

**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	Mr	Miss
First Name	Robert	Suzanne
Last Name	Barratt	Tucker
Post Town	Cannock	Shrewsbury
Organisation (where relevant)	Beau Desert Golf Club Limited	FBC Manby Bowdler LLP
Address Line 1		
Address Line 2		
Address Line 3		
Post Code		
Telephone Number		
E-mail Address		

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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Making a representation: We cannot accept anonymous representations. You must provide your contact details but only your name and comments will be published on the website. Your personal data will be held securely and processed in line with our privacy notice www.cannockchasedc.gov.uk/privacynotices. Once the plan is submitted your comments will be shared with the Planning Inspectorate and an independent inspector will review representations. You have the right to withdraw your representation and your data will be destroyed. Data will only be held until adoption of the Cannock Chase Local Plan.

Part B: Representation Form

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

Part B: Representation

Name and Organisation:	Beau Desert Golf Club Ltd
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Q1. To which document does this representation relate? (Please tick one box)

- Cannock Chase Local Plan 2018-2040
- Sustainability Appraisal of the Cannock Chase Local Plan 2018-2040
- Habitats Regulations Assessment of the Cannock Chase Local Plan 2018-2040

Q2. To which part of the document does this representation relate?

Paragraph :	1.8 The Spatial Strategy 1.18-19 Site Allocations Spatial Strategy for Cannock/Hednesford & 6	Policy:	Strategic Objective 2 (To create community facilities and healthy living opportunities across the District) Strategic Objective 3 (Deliver a sufficient supply of homes) Strategic Objective 7 (Protect and enhance natural environment) SO3.1: Provision for New Homes SO2.3: Provision of Open Space	Site:	C375a and C375b	Policies Map:	Housing site allocations
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Q3. Do you consider the Cannock Chase Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:
(Please tick as appropriate).

For office use	Part B 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.

1. **NPPF Para 35** sets four tests of soundness:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; 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 and other statements of national planning policy, where relevant.

[our emphasis]

2. **It is submitted that the Local Plan is UNSOUND because Policy SO3.1: Provision for New Homes and the housing site allocations identified on the Policies Map is based on a flawed evidence base, principally the Site Selection Methodology Paper 2023, the Strategic Housing Land Availability Assessment 2023 and the Green Belt Topic Paper 2023.**

3. **Accordingly, the Plan is neither positively prepared nor justified, and is inconsistent with national policy.**

4. The principles set out in the draft Local Plan, as summarised below, are supported but it is considered that the site allocations fail to achieve those aims.

- a. **Strategic Objective 3:** aims 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 by:
 - Facilitating sustainable housing provision for this plan period and the next;

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- *Delivering sufficient housing to meet the District's own need and an appropriate and sustainable contribution to the wider housing market area shortfall where justified in adopted plans;*
 - *Helping meet local need for affordable dwellings;*
 - *Providing housing choices for an ageing population;*
 - *Catering for the needs of different groups in the community.*
- b. **Policy SO3.1: Provision for New Homes** states that:
- *New housing allocations are concentrated within the existing urban areas, or within planned expansion to the urban areas in accessible and sustainable locations, in accordance with the Spatial Strategy.*
 - *Priority has been given to the re-use of previously developed land, including the former Rugeley Power Station site, to meet housing needs.*
 - *The allocated housing sites are shown on the Policies Map and are identified in the Site Allocations policies.*
 - *There is a need to identify new locations adjacent to existing settlements to accommodate the balance of dwellings which cannot be built on sites within the existing urban areas of the District. Therefore, strategic housing allocations including some or entire release of land within the Green Belt have been identified.*
- c. **The Updated District Profile for Cannock/Hednesford/Heath Hayes** identifies that the urban area, particularly Cannock, provides the majority of employment opportunities for the District.
- d. **Para 5.1.** asserts that *Cannock Chase District will meet the development needs arising from the district, plan for our future needs and provide a contribution towards the Housing Market Area shortfall. To meet these needs development will focus on.*
- *Re-use of brownfield land;*
 - *Supporting existing settlements and characteristics;*
 - *Assisting in the rejuvenation of town centres;*
 - *Ensuring infrastructure delivery to support growth;*
 - *Safeguarding natural and historic assets; and*
 - *Assisting in the delivery of the Council's ambition to be net zero carbon.*
- e. **Para 5.9.** states that *Residential and employment sites have been identified within the Local Plan to meet identified needs, these will be within the existing urban area or accessible and sustainable locations within the Green Belt.*
- f. **The Spatial Strategy** states that:
- *New development will be located in the most sustainable locations, including within and around existing town centres, neighbourhood centres and employment areas.*
 - *Development will be focussed on the existing urban areas and will protect and enhance Green Belt land and the National Landscape.*
 - *The adverse environmental impacts of development will be minimised and mitigated where unavoidable. The Local Plan will protect and enhance species, habitats and geological sites.*
- g. **The Spatial Strategy for Cannock/Hednesford/Heath Hayes** states that:
- *Cannock, Hednesford and Heath Hayes will be the main priority area for new residential and commercial development.*
 - *Previously developed land and brownfield sites will be prioritised for development, and a high quality of design reflecting the character of the area will be sought.*
 - *...*
 - *The networks of open space will be protected and enhanced to support the natural assets and continue to provide opportunities to improve health and well-being.*
 - *Improvements to cycle and footpath networks will be made to enhance connectivity and encourage more active travel, health and well-being.*

[our emphasis]

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5. **However, it is not considered that the housing site allocations reflect or achieve these aims.**

6. **The principal concern relates to the Council's decision not to put forward Site C375a for allocation for housing; and that the site selection process failed to properly assess site C375a, alongside site C375b, which is put forward for enhanced open space, to include ecological and biodiversity enhancements.**

Site Reference: C375a and C375b; Site Location: Land to the west of Beaudesert Golf Club, off Rugeley Road, Hednesford.

7. The Site is acknowledged to sit within Green Belt and AONB designations, but the Council has assessed there to be a need for Green Belt release to accommodate the housing need requirements going forward, and that brownfield sites should be prioritised for that.

8. It is considered that the assessment pursuant to the Call for Sites fails to properly consider the merits of the site as follows:

a. Site Area:

- i. The SHLAA assessment quotes the site area (for site C375a) as 2.48ha (the total site area including C375b is c.55ha), however, the landowner's submission indicates that the site area of C375a is 5-10acres (2-4ha).
- ii. It is not clear why the Local Authority have reduced the stated site area in this way and limited the scope of the area put forward for development. (It is explained why the site capacity is reduced – to account for net developable area), but not why the site size is reduced).
- iii. The site remains subject to detailed survey and any physical constraints that the Council may be taking into account to reduce the available area have the potential to be overcome. The housing development is required to enable the enhancements proposed on the adjacent land (site C375b), so as much development as is feasible (in an appropriate manner) is sought on C375a, in order to maximise the enhancements that are possible on the adjacent land.

b. Environmental constraints:

- i. The assessment asserts that: *'development at this location is likely to result in noise pollution impacting on local amenity'*.
- ii. Any scheme proposed would locate the dwellings away from the road and the use of an appropriate site layout, landscaping, and design specification of the dwellings would overcome any such amenity concerns. It is noted in this context that planning permission was granted for a residential scheme at Fallow Park, located directly on the A460 (Rugeley Road) and in close proximity to Site C375a.
- iii. Whilst the site was formerly used for quarrying and tipping of inert material; it is subject to close monitoring and management which has significantly reduced any risk arising from potential contamination. Brownfield sites such as this are to be prioritised under the NPPF.

c. Agricultural Land: The SHLAA assessment identifies the site as Grade 3 Agricultural Land, however, the Agricultural Land Classification mapping for the West Midlands Region identifies it as being 'Other land primarily in non-agricultural use'; the land is not suitable for agricultural use.

d. Green Belt & potential mitigation:

- i. The five purposes are as follows:
 - To check the unrestricted sprawl of large built up areas.
 - To prevent neighbouring towns merging into one another.
 - To assist in safeguarding the countryside from encroachment.
 - To preserve the setting and special character of historic towns.

- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- ii. The SHLAA assessment in this context refer to the Green Belt harm rating of this location (High/Very High); however, that rating relates to a wider area than site C375a, being the only part proposed for development requiring release from Green Belt, and which itself is considered brownfield land and is located adjacent to the main road and adjacent to existing residential development.
- iii. The larger proportion of the proposed site (C375b) is proposed for landscape and biodiversity enhancements, which will serve to preserve and enhance the openness and quality of the Green Belt and enable the purposes of including land within the Green Belt to be fulfilled more effectively. The enhanced Site C375b will serve as a strong distinction between the built up area to the West and the Green Belt to the East; and will itself be more clearly 'countryside' and will serve to protect against urban sprawl by virtue of its enhanced quality as policy accessible open space with demonstrable visual and landscape amenity as well as its primary characteristic of maintaining openness.
- iv. The proposal for site C375b seeks to restore a significant area of former forest which existed before quarrying took place; the potential for Biodiversity Gain as well as beneficial landscape impact and the provision of publicly accessible open space, along with connectivity to the wider AONB, is significant in the context of the Green Belt considerations, and is not recognised in the SHLAA assessment, neither is the permanence that would be ensured for this section of Green Belt, such that the assessment of harm in this case is flawed.
- v. In that context the scheme proposed for Site C375a & b taken together epitomises the objectives of NPPF 147, and as such the failings to fully assess this site in this context, and the consequent inappropriate assessment of the degree of harm arising, cause the Plan to be unsound in light of this policy conflict.
- e. Climate Change: The SHLAA Assessment refers to the site having the *potential for onsite dedicated energy generation*:
 - i. it is not clear what is envisaged in this regard, but this sentiment is difficult to reconcile with the Council's assessment of the unsuitability of the site for the proposed development.
 - ii. The proposed scheme will give rise to ecological, environmental and biodiversity enhancements as well as the enhancement of the openness for Green Belt purposes.
 - iii. Whilst climate change objectives are understandably important, it is considered that the proposed scheme for the permanent protection and enhancement of the site for afforestation and biodiversity gain contributes in a significant way to that objective, which is unrecognised here.
 - iv. The degree of harm arising from, for example, a solar scheme across this site, would give rise to a far more significant degree of harm to openness and visual and landscape harms, even if only temporarily, than the modest residential development of the brownfield site C375a, particularly when taken together with the significant enhancements proposed for the wider Site C375b.
- f. Summary: The summary draws reference to a number of inaccurate assertions and flawed assessments of the site in reaching its conclusion:
 - i. the assertion that there would be loss of Grade 3 agricultural land is incorrect;
 - ii. the degree of harm to the Green Belt is based on a flawed assessment which fails to take account of the brownfield status of site s375a and the proposed enhancements to Site C375b.
 - iii. The Summary asserts that '*there is potential for detrimental impacts on local water quality*' without explanation or justification. A bifurcation of the Bentley brook discharges into the land and then directly into the Rising Brook. Water

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quality has been monitored following the cessation of filling operations and considered satisfactory. There is no reason to expect that this position would be altered under the proposed scheme for the site

9. Fundamentally, there is a clear inconsistency of decision making here, when comparing this site with the adjacent development at Fallow Park for which permission was granted for a similar-sized housing scheme on brownfield land within the Green Belt and AONB. This site presents a far more comprehensive package of enhancements to Green Belt, AONB, landscape character, openness, and biodiversity as well as presenting opportunities for public accessibility and securing those enhancements permanently, all of which have been overlooked in the categorisation of this site.
10. Accordingly, it is considered that the Site Allocations shown on the **Proposals Map** and as triggered by **Policy SO3.1** are flawed, and do not satisfy the requirements of or are inconsistent with a number of NPPF policies, including:
- a) **NPPF 31:** *The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.*
 - b) **NPPF 32:** *Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains)...*
 - c) **NPPF 23:** *Broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non- strategic policies).*
 - d) **NPPF 16:** *Plans should:*
 - a) *be prepared with the objective of contributing to the achievement of sustainable development;*
 - b) *be prepared positively, in a way that is aspirational but deliverable;*
 - c) *be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
 - d) *contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
 - e) *be accessible through the use of digital tools to assist public involvement and policy presentation; and*
 - f) *serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*
 - e) **NPPF 8:** *Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*
 - a) **an economic objective** – *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;*
 - b) **a social objective** – *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*

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present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

f) **NPPF 11:** *Plans and decisions should apply a presumption in favour of sustainable development.*

For plan-making this means that:

a) *all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

g) **NPPF 123:** *...Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.*

h) **NPPF 124:** *Planning policies and decisions should: ...c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.*

i) **NPPF 147:** *...Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land*

11. It is submitted that these policies have not been applied in the site selection process under the SHLAA, in particular in relation to **Site Reference: C375a and C375b.**

12. **In light of the flaws identified, the site allocations fail to achieve the stated policy aims and objectives and the consequent inconsistencies with the aforementioned NPPF Policies renders the Plan unsound.**

For reference the SHLAA submission relating to Site C375a and b and the Council's assessment are annexed.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the

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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.

The Proposals Map should be revised to include Site C375a as being released from Green Belt for housing, to be supported by the wider scheme for open space incorporating ecological and biodiversity enhancements as put forward in relation to Site C375b.

(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:

Mr Barratt proposes to attend in order to explain the vision for the wider site which does not appear to have been fully appreciated or understood by the Council.

(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:



Date:

13 March 2024

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Cannock Chase District Council

Call for Sites Submission Form

Landowners, developers and other interested parties are invited to submit site suggestions for development for consideration e.g. housing, employment, retail, mixed use schemes, and other uses such as leisure.

IMPORTANT DISCLAIMER AND HOW WE USE YOUR PERSONAL INFORMATION

Please note the information you provide will be used to help prepare the Councils' Strategic Housing and Employment Land Availability Assessments and Local Plan documents. The submitted information will not be confidential and will be made publicly available via paper based reports (such as the Strategic Housing and Employment Land Availability Assessments) which will also be placed on our website. The submitted information will be shared with other employees or agencies (such as the Planning Inspectorate) who may be involved with the process and the Council is obliged to make the Call for Sites submissions available for public inspection. We therefore encourage you to avoid providing sensitive information that you do not wish to be published. Only names of the applicant/organisation/agent (not addresses or other contact details) will be attributed publicly. Your address and contact details will not be shared with anyone else and will be protected.

Please complete Part 1 with your personal details (which will be processed as detailed above). Then complete Part 2 with your detailed site submission (complete a separate form for each site submission). Please ensure the applicant/agent name is repeated at the start of each Part 2 form submitted.

By submitting this form you are also providing your consent for us to retain your details on our Planning Policy consultation data base so we can keep you up to date with progress on the plan and other consultations, unless you request that we do not do so by ticking this box

Our consultation database is held confidentially by the Planning Policy team, and we retain your details on record until you either a) request that we update them b) you unsubscribe by informing us in writing at planningpolicy@cannockchasedc.gov.uk or c) we have evidence that the contact is no longer active for example returned letters or email 'bounce-back'.

For further information see www.cannockchasedc.gov.uk/PrivacyNotice

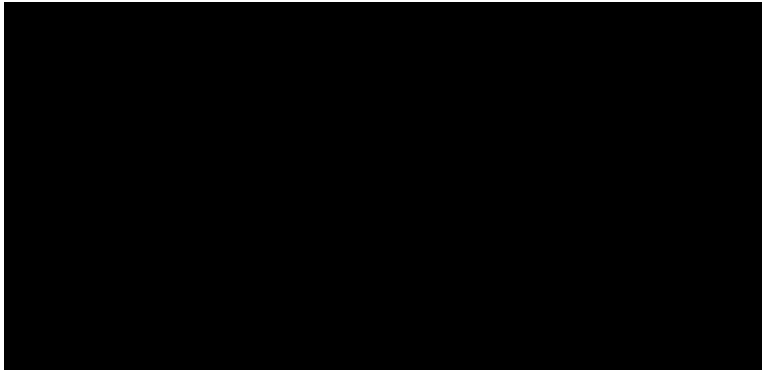


PART 1: NAME, ADDRESS AND CONTACT DETAILS

1. Name/Organisation:

Beau Desert Golf Club Limited

2. Address: Clubhouse



6. Agent Name (if applicable) and details (including address, telephone number and email address):

Suzanne Tucker
FBC Manby Bowdler LLP



If you have completed this form as an agent or on behalf of another person, please confirm that they have given their consent for you to do so by ticking the box below. Without this consent we will not be able to accept comments as being valid.

I can confirm that I have received consent from the named person/organisation to complete this representation form on their behalf.

PART 2: SITE SUBMISSION DETAILS

SITE INFORMATION

1. Name/Organisation/Agent (ensure same as Part 1)

Beau Desert Golf Club Limited

2. Status in relation to the submitted site:

(Landowner (please state SOLE or PART, if part provide brief details (no personal information) of other known landowners at Question 11); potential purchaser; housebuilder/developer (you intend to construct the site once permission is obtained or have option on site); operator (you intend to operate the development e.g. hotel); other- please specify e.g. interest group.

SOLE

3. Site Address:

(Please include a map with a boundary of the site, ideally 1:1250)

Land off Rugeley Road, A460 Hednesford, Staffordshire
See map

4. OS Grid Reference (centre of site)

Easting: 400810

Northing: 313430

5. Site Area (Hectares):

<i>Total Site Area</i>	<i>Net Developable Area (if different to the total site area)</i>
c.5-10 acres proposed for residential development (edged green on the plan)	

6. Description and current use of the site (including commentary on adjacent land uses):

Currently not in active use; the site (edged green) and the adjacent land (edged pink) was previously used for quarrying and tipping. Immediately adjacent, to the north-east of the site, is a site recently developed for housing. There is a building on part of the site and other evidence of its former commercial use.

7. Please provide details of any relevant planning history for the site

The site (edged green) and the adjacent land (edged pink) was previously used for quarrying and tipping.

The following planning consents affect the site (edged green) and the wider site (edged pink):

*252/84 Reclamation of Quarry Land
CH/89/0653 Reclamation by infilling.
CH/91/0267 Extension to land filling
CH/93/0552 Continuation of land filling
CH91/0360 stabilisation scheme
CH91/0671 Relaxation of condition 22 on CH91/360
CH/95/0019 Extension of time to allow for restoration
CH97/0356 Planning permission for golf course extension
CH97/05/0333 Planning permission for completion of landfill and construction of golf course.*

8. Please state whether the site is Greenfield, Brownfield or mixed. If mixed, please provide the area (in hectares) which is considered to be Brownfield:

There is a redundant building within the site (edged green on the plan), and other evidence of its previous commercial use.

9. To ensure the land meets the definition of previously developed land as provided in the Glossary to the NPPF, please confirm the following by ticking the statements which apply to the site:

The land is or was occupied by a permanent structure.	✓
The land is within the curtilage of a permanent structure and does not include any land that is not curtilage land.	
The land is not or has not been occupied by agricultural or forestry buildings.	✓
The land is not a formal minerals or waste disposal site with restoration conditions.	
The land is not a residential garden, park, recreation ground or allotment in a built up area.	✓
The land may have been previously developed but the remains of the permanent structure have not blended into the landscape in process of time.	✓

10. Is this a new site? (The site has not been included in previous versions of the SHLAA/ELAA or previously submitted to a Local Plan consultation. Please indicate if you are updating a previously entered site and provide the ID number if

available)

Yes/No/Comment:

This submission is by way of an update to a previously submitted site – allocated reference **C375**; please note that whilst site C375 extends across the land shown edged pink on the plan, only that part of it shown edged green is proposed for housing development.

OWNERSHIP OF THE SITE

11. Brief details of other ownership/land interests (no personal information to be submitted):

All of the land is a wholly owned asset of the Beau Desert Gold Club Limited

12. Are all the above owners/those with a land interest aware of this submission of the site?

Yes/No/Comment:

13. Are there any known ownership issues i.e. do all of the owners support the proposed use of the site and are there any third party landownership constraints related to use of the site e.g. requirements for access?

Yes/No/Comment:

The landowner Company has resolved to promote the site as part a comprehensive scheme to include the use of the wider site as open space; there are no third party landownership constraints.

DEVELOPMENT/ALLOCATION DETAILS

14. Type of development/allocation proposed (e.g. Residential/Employment/Mixed Use/Leisure Use/Green Space Network/Local Green Space. Please provide further details of the type of residential development e.g. affordable, starter homes, self build, residential institution, gypsy and traveller pitches/plots. Please provide further details of the type of employment/mixed use scheme proposed e.g. retail, offices, industrial etc)

<i>Type of development</i>	<i>Yes/No</i>	<i>Please state what type/mix of development is proposed e.g. for residential is it affordable, for employment is it offices?</i>
Residential	Yes	Open market housing, with such proportion of affordable units as may be deemed to be required pursuant to prevailing policy
Employment	No	
Other- please state	Yes	The overall proposition includes the adjacent land edged pink on the plan, which is proposed for Leisure/Green Space Network/Local Green Space, comprising c40-45 acres for publicly accessible woodland; and the area edged yellow comprising c.2-3 acres for a small extension to one of the existing holes at Beau Desert Golf Club

15. What is the potential capacity of the site? (Please provide approximate dwelling numbers and densities or indicative floorspace for employment developments with supporting commentary on how this has been calculated, including the assumed development density)

<i>Type of development</i>	<i>Suggested capacity</i>	<i>Comments (including assumed development density)</i>
Residential	c.50-80 dwellings	The requisite proportion of which would be affordable housing dwellings in accordance with policy requirements (subject to viability)
Employment	n/a	
Other- please state		

16. Are there any known constraints to the site?

<i>Constraint</i>	<i>YES/NO</i>	<i>Comments</i>
Legal/landownership issues e.g. restrictive covenants, ransom strips, rights of way	No	

Physical constraints e.g. topography, utilities (high pressure gas pipeline, pylons)		<p>Part of the site is flat, but parts are steeply sloping. There are derelict structures and other features remaining from the former use for quarrying and tipping. The quarrying activity ceased some time ago, and parts of the site were re-modelled as a consequence of inert tipping operations which followed.</p> <p>Parts of the site would need to be re-contoured to facilitate the proposed residential development and the associated open space provision across the wider site (as described further below), Any such works, would therefore need to be undertaken in consultation with the Environment Agency. A scheme for surface and foul drainage would be developed in consultation with the EA , Flood Risk Assessment Unit, and other relevant bodies.</p>
Ground conditions e.g. land stability, contamination	No	
Flood risk	No	
Minerals or waste sites nearby/minerals safeguarding issues	No	
Ecological designations/features	No	<p>There are no known ecological constraints associated with the proposed development site.</p> <p>The adjacent land is potentially suitable for a biodiversity site, and the intention is to enhance the area for ecological colonisation and conduct habitat improvement with a view to providing significant environmental and ecological enhancements.</p> <p>There is a pond/lake that has formed within the wider site that has the potential to provide enhanced ecological and biodiversity habitat.</p> <p>This does not affect the deliverability of the proposed residential site.</p>
AONB (within or in close proximity to)	Yes	Cannock Chase AONB
Green Space Network designation	No	
Conservation Area/Listed Building	No	
Green Belt designation	Yes	
Current use needs to be relocated	No	

Access difficulties		The site benefits from an existing access from the A460 which previously served the quarrying and landfill activity. The access to the edge of the site from Rugeley Road is public highway and comprises a metalled entrance and driveway. It is anticipated that some works may be required alongside the highway to improve visibility, and a TRO to extend the existing 30mph speed limit further East by a few hundred metres (i.e. toward Rugeley) to ensure appropriate highway safety
Infrastructure provision e.g. water, utilities	No	The site is adjacent to the A460 and therefore has ready connectivity to mains services.



If there are any other constraints not listed above please provide further details:

.....

17. Has any work been undertaken on the promotion of the site? (e.g. legal reports, traffic surveys, ecology reports) Please provide copies of any relevant surveys/reports where available

Yes/No/Comment:

.....

18. Are any of the following services available on or to site?

<i>Service</i>	<i>Availability</i>	<i>Comments</i>
Water	Yes /No	
Electricity	Yes /No	
Gas	Yes /No	
Foul Sewer	Yes /No	
Surface Water Sewer	Yes /No	
Telephone/Broadband Internet	Yes /No	

19. What access is there in terms of public transport?

Bus Stop – Approximate walking distance:

c. 150m from site entrance – there are bus stops on both sides of Rugeley Road (A460) located in close proximity to the access into the site (marked * on the plan)

Railway Station – Approximate walking distance:

c. 1.1km or 3/3 mile to Hednesford Station

20. Availability of the site: Over what broad time frame do you anticipate that the site could become available for the commencement of development (and provide supporting commentary to explain your answer)?

<i>Timescale</i>	<i>Tick if applicable</i>	<i>Comments</i>
Immediately		
1-5 years		
5-10 years	✓	Anticipated timescale
10-15 years 15 years or more	✓	In acknowledgement of the anticipated Plan Period extending to 2039 upon adoption of the emerging Local Plan

21. Is the site currently being marketed and is there current market interest in the site (please provide details of market interest): Yes/ No-/Comment

The Developer of the adjacent site (Fallow Hollow) and Forestry England have been in discussion with owners at a very preliminary level.

22. Have any viability appraisals of the development/allocation been undertaken to date and are there any viability issues arising at present? (Would the landowner(s) be prepared to sell the site at current land values?)

No viability appraisals have been undertaken; discussions with appropriate wildlife groups/bodies in connection with the preservation and enhancement of the pink area (excluding the green area) for wildlife habitats improvement is intended in due course.

The landowner may be open to offers for the land and/or promotion

23. Are there any specific intentions to start development? (e.g. planning permissions, work programme?) Yes/No/Comment:

.....

24. Will there be any phasing of the site? Yes/No/Comment:
(Please provide an approximate timescale of build out rates if possible)

The proposal is yet to be developed to this level of detail

25. Please provide any other relevant information below:

- 25.1 The wider site has been submitted previously; only a small area is proposed for residential development, with the wider area being proposed for leisure and open space purposes.
- 26.2 Only the area of land edged green on the attached plan is proposed for residential development, as part of a wider scheme for which the residential element would be a form of enabling development, to allow the adjacent land to be opened up for the public benefit and to allow improvements to the leisure facilities at Beau Desert Golf Club.
- 26.3 The wider site currently comprises an area formerly used as a sand and gravel quarry, and which was subsequently extensively tipped. The site put forward for allocation (edged red), includes structures and hardstanding formerly used in connection with the quarrying and tipping activity.
- 26.4 There is currently some, limited, public access across the adjacent area edged pink, in that there is a bridleway that crosses the site, but the route is impeded by the uneven topography and the quality of the open space is limited due to the nature and extent of past tipping activities.
- 26.5 The overall vision for the wider site would provide a small housing development, along the Rugeley Road, adjacent to the existing settlement and the Neighbourhood Plan boundary, utilising the parcel which has redundant buildings present, whilst providing a large area of improved open space to the east, with improved public accessibility, through the diversion of the bridleway and the provision of suitable areas for public enjoyment e.g. picnic areas and woodland walks, as well as providing improved habitat which would give rise to benefits for the AONB, and the local area generally in providing public open space, as well as giving rise to environmental and ecological benefits. The landowner is flexible as to the nature of the overall scheme and would welcome discussions as to how it might best be framed.
- 26.6 A small alteration to the Green Belt boundary is therefore proposed, to facilitate the development of this previously developed site, which would, in turn, facilitate the enhancement and improvement of the adjacent open space to allow for both improvements to the habitat as well as improved public accessibility alongside additional leisure facilities at the Golf Club.
- 26.7 This proposal would therefore be in alignment with and support the Vision and Objectives identified in the Local Plan Part 1, 2014, and in particular, in:
- 26.7.1 focusing development in existing settlements (including

Hednesford);

- 26.7.2 delivering both aspirational and affordable housing which provides for local needs and which also encourages more people in managerial and professional jobs who work or invest in the District to live here
 - 26.7.3 providing increases in quantity and quality of recreation spaces and in the enhancement of both the extent and quality of the green space network and leisure facilities;
 - 26.7.4 conserving and enhancing landscape character; and
 - 26.7.5 improvements to quality, quantity and range of accessible indoor and outdoor sport and recreation facilities.
- 26.8 Similarly, the spatial strategy in the emerging Local Plan (currently at pre-Submission Consultation (Reg 19) stage) proposes that:
- 26.8.1 Development will be located the most sustainable locations, be focussed on the existing urban areas, and will protect and enhance Green Belt land and the AONB; and
 - 26.8.2 The reuse of previously developed sites will be optimised, and natural assets will be Protected Green Belt release in order to provide sufficient land to meet Cannock Chase District's housing need with an element of flexibility.
- 26.8 Whilst it is outside the settlement, the site is immediately adjacent to it and to the Neighbourhood Plan boundary, it is therefore in a sustainable location, with good transport links and access to the services and facilities within the settlement of Hednesford. The residential development would provide connectivity between the settlement and the brownfield development to the north (along Rugeley Road).
- 26.9 The NPPF identifies the need to make effective use of land, (including Green Belt):
- 26.9.1 Para 119 requires planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions;
 - 26.9.2 Para 120(a) requires that planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve new environmental gains – such as developments that would enable habitat creation or improve public access to the countryside;

- 26.9.3 Para 120(b) requires that planning policies and decisions should recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
- 26.9.4 Para 145 provides that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.
- 26.10 Noting also that NPPF Para 142 also requires, in the context of Green Belt allocations, that plans should give first consideration to land that has been previously developed and/or is well-served by public transport (which this site plainly is); it also provides that plans should set out ways in which the impact of removing land from Green Belt can be off-set through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land should be identified; this is exactly what is proposed in the overall scheme envisaged here for the pink and yellow land identified on the plan.
- 26.11 The NPPF also has a focus on the enhancement of biodiversity:
- 26.11.1 Para 153 provides that Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, **biodiversity** and landscapes, and the risk of overheating from rising temperatures [our emphasis];
- 26.11.2 Para 174 provides that Planning policies and decisions should contribute to and enhance the natural and local environment by: ...d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- 26.11.3 Para 179 indicates that To protect and enhance biodiversity and geodiversity, plans should: ...b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

- 26.11.4 Para 180 provides that When determining planning applications, local planning authorities should apply the following principles:
...d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.
- 26.12 This proposal presents a unique opportunity to enable and facilitate significant biodiversity enhancements.
- 26.13 Releasing a small area of this site close to the existing settlement, alongside Rugeley Road, for residential development, would allow the Beau Desert Golf Club to fund (i) the opening up and reinstatement to a more natural landscape and habitat of what is currently an area of poor quality open land affected by steep slopes and difficult terrain, significantly enhancing biodiversity, and providing a more accessible area of managed woodland and wetland for public access, between Rugeley Road and the Golf Club, which in turn would facilitate improved access to the wider AONB beyond; and (ii) a modest extension of the existing golf course with the objective of raising the competitive status of the course regionally and nationally.
- 26.14 The active management of the pink area (excluding the green area) would mean that the landscape could be reinstated to a more natural Forest Heathland appropriate to its location; the habitat and biodiversity improved and the public access improved, in accordance with the 2016 'Review of Landscape Character Assessment for Cannock Chase District', thus enhancing the AONB. This requires funding, which the residential development of the site being put forward for allocation in the SHLAA would facilitate.
- 26.15 The proposal is in alignment with the NPPF principles as to the conservation and enhancement of landscape and scenic beauty in AONBs (Para 176).
- 26.16 The vision and objectives of the emerging Local Plan look to achieve economic growth – this proposal will achieve those objectives by allowing the re-use of a previously developed site for the provision of housing that will attract residents to facilitate growth and investment, but which will also fund localised improvements to open space, natural landscape and habitat and leisure facilities.

26.17 Whilst the emerging Local Plan provides for developer contributions to be put towards the improvement of leisure facilities and open space, this proposal would take a holistic approach by utilising residential development to enable and facilitate the improvement to open spaces and golf course provision

26.18 The proposed allocation of a small part of the wider site (C375) for residential use, to facilitate the improvement of the open space and leisure facilities within that site, would be a prime example of providing net gain within a single site allocation – allowing the opening up of a previously inaccessible area of countryside to provide opportunities for recreation as envisaged the Local Plan, in particular meeting the following Objectives in the existing Local Plan:

- Objective 1 Promote pride in attractive, safe, local communities
- Objective 2 Create healthy living opportunities across the District
- Objective 3 Provide for housing choice
- Objective 4 Encourage a vibrant local economy and workforce
- Objective 7 Provide well managed and appreciated environments
- Objective 8 Support a greener future

As well as the following strategic objectives in the emerging Local Plan:

- Objective 2 - To create community facilities and healthy living opportunities across the District;
- Objective 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;
- Objective 7 - To protect and enhance the natural environment;
- Objective 8 - To support a greener future.

Please **provide a map with the site boundary** with your response, ideally at a scale of 1:1250.

Please refer to the plan submitted herewith, identifying, **edged green**, the site being submitted for the SHLAA (the wider complementary site being edged pink).

Please send your completed form to Planning Policy by:

Email: planningpolicy@cannockchasedc.gov.uk

Post: Planning Policy
Cannock Chase Council
Civic Centre
PO Box 28
Beecroft Road
Cannock
Staffordshire
WS11 1BG

For further information email (see above), phone (01543) 462621 or view our website at www.cannockchasedc.gov.uk/planningpolicy





Cannock Chase Local Plan (2018-2040)

Site Selection Methodology

July 2023



	C373a		Land at Court Bank Farm, Cannock Wood			Site Withdrawn by Landowner	Site Withdrawn by Landowner	Yes - combined with C373b
197	C373a		Land at Court Bank Farm, Cannock Wood					
198	C373b		Hill Farm, 84 Hayfield Hill, Cannock Wood, Cannock, WS15 4RU			Site Withdrawn by Landowner	Site below .10 dwelling threshold	Yes - combined with C373a
199	C375a, b and c		Land to the west of Beaudesert Golf Club, off Rugeley Road, Hednesford			Rejected at PO Site Selection		Yes
200	C376a		Former Cannock Wood Colliery Tip, New Hayes Road, Cannock Wood					Yes
201	C376b		Land at Cannock Wood Tip, off New Hayes Road, Cannock		N/A - Site Not Known			Yes
202	C399		Land at junction of New Hayes Road and Ironstone Road, Cannock Wood					Yes
203	C400		Land at Cumberledge Hill, Cannock Wood (north of Courtbank Farm)					Yes
204	C401		Land adjacent to 18 Cumberledge Hill, Cannock Wood					Yes
205	C402		Land to the rear of 40-46 Hayfield Hill, Cannock Wood		Site below .10 dwelling threshold	Site below 10 dwelling threshold	Site below .10 dwelling threshold	-
206	C403		Land to the rear of Redmore Inn, Rugeley Road, Cannock Wood		Landowner Intentions – Site removed under Call for Sites 2021	Landowner Intentions – Site removed under Call for Sites 2021		-
207	C433		Land adjacent Rugeley Road, Hazelslade			Rejected at PO Site Selection		Yes
208	C467		Land at Old Ironstone Road, Burntwood/Wimblebury			Rejected at PO Site Selection		Yes
209	C489		Land at Newlands Lane, Heath Hayes		Proposed Allocation	Safeguarded Land		Yes
210	C541		Land South East of New Hayes Farm, Holly Hill Road, Cannock Wood		N/A - Site Not Known	Site below 10 dwelling threshold	Site below 10 dwelling threshold	-
211	C564		The Holding, Rugeley Road, Hazelslade, Cannock		N/A - Site Not Known	N/A - Site Not Known	Site below 10 dwelling threshold	-
212	R28		Land at Springs Farm, Brereton					Yes
213	R29a		Land to the north of Armitage Lane, Rugeley		R29			Yes - combined with R29b

Proformas in SHLAA Order

SHLAA Number: C375a and 375b

Site location: Land to the west of Beaudesert Golf Club, off Rugeley Road, Hednesford

Site area(ha): 2.48

Character density zone: 15-20

Maximum capacity: 50

Site notes/description:

Sole landowner promoting site, not developer. Site being proposed as part of a comprehensive scheme to include the use of the wider site as open space; there are no third landownership constraints. Site suggested for housing-led development (Site C375a) with associated open space provision and an extended golf course ((Site C375) with the residential scheme enabling this). Previously granted consent for extension of adjacent golf course (1997- now lapsed). Site is being promoted for open market housing with proportional affordable housing provision. The overall proposition includes the adjacent land proposed for Leisure/Green Space Network/ Local Green Space, comprising c. 40-45acres for publicly accessible woodland; and the area (C375b) comprising c. 2-3acres for a small extension to one of the existing holes at Beau Desert Golf Club. Site is not currently in active use; the site (C375a) and the adjacent land were previously used for quarrying and tipping. Immediately adjacent, to the north-east of the site, is a site recently developed for housing.

There is a building on part of the site and other evidence of its former commercial use. Landowner considers part of the site to meet the definition of previously developed land as provided in the NPPF Glossary. No detailed assessments or site promotion work undertaken to date. Site capacity suggested of 50-80 dwellings. Site size reflects area suggested for residential development only (Site C375a) however doesn't take into account NDA- assumed at 75%. Site is being promoted for availability in the medium/long term. There has been very preliminary level discussions with the developer of adjacent site (Fallow Hollow) and Forestry England). Further works required with regards to viability. Site formerly known as Land to the west of Beaudesert Golf Club, off Rugeley Road, Hednesford (C375(a) and C375(b)).

Site Boundary:



Proformas in SHLAA Order

Site Assessment:

Spatial strategy	The site is on the edge of Hednesford which is one of the priority locations for new development. The site proposed for development (C375a) is slightly detached from the urban area, within the Green Belt and the AONB which the Spatial Strategy seeks to protect and enhance.	
Landscape Character	<p>The site is mostly located within Cannock Chase AONB.</p> <p>Landscape Character Assessment (2016) LDU ref. - FH01d Sandy Slade (was SH01h) Site within Cannock Chase AONB Developing woodland, grassland and wetland habitats. Amenity grassland and woodland belts. No field pattern. Secondary woodland defines sense of enclosure. Former colliery buildings are prominent. Potential for further heathland development and important recreation corridor for Cannock Chase.</p> <p>Landscape condition: Extent of change – Widespread Magnitude of change – High Visual impact – High Habitat network – Declining Cultural pattern - Declining Functional integrity - Moderate Overall Condition - Good</p>	
Open space	<p>The site is located within close proximity (600m) of a number of open spaces and PRoWs therefore a significant positive effect is considered likely. Cannock Chase AONB which is classified as unrestricted semi natural open space lies directly adjacent to the site's north and east boundaries. Cotswold Road public sports ground lies within this designation and directly west of the site. The Hednesford Hills unrestricted area of semi natural open space lies approximately 65m to the south of the site forms part of the Green Space Network (2012). A ProW lies within the site and extends to the east to Hazelslade.</p> <p>The site includes a PRoW and a section of an unrestricted green link which could be lost due to development. This however, is uncertain as it cannot be known whether these features will be lost, retained or enhanced.</p>	
Flooding	<p>Site is located entirely within Flood Zone 1.</p> <p>On site water body acts as flood alleviation for Rawnsley Road. Culverting of watercourse running through site may be required.</p>	
Biodiversity	Beaudebert Golf Course, Rawnsley Hills Site of Biological Importance lies directly adjacent to the site's north east boundary. Furnace Coppice Biodiversity Alert Site lies approximately 350m north of the site. Cannock Chase SAC and SSSI are approximately 555m north west of the site	
Historic Environment	There are no heritage assets within or in proximity to the site.	

Proformas in SHLAA Order

Transport/ Public Transport	There are nine bus stops within 350m of the site. The five bus stops located on Rugeley Road are served every 30 minutes whereas the two bus stops Bradbury Lane and two on Station Road are served every 15 minutes. A cycle path passes approximately 120m east of the site. There is no railway station within 1km of the site.	
Access	Access into the site from A460 – Rugeley Road.	
Other Utilities	Electricity supply to the site by Western power is available	
Environmental Constraints	The site is not located within and does not connect to an AQMA. The site is located directly adjacent the A460 (Rugeley Road) and therefore development at this location is likely to result in noise pollution impacting upon local amenity. The site lies entirely within Source Protection Zone 3 so there is potential for detrimental impacts on local water quality. Former landfill site.	
Agricultural land	Agricultural land quality classification: Grade 3	
Green Belt & potential mitigation	Site is located within the Green Belt Green Belt Study: HE15 (southern section – High) and HE17 (northern section – Very High) Harm rating: High/Very High	
Climate change	Potential for on-site dedicated energy generation from renewable sources	
Proximity to services and facilities to meet people’s needs and avoid isolation	The site is located on the north-eastern edge of Hednesford. The Town Centre contains a range of services and facilities and is around a 16 minute walk, approximately 1.3km from the site.	
Infrastructure	There is limited infrastructure to serve the site. There are no schools within 600m of the site. The site is not located within close proximity (600m) of any existing healthcare facilities.	
Deliverability	Site indicated as deliverable with no known barriers to development	
LLPO Recommendation:	Site initially classed as Category C due to Green Belt location.	
Recommendation:	The site has not been identified for further consideration (Category C)	
Summary	The site is located on the edge of Hednesford although most of the services and facilities are beyond 600m from the site. Development would result in a loss of Grade 3 moderate/good agricultural land. The site is within the Green Belt and assessed to result in high/very high harm if released. The site is in the AONB where, in principle, land should be protected to conserve and enhance its natural beauty. The site is potentially subject to noise pollution. There is potential for detrimental impacts on local water quality	
Conclusion	Rejected	