

Cannock Wood Neighbourhood Plan: Submission
(Regulation 16) consultation - July 2023

Thank you for submitting the Submission version of the Cannock Wood Parish Neighbourhood Plan 2022-2039 and supporting documents to Cannock Chase Council

The Planning Policy section provide the following comments in response to the formal Regulation 16 consultation currently being undertaken by Cannock Chase District Council.

The Parish Council has worked pro-actively with the local community, an expert Neighbourhood Plan consultant and the District Council to produce the Neighbourhood Plan for the Cannock Wood Parish Council area.

Cannock Wood Parish Neighbourhood Plan 2022-2039 Submission consultation

The document is well presented in a clear format with local history and pictures for context.

Foreword

Page 4 - The map is out of focus. Please can it be made slightly larger or more legible?

Section 1 - Introduction

Useful information setting out the context for the producing the plan and the historical formation of Cannock Wood (including the close cross boundary links with Gentleshaw in neighbouring Lichfield District Council area). It is noted from the consultation undertaken so far on the Neighbourhood Plan that the distribution of the consultation documents to residents, both in paper and digital formats, has been comprehensive in order to raise awareness of the plan within the local community.

P6 and p22 - The statement that some of the local issues will fall outside of the Neighbourhood Plan policies is a useful recognition that the Neighbourhood Plan can only address planning issues and helps to manage local expectations in terms of the scope of the emerging plan.

Section 2 - Vision and Objectives

It is noted that the Vision for the plan achieved a very high approval rating from respondents in the November 2021 survey, which suggests a high level of support for the plans vision from respondents to the survey within the local community.

The objectives of the plan are relevant to the local area which the plan covers based on the evidence from surveys with local residents.

Policies

The policies reflect issues of relevance to the local community set out by the objectives. They aim to protect the heritage, cultural and landscape features important to the community. Additional commentary on some of the policies is included below:

Policy CW1: Housing Design 3.a. (and Objective 1: Housing)

Page 24 - Number 1 is missing from start of the first Policy text section.

The principal of housing that is appropriate for the needs of the local area is supported and the supporting evidence is noted.

The wording of section 3 of the policy is acceptable as it highlights that type of housing as the highest need based upon the evidence collated but does not restrict other types of housing that would be appropriate for the needs of the local population.

The focus of the policy on good design and minimising flood risk is supported.

Policy CW2: Local Character

The focus on local character is important and maintains local distinctiveness. It is noted that our suggestion from an earlier consultation that due to the level of detail, over time some of the higher tier policy documents and legislation may change in terms of some elements that can be implemented has been included within the supporting text.

Policy CW3: Non-designated Heritage Assets

The identification of non-designated heritage assets using local survey knowledge will help to protect buildings of local importance and provide a candidate list for a future Local List.

A formal Local List constituted by the District Council will be based on historical evidence that meets a set criteria and some buildings on the non-designated heritage assets list in the Neighbourhood Plan may not have sufficient evidence to meet the criteria to be included on that list. The policy takes this into account by acknowledging that some buildings may not be included on a Local List but that the local Neighbourhood Plan policy will still apply to them.

Policy CW5: Views and Vistas

It is acknowledged the views identified in the policy are important to local people and that some are also supported by inclusion in the Cannock Chase AONB Management Plan. The Council appreciate work has been undertaken to refine the policy and update the mapping to help address the earlier concerns raised in relation to the views listed as being restrictive to development over a wide area.

The policy is no longer overly restrictive on new development, as long as developers justify their choice of location through good design in terms of scale and height appropriate to the development location in order to preserve longer distance views.

Policy CW6: Protect and Enhance Landscape Heritage

Scheduled Ancient Monuments are now referred to as Scheduled Monuments and this policy wording should be amended in the Plan.

The recognition of designated wildlife and historic sites and the need to protect them is welcomed.

Page 41 - the map is out of focus.

Policy CW8: Protect and Enhance the biodiversity and wildlife of the parish including tree and hedgerow coverage

The inclusion of the 10% minimum biodiversity net gain (BNG) target is supported, although it should be noted that this part of the Environment Act is currently emerging policy and so is not currently in use within the Cannock Chase Council area. The current date for commencement is November 2023 (subject to national Government timescales) for major sites (10+ dwellings) and April 2024 for minor sites (1-9 dwellings).

The inclusion of the higher 20% target within the Green Belt part of the Parish (the part outside of the Cannock Wood Settlement Boundary) is not in conformity with the emerging Cannock Chase Local Plan policies and evidence that considers 10% BNG is appropriate for the Cannock Chase District Council area.

It is noted that the Parish Council has produced a Viability Assessment which considers that 20% is appropriate due to the higher house prices in the Green Belt parts of the Cannock Wood area and due to the implementation of a similar policy in the neighbouring Lichfield District Council area, which is covered by the Lichfield Local Plan.

However, Cannock Chase Council remains concerned about the implementation of this policy in terms of the higher 20% target for the Green Belt areas, which is above the 10% tested as part of the evidence in the emerging Local Plan for the District and the practicalities of how any off site Biodiversity Net Gain will be delivered on the

mapped areas highlighted with BNG potential, if it cannot be implemented on an application site.

The identification of potential future nature improvement sites and corridors identified in partnership with Staffordshire Wildlife Trust (who produced the District Council Nature Recovery Network mapping) will be useful evidence in identifying future opportunities for Biodiversity Net Gain projects.

Policy CW10: Footpath and Bridleway Improvements

The improvements are supported and our earlier suggestion has been incorporated for the policy to recognise the need to protect local habitats when designing and improving rights of way, in order to prevent increased recreational activity in sensitive areas where people and their animals (dogs and horses) can impact on the biodiversity.

Through good design footpath/bridleway improvements and improved signage can both improve access for users while also protecting local habitats.

Cannock Wood Parish is approximately 3KM from Cannock Chase SAC (Special Area of Conservation) and 2KM from the nearest SSSI (Site of Special Scientific Interest) so has the ability to provide recreational opportunities for walkers and horse riders away from the most sensitive areas of Cannock Chase, but is also close enough that signage and route design need to be carefully considered in terms of links to nearby areas.

Policy CW11: Highway Safety

Measures to improve highway safety are supported taking into account the design considerations of a rural area. It is noted the policy now includes our suggestion to reference the County Council as the highway authority responsible for highway improvements and safety in the supporting text.

Policy CW12: Community Assets

Sites are usually only listed on the Cannock Chase District Council Assets of Community Value list for a set period of time (usually 5 years, unless sold), if they meet the set criteria for inclusion, and often only when they are at risk and the local community wishes to attempt to secure ownership of them to secure their future for community use. Whilst the Parish Council may aspire to add further community assets to the District council register, they may not always meet the relevant criteria and be rejected as referenced in the supporting policy text.

It is noted that in line with our suggestion the policy has been updated to distinguish the difference between the Assets of Community Value and Assets of importance to

the local community (sometimes they may be on both lists if the relevant criteria are met).

It is also useful to note that some assets may already be protected via other policy routes e.g. the pub building via the non-designated heritage assets policy, Nunswell country park by its proximity to the Scheduled Monument moated settlement.

CW14: Village Boundary

The policy sets out the existing policy position and is in line with National and Local Policy.

P73 - For information when referring to the Parish Council being responsible for curating a list of Non-designated Heritage Assets it should also be noted that the District Council retains the right to consider a feature as a Non-designated Heritage Asset in line with the NPPF criteria and in the role of a Local Planning Authority for Local Plan or Planning Application purposes. This also applies to other Government bodies with planning responsibilities.

Cannock Wood Character Assessment

The document is observational based on site visits/local knowledge and factual references to existing documents, including documents named in the Cannock Chase Local Plan Evidence Base. It is comprehensive and detailed as part of the evidence base to support the plan.

Cannock Wood Design Code

It is noted that some of the previous comments raised on the supporting document have been taken positively into account and that some have not been considered necessary, where the wording strongly encourages a type of design but discretion is left up to the decision maker for flexibility to local circumstances e.g. roof Lights, height of buildings, etc. to support the flexibility suggested. It is considered that the document should be renamed as a Design Guide and reference amended to the revised title throughout the document, as it is not the same format and content as a detailed Design Code.

Screening Report SEA (Strategic Environmental Assessment) and HRA (Habitats Regulation Assessment)

We note that given the rural location within Cannock Chase AONB (Area of Outstanding Natural Beauty) there are no site allocations within the Neighbourhood Plan and that the plan promotes protection of the natural environment, which greatly reduces the likelihood of additional impact on sensitive designated habitats from any development that could occur through the adoption of the Neighbourhood Plan.

The Neighbourhood Plan is unlikely to have any significant effect on the environment given the local nature of the policies aimed largely at small scale incidental development proposals within the existing village settlement boundary to meet local needs and does not override the policies within the adopted Local Plan and the measures deliverable through the SAC Partnership to address any harm which may arise.

We welcome the recognition of Cannock Chase and Cannock Extension Canal SACs (Special Area of Conservation) within the reports.

It is agreed with the results of the Screening Report, subject to no objections from the other statutory consultees, that further stages of an SEA and HRA are not required for the Cannock Wood Neighbourhood Plan.

Planning Policy Team, Cannock Chase District Council - August 2023