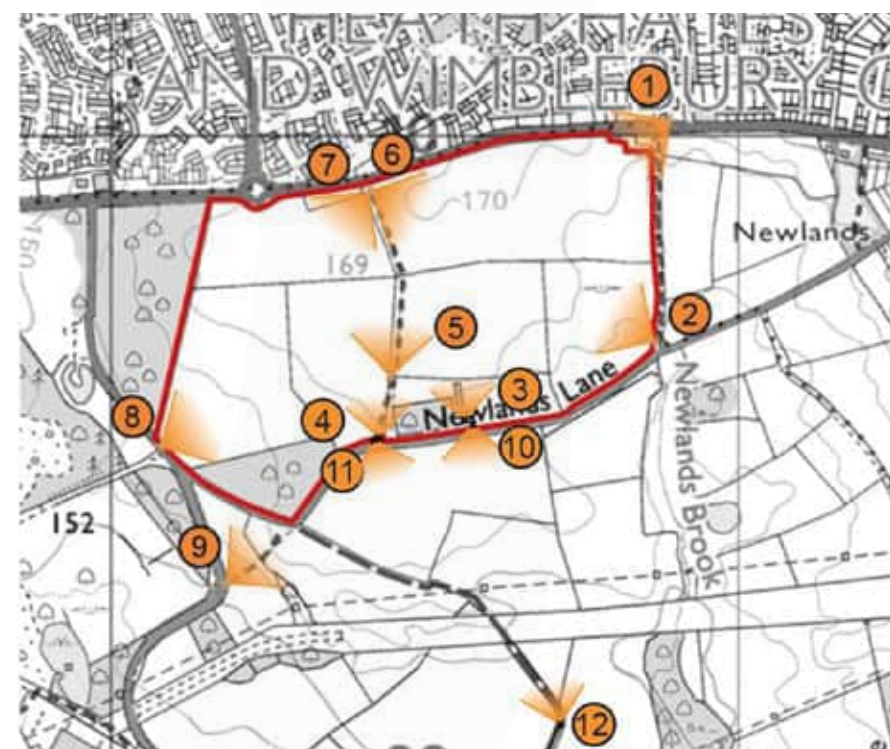
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VIEWPOINT LOCATIONS

### VIEWS

- **Viewpoint 1** shows the view facing south west towards the north eastern corner of the site. Cannock Road is visible within the majority of the view with the small compound that is located to the north eastern corner is visible to the far left. The internal hedgerows which define the large arable fields to the north of the site and the woodland block adjacent to the southern boundary are visible to the centre of the view.
- **Viewpoint 2** shows the view across the site facing west from the PRoW off Cannock Road. Existing tree and hedgerow planting filters views into the site.
- **Viewpoint 3** shows the view facing north into the site beyond the boundary vegetation from Newlands Lane/Footpath.



4



5



6

- **Viewpoint 4** shows the view from Newlands Lane facing north into the site. The expanse of the eastern part of the site is visible towards the northern boundary vegetation along Cannock Road, whilst existing vegetation towards the south east of the site restricts more distant views towards the eastern area. Topography visibly rises northwards towards the distance in the view.
- **Viewpoint 5** is situated slightly further north from Viewpoint 4, showing the view for recreational users of Norton Canes 25 footpath facing north. Again, the views of the site are expansive, with vegetation restricting views towards the east.
- **Viewpoint 6** shows the view facing south east from Norton Canes 25 footpath where it joins Cannock Road. The internal and boundary hedgerows and trees are visible along with the southern-sloping topography. Houses along Cannock Road are visible to the left hand side of the view.



7

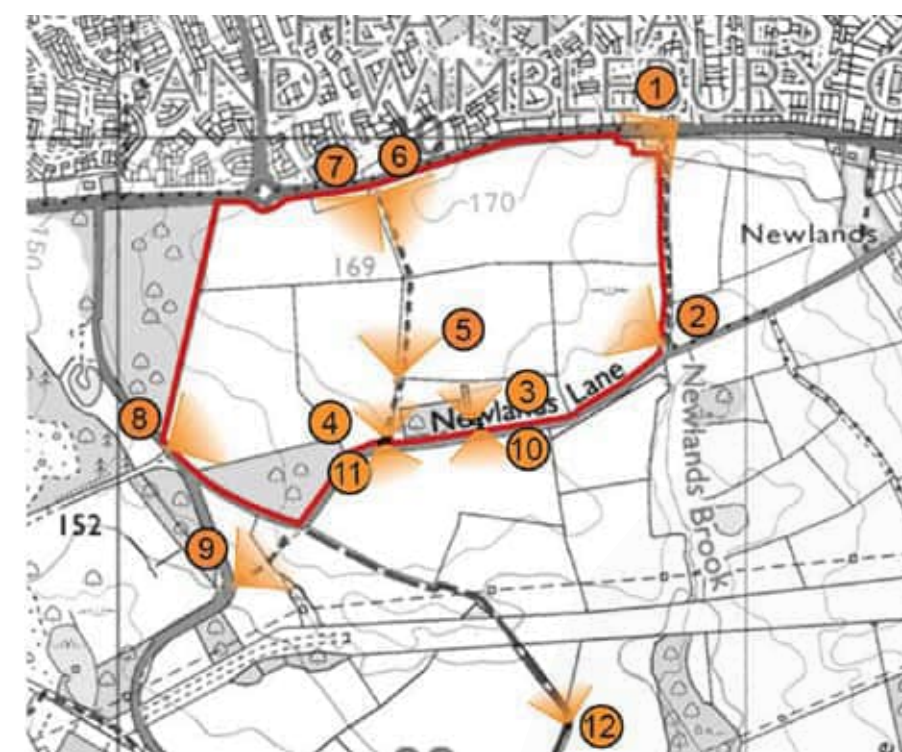


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- **Viewpoint 7** shows the view facing south west from Norton Canes 25 footpath where it joins Cannock Road. The boundary hedgerows and trees are visible along with the southern-sloping topography.
- **Viewpoint 8** shows the view from Newlands Lane looking across the site's south western corner. Mature trees and hedgerow allow for only filtered views into the site. Transient users of Newlands lane are the main receptor type for this viewpoint.
- **Viewpoint 9** shows the view from Norton Lane towards the boundary vegetation to the south west of the site. The undulating topography and intervening vegetation assist to restrict potential views towards the site.



VIEWPOINT LOCATIONS

- **Viewpoint 10 and 11** shows views facing south from Newlands Lane adjacent to the southern site boundary, looking across the potential area for the Country Park. The topography falls towards the south from this location with distant views possible beyond existing vegetation.
- **Viewpoint 12** shows the view along Norton Canes 35 footpath which runs to the south of the potential Country Park development. The footpath is overgrown and lined by mature hedgerows which restrict distant views along a large section.



10



11



12





PHASE 1 HABITAT PLAN | NOT TO SCALE

**Legend**

- Site Boundary
- A1.1.1 - Semi-natural Broadleaved Woodland
- ▨ A1.1.2 - Broadleaved Plantation Woodland
- A2.2 - Scattered scrub
- A3.1 - Scattered Trees
- B4 - Improved Grassland
- ▨ C3.1 - Tall ruderal
- G1 - Standing Water
- G2 - Running Water
- J1.1 - Arable
- ▨ J2.1.2 - Species-poor Intact Hedgerow
- ▨ J2.2.2 - Defunct, Species-Poor Hedgerow
- ▨ J2.3.2 - Species-Poor Hedgerow with Trees
- ▨ J2.4 - Fence
- J2.6 - Dry Ditch
- J2.8 - Earth bank
- TN1 - 4 - Japanese Knotweed Locations

**ECOLOGY**

**DESIGNATIONS**

4.73 The site falls within the Impact Risk Zones of two Special Areas of Conservation and three Sites of Special Scientific Interest. Given that the site is allocated in the emerging Plan, the Appropriate Assessment completed by the Local Authority will need to include any impacts from the site. The provision of suitable Alternative Natural Greenspace (SANGS) or any alternative option would be needed if this becomes required as part of any future policy.

**HABITATS**

4.74 The majority of habitats onsite are considered to be of low inherent ecological value. The woodland, running water, pond, the majority of hedgerows and trees are of ecological and intrinsic value at the site level and therefore require retention and/or mitigation for losses. The perimeter hedgerows forming the northern boundary provide good connectivity. It is recommended that they be retained within the development masterplan proposals.

**PROTECTED SPECIES**

4.75 The site offers potential for protected species, notably: bats, badger, breeding birds, wintering birds, great crested newts, water vole and white clawed crayfish. Dedicated surveys for these species will be undertaken to identify their presence and inform the scale of any required mitigation.

4.76 It is anticipated that the site provides significant scope to deliver any required mitigation in respect of protected species through the provision of the significant Green Infrastructure proposals within the site, including the provision of a new Country Park.

**BIODIVERSITY PROTECTION & ENHANCEMENT**

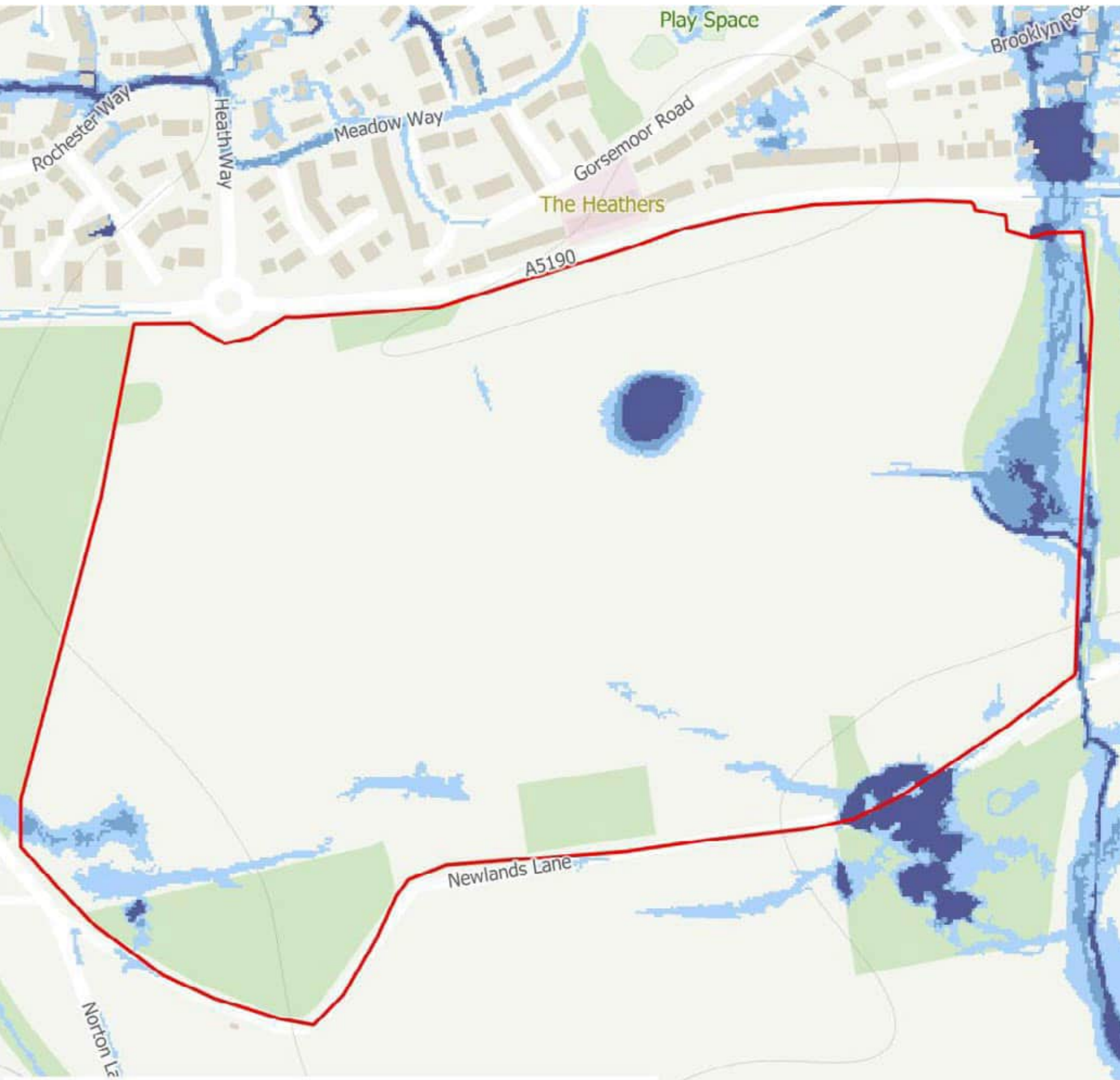
4.77 Retention and enhancements of the woodland, hedgerows and trees are recommended where possible and mitigation through landscape replanting. The NPPF requires sites to deliver biodiversity net gains and benefits. Therefore, additional enhancements are recommended to achieve this objective. Specific enhancements will be recommended following the completion of the recommended surveys referenced in the preceding pages, however, generic and easily achievable enhancements within the development would include the incorporation of bat and bird nesting boxes new buildings and retained trees, the adoption of a landscape and green/blue infrastructure strategy which complements ecology and a lighting strategy with low impacts to nocturnal fauna.

**ODOUR**

4.78 It is recognised that the site is within the vicinity of Poplars Landfill. It is understood that in 2012/13 the operator undertook work to reduce odour from the anaerobic digester.

4.79 The site does not lie any closer to the landfill site and anaerobic digester than existing dwellings. Upgrades and improvements to capacity will be provided where necessary.

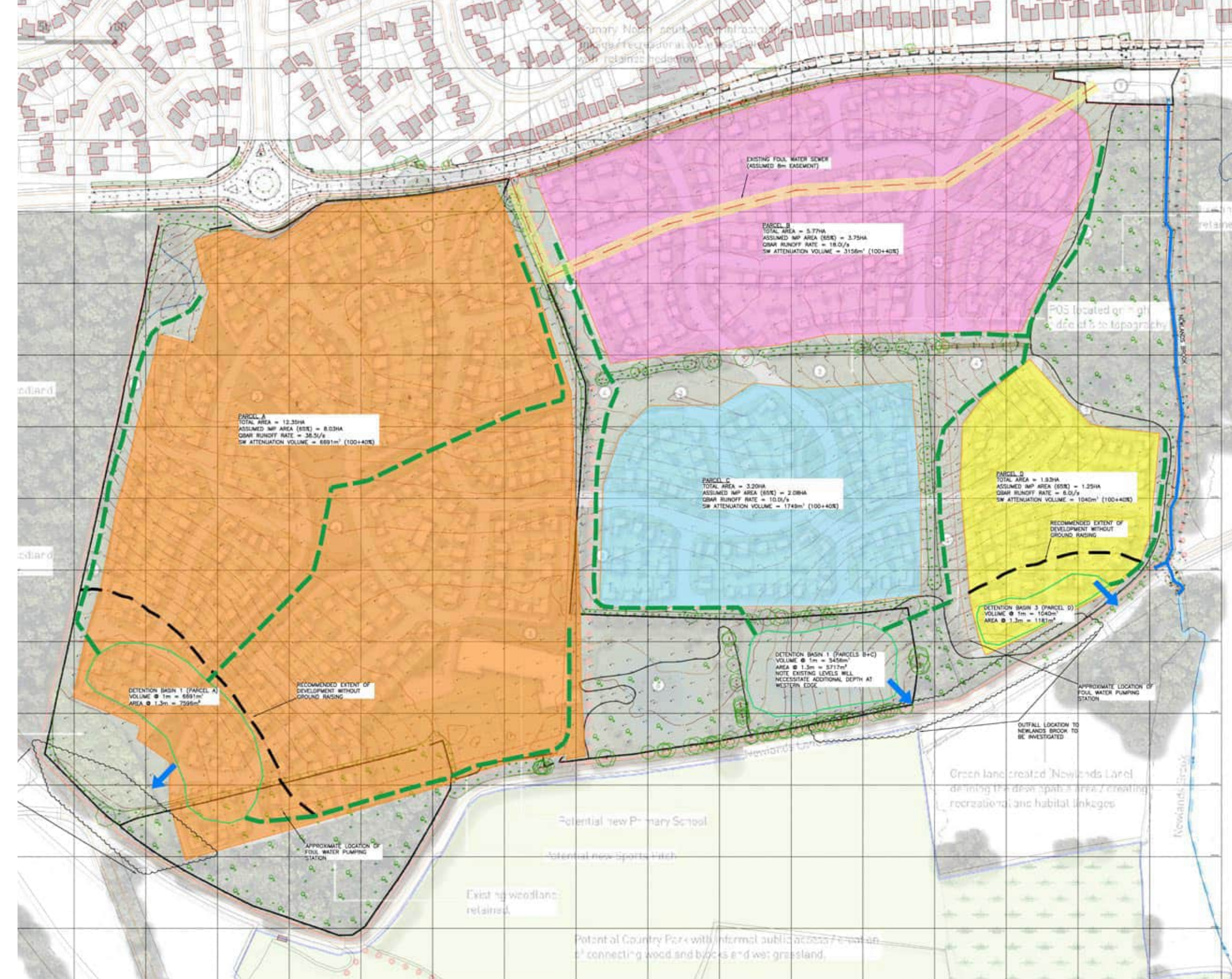
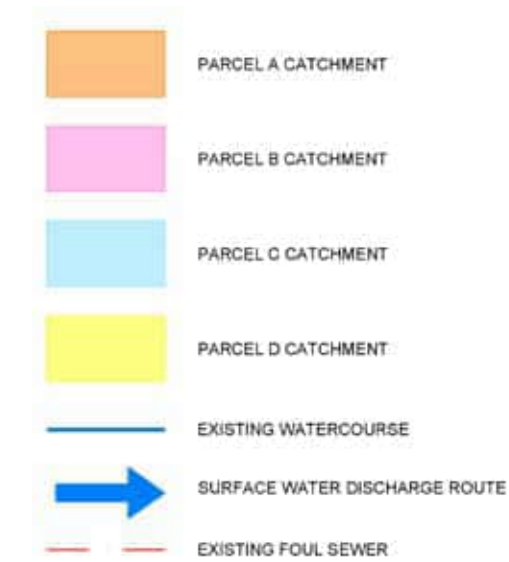
4.80 A detailed odour assessment will be completed to inform any impacts and required mitigation measures in due course, however odour is not considered to be a constraint to development in this location.



SURFACE WATER FLOOD RISK MAPPING | NOT TO SCALE

### FLOOD RISK & DRAINAGE

- 4.81 The site is shown to be entirely in Flood Zone 1, which is land considered to have a low probability of fluvial/tidal flooding.
- 4.82 No record of historic flooding on site exists although the lower lying areas adjacent the site boundary are likely to be seasonally wet. This is unlikely to pose a constraint to the development layout.
- 4.83 The area is not considered to be at notable risk from groundwater flooding and there are no small or large waterbodies that pose a risk to the site should they fail.
- 4.84 Tidal and canal sources are not considered to pose a risk due to the distance and terrain between the site and such features.
- 4.85 The topography of the site supports the use of gravity storm drainage, with a general fall towards existing watercourses.
- 4.86 It is anticipated that foul drainage will be drained via a mixture of gravity and pumping into the existing adopted sewer.
- 4.87 An initial surface water drainage strategy has been produced for the site and is incorporated within the indicative masterplan. It is proposed that on site attenuation is provided up to the 1 in 100 year plus climate change event, using sustainable drainage systems with a network of swales and ponds providing suitable flow conveyance, attenuation and a controlled outfall at greenfield runoff rates.
- 4.88 The ponds as shown on the masterplan are designed to work either independently or as a series of interlinked structures providing an overall volume of attenuation whilst achieving multiple stages of treatment to runoff prior to discharge. There is flexibility in this approach to allow a change in masterplan, or approach to phased development.
- 4.89 The drainage strategy has been developed with an aim to make parcels self-sufficient wherever possible to remove a reliance on large, site wide infrastructure and to promote the interception of exceedance flows, working with the natural topography to locate attenuation features in appropriate locations to best serve the development parcels.



INDICATIVE DRAINAGE STRATEGY | NOT TO SCALE

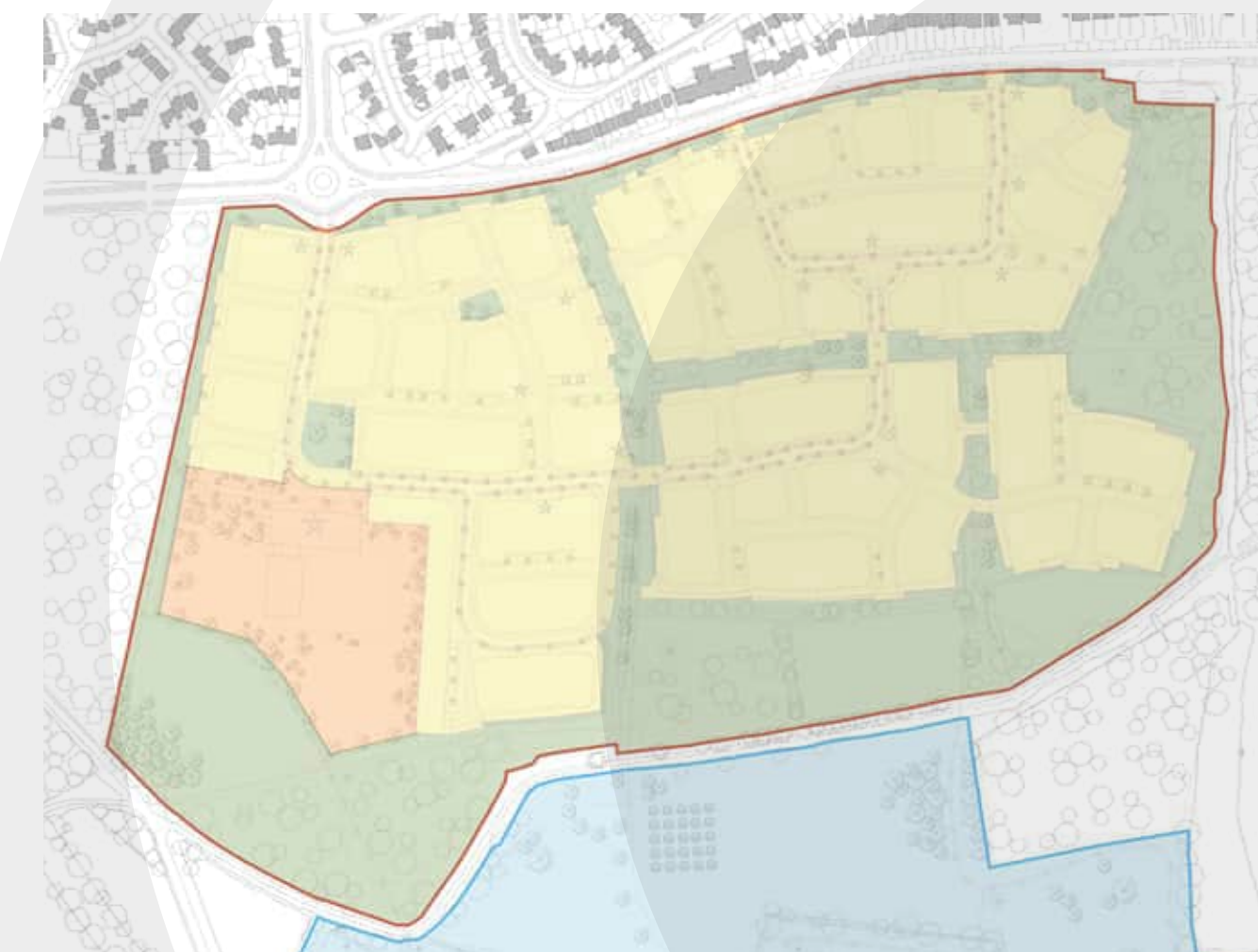
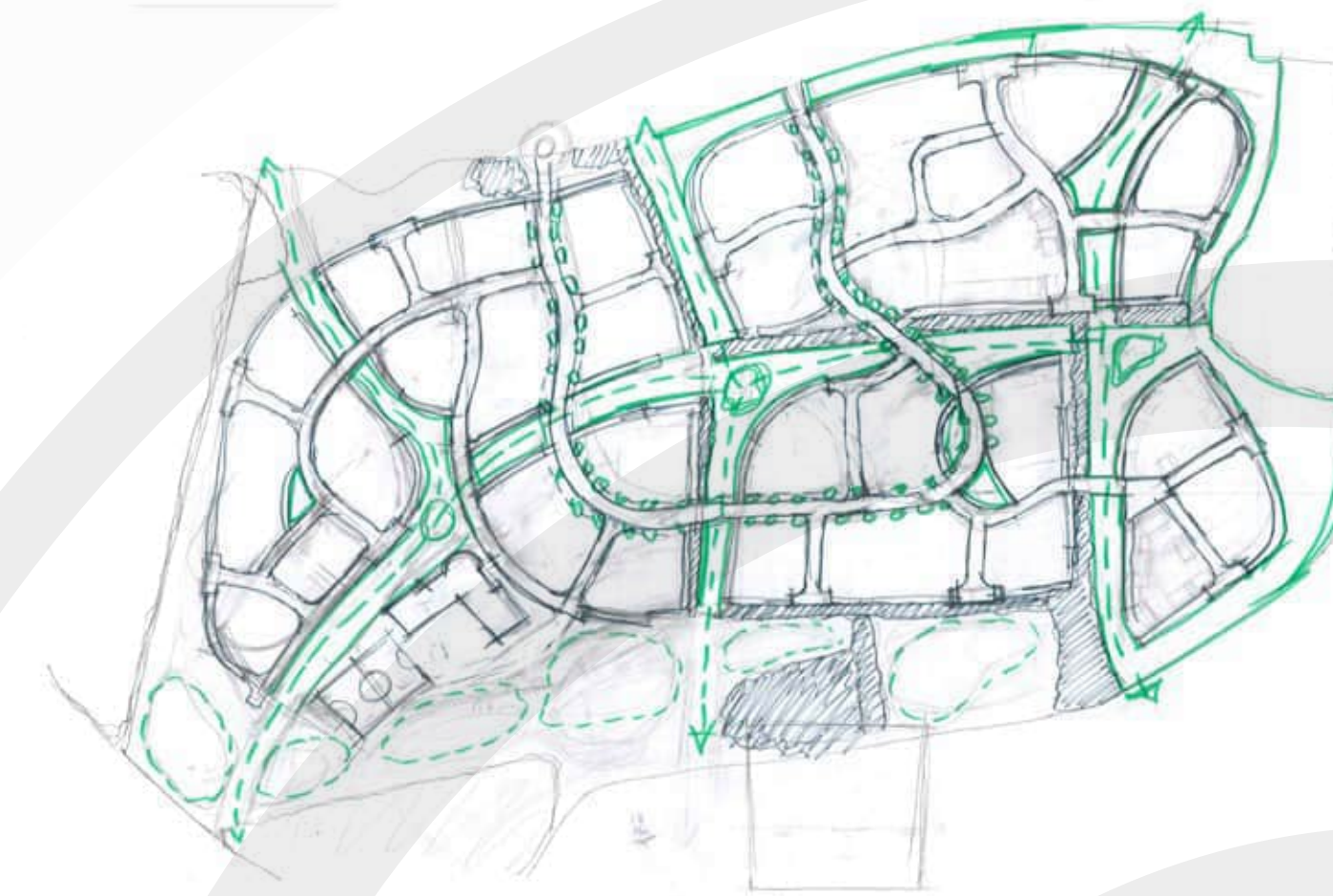


# 5

## VISION

### VISION

- To produce a living environment of the highest standard, with a clear and recognisable identity which reflects the local vernacular of Heath Hayes and contextual views;
- To provide a sustainable development comprising a range of houses, including family homes and smaller properties and significant new areas of publicly accessible open space, including a new Country Park to serve Cannock;
- To create a safe, attractive and secure neighbourhood, streets and places which promote social interaction which will afford access and movement priority to pedestrians and cyclists, including connectivity with the existing network of footpaths to local services and facilities;
- To provide a locally inspired and meaningful new green space network which enhances the character of the site and the natural and historic environment and creates a robust and enduring new Green Belt boundary; and
- To create a development that will enhance the attraction of Heath Hayes as a place to live and work, incorporating aspects of local character, heritage, landscape, visual amenity and biodiversity.





INDICATIVE MASTERPLAN | NOT TO SCALE

- Key
- Application site boundary
  - Other land under control of applicant
  - Existing (retained) trees & hedgerow
  - Indicative proposed planting
  - Open space
  - Potential for equipped play/LEAP
  - Trim Trail 'events'
  - Indicative surface water attenuation basin
  - Indicative development cell
  - Potential locations of landmark buildings
  - Primary School Reserve Site
  - Existing Public Right of Way
  - Proposed 2.4km circular walk
  - Other proposed footpath connections
  - Existing Foul Water Sewer & 8m o/a Easement

# 6

## INDICATIVE MASTERPLAN & DESIGN PRINCIPLES

6.1 The indicative masterplan identifies the following key features:

- Delivery of approximately 700 dwellings over phases, provided at a net density of 38 dwelling per hectare;
- Potential to deliver a primary school and/or other community facilities. The indicative proposal incorporates room to allow for the delivery of a primary school if necessary. The delivery of infrastructure could be phased accordingly;
- The provision of a potential Country Park to the south of Newlands Lane, providing a range of habitats including wet woodland. The Country Park would offer significant biodiversity benefits and provide recreational access to the countryside. The Park has been indicatively set out to provide opportunities for public recreation, including dog walking in an informal natural setting and would have the capability of serving a Suitable Alternative Natural Greenspace (SANG) role if necessary as part a future mitigation strategy for Cannock Chase SAC;
- Landscaping measures indicatively shown within the Country Park area 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, a new community orchard and picnic area and a new café/visitor centre;
- Green corridors are defined across the scheme through the retention of existing hedgerows & field boundaries. These provide excellent vehicle-free pedestrian permeability within the development, offering the potential for safe routes to school and increasing access opportunities to the Country Park for proposed and existing residents of Heath Hayes;

- Incorporation of the existing Public Right of Way that crosses the site within the central north to south green corridor as a strong and legible link between the Country Park and Cannock Road;
- Two equipped areas of children's play, located to be easily accessible and supplemented by the potential for a trim-trail route within the main site and extending into the Country Park;
- A series of planned and incidental spaces within the development zones that form legible features and begin to help define different areas of character;
- A street hierarchy consisting The Avenue and The Crescent as tree-lined primary streets which connect through the site forming direct and legible routes linking the three proposed points of vehicular access from Cannock Road. Features are shown along these primary streets that define pedestrian priority where strategic footpath routes cross the carriageway.
- Retention of existing vegetation and proposed woodland planting within the western part of the site provides visual containment and avoids the urbanisation of Newlands Lane by creating a development set-back from it;
- Appropriate ecological offsets are provided between proposed development areas and areas of existing woodland;
- Incorporation of the site high-point within the east to west green corridor;
- Incorporation of SuDS using balancing ponds indicated on the low points of the development along Newlands Lane (subject to detailed assessment). The possibility of further drainage solutions will also be explored to the south of Newlands Lane, within the potential Country Park to assist in the provision of wet woodland habitats;

- 6.2 In respect of standards, the Illustrative Masterplan provides a network of open space that maximises permeability and provides good connections to the potential Country Park. The green infrastructure proposed, including the potential Country Park significantly exceeds the Council's standards set out in the Developer Contributions and Housing Choices SPD (July 2015) and provides flexibility to ensure all typologies of open space, sport and recreation can be adequately incorporated.
- 6.3 In addition, the Illustrative Masterplan demonstrates how a mix of properties can be delivered to assist in the achievement of a balanced housing market. This includes the provision of smaller dwellings suited to younger people and larger three and four bedroom houses to meet aspirational needs. The delivery of 20% affordable provision has been assumed within the scheme to meet the requirements set out in CP7.
- 6.4 Due to the scale of the site, it is recognised that the proposal has the ability to support a number of community facilities that would complement the wide range of facilities that are already within easy reach. The indicative proposals identify land that could be occupied by a primary school or other community facility relevant to this location. This would improve the self-containment of the proposal and promote the delivery of a sustainable community. It is recognised that there will be a requirement for appropriate financial contributions to be made in respect of the proposal to mitigate impact of development, including a financial contribution in respect of Cannock Chase SAC in line with the current Mitigation Strategy advice.



# 7

## DELIVERABILITY AND CONCLUSIONS

### DELIVERABILITY

- 7.5 The site is a suitable area for housing as there are no physical, technical or environmental constraints preventing its development.
- 7.6 The Framework requires Local Planning Authorities to maintain delivery of housing land to meet their housing targets. To be considered deliverable, a site should be:
- Available. A site is considered available when there is confidence that there are no legal or ownership problems.
  - Suitable. A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities; and
  - Achievable. A site is considered achievable for development where there is a reasonable prospect that housing will be delivered on the site within five years, and in particular, development of the site is viable.

### AVAILABILITY

- 7.7 Richborough Estates have a legal agreement in place with the landowners and are in a position to progress with the promotion of the site for residential led development.
- 7.8 If the site is to be successfully allocated for development and removed from the Green Belt, Richborough Estates would seek to develop the site immediately, which would contribute considerably to the District's housing supply.



### SUITABILITY

- 7.9 The site is suitable for residential development for the following reasons:
- It offers a suitable location for development and can be brought forward immediately following an allocation;
  - It would form a natural extension to the established area of Heath Hayes;

### ACHIEVABILITY

- 7.10 The site has been fully assessed in terms of its environmental considerations and it has been demonstrated that the delivery of the site is achievable and deliverable, and a team of technical consultants has been appointed to support the delivery of this site moving forward. Where technical constraints are identified, Richborough Estates will provide appropriate mitigation and invest in the site to ensure delivery.
- 7.11 Richborough Estates has reviewed the economic viability of the proposals in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Perton. These considerations have been analysed alongside cost factors associated with the site, including site preparation costs and site constraints. Richborough Estates can therefore confirm that the site is economically viable and therefore achievable.



### KEY BENEFITS

- 7.12 Development of the site will contribute to building a strong, responsive and competitive economy. In particular, the delivery of new homes at the site will bring economic benefits during the construction, operational and commercial stages.
- 7.13 The proposal would assist in the delivery of supporting infrastructure, including a new Country Park to serve new and existing residents of Cannock.
- 7.14 Overall, the provision of much needed additional open market and affordable homes in the District will contribute to building a strong, responsive and competitive economy in line with the objectives of the NPPF.

### THE SUSTAINABILITY CREDENTIALS OF THE SITE

- 7.15 Having established that exceptional circumstances exist for Green Belt release both at the strategic level across the HMA, across the district and specifically in relation to this site, it is necessary to demonstrate why this site would help achieve the overall objectives set out in Paragraph 8 of the National Planning Policy Framework in achieving sustainable development.



## ECONOMIC OBJECTIVE

7.16 The Framework states that this should be to 'help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.'

7.17 It is important that the Council achieves a sustainable, balanced spatial strategy. This must ensure that urban and brownfield sites are allocated for a range of uses which need to include employment and other economic uses: such sites should not all be allocated for housing. This is especially important as in its Corporate Plan Cannock Chase Council has clearly stated its ambitions to see the district thrive and grow in economic terms.

7.18 This site can help with the achievement of a well-balanced spatial strategy as well as helping to deliver the ambitions of the Corporate Plan.

7.19 This site is sustainably located with easy access by public transport, walking and cycling to a range of employment, education and training facilities, local services and the District's main town centre. The scale of the development means that it will be able to offer a mix of housing types and tenures and deliver the supporting infrastructure to help achieve balanced and sustainable economic growth.

7.20 The construction of the site would also provide a significant economic boost and the developer will be encouraged to work with the local community and economic partnerships to provide opportunities in the local area.

## SOCIAL OBJECTIVE

7.21 The Framework states that this should be 'to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being'.

7.22 The site will provide a mix of housing types and tenures to meet the needs of the community and of the housing market area. The development will be supported by the right infrastructure such as a new primary school and local centre if required. Significant levels of open space will be incorporated into the site, including the country park to the south, and this will provide major opportunity for sport, leisure and recreation, including walking and cycling links to the wider community beyond. In terms of the wider community, there are many existing local facilities which are easily accessible.

7.23 It is important that reliance on travel by car is minimised, and that allocated sites offer alternatives through walking, cycling and public transport. The site is extremely well placed for sustainable means of travel to access the local services and facilities, including the following existing opportunities which would then be complemented by additional links which the development would provide:

- Walking: two local roads within the vicinity of the site: the A5190 Cannock Road (which has a 40mph speed limit and wide footpaths), and Newlands Lane (a residential road with varying footway widths of 1.5m to 2.0m on either side of the carriageway). There are two Public Rights of Way in proximity to the site. One runs north – south through the centre of the site and the other runs north – south immediately beyond the eastern site boundary.

- Cycling: the National Cycle Network Route 5 runs along Miners way and links Heath Hayes to Brownhills, Pelsall and Walsall, approximately 2.9km to the east of the site. From Miners way cyclists can also travel to Walsall and Lichfield. Policy CP10 of the adopted Local Plan also designates a 'Proposed Recreational Footpath and Cycle Route' to the south of the proposed country park, linking Norton Canes to the east with Norton lane (and Kingswood Lakeside employment site) to the west so there are opportunities for the site to link in to this.

- Bus: bus services can be accessed from Gorsemoor Road (nursing home) and Heath Road (Rochester way) bus stops. These bus stops are positioned within a 500m walk of the centre of the site and both provide access to the number 61 bus service. This is an hourly weekday service between Cannock and Lichfield, and it also operates at weekends including every 60 minutes on Saturdays. These stops also serve the less frequent 61A service which provides a morning bus and a single bus in the afternoon.

- Rail: Cannock Railway Station is located 2.7km to the west of the site. This has two platforms and a station car park, and it is a stated priority of the Council to secure improvements to this, linked to the Mill Green Designer Outlet Village which is currently under construction. Cannock station provides West Midlands Trains services to destinations including Hednesford, Tame Bridge Parkway, Rugeley Trent Valley, Walsall and Birmingham New Street. Direct trains operate at approximately 30 minute intervals in either direction. The £100m Chase Line electrification project has now been completed and will see the introduction of faster, longer and more frequent services including two trains per hour throughout the day to Birmingham and new direct services to the NEC, Birmingham Airport and London Euston. The line speed will be increased from 45mph to 60mph. The site is well located to benefit from these upgrades and the connections they afford.

## ENVIRONMENTAL OBJECTIVE

7.24 The Framework states that this needs to 'contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'.

7.25 Allocation of the site will help deliver the requirement for effective use of land, helping the Council to achieve a balanced spatial strategy. It is clear that there will not be sufficient capacity to accommodate all of the residential requirements in the urban areas, but neither should every urban and brownfield site be utilised for housing as this will lead to an imbalance between economic and social uses across the district, and furthermore there will still need to be a network of linked open and green spaces across the district to fulfill environmental objectives at the strategic scale.

7.26 The site will improve biodiversity in the area, including protection of the existing Site of Biological Interest adjacent to the south east of the proposed country park area, and the creation of wet woodland in association with Newlands Brook. The proposal also creates opportunities to enable links from the site to the wider proposed heathland enhancement corridor between Cannock Chase and Sutton Park as referenced in Policy CP12 of the current adopted Local Plan so the site will be able to offer significant additional benefits beyond its boundaries.

7.27 The site lies within a designated 15 kilometre radius of the highly sensitive and protected Cannock Chase Special Area of Conservation. Development within this area has to provide mitigation for the impacts of new visitors arising from new residential development, in line with a mitigation strategy prepared by the Council and its partners. The site has the potential to provide 'Suitable Alternative Natural Green Space' or other significant green infrastructure should this be required in the future, which could help provide an alternative, local and attractive destination for walkers and, in particular dog walkers, as the evidence shows that the latter tend to use Cannock Chase regularly and cause the most damage so this could provide an excellent alternative which could protect the fragile habitats of the Chase.

7.28 Much of the northern part of Cannock Chase district is an Area of Outstanding Natural Beauty (AONB), which rises to a plateau and commands significant views across Staffordshire, the West Midlands, Shropshire and beyond. Both the adopted and the emerging local plan, linked to the AONB Management Plan, highlight the significance of this key asset and the need for its protection including its setting. The site being promoted is well located in terms of its distance away from the AONB, and offers the opportunity for landscape enhancement through the country park.

7.29 The landscape character of the site is located within 'Planned Coalfield Farmlands' as defined by the Landscape Character Assessment provided as part of the Local Plan evidence base. Further consideration of this matter is provided in the Landscape section of this document however it can be concluded that the character of the landscape is not rare or unique, is influenced by its urban context, and the site can be designed sensitively to maximise the benefits from the existing layers of vegetation and the proposed landscaping, including the country park.

7.30 The site will be designed to minimise waste and pollution, including mitigation if required in relation to the designated Air Quality Management Area at Five Ways junction. It is recognised that the site is within the vicinity of Poplars landfill and it is understood that in 2012/13 the operator undertook work to reduce odour from the anaerobic digester. The site does not lie any closer to this facility than existing dwellings. However, an odour assessment will be completed to inform any impacts and, if necessary, any mitigation measures required.

7.31 The Environment Agency's Flood Mapping shows the site lies within Flood Zone 1 (less than a 1 in 1000 annual probability of river or sea flooding) and is therefore suitable for residential development. The nearest watercourse is Newlands Brook which runs along the eastern boundary of the site, and the site will be designed to ensure built development is not located within any associated floodplain: the stream largely flows through woodland which would be retained.

9.32 The site would include a comprehensive drainage strategy to ensure surface water is dealt with in a sustainable manner, subject to detailed assessment this could include the incorporation of SuDS using balancing ponds along the lower points of the development along Newlands Lane, which could also provide further biodiversity and amenity benefits.



- 8.1 This Promotional Document demonstrates that there is a need to accommodate an increased level of housing within the District to meet future housing needs and there are exceptional circumstances to justify the need for Green Belt release to accommodate this as part of the Local Plan review.
- 8.2 This site represents a well located and exceptionally sustainable site, which would deliver approximately 700 new market and affordable dwellings to meet the future housing need of Cannock Chase District without undermining the purposes of the Green Belt or adversely impacting upon the environment.

- 8.3 In summary, this Promotional Document has illustrated that the site would:
- Positively contribute to the identified need for new housing and create a range and mix of housing types that will make a positive contribution to the District's housing requirements;
  - Deliver a new Country Park which would offer significant biodiversity benefits and provide recreational access to the countryside. The Park would have the capability of serving a Suitable Alternative Natural Greenspace (SANG) role if necessary as part a future mitigation strategy for Cannock Chase SAC;
  - Provide the potential to deliver a new primary school and/or other community facilities;
  - Be sustainably located on the edge of Heath Hayes and within proximity of a wide range of services and facilities, including the proposed West Midlands Designer Outlet Village, currently under construction;
  - Accommodate a high-quality residential development with safe, attractive and secure neighbourhood, streets and places which promote social interaction which will afford access and movement priority to pedestrians and cyclists, including connectivity with the existing network of footpaths to local services and facilities;
  - Provide a locally inspired and meaningful new green space network which enhances the character of the site and the natural and historic environment and creates a robust and enduring new Green Belt boundary; and
  - Create a development that will enhance the attraction of Heath Hayes as a place to live and work, incorporating aspects of local character, landscape, visual amenity and biodiversity.

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