

**Cannock Chase Council:
Cannock Chase Local Plan
Representation Form**



Name of the Local Plan to which this representation relates: Cannock Chase Local Plan

Please return to:
planningpolicy@cannockchasedc.gov.uk or:
 Planning Policy, Cannock Chase Council, Civic Centre, PO Box 28,
 Beecroft road, Cannock, Staffordshire, WS11 1BG

Please return by: 5:00pm on Monday 18 March 2024 (late forms will not be accepted)

Part A: Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)*
	*If an agent is appointed, please provide client Title, First Name, Last Name, Organisation (if applicable) and Post Town in column 1 and provide full contact details for the agent in column 2.	
Title	-	Ms
First Name	-	Wakako
Last Name	-	Hirose
Post Town	-	London
Organisation (where relevant)	AB Agri Limited	Rapleys LLP
Address Line 1	C/O Agent	
Address Line 2		
Address Line 3		
Post Code		
Telephone Number		
E-mail Address	C/O Agent	

Do you consent to be notified about progress of the Cannock Chase Local Plan?

Yes No

Notifications: If you consent to be notified about progress on the Local Plan your details will be added to the consultation database. Your personal data will be held securely and processed in line with our privacy notice www.cannockchasedc.gov.uk/privacynotices. Contact will be limited to information regarding planning policy and your data will not be shared. You may unsubscribe at any time by email or writing to us using the details on this form. Data will only be held until adoption of the Cannock Chase Local Plan.

For Office Use	Part A Reference	
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Q4. Please give details of why you consider the Cannock Chase Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Cannock Chase Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see our representations letter in full.

We object to the first paragraph of Policy SO4.1 which refers to "non-town centre offices, industry and warehousing (formerly Class B of the Use Classes Order)", as it is misleading to suggest that these uses are all formerly Class B. While former Class B1 use (offices, research and development, and light industry) is now Class E, General industry and warehousing remain Classes B2 and B8."

(Please continue on a separate sheet if necessary)

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Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We consider that the following amendments are necessary to the first paragraph of Policy SO4.1:

The existing Employment Areas (listed in the Supporting Text) will be safeguarded and their redevelopment for non-town centre offices, *research & development and light industry (formerly Class B of the Use Class Order)* and *Class B2 general industry and Class B8 warehousing (formerly Class B of the Use Classes Order)* will be supported.

(Please continue on a separate sheet if necessary)

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

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

In order to respond to the Inspector's MIQs effectively.

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(Please continue on a separate sheet if necessary)

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature:	
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Date:	18/03/2024
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Please see the representations letter in full.

The boundary of the Brereton Business Park EEA includes the operational area of Premier Nutrition. However, the existing staff car park on the southern side of Colliery Road is outside the EEA boundary.

Planning permission (ref: CH/91/0321) for the staff car park was granted in 1991 as part of the extension of the premises. The car park was leased to the then operator of the current Premier Nutrition site in March 1992, which has since been transferred to Premier Nutrition. The car park has been used as staff parking to serve the business operating from the Premier Nutrition site in excess of 30 years. It is therefore established and essential infrastructure for the operation of the factory. As such, the EEA boundary should be extended to include the existing staff car parking area in order to ensure that the staff parking area is also protected under Policy SO4.1 as the existing employment land.

As explained above, the Premier Nutrition site is constrained in terms of future growth involving the creation of additional staff due to the lack of an additional parking provision. The existing parking provision for Brereton Business Park within the EEA is located on the northeastern side of The Levels, opposite Premier Nutrition. This off-street parking area is regularly full and there is an overflow of on-street parking with no opportunity to increase off-street parking spaces along The Levels. In order to ensure that there is sufficient land available for additional parking in the future for the existing business to grow, the boundary of the extension of the EEA should include additional land adjacent to the existing staff parking area on Colliery Road, as identified on the accompanying site location and context plan. This is in line with the NPPF which requires planning policies to seek to address potential barriers to investment, such as inadequate infrastructure, in order to support economic growth and productivity (NPPF September 2023 Paragraph 86.).

The existing staff parking area and additional land being requested for inclusion within the EEA are located within the Green Belt. We consider that these areas should be released from the Green Belt in order to meet the needs of the existing business, for which exceptional circumstances exist.

Cannock Chase Green Belt Study (2016) includes a Detailed Harm Assessments. A parcel referenced RU35 in which the subject area is included at the northern tip is identified as having Low-Moderate harm in the analysis of the harm of releasing the parcel considering:

- the loss of that parcel's contribution to the Green Belt purposes; and
- additional harm resulting from the weakening of adjacent Green Belt land.

The Green Belt Harm Assessment for parcel RU35 identifies that:

- the existing staff parking area is identified as not large enough in scale to impact openness;
- land has some degree of containment by urban development and Colliery Road forms only a weak boundary to the inset area;
- development would not be perceived as sprawl of the large built-up area as it is not close enough to the large-built up area;
- The area makes a relatively weak contribution to preventing the merging of neighbouring towns;
- the release of the parcel would have negligible impact on the adjacent Green Belt, and

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- notwithstanding that the parcel makes a relatively strong contribution to preventing encroachment from the countryside, overall the harm resulting from its release, as an expansion of Rugeley would be low-moderate.

The proposed release of the Green Belt is not the whole extent of the parcel assessed in the Green Belt Study (2016) as having low-moderate harm if it were to be released from the Green Belt in its entirety. The area is much smaller parcel bordered by the built-up area on two sides, previously developed land in part and well screened with landscape buffer. On the basis of this self-contained nature of the area and the purpose of the release being limited to well-screened surface car park with landscape buffer to serve the business within the EEA, it is considered that there is no/very low harm associated with the release of the area from the Green Belt.

We consider that exceptional circumstances exist to justify the release of the area from the Green Belt as outlined above in terms of meeting the needs of the existing business in the designated employment area and no/very low harm arising from its release. Furthermore, the permanence of the Green Belt will endure in the long term once the boundary is amended, as it includes additional land which would allow the existing business to grow in the long term.

(Please continue on a separate sheet if necessary)

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Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To extend the boundary of Brereton Business Park Existing Employment Area to include the existing staff parking and additional land adjacent (as identified on the site location and context plan) and release that are from the Green Belt.

(Please continue on a separate sheet if necessary)

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

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Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
 Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:


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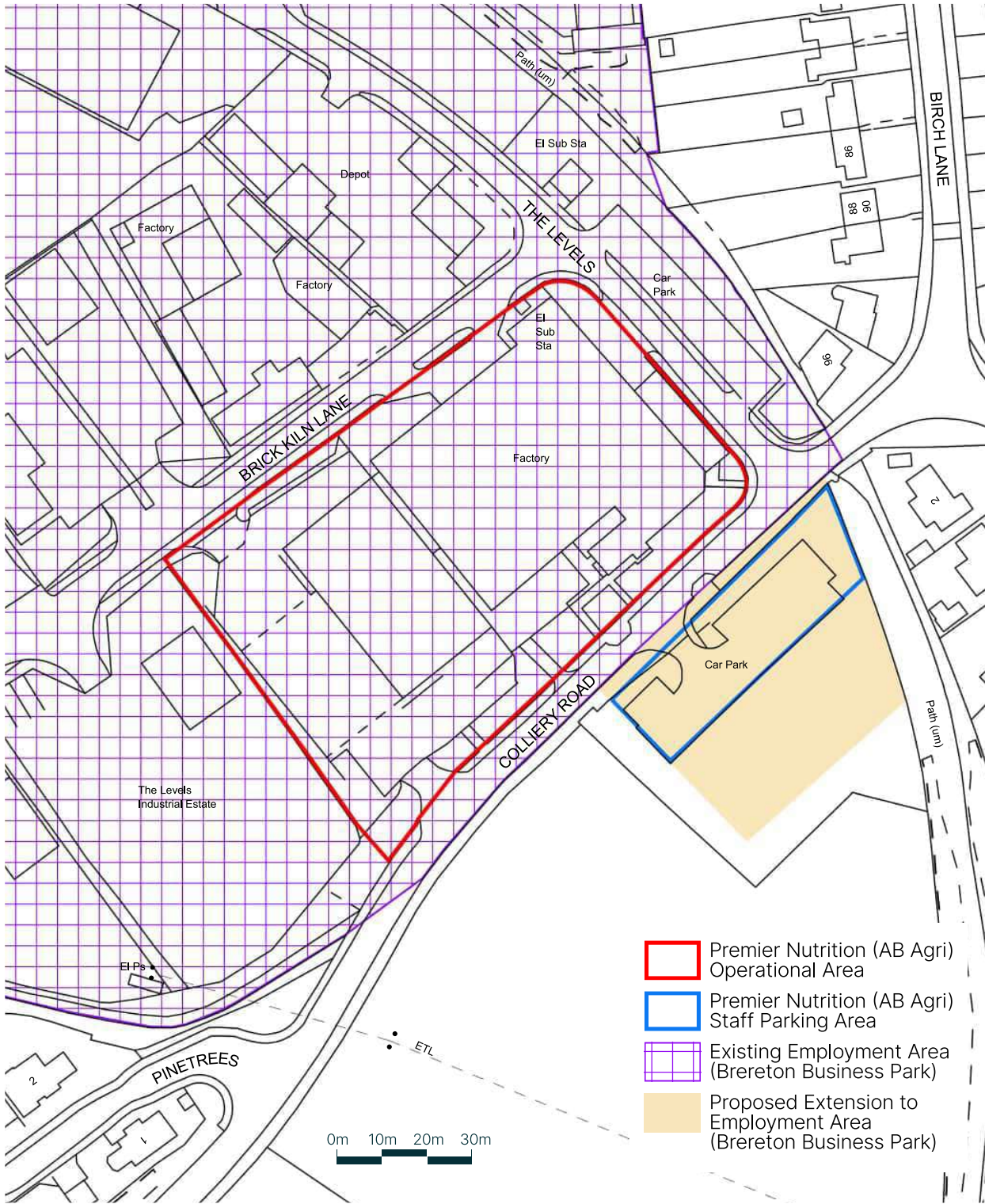


In order to respond to the Inspector's MIQs effectively.

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Signature:		Date:	18/03/2024
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- Premier Nutrition (AB Agri) Operational Area
- Premier Nutrition (AB Agri) Staff Parking Area
- Existing Employment Area (Brereton Business Park)
- Proposed Extension to Employment Area (Brereton Business Park)

SITE LOCATION AND CONTEXT PLAN

Premier Nutrition
 The Levels
 RUGELEY WS15 1RD



Scale @ A4 : 1:1250

Plan No. : 19-02253_SLC01

RAPLEYS

rapleys.com
 0370 777 6292

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Planning Policy
Civic Centre
PO Box 28 Beecroft Road
Cannock
WS11 1BG

Submission by email – planningpolicy@cannockchasedc.gov.uk

Our ref: WH/19-02253
Date: 18 March 2024

Dear Sir/Madam

Re: Cannock Chase District Local Plan Pre-Submission (Regulation 19) Consultation Representations one behalf of AB Agri Limited

We act on behalf of AB Agri Limited ('AB Agri') and have been instructed to submit representations to the above consultation.

AB Agri is the owner and operator of Premier Nutrition, an animal feed mill specialised in animal nutrition, located in Brereton Business Park, Rugeley. The accompanying site location and context plan (ref: 19-02253_SLC01) identifies the operational area and the adjoining existing staff parking area on Colliery Road. It is a strategically important site for AB Agri, as it is the UK head office for Premier Nutrition and is well located in terms of the delivery of raw materials and the distribution of products to the customers. AB Agri is therefore committed to the long term operation from the Premier Nutrition site in Rugeley and is reviewing opportunities for improvements and enhancement of the business in order to meet customer demand in an efficient and effective way.

In terms of potential growth of the business, investment in technical improvements and equipment to make the manufacturing more efficient and increase the productivity is constantly being reviewed. However, the site cannot increase the number of staff, as it is limited by the existing parking provision for the factory. The operational area of Premier Nutrition has very limited on-site staff parking provision. Staff parking is predominantly provided at the parking area on the south side of Colliery Road, as identified on the site location and context plan. In order for the business to grow and to create additional local jobs, an extension to the existing car park on Colliery Road may be required in the long term.

Under the transitional arrangement, the Local Plan will be examined under the relevant previous version of the NPPF. As such, references to the NPPF in these representations relate previous versions of the NPPF.

Policy SO4.1 Safeguarding Existing Employment Areas for Employment Uses

Premier Nutrition's operational area is designated within an Existing Employment Area ('EEA') (Brereton Business Park). In principle, we support policy SO4.1 as it:



- safeguards EEAs for employment purposes;
- supports redevelopment for non-town centre offices, industry and warehousing within EEAs, and
- protects EEAs from inappropriate neighbouring development.

However, we object to the first paragraph of Policy SO4.1 which refers to “non-town centre offices, industry and warehousing (formerly Class B of the Use Classes Order)”, as it is misleading to suggest that these uses are all formerly Class B. While former Class B1 use (offices, research and development, and light industry) is now Class E, General industry and warehousing remain Classes B2 and B8.”

As such, we consider that the following amendments are necessary to the first paragraph of Policy SO4.1:

The existing Employment Areas (listed in the Supporting Text) will be safeguarded and their redevelopment for non-town centre offices, *research & development and light industry (formerly Class B of the Use Class Order)* and *Class B2 general* industry and *Class B8* warehousing ~~(formerly Class B of the Use Classes Order)~~ will be supported.

Brereton Business Park Existing Employment Area Boundary

The boundary of the Brereton Business Park EEA includes the operational area of Premier Nutrition. However, the existing staff car park on the southern side of Colliery Road is outside the EEA boundary.

Planning permission (ref: CH/91/0321) for the staff car park was granted in 1991 as part of the extension of the premises. The car park was leased to the then operator of the current Premier Nutrition site in March 1992, which has since been transferred to Premier Nutrition. The car park has been used as staff parking to serve the business operating from the Premier Nutrition site in excess of 30 years. It is therefore established and essential infrastructure for the operation of the factory. As such, the EEA boundary should be extended to include the existing staff car parking area in order to ensure that the staff parking area is also protected under Policy SO4.1 as the existing employment land.

As explained above, the Premier Nutrition site is constrained in terms of future growth involving the creation of additional staff due to the lack of an additional parking provision. The existing parking provision for Brereton Business Park within the EEA is located on the northeastern side of The Levels, opposite Premier Nutrition. This off-street parking area is regularly full and there is an overflow of on-street parking with no opportunity to increase off-street parking spaces along The Levels. In order to ensure that there is sufficient land available for additional parking in the future for the existing business to grow, the boundary of the extension of the EEA should include additional land adjacent to the existing staff parking area on Colliery Road, as identified on the accompanying site location and context plan. This is in line with the NPPF which requires planning policies to seek to address potential barriers to investment, such as inadequate infrastructure, in order to support economic growth and productivity (NPPF September 2023 Paragraph 86.).

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- the release of the parcel would have negligible impact on the adjacent Green Belt, and
- notwithstanding that the parcel makes a relatively strong contribution to preventing encroachment from the countryside, overall the harm resulting from its release, as an expansion of Rugeley would be low-moderate.

The proposed release of the Green Belt is not the whole extent of the parcel assessed in the Green Belt Study (2016) as having low-moderate harm if it were to be released from the Green Belt in its entirety. The area is much smaller parcel bordered by the built-up area on two sides, previously developed land in part and well screened with landscape buffer. On the basis of this self-contained nature of the area and the purpose of the release being limited to well-screened surface car park with landscape buffer to serve the business within the EEA, it is considered that there is no/very low harm associated with the release of the area from the Green Belt.

We consider that exceptional circumstances exist to justify the release of the area from the Green Belt as outlined above in terms of meeting the needs of the existing business in the designated employment area and no/very low harm arising from its release. Furthermore, the permanence of the Green Belt will endure in the long term once the boundary is amended, as it includes additional land which would allow the existing business to grow in the long term.

Conclusion

Premier Nutrition is an established business, operating an animal feed mill in Brereton Business Park. It is a strategically important site for AB Agri and it is committed to the long term operation from the site. As such, while we support the EEA policy in principle, we consider that the EEA boundary should be amended to include the area serving as essential infrastructure in order to

support the ongoing operation and future growth. We also consider that there are exceptional circumstances to release the suggested EEA extension area to be released from the Green Belt.

We request that our submission is fully taken into account in the emerging Local Plan process and would be grateful for your acknowledgement of receipt.

Yours faithfully,



Wakako Hirose
BA (Hons) DipTP MRTPI
Associate Partner - Town Planning



Encl. Site Location and Context Plan