



Planning Inspectorate

Report to Cannock Chase Council

by A McCormack BSc (Hons) MRTPI
an Inspector appointed by the Secretary of State

Date: 05 March 2026

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Cannock Chase District Local Plan 2018 - 2040

The Plan was submitted for examination on 29 November 2024

The examination hearings were held between 13 May and 11 July 2025

File Ref: PINS/X3405/429/11

Contents

Abbreviations used in this report.....	3
Non-Technical Summary	4
Introduction	5
Context of the Plan.....	6
Public Sector Equality Duty.....	7
Assessment of Duty to Co-operate.....	7
Assessment of Other Aspects of Legal Compliance.....	8
Assessment of Soundness	9
Issue 1: Vision, Strategic Objectives, Spatial Strategy and Priorities.....	10
Issue 2: Delivering High Quality Development	12
Issue 3: Creating Community Infrastructure and Healthy Living Opportunities	13
Issue 4: Providing for Housing (inc. Need, Supply, Green Belt Release and Choice)	16
Issue 5: Encouraging a Vibrant Local Economy and Workforce	25
Issue 6: Provision of Sustainable Transport and Communications Infrastructure.....	29
Issue 7: Creating Attractive Town and Local Centres	32
Issue 8: Protecting and Enhancing the Natural Environment.....	34
Issue 9: Supporting a Greener Future.. ..	40
Issue 10: Site Allocations.....	43
Issue 11: Delivery and Monitoring.....	58
Overall Conclusion and Recommendation.....	59
Schedule of Main Modifications	Appendix

Abbreviations used in this report

AMR	Authority Monitoring Report
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
DPD	Development Plan Document
DPA	Dwellings Per Annum
DPH	Dwellings Per Hectare
DtC	Duty to Co-operate
EDNA	Economic Development Needs Assessment
ELAA	Employment Land Availability Assessment
GTAA	Gypsy and Travellers Accommodation Assessment
GTTS	Gypsies, Travellers and Travelling Showpeople
HE	Historic England
HIA	Heritage Impact Assessment
GBBCHMA	Greater Birmingham and Black Country Housing Market Area
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
IFS	Infrastructure Funding Schedule
IIA	Integrated Impact Assessment
LDS	Local Development Scheme
LEA	Local Education Authority
LHN	Local Housing Need
MHCLG	Ministry for Housing, Communities and Local Government
MM	Main Modification
NE	Natural England
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
PPS	Playing Pitch Strategy
PPTS	Planning Policy for Traveller Sites
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCC	Staffordshire County Council
SCI	Statement of Community Involvement
SE	Sport England
SGS	Strategic Growth Study
SHLAA	Strategic Housing Land Availability Assessment
SOCG	Statement of Common Ground
SRFI	Strategic Rail Freight Interchange
SSSI	Site of Special Scientific Interest

Non-Technical Summary

This report concludes that the Cannock Chase District Local Plan 2018 – 2040 provides an appropriate basis for the planning of the Cannock Chase District, provided that a number of main modifications (MM) are made to it. Cannock Chase Council has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared a schedule of the proposed modifications and, where necessary, carried out a sustainability appraisal (SA) and a habitats regulations assessment (HRA) of them. The MMs were subject to public consultation over a six-week period. In some cases, I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering the further SA and HRA work and all representations made in response to consultation on them.

The main modifications can be summarised as follows:

- Changes to the presentation and layout within the Plan of the Vision, Strategic Objectives, Spatial Strategy and Strategic Priorities to reflect a clearer and effective overall strategy within the Plan.
- Insertion of new policies SS1, SS2, SS3, SS4 and SS5 to ensure that the Spatial Strategy and Strategic Priorities within the Plan are clearly set out and effective for each defined area within Cannock Chase District.
- Modifications to the Plan to clarify and distinguish between strategic and non-strategic policies within the Plan and to ensure consistency with national policy.
- Changes to the wording of policies to ensure that the Plan is effective and consistent with national policy.
- Modifications within policies to remove unnecessary cross-referencing to other policies and to C in the clarity and effectiveness of the Plan.
- Modifications to Table D of Policy SO3.2 to reflect up to date information and evidence relating to affordable housing provision and modifications to Table E of Policy SO3.2 in relation to housing mix.
- Amendments and corrections to the housing trajectory calculation and its presentation to present the up-to-date housing supply position for the Plan period.
- Amendments and corrections to the Employment Site Allocations (Table F, Policy SO4.2) to present the up-to-date employment land supply position for the Plan period.
- Modifications to the Plan to correctly reflect the Plan’s approach in terms of ‘low carbon’ rather than ‘net-zero carbon’ development.
- A number of other modifications to ensure the Plan, as a whole, is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the Cannock Chase District Local Plan 2018 - 2040 (the Plan) in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended) (the 2004 Act). It considers first whether the Plan’s preparation has complied with the Duty to Co-operate (DtC). It then considers whether the Plan is compliant with the legal requirements and whether it is sound. Paragraph 35 of the National Planning Policy Framework (September 2023) (NPPF), the version of the NPPF against which the Plan is being assessed, makes it clear that for it to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy. In this report, I refer to documents submitted to the published examination document library on the Council’s examination website.
2. The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. The Cannock Chase District Local Plan 2018 – 2040, submitted in November 2024, is the basis for my examination. It is the same document as was published for consultation in February 2024.

Main Modifications

3. In accordance with Section 20(7C) the 2004 Act, the Council requested that I should recommend any MMs necessary to rectify matters that make the Plan unsound and/or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in the Appendix attached to this report.
4. Following the examination hearings, the Council prepared a complete schedule of proposed MMs and, where necessary, carried out an updated SA and HRA on them. The proposed MM schedule was subject to public consultation for six weeks from 20 October to 1 December 2025. I have taken account of the consultation responses in reaching my conclusions in this report. In light of this, I have made some amendments to the detailed wording of some main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the changes significantly alter the content of the modifications published for consultation nor do they undermine the participatory processes and SA and HRA that have been undertaken. Where necessary, I have highlighted such amendments in this report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan including, for reasons that will become clear, various Green Belt boundaries. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the plan

identified as Cannock Chase Local Plan Policies Map, as set out in [SD2]. A digital interactive version was also submitted as the Cannock Chase Local Plan Interactive Policies Map [SD2A].

6. The policies map is not defined in statute as a development plan document (DPD) and so I do not have the power to recommend any modifications to it. However, several of the MMs to the Plan’s policies require further corresponding changes to be made to the policies map. In some cases, where the geographic illustration of policies on the submission version of the map is not justified or clear, changes to the map are needed to ensure that the relevant policies are effective. These further changes to the policies map were published for consultation alongside the MMs. In this report I have identified any amendments needed relating to those further changes in the light of the consultation responses made.
7. Should the Plan be adopted, to comply with the legislation and give effect to the Plan’s policies, the Council will need to update the policies map to include all changes identified in the Local Plan Interactive Policies Map [SD2A] and the further changes published with the MMs, incorporating any necessary amendments identified in this report.

Context of the Plan

8. The Plan is proposed to replace the Cannock Local Plan 2014 Part 1 [AD1] and it will constitute the full development plan for the Cannock Chase District. It is designed and intended to form part of the overall development plan for the District, together with plans for minerals and waste prepared by Staffordshire County Council (SCC) and neighbourhood plans. There are adopted Neighbourhood Plans for Hednesford and Cannock Wood, and four designated areas (Brereton & Ravenhill, Heath Hayes and Wimblebury, Norton Canes and Rugeley) where neighbourhood plans are in preparation.
9. The Cannock Chase District lies within southern Staffordshire on the northern edge of the Black Country areas. The District area consists of around 60% Green Belt land and there are several land designations within it. These include the nationally significant Cannock Chase National Landscape (formerly the Cannock Chase Area of Outstanding Natural Beauty (AONB)) and the Cannock Chase Special Area of Conservation (SAC). The District also acts as a strategic link between wider Staffordshire to the north and the West Midlands conurbation to the south.
10. Between 2011 and 2021, the population in Cannock Chase rose by 3.1% to 100,519 residents, according to the 2021 Census. As the Plan indicates, 2018-based population estimates project that the District’s population will rise by almost 15% to 115,178 by 2043. Furthermore, due to its proximity to the West Midlands conurbation, the District experiences pressure for development, particularly housing. As such, the Plan is tasked with balancing the provision of sufficient housing within the context of a Plan Area that is substantially and significantly subject to the protection of several land designations.

Public Sector Equality Duty

11. Throughout the examination I have had due regard to the aims expressed in S149(1) of the Equality Act 2010 and the equality impacts of the Plan in accordance with the Public Sector Equality Duty. This, amongst other matters, sets out the need to advance equality of opportunity and to foster good relations between people who share a protected characteristic and people who do not share it. This has included my consideration of several matters during the examination. These are, for example, policies in the submitted Plan concerning housing for older people and those with health problems, disabilities and specific needs (Policies SO3.2 and SO3.3), for Gypsies, Travellers and Travelling Showpeople (GTTS) (Policy SO3.4) and a range of other policies which should directly benefit those with protected characteristics.
12. I have also noted the findings of the Council’s Integrated Impact Assessment (IIA) for the Plan (Land Use Consultants) February 2024 [SD4] submitted with the Plan and the updated IIA (October 2025) [MOD4] which was produced in relation to the proposed modifications to the Plan. Based on this evidence, I am satisfied that the Plan overall would result in no significant negative effects on people with protected characteristics as most of its policies would result in neutral or positive impacts. Furthermore, the identified modifications to the submitted Plan would have no substantive adverse impact on the those with protected characteristics and therefore would not change the assessment within the IIA update [MOD4]. As such, considering all relevant matters and evidence, I agree with the conclusion of the IIA update.
13. Overall, it is my assessment that the disadvantages these identified groups may suffer would be diminished and their needs met in so far as they are different to those without a relevant protected characteristic through the relevant policies of the Plan. As a result, the Plan, when considered as a whole, would not bear negatively or disproportionately on these groups or others within this category.

Assessment of Duty to Co-operate

14. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by Section 33A in respect of the Plan’s preparation.
15. The Council’s Duty to Co-operate Statement of Compliance [SD11], as well as the evidence contained in the hearing statements, sets out the various steps the Council has undertaken to engage and co-operate with neighbouring authorities, prescribed bodies and other public bodies at key stages in the preparation of the Plan. This evidence explains in detail how the Council has worked with these bodies on strategic and cross-boundary matters affecting the District including meeting housing needs; contributing towards addressing the unmet need of the GBBCHMA; meeting economic needs; planning for infrastructure; protecting the Green Belt; meeting the needs of GTTS; conserving and enhancing heritage assets; mitigating the impacts of climate change; the

enhancement and protection of designated landscape areas and strategic cross-boundary site allocations.

16. It is evident that the Council has a longstanding record of co-operation and joint working with neighbouring and statutory authorities and its approach to the Plan has continued in that positive way. This work has been undertaken through a range of activities including regular engagement, meetings and joint working with key partner organisations and bodies. This has led, in some cases, to the sharing of data to monitor the housing and employment shortfall across the GBBCHMA and different functional economic market areas, jointly procuring evidence to present a consistent evidence base to inform respective local plans and providing a contribution towards the unmet need of the GBBCHMA in the Plan. The activities described have assisted in identifying the strategic matters relevant to the Plan. Further evidence of the Council’s approach to meeting the DtC is provided through several Statements of Common Ground (SOCGs) which have been agreed and signed by all relevant bodies.
17. SOCG’s on various strategic matters and key issues have been prepared in conjunction with key stakeholders. These statements summarise, for example, the discussions and resolutions, where appropriate, of matters relating to heritage assets [EXAM9], housing supply and delivery [SOCG1-4 inclusive, SOCG6, SOCG9-13 inclusive, EXAM10, 10A and 10B], highways infrastructure [SOCG11, EXAM13], environmental impact and habitats [SOCG8] and employment land and economic development [SOCG5]. There are also SOCGs between the Council and site promoters and developers [SOCG9-13 inclusive] which demonstrate a level of effective and on-going communication and co-operation between those key stakeholders to deliver sustainable development in the District during the Plan period.
18. The evidence demonstrates that the Council has made considerable efforts to engage effectively with all relevant organisations and prescribed bodies throughout the preparation of the Plan and that a framework of meetings, officer working groups and regular communication and engagement with other organisations and statutory bodies remains in place. The Council has been diligent and thorough in its procedures and activities under the DtC. From relevant submissions, it is evident that it has done so proactively and effectively. Therefore, I am satisfied that the Council has engaged constructively, actively and on an on-going basis with all necessary and statutory parties in the preparation of the Plan and that the DtC has, as a result, been met.

Assessment of Other Aspects of Legal Compliance

19. The Plan has been prepared in accordance with the Council’s Local Development Scheme (LDS) [SD9]. Consultation on the Plan and the MMs was carried out in compliance with the Council’s Statement of Community Involvement (SCI) [SD8].
20. The Council carried out a SA of the Plan [SD3], prepared a report of the findings of the appraisal, and published that report along with the Plan and other submission

documents under Regulation 19. The SA was updated to assess the MMs in a way that is adequate [MOD4]. The SA overall has used a framework to appraise the policies of the Plan against a set of defined objectives which have been adequately justified. It has also suitably addressed reasonable alternatives. Overall, the SA has found that there would be no significant adverse impacts on the defined objectives set out resulting from the policies and proposals of the Plan. Accordingly, I am satisfied that the approach to the SA is robust and the necessary procedural and legal requirements have been met.

21. The Cannock Chase Local Plan HRA Report for the Regulation 19 Consultation (January 2024) [SD5] sets out that the Plan may have some negative impacts which requires mitigation. This mitigation has been secured through the Plan within the requirements of its policies, as modified. The HRA has been updated at various stages of the process [SD17 and MOD5] as required and in response to representations, new information and the MMs proposed and confirmed. As such, the Plan complies with the Habitats Regulations. The HRA is incorporated into an overall IIA and suitably sets out why an Appropriate Assessment is not necessary. The HRA concludes that, whilst there may be some negative impacts, with appropriate mitigation, the Plan is unlikely to lead to any significant adverse effects (either alone or in combination) on any European Sites. I find this to be a reasonable conclusion based on the robust evidence, noting Natural England’s (NE) support of the HRA and the identified mitigation measures.
22. The Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority’s area. It also includes policies designed to secure that the development and use of land in the authority’s area contributes to the mitigation of, and adaptation to, climate change. I consider these matters in further detail below. Accordingly, I conclude that the Plan, as modified, achieves this statutory objective.
23. The Plan complies with all other relevant legal requirements, including the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

24. Taking account of all representations, written evidence and the discussions that took place at the examination hearings, I have identified several main issues upon which the soundness of the Plan depends. This report deals with these under the following headings regarding the main matters of soundness. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan. Policies and designations which do not raise main issues and are considered sound are not referred to in this report.

Issue 1: Whether the vision, strategic objectives, spatial strategy and priorities of the Plan are positively prepared, justified, effective and consistent with national policy.

Vision

25. The Council, through the Plan, seeks to achieve its overall Vision as set out within its Corporate Plan (2022-2026). In simple terms, the Vision looks to create a prosperous District for all, provide good quality homes and economic opportunities, protect the environment and ensure efficient and affordable transport links. The approach of generating economic growth while protecting the built and natural environment is in very clear accordance with the NPPF and cannot reasonably be criticised.
26. The Plan provides a Vision of the changes to take place across the District to 2040 and outlines the physical, economic, social and environmental characteristics of the District that will evolve and change over that time. However, the clarity of the Vision and the elements that will contribute towards its achievement are not sufficiently evident or clear. As such, this adversely impacts the overall effectiveness of the Plan.
27. To rectify this and ensure that the Plan is clear and effective in its overall aim and purpose, modification to the opening sections of the Plan is necessary. This is achieved through **MM1** which addresses the change required and restructures how the Vision, alongside the Strategic Objectives and Spatial Priorities, is presented and considered within the Plan. The modification to the wording in the Vision, set out in **MM1**, builds on that in the submitted Plan and does not introduce anything previously not included in the Plan. Its purpose is to present a clear, concise and effective statement on the overall aim and purpose of the Plan and for that reason it is necessary for soundness.
28. The Plan period to 2040, as set out in the Vision, will not meet the minimum 15-year period from adoption of the Plan that NPPF Paragraph 22 states should be considered, Nonetheless, I have considered the anticipated adoption of the Plan in early 2026 and the Plan period from adoption will likely be 14 years, to 2040. Although this will be less than the 15-year period and inconsistent with the NPPF, in my view the Plan should be adopted, if possible, and an early review of the adopted Plan be undertaken to consider afresh the medium and longer-term development implications for the District.
29. To my mind, this is a pragmatic and appropriate approach to ensure that Cannock Chase has a sound and deliverable Plan in place for at least the medium term. The Plan, subject to modifications and once adopted, will deliver the development required to meet the District’s needs for the period to 2040. Prolonging the examination and delaying adoption of the Plan to extend the post-adoption Plan period by perhaps only 12 months does not serve the best interests of delivering certainty of development within Cannock Chase District in a plan-led planning system. However, an early Plan review should be made to ensure that emerging and ongoing matters, including future housing land requirements and supply, are addressed in future and applied across a full 15-year post-adoption Plan-period. As a result, with the recommendation identified and considering the above, I find the Plan period to 2040 within the Plan to be acceptable.

Strategic Objectives

30. The Plan identifies eight Strategic Objectives aligned to the development proposals within the District, particularly those at Heath Hayes. The Objectives set out specific requirements for proposals within the Plan and feed into specific policies informing decisions on proposals that will come forward in the Plan period. In this regard and all other respects, I find the Strategic Objectives to be positively prepared, robust in their requirements and justified and effective in providing an appropriate basis for sustainable development within Cannock Chase for the Plan period.

Spatial Priorities and Spatial Strategy

31. The Plan sets out six Spatial Priorities following on from the Vision and Strategic Objectives. These include the re-use of brownfield land, supporting existing settlements and their characteristics, the rejuvenation of town centres, ensuring infrastructure delivery to support growth, safeguarding natural and historic assets and the delivery of the Council’s ambition to be low carbon. These priorities have been repositioned within the Plan, through **MM1**, to ensure a more logical and clearer flow to the overall development strategy. This is necessary for the Plan to be effective and sound.
32. The Spatial Strategy is set out as a series of bullet point statements and priorities relating to the identified geographical areas and settlements within the Plan area. Whilst these statements and priorities are evident within the Plan, their importance to the overall strategy and delivery of the Vision and Strategic Objectives is not sufficiently clear, nor given the necessary weight within the Plan for decision-making. To address this, modifications to the Spatial Priorities and Spatial Strategy are necessary in relation to overall presentation and clarification and therefore to make the Plan effective. These are set out within **MM2, MM3, MM4, MM5, MM6** and **MM7** which present these statements and priorities as strategic policy and afford them the necessary significant weight to ensure that the Plan is effective in terms of decision-making.
33. The modifications listed above introduce Policies SS1, SS2, SS3, SS4 and SS5 with associated amendments to policy wording and supporting text. The purpose of these modifications is to provide clearer referencing of each statement and give them priority as they relate to relevant policies within the Plan, making it and its policies effective.
34. I have considered points made about the introduction of the strategic policies relating to Heath Hayes and Norton Canes. In my assessment, no further amendments to Policies SS3 and SS4 are necessary for them to be sound. In relation to Policy SS5 and the reinstatement of a reference to the historic environment and the role of heritage landscapes, the removal of such a reference was unintentional by the Council in the drafting of the policy. Therefore, for clarity within Policy SS5 and to ensure it is effective and sound, an amendment to the proposed modification consulted upon is needed to include this reference within cause (b) of Policy SS5. This is set out in **MM7**.

35. For the Plan to be effective and consistent with national policy, it is necessary to ensure there is clarity regarding what are strategic and non-strategic policies. This is remedied through **MM8** which inserts a table at the end of the Local Plan Vision & Objectives section of the Plan and should be read and used in concert with the other modifications relating to this section of the Plan, as set out above.

Conclusion

36. Considering the above, subject to the modifications I have set out, I am satisfied that the Plan’s overall development Vision, Strategic Objectives, and Spatial Strategy are positively prepared, justified, effective and consistent with national policy and provide an effective basis to deliver sustainable development within the District, having regard to relevant trends and challenges.

Issue 2: Whether the Plan provides for high quality development that is distinctive, attractive and safe and the Plan’s approach is positively prepared, justified, effective and consistent with national policy.

Policy SO1.1

37. Policy SO1.1 is concerned with the protection, conservation and enhancement of the distinct local heritage environment within Cannock Chase District. This includes that which relates to designated and non-designated heritage assets such as conservation areas, listed buildings scheduled monuments and designated landscapes and locally important parks and gardens.
38. As written in the Plan, Policy SO1.1 uses terms which are not consistent with national policy, including ‘preserve’ rather than ‘conserve’. It is acknowledged that the policy is not intended to reproduce national policy. As such, there are elements of consideration referenced in the policy, such as ‘artistic or architectural’ that provide more locally specific guidance within the Plan. This does not go beyond the requirements of national policy as might be considered under aesthetic significance. Nonetheless, for Policy SO1.1 to be effective and consistent with national policy, **MM9** is necessary.
39. In terms of setting requirements for additional detail on the impact and mitigation of proposals on the historic environment beyond that required by a heritage statement, the wording of Paragraph 6.6 in the supporting text for the policy requires amendment. The text is designed to provide more guidance to applicants on what is anticipated from a heritage statement. However, the wording regarding applications for Listed Building Consent exceeds national requirements in relation to requiring more detail from a Conservation Architect for all but the simplest applications. To avoid this, a modification to the text is needed (**MM10**) stating that such action can require more detail, and it is recommended that advice is ‘sought’ from a suitably qualified and experience Conservation Architect rather than required. This is necessary to ensure the policy is effective and consistent with national policy.

40. Similarly, Paragraph 6.7 of the Plan states that the provision of a detailed Heritage Statement should be proportionate to the scale of development and in all cases, all such documents be prepared by a suitably experienced historic environment specialist. I acknowledge that the Council’s intention here is to ensure quality submissions. However, this latter requirement exceeds national requirements. To rectify this, **MM11** amends Paragraph 6.7 to recommend the action rather than stipulate that it must be done in all cases. The modification is necessary for the Plan to be effective and consistent with national policy.

Policy SO1.2

41. Policy SO1.2 is concerned with enhancing the quality of the built environment. The policy covers development proposals being in conformity with local plan policies and local design guides and sets out the need for all development proposals to include a Design and Access Statement. Within the policy, as with several others, a list of relevant policies relating to the purpose of Policy SO1.2 are set out. The inclusion of these references within policy is unnecessary and repetitive. The Plan is to be read ‘as a whole.’ Therefore, to include the ‘signposting’ of other relevant policies within the policies of the Plan is not effective and does not result in a positively prepared Plan.
42. As such, it is necessary to remove such references from within the policies and, where appropriate, set them out within the supporting text. It is acknowledged that there is merit in linking relevant policies across the Plan. However, these references are superfluous and unnecessary within the policies themselves. In the case of Policy SO1.2, **MM12** moves reference to relevant policies from the policy to the supporting text and is required for the policy and the wider Plan to be clear and effective. Furthermore, the removal of policy references from within policy to supporting text is to be consistently applied throughout the Plan through modifications.

Conclusion

43. In considering the above and subject to the modifications identified, I find the Plan’s approach to delivering high quality development that is distinctive, attractive and safe to be suitably evidence-based and justified. Moreover, I conclude that in this regard, the Plan and relevant policies seeking to achieve high quality development are positively prepared, justified, effective and consistent with national policy.

Issue 3: Whether the Plan provides for creating community infrastructure and healthy living opportunities and is positively prepared, justified, effective and consistent with national policy in that regard.

Policy SO2.1

44. Policy SO2.1 relates to safeguarding the provision of community facilities which aligns with the Plan’s strategic objective to safeguard existing services and guard against the unnecessary loss of valued services and community facilities. **MM13** replaces the word ‘facilities’ with ‘venues’ and provides sufficient flexibility within the policy to include and

consider all aspects of community infrastructure in the District, such as those concerned with sports and sporting events. In addition, as with Policy SO1.1, the policy does not use terms consistent with national policy. As such, **MM13** is required to ensure that the policy is consistent with national policy.

45. In accordance with the consistent application of moving policy references from policy to supporting text throughout the Plan, a further modification to Policy SO2.1 (**MM14**) is required. This removes policy references set out within the fifth paragraph of Policy SO2.1 and places them in the supporting text. This consistency of approach and application with related modifications is necessary to ensure that the Plan and all relevant policies are positively prepared and effective.

Policy SO2.2

46. NPPF Paragraph 92 requires local plans, through their policies, to create places that are safe, inclusive and accessible and which promote health and well-being in local communities. Local plans should enable and support healthy lifestyles especially where this would address identified local health and wellbeing needs. Policy SO2.2 of the Plan is supported by evidence such as the Indoor Built Facilities Study (May 2019) [LR1] and the Sport and Leisure Facilities Needs Assessment (August 2018) [LR2] alongside the Staffordshire Education Infrastructure Contributions Policy which identified community, sports and educational infrastructure needs in the local area and helped to clarify how new development could address those needs.
47. As such, the policy lists a range of factors which could impact on health and amenity that should be considered. It is understood that the intention of the policy is to be applied quite broadly to enable any type of application to be assessed and determine whether it has negative impacts on health and amenity rather than focussing on specific uses or types of development that are most likely to result in harm. Therefore, the policy enables a reasonable consideration of what is appropriate within any proposal based on the locality and any adjacent uses. In that respect, it provides sufficient detail to be flexible and effective.
48. The policy takes account of the need to protect new development from unacceptable external factors on health and well-being that can be mitigated through consideration of its location and impact and because of its aim to ensure inclusivity by making sure that people with limited mobility can have access to new developments.
49. Whilst the policy is reasonable and appropriate, positively prepared, justified and consistent with national policy, for it to be fully effective and consistent with other policies within the Plan, a modification to its wording is needed (**MM15**). This involves the removal of references to other policies in the policy to the supporting text which aligns with other modifications. This provides clarity within the policy and makes it effective. Accordingly, **MM15** is necessary to ensure that is the case.

Policy SO2.3

50. Policy SO2.3 concerns the provision of existing and new open space, sports and recreational buildings and land, including playing fields. It is informed through an assessment of existing facilities, maintenance requirements and where there is a surplus to requirements or a specific need where existing provision is inadequate. The policy sets out that where proposals would result in a reduction in existing provision, there must be a clear justification provided for it or demonstrate that a suitable replacement will be provided. It also encourages proposals where new provision is identified and where this does not conflict with other policies in the Plan. The policy is also supported through the identified needs set out within the Cannock Chase Playing Pitch Strategy (PPS) and all proposals assessed against the policy will be considered in that context and that of any subsequent updates to the PPS.
51. Throughout the preparation of the Plan, Sport England (SE) has worked with the Council and raised concerns relating to wording in terms of the policy being effective and consistent with national policy. I have had regard to SE’s input relating to Policy SO2.3 and note the collaborative work undertaken between it and the Council on these matters, noting also the Statement of Common Ground [SOCG7]. With this in mind, it is clear to me that for Policy SO2.3 to be effective and consistent with national policy, modifications are necessary.
52. Regarding all sites and the potential for loss of existing playing fields, **MM16** is required to ensure that the change in demand and/or supply of playing pitches within the District is considered throughout the Plan period and is applied to all development proposals, including all site allocations.
53. I have considered points relating to both the PPS and wider evidence base and also note that the Council envisages that the New Development Calculator will be used to determine financial contributions. This is an accurate tool to determine outdoor sports provision. However, modifications to Policy SO2.3 through **MM16, MM18, MM19** and **MM20** and to the Table within the supporting text (**MM17**) are necessary for the policy to have flexibility in terms of relying upon relevant up-to-date evidence and is positively prepared, justified, effective and consistent with national policy.

Policy SO2.4

54. Policy SO2.4 concerns the impact of development proposals on allotments and community gardens. It seeks to protect such facilities unless an overriding sustainable development justification is made for a proposal. The policy requires that, in such instances, the replacement of any lost facilities in a location appropriate to demand is to be provided.
55. The policy is clear in its support for such facilities whilst resisting the loss of any existing supply to maintain existing provision. It is, therefore, consistent with NPPF Paragraph 92c to enable access to healthier food and allotments. Furthermore, I am satisfied that

the policy has been positively prepared and is justified having considered the standards and evidence set out in the Open Space Assessment [LR5]. However, Policy SO2.4 needs to be clear about the standards against which proposals will be assessed. To achieve this, reference to the relevant standards should be explicitly identified within the policy. **MM21** provides additional policy text and clarity of the supporting evidence in the relevant Table within the Plan and is needed for the policy to be effective.

Policy SO2.5

56. Policy SO2.5 relates to the provision of opportunities for healthy living and activity through active design. NPPF Paragraph 130 requires local plans to create places that are inclusive and accessible for existing and future users which promote health and well-being. The policy considers the support of organisations and bodies including SE and Active Travel England in incorporating active design into policies on healthy living and activity. The policy is justified by incorporating the principles of active design as best practice in SE guidance.
57. The policy is positively prepared and justified through evidence and consistent with national policy. It is also effective in providing health opportunities for healthy living and activity. However, Policy SO2.5 is not consistent with the identified approach throughout the Plan to avoid unnecessary repetition of references in policy to other policies in the Plan. As such, **MM22**, in line with other modifications, is necessary to ensure that Policy SO2.5 is effective.

Conclusion

58. In considering the above, subject to the modifications identified, the Plan provides for creating community infrastructure and healthy living opportunities. Accordingly, I conclude that the Plan, in that regard, is positively prepared, justified, effective and consistent with national policy and therefore sound.

Issue 4: Whether the Plan provides for housing in a way that is positively prepared, justified, effective and consistent with national policy.

59. This issue considers whether the Plan establishes a positively prepared, justified and effective strategy for identifying and meeting housing needs over the Plan period (2018-2040) that is consistent with national policy. This includes the District’s contribution to addressing unmet need within the GBBCHMA. This issue also considers whether the Council, and the Plan, can deliver the supply of housing and housing choice required to meet its needs and demonstrate a deliverable five-year housing land supply following adoption of the Plan.

Housing Need

60. NPPF Paragraph 61 requires strategic policies to be informed by a Local Housing Need (LHN) assessment using the standard method unless exceptional circumstances justify

an alternative approach. It further requires authorities to take account of unmet need from the neighbouring areas where appropriate.

61. The Council’s original Housing Need Assessment (2019) [H9], subsequently updated in 2024 [H10], applies the standard method in accordance with the NPPF and National Planning Policy Guidance (NPPG). The evidence reviews demographic projections and market signals in line with national guidance and concludes that there is no justification for deviating from the standard method. Having considered this, I agree that the standard method figure forms an appropriate and justified basis for establishing the Cannock Chase housing requirement. The LHN is calculated as 264 dwellings per annum (dpa) within the Plan, equating to 5,808 dwellings over the Plan period.
62. Cannock Chase District lies within the GBBCHMA, where earlier evidence, the Strategic Growth Study 2018 (SGS) [H5, H5a and H5b], identified a substantial shortfall of housing capacity in the GBBCHMA – around 60,900 dwellings – arising mainly from Birmingham and the Black Country authorities. The SGS [H5, H5a and H5b] and the Council’s Green Belt Topic Paper Update (2023) [ENV16] have identified that Cannock Chase could reasonably contribute at least 500 dwellings towards addressing this wider unmet need.
63. The District’s overall requirement includes a contribution towards the wider GBBCHMA shortfall. The SGS [H5, H5a and H5b], although due for review, remains the jointly acknowledged basis for identifying broad options to address unmet needs and continues to be referenced in cross-boundary exchanges. Cannock Chase’s limited yet meaningful contribution is consistent with the proportionate dispersal principle advanced in the SGS and the Plan’s trajectory evidence. The 500-dwelling contribution has therefore been added to the LHN figure for the District, resulting in an overall housing requirement of 6,308 dwellings for the Plan period. From the supporting evidence, I find the basis for this contribution to the unmet need in the GBBCHMA reasonable, robust and justified.
64. Housing delivery in the District between 2018 and 2023 has exceeded the LHN figure, resulting in an oversupply in the early part of the Plan period. However, several major sites that have supported this delivery are nearing completion. The Plan’s strategic allocations – particularly the Former Rugeley Power Station site (Site SM1) and proposed sites released from the Green Belt at Heath Hayes – require a substantial lead-in time before making significant contributions to completions.
65. To ensure that the housing requirement remains deliverable and reflective of real-world build-out expectation, the Council has adopted a stepped trajectory approach to meeting its requirement. This is set out as 264 dpa for the first five years post-adoption (2025-2030) and 314 dpa from 2030 onwards, incorporating the additional 500-dwelling contribution to the GBBCHMA shortfall. Given the phasing and development timelines of the major strategic sites, I find this stepped approach to the housing requirement to be realistic, reasonable, effective and justified. It reflects the anticipated pattern of delivery and does not defer necessary provision.

Green Belt Release

66. Cannock Chase is a constrained authority with a substantial proportion of land (60%) designated as Green Belt, alongside significant environmental assets. The evidence base references a broad suite of technical papers informing the Plan’s strategy, including topic papers on Green Belt, housing and infrastructure and the SHLAA (2023).
67. At the GBBCHMA level, the SGS [H5, H5a and H5b] is the only jointly commissioned evidence that identifies how authorities might contribute to addressing the significant unmet housing need across the GBBCHMA. Notwithstanding its age, it has continued to inform authorities’ positions during plan preparation and cross-boundary engagement.
68. The examination has been supported by an extensive document library, including documents submitted at my request, the Council’s responses on housing trajectories and related assumptions [EXAM 38A–38H], and updates to the Meeting Housing Needs Topic Paper [EXAM39]. These provide important context for the role of Green Belt land release within the overall spatial strategy and housing delivery trajectory.
69. NPPF Paragraph 140 states that Green Belt boundaries may be altered only where exceptional circumstances are fully evidenced and justified. The Council’s case for exceptional circumstances rests on several interlocking factors. Firstly, the scale and nature of need within and across boundaries. The examination evidence identifies a substantial, long recognised shortfall across the GBBCHMA and confirms that Cannock Chase has taken a proportionate role in contributing to unmet need as part of its housing requirement rationale. Local authorities in the GBBCHMA have continued to reference the SGS [H5, H5a and H5b] as the joint evidence base for addressing the housing shortfall, while recognising the need for updating in due course.
70. Secondly, constraints and reasonable alternatives. The evidence base identifies extensive environmental and policy constraints in the District. The Council’s assessments indicate limited capacity to meet needs without Green Belt release after accounting for brownfield opportunities and urban capacity. Thirdly, spatial strategy and delivery. The examination evidence on trajectories confirms that key strategic sites, including previously developed land such as the Former Rugeley Power Station (Site SM1), will also contribute but with lead in times and phased delivery. This reinforces the need to complement such sources with modest, carefully selected Green Belt land releases to ensure a deliverable and continuous supply.
71. The Council’s Green Belt Topic Paper Update [ENV16] and associated evidence describe a land parcel-based assessment of Green Belt purposes and harm, cross-referenced to environmental and infrastructure constraints and the SHLAA. In overall terms, the methodology reflects common practice that is seen elsewhere in the region and is set out with sufficient transparency to enable participants to understand inputs and conclusions. The evidence shows that the Council has collated a range of thematic assessments (e.g. landscape, environmental constraints, transport and infrastructure), the results of which have been integrated into site selection judgements.

72. I am satisfied that the approach is proportionate for plan-making and consistent with national policy in identifying firstly, the contribution of parcels of land to the Green Belt purposes; secondly, the relative degree of harm from release; and thirdly, the short-listed locations where any necessary release would be least harmful.
73. As indicated earlier, as Cannock Chase is a particularly constrained authority area in terms of land designations, representations within the GBBCHMA acknowledge this, with reference to extensive Green Belt and National Landscape coverage and support for the principle of proportionate dispersal. This reinforces the Council’s position that alternatives to Green Belt release within Cannock Chase are limited.
74. The Duty to Co-operate (DtC) is addressed elsewhere in this Report. However, for the purposes of this issue, I have considered whether the Green Belt approach sits coherently within the DtC context and how reasonable alternatives have been explored. There is clear evidence of sustained engagement with GBBCHMA partners, with SOCGs evolving and emerging during the examination hearings and in subsequent submissions. The Council’s housing trajectory clarifications and the Meeting Housing Needs Topic Paper Update 2025 [EXAM39] were published in response to queries, demonstrating an iterative and transparent process in refining and clarifying the spatial strategy and its delivery assumptions.
75. The evidence base catalogues the urban capacity and brownfield opportunities considered as part of site selection, alongside policy constraints (including the Cannock Chase SAC mitigation framework) which shape the distribution and capacity for growth. In my assessment, this provides an appropriate and proportionate evidential platform for concluding that Green Belt land release is necessary, as proposed, once reasonable alternatives are exhausted.
76. The Council’s identification of locations has been informed by land parcel-level Green Belt analysis, SHLAA capacity work and the balancing of environmental and infrastructure constraints. SA and HRA work has also informed the overall assessment of sites. Sites proposed for release have been selected to deliver the required quantum of development while seeking to minimise harm to the Green Belt purposes and to reinforce strong, defensible boundaries. The material before me indicates a clear preference for locations where changes would integrate with the settlement edge, avoid sprawl, and maintain separation between settlements.
77. Across the shortlisted locations, the Council’s assessments differentiate between parcels of land with varying degrees of contribution to the Green Belt purposes. Where release is proposed, it is typically because harm has been assessed as lower relative to alternatives and it is possible to define permanent, logical boundaries (e.g. established infrastructure corridors, durable landscape features). The examination material on delivery supports the proposition that these locations can contribute within the expected trajectory, in combination with strategic brownfield sites.
78. The evidence demonstrates a clear intention to draw revised Green Belt boundaries using physical, readily recognisable features. Once adopted, these boundaries can

endure beyond the Plan period. Where necessary, the policies map and allocation policies should include precise mapping and wording to avoid ambiguity at the decision-making stage.

79. The approach to Green Belt land release has been considered alongside environmental and infrastructure requirements. Particularly relevant is the Cannock Chase SAC mitigation framework (Strategic Access Management & Monitoring Measures) which operates within an established zone of influence to ensure new development avoids adverse effects from recreational pressure. The SAC evidence base explains the strategic mitigation approach and its continued applicability to planned growth, subject to periodic review and updating. This provides a clear policy context for ensuring that any Green Belt land releases are phased and mitigated appropriately.
80. The evidence also references transport and infrastructure considerations that underpin the deliverability of the proposed strategy. Where site-specific mitigation is necessary, such as active travel links, junction improvements, education or healthcare capacity, these are embedded in the allocation policies and Infrastructure Delivery Plan (IDP) to ensure timely provision.
81. Representations asserting that additional Green Belt land should be released, as well as those advocating that no release is necessary have been considered. In light of the Council’s evidence and the submitted clarifications on delivery, I am not persuaded that significantly greater release is justified given the Green Belt purposes and environmental sensitivities. However, in the absence of the proposed limited releases, the Plan would be less likely to deliver a positively prepared and effective housing delivery strategy, particularly in the medium term, once lead-in times for strategic brownfield sites is factored in.
82. Having regard to the above, the methodology for the Council’s Green Belt assessment is proportionate and consistent with national policy. It provides a transparent basis for identifying the least harmful locations for Green Belt land release. Exceptional circumstances to justify altering Green Belt boundaries, as proposed, have been demonstrated, arising from the combination of identified need (including GBBCHMA unmet need), land constraints, and the evaluation of reasonable alternatives.
83. The proposed releases are justified by the evidence, with boundaries capable of enduring beyond the Plan period and appropriate mitigation secured through policy and the infrastructure framework. In terms of strategy and delivery, the approach is closely integrated with the Plan’s housing delivery trajectory and the role of strategic sites and is reinforced by the clarifications provided on phasing and build-out. Furthermore, the approach aligns with the GBBCHMA context provided by the SGS [H5, H5a and H5b] and on-going engagement with partners recorded prior to and throughout the examination.

Green Belt Findings

84. In assessing the proposed alterations to the Green Belt, I have had full regard to the tests set out in national policy. The Council has demonstrated, through evidence and

based on the identified composite need (including cross boundary unmet need), constraints and in the light of the evaluation of alternatives, that exceptional circumstances exist to justify revisions to the Green Belt boundary, as required through NPPF Paragraph 140.

85. The Plan is supported by a Green Belt review which has assessed each site against the five purposes of the Green Belt. I have considered this, along with representations made and I am satisfied that the methodology and conclusions provide an appropriate basis for determining whether the sites proposed for release make a strong, moderate or limited contribution to the Green Belt purposes. I am also satisfied that the Council has explored all reasonable alternatives to meet its development needs before concluding that changes to the Green Belt boundary are necessary. This approach accords with national policy expectations that Green Belt boundaries should be altered only in exceptional circumstances.
86. Having considered the approach and evidence provided, I conclude that the proposed Green Belt releases identified and set out in the Plan are justified, effective and consistent with national policy. The boundary changes, as adjusted and modified throughout the examination, are enduring and clearly defined. Whilst I provide my overall conclusions on Green Belt release regarding the Plan here, I also set out later in this report the exceptional circumstances that justify the release of Green Belt land relating to each proposed site within the site allocations of the Plan.

Housing Supply (including Five Year Housing Supply)

87. The Council has, through the Plan process, identified a total of 6,444 dwellings, not including the additional 324 windfall dwellings (calculated in line with the 2023 SHLAA [H1 and EXAM5] methodology). This brings the total identified dwellings to 6,768 and provides sufficient supply within the Plan-period to meet the LHN (5,808 dwellings), the 500-dwelling contribution to the GBBCHMA and the requisite 5% buffer as Cannock Chase has not experienced persistent housing under-delivery in recent years.
88. The five-year land supply is considered from the point of adoption of the Plan. The Council’s most up-to-date evidence is found within the latest housing trajectory evidence [EXAM38A-38E and EXAM38H] and the Meeting Housing Needs Topic Paper Update 2025 [EXAM39]. For clarity, responses to these documents by interested parties have also been considered. The evidence provides revised assumptions on lead-in times, build-out rates and phasing, including information for strategic sites.
89. The five-year supply includes sites identified through the 2023 SHLAA methodology; a windfall allowance of 54 dwellings; an 18% non-implementation discount applied to minor sites, reflecting historic patterns of non-delivery and local market evidence; and a 5% buffer, consistent with national policy.
90. For the first five years post-adoption of the Plan (2025-2030), the requirement is 1,386 dwellings (278 dpa). From the evidence [Table 4.2, EXAM39], a deliverable supply of housing land for 1,581 dwellings is identified, equivalent to 5.7 years of supply.

91. The Council’s methodology is transparent, proportionate and consistent with national guidance. The housing trajectory evidence provides credible, up-to-date and detailed justification for each site included in the supply. I am, therefore, satisfied that the Council can demonstrate a deliverable five-year housing land supply at adoption of the Plan. Furthermore, the Council has established an appropriate mechanism for rolling forward the supply through annual monitoring, with the ability to update delivery assumptions as more detailed information emerges through permissions and actual build-out performance.

Policy SO3.1

92. Policy SO3.1 concerns the provision of new homes. Strategic Objective 3 of the Plan reflects national policy requirements as set out in NPPF Paragraphs 60-62 in relation to determining local housing need, the identification of land to come forward where it is needed and to meet the needs of groups with specific housing requirements.
93. Policy SO3.1 identifies that for the Plan period (2018-2040) housing provision for the District will be made for a minimum of 5,808 dwellings (net) to meet the objectively assessed local housing need and to ensure a sufficient supply of deliverable and developable land is available to deliver around 264 dwellings each year. This, as the policy states, is based on the Government’s standard methodology calculation for housing need. In addition, the policy identifies that a further 500 dwellings are to be delivered towards addressing unmet needs of neighbouring areas in the GBBCHMA.
94. The policy also states that development will achieve an average site density of 50 dwellings per hectare (dph) in the areas of Cannock, Rugeley and Hednesford town centres and 35dph in the suburban areas. However, it has been clarified that proposals in the areas identified will have a target site density of 50dph and 35dph respectively, rather than those values being an average site density. As such, to ensure that this is clear in the policy, **MM23** is necessary to ensure that the policy is justified and effective.
95. For the Plan to be effective in terms of housing provision and choice and consistent with national policy, it must set out how the housing requirement for the District will be met. Taking account of this, **MM137** is required to include the latest housing trajectory [EXAM 39, Appendix A] as an appendix within the Plan for reference. It is acknowledged that the trajectory will change over time and reference within the supporting text of Policy SO3.1 should reflect this. However, for the Plan to be effective and sound, **MM137** is required.

Policy SO3.2

96. Policy SO3.2 sets out the Plan’s approach to housing choice. As the examination has progressed, modifications to the policy have been proposed to ensure that it is positively prepared, justified, effective and consistent with national policy. **MM24** removes the minimum percentage requirement for First Homes reference from the policy to increase the provision of social rented housing in line with evidence presented in the most recent Housing Needs Assessment Update 2024 [H10]. In that context, the modification is

- necessary to ensure that the policy is justified and effective. **MM29** relates directly to **MM24** and updates the supporting text for the policy to align with the changes to the policy itself. **MM29** is also necessary to ensure that the policy is justified and effective.
97. **MM25** is required for accuracy and to reflect the up-to-date evidence that informs the Plan and policy, namely the Housing Needs Assessment Update 2024 [H10]. It is necessary to ensure that the Plan and policy are justified and effective. **MM26** amends Table D in Policy SO3.2 to align the affordable housing percentages with the evidence contained in the Viability Study 2024 [EC10] and to also refer to areas rather than ward boundaries which were superseded in 2023. This is reasonable as the areas listed in Table D within the District are clearly identifiable. These changes are necessary for precision and accuracy within the policy and for it to be effective.
98. **MM27** is a modification to Table E within Policy SO3.2 to amend the reference to 45% in Market Housing 3-bedrooms to 40% to align with the Housing Needs Assessment Table. The change is required to ensure the Plan and policy are effective and justified through the most up-to-date evidence. **MM28** relates to **MM27** and amends the supporting text for Policy SO3.2 accordingly. **MM28** is therefore also required to ensure that the policy is effective and justified in that regard.
99. **MM30** amends the wording ‘*subject to viability assessment, unless otherwise agreed by the Council*’ of the final sentence of the second paragraph of Policy SO3.2 to ‘*...viability assessment and/or otherwise agreed by the Council.*’ The reason for this modification is that the former version suggests all applications would be subject to viability assessment, whilst the latter suggests that an assessment would be required more on the rare occasion where changes in site circumstances justify it (NPPF Paragraph 58). The change is imposed to deter developers from seeking to assess viability on every application to reduce the contribution to affordable housing for example. This is a reasonable concern and the amendment set out in **MM30** is justified in that regard. As a result, the modification is necessary for the policy to be flexible and effective.
100. An amendment to policy wording within Paragraph 4 of Policy SO3.2 is required to provide clarity and flexibility within the Plan and to ensure it is effective. **MM31** provides confirmation of where reference to the financial contribution formula of the viability assessment referenced within Policy SO3.2 is set out.

Policy SO3.4

101. Policy SO3.4 concerns the housing needs of Gypsies and Travellers and Travelling Showpeople (GTTS) within the Cannock Chase District. The identified local needs for pitches and plots are to be met through listed criteria set out within the policy. This is proposed, initially, by existing authorised sites and site allocations GT1 (3 pitches) and GT2 (2 pitches) in the first five years of the Plan period. The policy also identifies that to meet the longer-term need identified in the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2019 (GTAA) [H6] for a further 13 residential pitches,

proposals for new sites for Gypsies and Travellers and 10 plots for Travelling Showpeople outside of the Green Belt will be supported, subject to a series of criteria.

102. Whilst the GTAA was produced in 2019, further work has since been undertaken to verify that the assessment is still applicable and valid. The Council confirmed in its submissions that it considered an updated GTAA was only necessary where circumstances had changed in the intervening period to the extent that overall need would be affected. The potential for this was considered in the GTTS Topic Paper (Dec 2023) [H7] where additional detail was submitted. A two-year extension period is also addressed where one additional pitch to 2040 was justified. Furthermore, the GTTS Topic Paper presents a full and detailed assessment of available sites for such accommodation within the District.
103. The evidence to support the Plan’s approach to GTTS accommodation need is robust and uses an established methodology which complies with national policy and legislation. In reaching this identified requirement within Policy SO3.4, it is evident that the Council undertook an exhaustive assessment to meet identified needs with specific, deliverable sites over years 6-10 and, where possible, for years 11-15 of the Plan period in accordance with the national Planning Policy for Traveller Sites (PPTS). The Topic Paper [H7] regarding this matter provides the background and satisfactory evidence for this work. The Council also consulted with all 14 local authorities in the GBBCHMA to determine whether they could assist in meeting the needs of the District.
104. The detailed criteria set out in the policy is found to align with, and support, the criteria set out in Paragraph 13 of the PPTS. The policy is justified on the basis that there is no alternative approach due to the lack of specific deliverable sites available. Furthermore, I find that the policy approach within the Plan supports site provision should suitable sites come forward during the lifetime of the Plan.
105. The Council has clarified that Policy SO3.4 was not intended to limit the use of the criteria-based policy to only meet the longer-term need identified in the GTAA. It is the intention of the policy to demonstrate how this need is to be met. To reflect this and ensure that the policy is clear and flexible, **MM32** is identified to include reference to meeting unidentified needs as well as the longer-term need. The modification is also required to ensure that the policy is effective in meeting its aims.

Conclusion

106. The Council has established a justified and effective housing requirement for the District, including a reasonable and justified contribution towards unmet need within the GBBCHMA. The stepped housing trajectory reflects realistic delivery expectations and ensures that the Plan is positively prepared. The Council has demonstrated a justified and effective strategy for Green Belt land release in Cannock Chase. The methodology is proportionate, exceptional circumstances have been satisfactorily demonstrated and the selected releases represent the least harmful options in terms of the Green Belt purposes with boundaries capable of enduring beyond the Plan period.

Furthermore, the Council can demonstrate a deliverable five-year housing land supply at the point of adoption that is effective and consistent with national policy.

107. Subject to the modifications set out in this report, the Plan’s approach to providing for housing to meet the identified requirement, supply and choice, including Green Belt land release, through the relevant policies, provides a suitable and appropriate framework to deliver the level of growth anticipated over the Plan period. Accordingly, I conclude that the Plan’s approach to delivering housing is positively prepared, justified, effective and consistent with national policy.

Issue 5: Whether the Plan’s approach to encouraging a vibrant local economy and workforce is justified, effective and consistent with national policy

Policy SO4.1

108. The Plan deals with the safeguarding of existing employment areas for employment uses in Policy SO4.1. The policy sets out criteria to be met to permit development proposals for a change of use of existing and future employment areas. Furthermore, proposals which enhance existing employment areas through the provision of supporting infrastructure, such as nurseries and after school clubs, enabling the working population to have an easily accessible network of family care are supported.
109. The wording of Policy SO4.1 regarding Use Classes is not consistent with the most recent Use Classes Order considering that not all B Use Classes have been reclassified. Accordingly, a modification to the wording of the policy (**MM33**) to rectify this inconsistency is necessary to ensure that the policy is clear and effective.
110. Taking account of this modification, Policy SO4.1 clearly sets out the intention of safeguarding existing employment areas unless where specific situations identified in the policy are demonstrated by a development proposal or applicant. It seeks to ensure that there would be no detrimental harm to any retained areas of existing employment areas. This is consistent with national policy to enable businesses to invest, expand and adapt (NPPF Paragraph 81) and in terms of responding to changes in economic circumstances, where applicable (NPPF Paragraph 82).
111. I have noted the assessments supporting the policy, as identified at Paragraph 6.127 of the Plan, which show that the District’s employment areas are performing important economic roles and continue to contribute to the overall employment land supply. This is supported and demonstrated further by the Employment Land Availability Assessment 2023 [ELAA 2023] [EC1] and the ELAA 2024 [EXAM 3] where the continued supply of land from the existing employment areas is evidenced. As a result, the policy is justified by suitable and appropriate evidence and effective as it is also deliverable. The policy approach is consistent with national policy as it provides certainty that existing employment areas will be protected, contributing towards creating the conditions in which businesses can invest, expand and adapt.

Policy SO4.2

112. Policy SO4.2 relates to the provision for new employment sites and states that there is anticipated provision for up to 74 hectares (ha) of employment land during the Plan period. The starting point for assessing the appropriate provision of land for new employment uses is the Council’s Economic Development Needs Assessment (EDNA) 2019 [EC5]. The EDNA stated that the Cannock Chase District need for B-Class employment land OAN comprised a range of 30 to 67 ha between 2018 and 2036, and between 33 and 74 ha to 2038.
113. The range set out in the EDNA 2019 has been superseded by the EDNA Update 2024 [EC7]. That update is based on the latest available data and forecasts during drafting of the Pre-Submission Plan. The 74 ha (gross) figure reflects the Experian Baseline Scenario taking account of flexibility and loss replacement as detailed in the EDNA 2024 update. This is also referred to as ‘Scenario 1’ [Table 4.19, page 46 and Figure 4.3 of EC7]. This is within the recommended range presented in the supporting evidence of the EDNA 2024 update of 65 – 94 ha (gross). As such, the policy figure is reasonably justified by the supporting evidence. Furthermore, as the identified 74 ha (gross) takes account of potential losses and flexibility, I find it to be a robust target for employment land that is justified within the Employment Topic Paper Update [EC11a].
114. I have considered the evidence in relation Policy SO4.2, including the West Midlands Strategic Sites Study [EC2, EC3 and EC4] alongside the EDNA 2019 and EDNA Update 2024. It is clear to me from the assessment made and the range of scenarios presented that the Experian Baseline (Scenario 1) is an appropriate, reasonable, justified, comprehensive and robust indicator upon which to inform the Plan’s new employment land requirement, as set out in Policy SO4.2.
115. Policy SO4.2 identifies the removal of site allocations SE1 and SE2 from the Green Belt. The evidence provided to support this demonstrates that these sites are required to meet identified employment need over the Plan period and that this need cannot be met on sites outside of the Green Belt. It is noted that whilst 10 hectares of land outside of the District has been secured as a contribution to Cannock Chase’s employment land supply from the Strategic Rail Freight Interchange (SRFI) in South Staffordshire, DfC discussions did not result in any further such land contributions. Furthermore, the exceptional circumstances cases for the release of Sites SE1 and SE2 from the Green Belt are set out in detail in the submitted Green Belt Topic Paper [ENV16].
116. The exceptional circumstances case identifies that the allocation of Sites SE1 and SE2 will ensure development needs for employment are met in the Plan period in deliverable and appropriate locations with good proximity and access to the trunk road network and M6 Toll. This reduces the impact of lorries and other vehicles and traffic generation on minor roads in the surrounding Green Belt. Existing links to the train station, retail areas and residential areas will also help to reduce the need to travel for employment. The development of Site SE1 could also improve access by public transport to that part of the employment park with the provision of an additional bus stop and service. With site

SE2, there is the potential to deliver enhancements to biodiversity and strategic green infrastructure links to the Cannock Extension Canal SAC Chase and enhance the habitat connectivity to Wyrley Common and the nearby dismantled railway line.

117. The allocation of Site SE1 represents a logical extension to the existing Kingswood Lakeside Employment Park and is the final phase of its expansion as there is no land remaining in future. It provides assurance of the permanence of the Green Belt following this last release of land from the Green Belt in the area. The surrounding area of site SE1 will be safeguarded for a community park providing opportunity for enhanced biodiversity and / or recreational access to provide compensatory mitigation, preserving and enhancing the network of ponds and tree belts to the west and south part of the site. The enhancement of the surrounding area as identified will safeguard the countryside from further encroachment and will make a strong contribution to checking the sprawl of the urban area of Cannock. The scale of Site SE2 provides the opportunity to optimise the layout of the site, including landscaping and the impact on the wider Green Belt.
118. The Green Belt Harm Assessment 2021 [ENV14] identifies that Green Belt harm due to the land release can be reduced by the introduction of new woodland belts and/or small woodlands within the site. Taking these factors into account, I find this to present a reasonable and justified case for exceptional circumstances and Green Belt release.
119. The policy sets out, in Table F, the employment site allocations identified within the Plan. This includes Sites SE1 and SE2. The Council has sought to ensure the distribution of employment land aligns with the spatial strategy, focusing growth in the most sustainable and accessible locations. It is evident that the Council has maximised all available brownfield sites in urban locations, in a particularly restrictive Plan area, prior to the consideration of greenfield and Green Belt sites. Of the sites identified within the policy, the majority comprise extensions to existing business parks, thus facilitating and meeting an identified need for the expansion of local businesses. The selection of these sites has been informed through and by appropriate evidence including the EDNA [EC5] and its 2024 Update [EC7].
120. Having considered the policy and related evidence, I am satisfied that Policy SO4.2 has been positively prepared as it plans for growth in accordance with the latest available forecasting and identifies the sector with the greatest demand based on the EDNA Update 2024 [EC7]. It also identifies and allocates suitable, available and deliverable sites to meet the identified need. Furthermore, the need and supply have been informed by discussions with other relevant parties and organisations through the DtC.
121. Policy SO4.2 takes account of the SRFI in South Staffordshire in considering the District’s employment land supply. As such, the release of land at sites SE1 and SE2 from the Green Belt is justified as all options have been explored and exhausted prior to the consideration of new sites in the Green Belt. This approach is set out and explained in the submitted Green Belt Topic Paper [ENV16].

122. Notwithstanding the above, several modifications to the policy are necessary for soundness, with particular regard to the effectiveness and justification of the policy. **MM34** corrects the entry in Table F for Site SE1 which is required for precision and clarity and is based on the most up-to-date information available, including the ELAA 2023 [EC1]. Similarly, a correction to the address and area for Site E14 in Table F, as set out in **MM36**, is required for the same reasons. **MM36** also includes Site E15 which is identified in the ELAA. This is to ensure alignment with the base data.
123. There is a further modification to the policy text, **MM35**, to correct the total area of employment sites allocated to protect them for employment uses. This modification is necessary for clarity and for the justification and effectiveness of the policy. **MM37** is required to include the word ‘gross’ to provide clarity within the policy and ensure that it is effective in terms of what the figures presented reference. **MM37** aligns with **MM3** regarding Policy SS1.
124. Subject to the modifications, I am satisfied that Policy SO4.2 is consistent with national policy and will assist in creating the conditions for new employment sites in which businesses can invest, expand and adapt, aligning with NPPF Paragraphs 81–83.

Policy SO4.3

125. Policy SO4.3 deals with the intensification of use on existing employment sites within Cannock Chase District and identifies site allocations with approximately 16 hectares of land, where such intensification of use will be supported. The Council has set out that its approach relating to this policy has been informed and supported by clear, robust and up-to-date evidence including the ELAA 2023 [EC1], a Development Capacity Study [H11] and the Site Selection Methodology [H13]. From this, it is reasonable to consider that the intensification of the identified sites will bring forward additional employment development. It has also been demonstrated through the ELAA that the District has a history of sites coming forward on existing employment land to provide new and intensified employment opportunities. Therefore, I find the expectation of delivery through the intensification of existing sites to be reasonable and achievable.
126. The policy is positively prepared as it seeks to retain employment generating uses on sites where the identified evidence demonstrates viability for employment use based on the assessment of existing employment areas. This comprises of the EDNA and the ELAA 2023. Therefore, the Policy is largely effective. However, **MM38** is required for clarity, effectiveness and consistency within the Plan and policy. This modification inserts a title for the Table within Policy SO4.3 (Table G).
127. With the above modification, the policy reasonably considers the contribution of existing employment areas towards the District’s supply and the importance of retaining it whilst allowing some flexibility to enable a response to changes in economic circumstances. In this way, the policy aligns with NPPF Paragraphs 81 and 82.

Policy SO4.4

128. Policy SO4.4 concerns sustainable tourism and the rural economy. It seeks to ensure that proposals to support the rural economy will be supported in rural areas where safeguards are in place to protect the important qualities of the countryside such as openness and character to support the rural economy. The policy also provides examples of the types of development anticipated to achieve this and sets out how applications should demonstrate that the proposals can be developed in a positive way whilst retaining the important aspects of the rural areas including the environment, protected landscapes and through education.
129. NPPF Paragraph 84 states that local planning policies should enable the growth of rural business and sustainable rural tourism, provided the character of the rural areas is respected. It also recognises that sites to meet the needs of local businesses may not always be available in built up areas and that any site must not have an unacceptable impact and be sensitive to the surroundings (NPPF Paragraph 85). Policy SO4.4 is, therefore, consistent with national policy and its aims are justified to meet the economic needs of the rural areas.
130. Policy SO4.4 is positively prepared as it seeks to consider favourably development proposals in the rural areas that can benefit the local economy and increase tourism opportunities. However, this is subject to the safeguards within the policy setting out no adverse effects on the special features that make the rural areas important.
131. A modification is required for Policy SO4.4 (**MM39**) which removes unnecessary cross-referencing of other policies in the Plan and accords with similar modifications to policy text and policies recommended at various points throughout the Plan. **MM39** is required for clarity within the Plan and policy and for their effectiveness.

Conclusion

132. Considering the above, and subject to the modifications identified, I conclude that the Plan’s approach to creating a vibrant local economy and workforce is an effective strategy based on robust evidence. As such, it is positively prepared, justified and consistent with national policy and is therefore sound.

Issue 6: Whether the Plan is positively prepared, justified, effective and consistent with national policy in the provision of sustainable transport and communications infrastructure

Policy SO5.1

133. Policy SO5.1 relates to accessible development and requires all major development proposals to meet certain accessibility requirements and parameters for the application process to address. Furthermore, the policy seeks to provide an inclusive network of transport options to allow everyone to access essential services and economic and social opportunities. The policy sets out that these choices should include safe, high-

quality walking and cycling routes to encourage an increase in the uptake of active travel. In addition, such provision should address the needs of people with disabilities and reduced mobility.

134. The intentions of the policy are clearly consistent with national policy. NPPF Paragraph 112 is reflected in Policy SO5.1 in terms of transport choices and meeting the needs of all users. However, there are modifications to the policy wording that are required to ensure it is positively prepared, justified and effective. These are identified as **MM40**, **MM41**, **MM42**, **MM43**, **MM44** and **MM45**.
135. **MM40** clarifies that major developments will be in locations that can provide convenient access for all sections of the community to facilities and services relevant to the type of development proposed and its location. **MM41** removes reference to the reduction of the reliance on private cars by the location of development. **MM42** removes the reference to frequent public transport services and replaces it with appropriate public transport services. The above modifications are necessary to ensure that the policy is justified, effective and consistent with national policy.
136. **MM43** removes unnecessary cross-referencing to other policies in the Plan from within Policy SO5.1 for consistency across the Plan, to provide clarity and ensure that the policy is effective. **MM44** removes reference to zero carbon from the policy, reflecting the Council’s position on low carbon, rather than zero carbon emissions and technology and is required to ensure that the Plan and its policies are effective. Finally, the modification set out in **MM45** is necessary to clarify that the wording of Policy SO5.1 applies to all development, both major and minor, where significant amounts of movement will be generated. It is required for the policy to be effective.
137. Having considered and assessed the supporting evidence for this policy I find that, with the modifications in place as I have identified, Policy SO5.1 is based on robust evidence and, as such, justified.

Policy SO5.3

138. Policy SO5.3 concerns the Council’s development policy relating to low carbon transport. The policy seeks to support development proposals which aim to reduce overall reliance on carbon-intensive modes of transport and are designed to facilitate or incorporate the charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations. The policy sets out how, as part of a design and access statement, all major developments proposed will achieve this. In that regard, Policy SO5.3 is consistent with NPPF Paragraphs 110 and 112.
139. Several modifications to the policy are required for it to be justified and effective. These are identified as **MM46**, **MM47**, **MM48** and **MM49**. **MM46** removes the reference to zero carbon transport from the title of Policy SO5.3. This change is required to provide clarity and consistency throughout the Plan regarding net-zero carbon emissions. This also reflects the Council’s position on carbon emissions, which is now working towards

achieving low carbon transport rather than zero carbon, and to ensure the Plan and its relevant policies are effective. **MM47** makes changes to wording within Policy SO5.3. The changes are necessary to provide the most appropriate wording and clarification on the aims of, and relationship between, Policies SO5.3 and SO5.4 and to ensure the policies are effective. **MM47** also removes unnecessary cross-referencing between the Plan’s policies, providing greater clarity within and across the Plan and its policies.

140. **MM48** amends the wording of bullet point 2 of Policy SO5.3, notably the removal of the reference to zero carbon transport options, which is required to provide clarity and consistency throughout the Plan regarding the Council’s position on a net-zero carbon emissions target. It is also necessary to ensure the Plan and the policy are effective. **MM49** removes an unnecessary cross-reference within Policy SO5.3 to another policy within the Plan. This is required to provide clarity within the Plan when read as a whole and ensure the effectiveness of the policy.

Policy SO5.4

141. Policy SO5.4 concerns the maintenance and improvement of the transport system. It is stated in national policy that transport issues must be considered from the earliest stages of plan-making and development proposals. This is required to ensure the potential impacts of development on transport networks can be addressed effectively and opportunities from existing or proposed transport infrastructure are realised.
142. To achieve this, Policy SO5.4 states that the Council will work in partnership with relevant parties and sets out criteria that development proposals will be required to address. The policy also identifies further criteria which the Council will undertake to achieve the aim of the policy.
143. The policy has been positively prepared as it seeks to ensure transport infrastructure requirements will be met and will support new development. Furthermore, accessibility and sustainable transport modes are identified and are to be considered from the outset of development proposals. Policy SO5.4 is justified as it aligns with Government advice to promote active travel. It is also designed to ensure the policy aids the implementation of wider transport plans [T1, T2, T3] and that the critical infrastructure determined through the evidence provided is delivered [T5, T6, T7].
144. Notwithstanding the above, modifications to Policy SO5.4 are necessary for the policy to be effective and consistent with national policy. **MM50** sets out a modification to the first bullet point in the policy to include reference to promoting walking and cycling. This is required to provide appropriate wording and to clarify the aims of Policy SO5.4 and therefore make the policy effective. **MM51** is a modification to the second bullet point of Policy SO5.4 to provide clarity and ensure that the policy wording aligns with national policy. It replaces the term ‘the demonstrable’ in the relevant clause with ‘any severe adverse’. **MM51** is necessary for consistency with national policy.

Conclusion

145. In light of the above, subject to the modifications identified above, the Plan’s approach to the provision of sustainable transport and communications infrastructure is an effective strategy that is based on clear and robust evidence. Moreover, in relation to this issue, the Plan, with these modifications, is positively prepared, justified, effective and consistent with national policy.

Issue 7: Whether the Plan’s approach to creating attractive town and local centres is justified and effective.

Policy SO6.3

146. Policy SO6.3 relates to the safeguarding of existing town centre services. NPPF Paragraph 86 requires local planning policy to take a positive approach to town centre growth, management and adaptation. In this regard, the policy seeks to make clear the range of uses permitted within the town centre to safeguard the future of town centres within Cannock Chase. The policy is supported and informed by robust evidence such as the Cannock Chase Retail and Town Centre Uses Study 2021 [EC12, EC12a, EC12b] as well as a consideration of committed investment and regeneration programmes.

147. I am satisfied that the policy is deliverable over the Plan period as it identifies the Use Classes in line with the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, enabling sufficient flexibility where there is reasonable evidence of no prospect of no town centre service use on a site. In that regard, the policy is effective. As a result, I also find the policy to be justified and consistent with national policy. However, for the policy to be read clearly, referenced correctly and be fully effective, a modification to the text and structure of Policy SO6.3, identified as **MM52** in the attached schedule, is required. **MM52** provides a clearer policy in terms of referencing the criteria by replacing bullet points with numerical referencing. This modification also makes the policy consistent in its presentation with other policies in the Plan, provides a clearer presentation of the policy and makes it effective in its use.

Policy SO6.5

148. Policy SO6.5 concerns redevelopment areas within Cannock town centre. The policy promotes the continuation of the town’s market, allocates a range of suitable town centre sites to meet the scale and type of development likely to be needed and recognises the role that residential development plays in the town centre. As such, the policy contributes to the viability and vitality of the centre and is therefore in line with Paragraph 86 of the NPPF and consistent with national policy.

149. The policy and its approach are supported with evidence including the Retail and Town Centre Uses Study 2021 [EC12, EC12a, EC12b] and the site allocations set out within the policy have been identified in, and justified by, the Town Centre Prospectus (EC14) and have also subject to SA [SD3, pages 310-318]. Due to potential heritage impacts in

the Cannock Town Centre Conservation Area, I note that the site allocations have been subject to a Heritage Impact Assessment (HIA) [HIS2, EXAM2]. I also note that a study of the cumulative impact of all sites on heritage in the town centre has been detailed in the Council’s SOCG with HE [EXAM 9, pages 27-37]. Furthermore, the Council has worked closely with Staffordshire County Council (SCC) on wider plans to assist in delivering improvements to the town centre. This has included three transport plans [T1, T2, T3].

150. Following consideration of the evidence and the relevant matters, I am satisfied that the policy is positively prepared and consistent with national policy. Nonetheless, there are modifications to the policy required to ensure it is fully up-to-date, justified and effective. **MM53** is a modification to remove Site Allocation M3 from the policy as the site is no longer available for development and is to be retained as a town centre car park. This modification is necessary for clarity and for the justification and effectiveness of the policy and the Plan through the incorporation of a factual update. **MM54** relates to the removal of an unnecessary cross-reference between the Plan’s policies within the policy. The Plan is to be read ‘as a whole’ and as such, **MM54** is required for clarity and to ensure the policy and Plan are effective.

Policy SO6.6

151. In my assessment, Policy SO6.6, which considers redevelopment areas within Rugeley town centre, is effective in that it allocates deliverable sites over the Plan period. There is substantive evidence for this in various supporting strategies and plans, such as the Transport Strategy [T1] and the Infrastructure Delivery Plan (IDP) [I1]. This demonstrates that the Council has worked closely with SCC to identify suitable sites for redevelopment and proposals to improve Rugeley town centre such as public realm improvements at Horsefair. There is further evidence of partnership and collaborative working by the Council with other relevant parties to develop a Town Centre Vision and Framework for Rugeley town centre to help drive investment.
152. The policy approach is justified by the Cannock Chase Retail and Town Centre Uses Study 2021 [EC12, EC12a, EC12b]. Furthermore, the site allocations have been considered as part of the SA. Consequently, I am satisfied that the policy is suitably and appropriately justified. The policy aligns with national policy, supporting the role the town centre plays at the heart of local communities by taking a positive approach to its growth, management and adaptation in accordance with Paragraph 86 of the NPPF.
153. However, for the policy to be read with clarity and to be fully effective, it requires modification, as set out by **MM55**. This removes the unnecessary cross-reference to Policy SO5.2 within the policy wording and is required to provide clarity within the Plan and Policy and ensure that both are effective. With the modification and following my overall consideration of the policy and supporting evidence, I find Policy SO6.6 to be positively prepared, justified, effective and consistent with national policy.

Policy SO6.7

154. Policy SO6.7 relates to redevelopment areas in Hednesford town centre and is justified based on the evidence and work undertaken to develop the policy, including the Cannock Chase Retail and Town Centre Uses Study [EC12, EC12a, EC12b], and with regard to the Hednesford Neighbourhood Plan (2018) [AD9]. Hednesford differs from Cannock and Rugeley town centres as it is covered by a neighbourhood plan which identifies potential opportunity sites in the town centre. The Council has had regard to some of the key elements from that neighbourhood plan in relation to Policy SO6.7 to assist with ensuring consistency in the approach to improve Hednesford town centre and to ensure its longevity. The policy contains wording to support opportunities for redevelopment on Market Street which provides an open flexible approach should any sites come forward within the lifetime of the Plan.
155. I note that Design Guidance is envisaged to come forward soon after adoption of the Plan that will further strengthen the policy approach by considering the distinct characteristics of the town centre in more detail. Policy SO6.7 is effective as it is suitably flexible to enable development opportunities to come forward during the lifetime of the Plan. Moreover, the policy is consistent with national policy, in a similar way to Policies SO6.5 and SO6.6, particularly in relation to Paragraph 86 of the NPPF.
156. Nonetheless, a similar modification to that identified for Policy SO6.6 is required for Policy SO6.7 and is set out as **MM56**, removing the unnecessary cross-reference to Policy SO5.2 within the policy wording. The modification to Policy SO6.7 is necessary to ensure clarity within the policy and its effectiveness.

Conclusion

157. Taking account of the above, and subject to the modifications identified, I conclude that the Plan’s approach to creating attractive town and local centres is justified and effective. Accordingly, in that regard I find the Plan, with the modifications made, to be clearly based on, and informed by, robust evidence. Furthermore, the relevant policies in the Plan are also found to be positively prepared and consistent with national policy.

Issue 8: Whether the Plan’s approach to protecting and enhancing the natural environment is justified and effective.

Strategic Objective 7

158. Strategic Objective 7 of the submitted Plan concerns the protection and enhancement of the natural environment. For the Strategic Objective, and the Plan, to be effective and consistent with national policy, a modification (**MM57**) to the wording in its second bullet point is necessary. This is required to clarify the distinction between the protected landscape of the Cannock Chase National Landscape and the Green Belt.

Policy SO7.1

159. Policy SO7.1 considers the protection, conservation and enhancement of biodiversity and geodiversity. NPPF Paragraph 174 states that local planning policies should contribute to, and enhance, the natural and local environment by protecting and enhancing sites of biodiversity or geological value and soils, and minimising impacts on, and providing net gains for biodiversity. Cannock Chase District contains a range of protected habitats and landscapes of local and national importance, including a larger number and coverage than might be expected for a relatively small Council area. Consequently, I acknowledge the importance of a key local policy on the protection, conservation and enhancement of these protected areas within Cannock Chase and cross-boundary connections into neighbouring Council areas. Furthermore, I find that Policy SO7.1 aligns with NPPF Paragraph 175 in distinguishing between the hierarchy of international, national and locally designated sites.
160. The policy has been positively prepared and considers the need to protect the wide variety of protected sites in an area that is under pressure from development. It is consistent with Chapter 15 of the NPPF, specifically Paragraph 174, which states that planning policies should enhance the natural and local environment. The policy is broadly effective in providing a focus on habitats relevant to Cannock Chase such as SACs and SSSIs.
161. The policy is justified through the evidence provided to support it. This includes the Cannock Chase District Nature Recovery Network 2020 [ENV18] which outlines the existing situation of the District’s nature network and describes key locations where habitats may be created to enhance and help inform options for habitat restoration. This work is based on habitat data and protected sites held by Staffordshire Wildlife Trust and other bodies. This provides robust and clear evidence. Furthermore, these protected sites are also shown on the policies map [SD2] which has been updated from the sites shown on the currently adopted 2014 policies map [AD2]. Having considered this and other relevant evidence, I am satisfied that the policy and approach is justified.
162. Notwithstanding the above, modifications to the wording of Policy SO7.1 are necessary to ensure that the policy is effective. Firstly, **MM58** introduces a new paragraph to the submitted policy after its second paragraph. This provides clarity and recognises the Midland Heath Heartland, a regional cross-boundary project to connect rare lowland heathland habitats between Cannock Chase and Sutton Park in the Birmingham Council area. Secondly, **MM59** is a modification to policy wording required to clarify the level of adverse effects on locally distinctive designated sites that will be determined through the application of the policy.

Policy SO7.2

163. Policy SO7.2 concerns biodiversity net gain (BNG). NPPF Paragraph 179 sets out that plans should secure measurable net gains in terms of biodiversity but does not set out all the detail including the statutory minimum 10% net gain to be achieved. Policy SO7.2

sets out this detail for the Cannock Chase District. The 10% requirement target is assessed as reasonable and achievable within Cannock Chase where house prices have been shown to be generally lower than some neighbouring areas and the District contains areas of deprivation which make development sites less viable if a higher target is set. Notwithstanding this, I note the Council’s position that the minimum requirement target (10%) allows for potentially higher percentages to be agreed with developers where development sites are more viable.

164. The policy refers to the long-term management of biodiversity features retained and states that the information accompanying proposals should consider the Biodiversity Gain Hierarchy while also stating that Government policy prevails. The policy also recognises the Statutory Biodiversity Metric as a key part of the policy requirements and makes it clear that this is the metric that should be used. It is a requirement for soundness to ensure that all development proposals use the same metric when assessing sites and that assessments are comparable.
165. To ensure that the policy is clear and effective regarding irreplaceable habitats and the metric, amendments to Policy SO7.2 and its supporting text are necessary. **MM60** and **MM62** are required to clarify that the delivery and monitoring of BNG through the policy is not applied to irreplaceable habitats. A further modification, **MM61**, is required to remove unnecessary cross-referencing of the Plan’s policies within the policy, provide clarity and to make the policy effective and consistent within the Plan.
166. Subject to the modifications to Policy SO7.2, I find it to be justified, considering the evidence presented including the Cannock Chase District Nature Recovery Network 2020 [ENV18] and the Local Plan and CIL Viability Assessment [EC9]. The policy is deliverable and therefore justified and effective as BNG is a legal requirement that developers will be required to plan for when planning development in the District. The policy is positively prepared as it provides certainty to applicants on the level of detail required to be submitted with proposals, thus aiding the planning application process at the local level. Finally, Policy SO7.2 is consistent with national policy in terms of minimising impacts on, and providing net gains for, biodiversity as well as identifying and mapping components of habitats and networks.

Policy SO7.3

167. Policy SO7.3 deals with habitat sites, including the Cannock Chase SAC. The policy makes clear that development will not be permitted where it would have adverse impacts on habitats sites and that effective avoidance and/or mitigation must be demonstrated. I am satisfied that the policy recognises the potential for adverse effects, as noted in the submitted Habitats Regulations Assessment (HRA) [SD5]. The Council revised the HRA in November 2024 [SD17] to support the submission of the Local Plan in line with evidence [ENV11] and an agreement set out in the SOCG between the Council and NE on air quality [EXAM7]. Having considered this evidence, I note that, as a result of it, the soundness issues regarding the policy are largely resolved and the policy is supported by NE. Nonetheless, a modification to the policy wording (**MM63**), is

necessary for accuracy and its effectiveness. Taking the above matters into account and with the modification in place, the policy is found to be effective.

168. I am satisfied that the policy has been positively prepared, noting that regular and detailed discussions with the Council, neighbouring authorities and statutory bodies have taken place. The policy is justified as it is based on clear, up-to-date evidence such as traffic assessments [ENV10], air quality monitoring [ENV11] and local plan data. Furthermore, a mitigation strategy is set out in the Partners Memorandum of Understanding [ENV9] based on the implementation plans for site users [ENV6] and car parking [ENV7]. These have all been considered by the evidence base review (ENV8).
169. The policy is consistent with the need to protect habitats from harm and will be effective in doing so through the policy safeguards and SAC mitigation scheme set out in ENV9. NPPF Paragraph 179 requires plans to safeguard wildlife rich habitats and the protection of priority species. NPPF Paragraph 180 states that planning applications should be refused if significant harm to biodiversity, the loss or deterioration of irreplaceable habitats or an adverse effect on SSSIs from development cannot be avoided. NPPF Paragraph 181 also notes that a SAC, Special Protection Area and Ramsar site should be given the same protection. Accordingly, I am satisfied that Policy SO7.3 is consistent with national policy.

Policy SO7.4

170. Policy SO7.4 considers the protection, conservation and enhancement of landscape character. NPPF Paragraph 174 states that policies should recognise the intrinsic character and beauty of the countryside. The policy does this and is therefore consistent with national policy. The policy has also been positively prepared, taking account of the need to balance the requirement for development against the necessity to protect the landscape. Furthermore, the policy will be effective in maintaining a balance between the need to build new homes and employment sites whilst protecting the landscape features of the District. These aims are set out in the Landscape Character Assessment (ENV1), the 2016 version is noted as an update of the earlier 2009 study. In view of this, I find the policy to be justified by the evidence.
171. Notwithstanding the above, **MM64** sets out a modification to the policy wording required to provide clarity within the Plan and ensure that it is effective. In this regard, **MM64** removes unnecessary cross-referencing between the Plan’s policies within Policy SO7.4. Subject to this change being made, I am satisfied that Policy SO7.4 is sound.

Policy SO7.6

172. Policy SO7.6 concerns the protection, conservation and enhancement of the Green Belt. A modification to the policy wording is required to provide a factual correction. This relates to an inaccurate cross-reference to a community park associated with an employment site [SE1]. As a result, **MM65** is necessary to provide clarity and accuracy and ensure that both the policy and the Plan are effective.

173. This Green Belt policy has been positively prepared due to its consideration of the fact that the Green Belt designation covers the entire rural area of the District and is also cross-boundary into neighbouring authorities. The policy is justified as the Green Belt designation is a longstanding protection of more than 50 years, protected under national policy and in the current adopted Plan [AD1] Policy CP1 Strategy, as well as being a consideration in policies on housing and employment. This continued protection over a long period shows that such a policy has been effective in protecting settlements in Cannock Chase from coalescence with Black Country towns and Stafford.
174. Furthermore, the Green Belt Study [ENV13] and Green Belt Harm Assessment [ENV14], in addition to the Green Belt Topic Paper [ENV16], provide the evidence base for the quality of the Green Belt in meeting the purposes set out in the NPPF. These supporting documents also provide commentary and context on decisions made in the Plan about development. Overall, I find Policy SO7.6 to be consistent with Chapter 13 of the NPPF and provides local context with reference to the land protected on the new policies map [SD2/SD2A] and the delivery of new public open space in relation to new developments.

Policy SO7.7

175. Following on from Policy SO7.6, Policy SO7.7 considers changes to the Green Belt. In terms of the exceptional circumstances that would warrant altering the Green Belt boundaries as identified in Policy SO7.7. The Council has exhausted all reasonable options for meeting identified needs for development before considering Green Belt release in accordance with Paragraph 141 of the NPPF. I have had regard to the Cannock Chase Green Belt Study 2016 [ENV13], the Green Belt Harm Assessment 2021 [ENV14] and the Cannock Chase Green Belt Topic Paper 2024 [ENV16] which sets out the assessment process that the Council went through to determine that Green Belt land release was necessary and the exceptional circumstances case for each site allocation proposed.
176. In terms of exploring all reasonable alternatives before Green Belt land release, the Council sought to prioritise and maximise the use of brownfield and under-utilised land. It then looked at increasing development densities where appropriate through a Development Capacity Study [H11] and SHLAA reviews [H1 and EXAM5]. This explicitly considered additional potential sources of land, such as surplus public sector land, regeneration opportunities, redevelopment within existing housing estates and other under-utilised land. The Brownfield Land Register [H12] was reviewed, as well as consideration of small-site contributions from neighbourhood planning activity. Previously rejected or stalled sites were revisited and reassessed and the potential reallocation of existing employment land was tested, where appropriate. The Council also consulted with other authorities about whether housing need could be met elsewhere and tested alternative spatial strategy approaches prior to concluding that Green Belt land release was required.
177. Overall, the evidence indicates that the Council did not move directly to Green Belt land release. Instead, it followed a sequential approach, testing brownfield land sources and

development capacity, density optimisation and a wide range of non-Green Belt supply sources. It also considered cross-boundary options before concluding that Green Belt boundary alteration, as set out in Policy SO7.7 was necessary to meet identified needs.

178. In addition to identifying the site allocations being released from the Green Belt, Policy SO7.7 also proposes to safeguard four sites (S1, S2, S3 and S4) to accommodate the growth requirements of Cannock Chase beyond the Plan period or following a review of the Plan. As such, the policy is consistent with NPPF Paragraph 143. In light of this, it is considered that the Plan is positively prepared. Green Belt boundaries would not be subject to further alterations beyond the Plan period as a result of the identified safeguarded land removed from the Green Belt in this Plan.
179. However, the Plan has been produced in the context of a relatively stable standard method of calculating housing need. It is acknowledged that the method of calculating housing need has been significantly altered in a subsequent revision of the NPPF published in December 2024. Nonetheless, this Plan is being examined in relation to the September 2023 published version of the NPPF. Were an early review of this Plan, once adopted, to occur the amended method of calculating the housing need would need to be applied. Moreover, an updated assessment of the housing requirement in Cannock Chase, including any safeguarded land, would need to be made.
180. Notwithstanding this, Policy SO7.7 has been designed to be flexible in this regard. The policy highlights mitigation solutions which aligned with the NPPG on the Green Belt (Paragraph 002) at the time the Plan was produced. The Council considered that the type of compensatory improvements should not be prescriptive as this depends on the assessment of harm and opportunities presented by individual sites. The site allocation policies detail more specific mitigation measures. Moreover, in this report, I deal with the exceptional circumstances for Green Belt land release in relation to each relevant proposed site allocation.
181. For Policy SO7.7 to be fully effective, it is necessary for modifications to be made to the policy wording. Firstly, **MM66** sets out a modification relating to Site SE2 to include Watling Street Business Park and Extension which is required to provide clarity on the land that Site SE2 relates to within the policy and the Plan and to ensure that both are effective. Secondly, modification **MM67** relates to the wording of the final paragraph of Policy SO7.7 and is required to provide clarity within the policy and ensure it is effective.
182. Subject to the above and other relevant modifications identified in this report, I find Policy SO7.7 to be positively prepared as it enables targeted Green Belt land release to meet the identified growth needs of the District whilst protecting and enhancing the natural environment. It also safeguards sites to meet future needs. The policy is justified, based on robust evidence which includes two Green Belt Assessments [ENV13, ENV14] and the Green Belt Topic Paper [ENV16] which sets out the work undertaken to exhaust reasonable alternatives as well as defining exceptional circumstances. The policy and approach are also supported by the Site Selection Methodology [H13] informed by SA [SD3]. Moreover, the policy is consistent with

national policy, particularly NPPF Paragraphs 140 -143, and effective as it provides for deliverable sites over the Plan period.

Conclusion

183. In light of the above and subject to the modifications identified, I conclude that the Plan’s approach to protecting and enhancing the natural environment through its relevant policies is justified and effective.

Issue 9: Whether the Plan effectively supports a greener future and its approach is justified and consistent with national policy.

Policy SO8.1

184. Policy SO8.1 of the Plan concerns low and zero carbon energy and heat production. It is noted that the policy will impact on development costs through its requirement for low and zero carbon technology and renewable energy equipment. These costs are recognised in the Local Plan Viability Report 2022 [EC9 and EC9a]. An energy efficiency / renewable low carbon cost of £4,850 per unit is identified that is based on the Future Homes Standard taken from the MHCLG consultation on changes to Part L of Building Regulations at the time. It is noted that a further £7,500 allowance was included to meet the zero-carbon standard. However, following the design requirement cost assumptions being revisited in 2024 (Local Plan and CIL Viability Assessment Addendum Report [EC10]) to update and reflect market conditions at the time, the additional net-zero allowance of £7,500 in the 2022 report was not retained due to evidence illustrating downward pressure on development viability.

185. NPPF Paragraph 155 states that to help increase the use and supply of renewable and low carbon energy and heat, plans should consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure development. Policy SO8.1 does not refer to supporting infrastructure and is therefore not consistent with national policy. To rectify this, **MM69** is required to amend the wording of the first bullet point of the policy. This is necessary to provide clarity within the policy, ensure its effectiveness and consistency with national policy

186. In addition to the above modification, further amendments to the wording of Policy SO8.1 are required (**MM68**) to clarify the Plan’s position on achieving low carbon and net-zero carbon energy. This includes the retitling of Policy SO8.1 and the provision of relevant references within the policy text. **MM68** is necessary to ensure clarity and the effectiveness of the policy.

187. A further modification, **MM70**, relates to the removal of unnecessary references made within Policy SO8.1 about the outcome of consultation with communities that would be affected. This is required for clarity and the effectiveness of the policy.

188. The Environment Act 2021, Chapter 14 of the NPPF and the NPPG on climate change provide the legislative and national policy context for Policy SO8.1. NPPF Paragraph 154 states that new development should be planned for in ways to help reduce greenhouse gas emissions. It is identified that developments should be climate resilient and mitigation should be at the forefront of planning considerations. In this context, I find Policy SO8.1 to be positively prepared and consistent with national policy, subject to the above modifications.

189. I have had regard to the Future Homes Standard which sets criteria for new homes to be net-zero ready. I also note the acknowledgement of the Climate Change Committee that significant renewable energy expansion will be necessary to meet UK carbon budgets. The Climate Change Adaptation and Mitigation Strategy [CC1 and CC2] advances this further, providing the evidence base that informs the Plan’s policy and action. In this context, there is clear and robust evidence to support and justify Policy SO8.1 and for it to be effective.

Policy SO8.2

190. Policy SO8.2 concerns achieving net-zero carbon development. A modification to the policy wording, as set out in **MM71**, relates to the removal of references to net-zero carbon emission development. This is required to accurately reflect the Plan’s strategy in terms of achieving net-zero and ensures the policy and its aims are effective.

191. The policy duplicates Building Regulations in part. Nonetheless, the Climate Change Adaptation and Mitigation Strategy [CC1 and CC2] does make a distinction between regulated emissions covered through Building Regulations and unregulated emissions, including embodied carbon, that are not. As such, partial repetition of Building Regulations within the policy is reasonable in this case and does not constitute a matter of soundness.

192. With the above modification, the policy is considered to have been positively prepared and is supported by evidence that is clear and robust. It is also noted that the requirements of the Climate Change Act 2008 and carbon reduction targets within construction as well as NPPF Paragraphs 152 and 155 to reduce greenhouse gas emissions are reflected within Policy SO8.2. Therefore, the policy is in line with national policy and is justified and effective.

Policy SO8.3

193. Policy SO8.3 relates to achieving sustainable design. In a similar way to the modifications to Policy SO8.2 identified above, **MM72** removes references to zero carbon energy in Policy SO8.3 and is necessary to correctly reflect the Plan’s strategy on the matter and for the policy to be clear, accurate and effective.

194. **MM73** is a further modification to Policy SO8.3 which relates to the removal of unnecessary cross-references within the policy to other policies in the Plan. This

reflects the consistent approach taken throughout the Plan and is necessary to provide clarity and consistency within the Plan and for the policy to be effective.

195. **MM74** removes the clause within Policy SO8.3 that all residential development proposals should exceed the standards set out by the Home Quality Mark and the BREEAM “excellent” rating. However, there is also a clarification inserted into the Policy text that proposals should comply with the most up-to-date national building standards. This modification is required to provide clarity within the Plan and for it to be effective and consistent with national policy.
196. There are many aspects to sustainable design. All major development should strive to incorporate sustainable design, as far as possible, as reflected in national policy. However, there may be circumstances where this is unachievable. To reflect this, and cater for such circumstances, a modification (**MM75**) to the third paragraph of Policy SO8.3 is required to adjust the clause ‘must’ to ‘should’. **MM75** is necessary to ensure that the policy is clear, flexible and effective.
197. **MM76** is a modification to the wording of Policy SO8.3 removing reference to the provision of electric vehicle recharging infrastructure within new development. This is necessary for the clarity of the policy and to avoid unnecessary duplication with Building Regulations. It is also required for the policy to be effective.
198. Taking account of the above modifications, I find Policy SO8.3 to be positively prepared in setting out clear aspirations for sustainable design in development proposals. The evidence to support, inform and underpin the policy and its approach is appropriate and robust. As such, I also find the policy to be justified and effective. Furthermore, I am satisfied that the policy is consistent with national policy.

Policy SO8.5

199. Policy SO8.5 concerns the Plan’s aspiration for development proposals to avoid air, water, soil, noise and light pollution. NPPF Paragraph 174 states that planning policies should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Furthermore, the NPPF states that development should, wherever possible, help to improve local environmental conditions. NPPF Paragraph 185 refers to noise and light pollution. NPPF Paragraph 186 sets out that planning policies should consider Air Quality Management Areas, including opportunities to avoid adverse impacts, where possible at the plan-making stage.
200. For Policy SO8.5 to align with national policy, a modification to its wording (**MM77**) is required to replace the word ‘will’ with ‘should’ after ‘All major development proposals ...’ This is necessary to align the policy with the strong emphasis within national policy that steps should be taken but are not compulsory. **MM77** provides clarity and flexibility within the policy, allowing developers to provide a justification in circumstances when the steps as set out in the policy are not required. This enables the policy to be effective.

201. Subject to the modification being made, I find Policy SO8.5 to be effective in setting out how development proposals can avoid harm to health and the natural environment by taking account of national policy. I also find the policy to be positively prepared regarding national and local guidance as set out in the relevant evidence and incorporating all relevant aspects within the Plan.

Conclusion

202. In light of the above, subject to the modifications I have identified, I conclude that the Plan and its relevant policies effectively support a greener future and that the approach and policies are justified and consistent with national policy.

Issue 10: Whether the approach of the Plan to Site Allocations is justified and effective and provides a robust strategy for their delivery with clear and precise policy criteria.

203. The Site Allocations strategy within the submitted Plan divides Cannock Chase into distinct areas and the site allocations identified are placed into distinct categories: Strategic Residential Site Allocations; Residential Site Allocations; Strategic Employment Site Allocations; Employment Site Allocations and GTTS Site Allocations. Sites identified in the Plan have been assessed against a site selection process, as set out in the supporting Site Selection Paper [H13] which explains the methodology and site selection criteria.

204. To be effective, modifications to the site allocations within the Plan, are made in the context of all other relevant modifications identified in this report. The Plan identifies key factors affecting the context for the allocations. For example, employment needs, residential development need, heritage and design, the Green Belt and landscape designations. Overall, each of these elements of the Plan, modified where necessary, provide a useful context and appropriate starting point for the site allocations to follow.

Strategic Site Allocations

SH1: Land South of Lichfield Road, Cannock

205. The site allocation in Policy SH1 is proposed to be split into two parts, the northern part lies to the south of Lichfield Road, Heath Hayes and is bounded by Newlands Lane to the south and existing woodland to the east and west. The southern part of the site lies to the south of Newlands Lane and is proposed as community parkland to be delivered alongside the residential development. Policy SH1 shows an indicated yield of 700 dwellings for the site allocation and the northern part of the site is proposed to be removed from the Green Belt with the southern part to remain within it and be enhanced.

206. For the northern part of the site within Policy SH1 to be released from the Green Belt, exceptional circumstances must be demonstrated. The case for this is set out within the submitted Green Belt evidence [ENV13 and ENV14] and the Green Belt Topic Paper [ENV16]. From this, I have considered the significant number of dwellings to be

delivered within a comprehensive and sustainable development which would be in good proximity to a range of existing facilities. Compensatory mitigation could be realised in terms of publicly accessible country parkland provided and enhanced, the retention of existing trees and hedgerows within the new development, the planting of new native woodland and wider green space access in the local area.

207. Furthermore, the proposed development of the site would provide key educational infrastructure including a new primary school which would help to reduce pressure on existing facilities. Improvements to the Five Ways junction would also help to relieve congestion on the local highway network, improve overall air quality and mitigate the impact of additional traffic through the junction.
208. In terms of Green Belt harm, the Green Belt Harm Assessment [ENV14] identifies that the release of the wider area of land around the allocation from the Green Belt would result in ‘high’ harm. This is because the wider area of land makes a strong contribution to safeguarding the countryside from encroachment and checking the sprawl of the built-up area.
209. As it relates to a strategic site, there are several criteria specific to Policy SH1 which have been informed by evidence. I find all to be necessary and justified satisfactorily. However, several modifications have been identified which are necessary for the policy and to be effective. These are identified below. However, there is also the opportunity to reduce the harm of Green Belt release by the mitigation identified above which would help to form a strong Green Belt boundary and reduce the impact of urban containment.
210. In light of the above, I have regard to the Green Belt tests in the NPPF in assessing whether the site proposed for Green Belt release within Policy SH1 is justified and sound. In this case, I find that exceptional circumstances do exist and therefore, site SH1 is suitably and justifiably identified for Green Belt release.
211. As set out in the attached schedule, **MM78** amends the wording throughout Policy SH1 relating to community parkland rather than a community park. This is necessary for clarity about the land use proposed and therefore the effectiveness of the policy. **MM79** amends the policy wording in terms of clarifying the name of Lichfield Road, rather than Cannock Road, to ensure precision and clarity and therefore the effectiveness and consistency of the policy and throughout the Plan. **MM80** adds the word ‘significant’ in terms of adverse impact on air quality and traffic congestion. This is required to clarify the level of adverse impact considered within relevant policies, including Policy SH1, and for the effectiveness of those policies.
212. Further modifications set out in the attached schedule at **MM81, MM82, MM83, MM84, MM85, MM86** and **MM87** are all necessary for the clarity of Policy SH1 and to ensure that it is effective. Some modifications, such as **MM82**, relate to factual corrections within the policy wording, whilst others, such as **MM85, MM86** and **MM87** also relate to a point or points of clarification and consistency with other parts of the Plan. **MM81, MM83** and

MM84 each provide additional text within, and remove text from, the policy for points of clarification and the effectiveness of the policy.

213. Overall, these modifications are necessary for the reasons stated and have been considered in conjunction with points raised in all relevant submissions and evidence provided. With these modifications, Policy SH1 is deliverable, justified and effective in helping to meet the identified development needs in the Cannock Chase District.

SH2: Land East of Wimblebury Road, Heath Hayes

214. The site allocation within Policy SH2 is within walking distance of a primary school, Heath Hayes Local Centre and Heath Hayes Park and allotments. It is also close to bus stops for public transport connections to the wider area. The site is bounded by an existing plantation woodland to the east which was historically the location of Cannock Chase Colliery No.8. Public rights of way are located within the woodland. I note that the existing woodland could be subject to improvements enhancing access to, and enabling recreation within, the retained Green Belt. The Chasewater and the Southern Coalfield Heaths SSSI lies close to the site’s eastern boundary and the site also lies close to two locally designated Sites of Biological Importance. The site is identified as having capacity for approximately 400 dwellings in the Plan and is adjacent to a safeguarded site (Site S4) removed from the Green Belt for future development.
215. For the release of the site from the Green Belt, I have considered the evidence for exceptional circumstances. It is accepted that there are insufficient non-Green Belt sites within the District to meet the requirements of the Spatial Strategy. This site would provide around 400 dwellings, of which 35% would be affordable housing – about 143 dwellings – which is a substantial contribution. The site is in a sustainable location with good walking and cycling access to range of existing facilities. I also note that this site would form a natural rounding off to the residential area of Heath Hayes which would not be detrimental to the principles of the Green Belt.
216. Furthermore, the development of this site, with the potential future development of adjacent safeguarded land (site S1) would facilitate the provision of key highway infrastructure improvements in terms of a new relief road from Wimblebury Road to Burntwood Road and Norton Road. The development of the site would also provide a stronger visual, defensible boundary from the remaining Green Belt as it is entirely bound by established woodland to the north and east, by built development to the west and Heath Hayes Park to the south.
217. Compensatory mitigation has been identified in terms of retaining woodland adjacent to the site as Green Belt, providing environmental quality and accessibility to the Green Belt close to the site. Proposed public open space on the site could be linked to existing PROWs through the woodland with existing paths extended and enhanced to create a circular walking route. The development of the site would assist in facilitating improvements to the Five Ways junction, improving quality and reducing traffic

congestion in the area. Contributions from development on the site could increase the viability for delivering a new primary school on the proposed site allocation (SH1)

218. In terms of Green Belt harm, the Green Belt Harm Assessment [ENV14] identifies that the release of this site from the Green Belt would likely result in ‘moderate-high’ harm. This is on the basis that the area makes a relatively strong contribution to safeguarding the countryside from encroachment and to checking the sprawl of the large built-up area. However, the development of the site would help strengthen the boundary between new urban development and the remaining Green Belt and reduce the likelihood of any harm being caused to the wider Green Belt, as recommended in the Green Belt Harm Assessment [ENV14]. The harm could be mitigated further by the introduction of new woodland belts and small woodlands within the site to the northeast which could further strengthen the Green Belt boundary and help reduce the impact of urban containment.
219. Having considered the above, I have had regard to the Green Belt tests in the NPPF in assessing whether the site proposed for Green Belt release within Policy SH2 is justified and sound. In this case, I find that exceptional circumstances do exist and therefore, site SH2 is suitably and justifiably identified for Green Belt release.
220. Modifications **MM88**, **MM89**, **MM90**, **MM91**, **MM92** and **MM93** are needed for Policy SH2 to be clear, appropriately flexible, factually correct and effective. **MM88** and **MM91** relate to a factual correction of the acronym for the Wimblebury Road Relief Road. This clarifies the reference and is required for the policy to be accurate and effective. **MM89** concerns a correction and upward amendment to the development capacity of Site SH2 to approximately 435 dwellings. **MM89** is necessary for consistency, flexibility and effectiveness within the Plan and its relevant policies.
221. **MM90** adds the word ‘significant’ to the policy and is necessary to provide clarification on the level of adverse impact to be determined through the policy and for the effectiveness of the policy. **MM92** and **MM93** add wording to the policy which is necessary for reasons of clarification in terms of the level of adverse impact to be determined and assessed through the policy. It should be noted that a further amendment to **MM93** is identified in the attached schedule following consultation. This is to correct the reference within Policy SH2 to Sites, rather than Areas of Biological Importance. This corrective change is necessary for accuracy and effectiveness. These modifications to Policy SH2 are also required to ensure an appropriate level of flexibility within the policy.
222. With the above modifications in place and having regard to the extensive evidence to support the policy and site allocation, I am satisfied that the site allocation within Policy SH2 is deliverable, justified by the relevant evidence submitted and effective in its contribution to meeting identified housing needs in the Cannock Chase District.

SH3: Land to the rear of Longford House, Watling Street

223. The site within Policy SH3 is on the urban edge of Cannock, surrounded on three sides by development and consists of brownfield and green field land. However, the undeveloped part of the site is in the Green Belt and therefore is removed from the Green Belt in the Plan. The site is adjacent to Longford House, a non-designated heritage asset that is close to Longford Lodge, a Grade II Listed building. It is sustainably located with existing and potential opportunities for active travel to nearby services and facilities as well as employment opportunities within walking distance. An indicated yield of up to 45 dwellings is identified within the Plan.
224. The site allocation comprises elements of previously developed land and land that lies within the Green Belt. Regarding the parts of the site to be released from the Green Belt, exceptional circumstances must be demonstrated to justify such a release. From the evidence provided, there are insufficient non-Green Belt sites within proximity to Cannock to meet the requirements of the Spatial Strategy of the Plan. Although the site is identified to provide a modest contribution of dwellings, its urban location allows for higher density development, maximising the use of the land and its contribution to the delivery of affordable housing. Part of the site has been previously developed and the site is well-served by public transport. It is also in a location that provides good access to Cannock town centre by cycle and on foot.
225. In relation to Green Belt harm, the evidence provided determines that the site allocation within Policy SH3 makes a ‘low to no’ value contribution to the five purposes of the Green Belt. The site is surrounded on three sides by development and, if redeveloped, its proposed residential use could be intensified. The development of the site would infill land and round off the urban edge of Cannock and its boundary with the Green Belt and improve the impact of the site allocation on the remaining Green Belt.
226. Having considered the above, I have had regard to the Green Belt tests in the NPPF in assessing whether the Green Belt release of relevant areas of the site proposed for within Policy SH3 is justified and sound. In this case, I find that exceptional circumstances do exist and therefore, site SH3 is suitably and justifiably identified for Green Belt release.
227. Overall, Policy SH3 is justified through the evidence it is supported and informed by and is deliverable. However, modifications to the policy are needed for it to be effective and therefore sound. **MM94** sets out a change to the policy wording on the development capacity of the site. It is acknowledged that the site capacity has been identified in line with the methodology set out in the SHLAA 2023 and 2024 [H1 and EXAM5]. Nonetheless, the inference of ‘up to 45 dwellings’ provides no flexibility where there may be potential for more dwellings. The replacement of ‘up to’ by ‘approximately’ is therefore more appropriate and the modification is necessary to ensure consistency, flexibility and effectiveness within the policy, the site and across the Plan.

228. **MM95** sets out a modification to the policy, inserting additional wording through a further criterion to ensure that an appropriate contribution to education provision is provided through any proposed development of the site allocation within Policy SH3. The modification is reasoned, justified and necessary to ensure clarity within the policy and that factual amendments are made correctly. It is also required for the policy to be effective.

SH6: Former Hart School, Burnthill Road, Rugeley (Hagley Park)

229. The site proposed in Policy SH6 is located on the edge of Rugeley, accessed from Burnthill Road and adjacent to a leisure centre. The site was in previous use as a school and as such consists partly of brownfield land. However, the site allocation also requires the release of some Green Belt land with around 2ha of its total 4.9ha area within the Green Belt. The site is within walking distance of local services and facilities, including a local primary school. An indicative dwelling yield of up to 145 dwellings on the site is set out within the policy in the submitted Plan.
230. For land to be released from the Green Belt, the exceptional circumstances to justify this are set out in evidence which I have considered, including the Green Belt Harm Assessment [ENV14]. It has been evidenced that there are insufficient non-Green Belt sites within proximity to Rugeley to meet the Spatial Strategy needs of the Plan, other than the large allocation at the former Rugeley Power Station. The potential contribution of about 145 dwellings would include affordable housing provision. Furthermore, a significant element of the proposed site is previously developed therefore minimising the amount of land required for Green Belt release.
231. The land within the Green Belt was formerly used as a school playing field and therefore utilising it for additional housing will optimise the redevelopment potential of the site overall. It is in a sustainable location and within walking and cycling distance to a range of facilities. There are no non-Green Belt land options in this broad location that could accommodate a similar level of development, and it would optimise the use of a part previously developed site.
232. The NPPF states that 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. In my assessment, the site within Policy SH6 meets both criteria.
233. In considering Green Belt harm, the evidence determines that the overall site allocation within Policy SH6 makes a ‘low’ contribution to the five purposes of the Green Belt. The site is relatively enclosed from the wider Green Belt due to being surrounded by development on three sides. The site is also bordered to the west by established hedgerow and trees which has the potential to be enhanced with additional planting to soften the impact of the urban edge on the wider landscape of the Green Belt.

234. I have had regard to the Green Belt tests in the NPPF in assessing whether the Green Belt release of relevant areas of the site proposed for within Policy SH6 is justified and sound. In this case, exceptional circumstances do exist and therefore, the site allocation within Policy SH6 is suitably and justifiably identified for Green Belt release.
235. Notwithstanding this, modifications to the policy are required. **MM96** sets out a modification to the policy wording to replace ‘Transport Statement’ with ‘Transport Assessment and Travel Plan’. This is necessary to enable a factual amendment to be made to the policy, to provide clarification and ensure that the policy is effective.
236. **MM97** identifies a similar modification to Policy SH6 as is set out in **MM94** above in relation to Policy SH3 and site capacity. The replacement of ‘up to’ with ‘approximately’ is necessary to ensure clarity, particularly between policy and supporting text within the Plan, as well as the consistency, flexibility and effectiveness of the policy, the site and the Plan.

SM1: Land at The Former Rugeley Power Station

237. The large site allocation within Policy SM1 is a cross-boundary site with Lichfield District and forms the largest available brownfield site in Cannock Chase District. The site is not located within the Green Belt or National Landscape and is within 850 metres of Rugeley Trent Valley Railway Station. Although the site is not within walking distance or near any existing education or healthcare facilities, the scale of the proposed development on the site allows for new facilities to be provided. A dwelling yield of up to 2,300 dwellings in total, of which up to 1,000 dwellings are to be within Cannock Chase District, is identified within the submitted policy.
238. As explained in other similar modifications, **MM98** is a modification to the policy wording relating to the defining of the site capacity by replacing ‘up to’ with ‘approximately’. For similar reasons previously stated, **MM98** is needed for clarification, consistency and flexibility within the policy and for the effectiveness of the policy, the site and the Plan and its other relevant policies.
239. **MM99** amends policy wording in Policy SM1 to ensure that it aligns with the wording of planning conditions attached to the outline planning approval for this site. It is also intended to enable the Council to retain control of the development of this large strategic site and to ensure a consistent approach regarding the required facilities to be provided as part of its future development over the coming years. The modification is therefore required for clarification purposes and to ensure that Policy SM1 is effective.
240. **MM100** amends wording in Policy SM1 which is necessary to ensure that there is clarity within the policy about the education contribution sought from its development site and to ensure that the policy is effective.

SE1: Kingswood Lakeside Extension 2, Norton Canes

241. The site identified within Policy SE1 is located on the urban edge of Cannock and is situated east of the existing Kingswood Industrial Estate and north of the Kingswood Lakeside Employment Park. As the site lies within the Green Belt, the proposal to develop it will result in its release from the Green Belt.
242. There are modifications to Policy SE1 which are necessary to ensure factual accuracy, consistency across the Plan, flexibility within the policy and for it to be effective. These are set out in the attached schedule as **MM101**, **MM102**, **MM103**, **MM104** and **MM105**. **MM101** is the correction of factual errors, amending the employment floor space measurement from ‘up to’ to ‘approximately’ and ‘sqm’ to ‘sqft’ within the policy wording. **MM102** and **MM103** relate to amendments to policy wording. These changes emphasise the need for a Transport Assessment and Travel Plan to support any development proposal at SE1.
243. **MM104** removes the requirement to create a new community park on the site and instead emphasises the enhancement of existing habitats and ecological features, as proposed and agreed by the landowner of the site. **MM105** adds wording to Policy SE1, which is supported by NE [SOCG8], for the need for proposals on the site to be screened to determine the impact on the conservation objectives of a designated site, in this case a Site of Biological Importance and the Site of Special Scientific Importance (SSSI) Impact Zone. Both **MM104** and **MM105** are necessary to provide clarity on the relevant requirements for developing the site and to ensure that the policy is effective.
244. Policy SE1 and the site allocation within it is justified as it is identified in the ELAA [EC1 and EXAM3], within the summary in the site selection methodology [H13] and the Green Belt Topic Paper [ENV16]. Having regard to all relevant submitted evidence, I am satisfied that it provides reasonable and appropriate evidential support for this site and policy. Subject to the modifications identified, the policy requirements are clear and precise and, based on the assessments and evidence provided, the site is deliverable.

SE2: Watling Street Business Park Extension

245. The site allocation within Policy SE2 is identified to provide 50,000sqm of industrial and logistics floorspace (E(g)iii), B2 and B8 floorspace. However, it is evident that modifications to the policy are necessary to provide clarification, accuracy and flexibility within the policy and Plan and to ensure the effectiveness of both. As with other modifications identified, the basis for them has emerged through my consideration and assessment of discussions between the Council, landowners, developers and statutory organisations and the evidence provided and all within the context of meeting the tests of soundness.
246. **MM106** is a modification to the policy wording relating to a drafting error and is required to correct the amount of employment floorspace proposed on the site from 50,000sqm down to 43,000sqm. This has been informed through a detailed site appraisal

undertaken by the landowner, set out in supporting evidence [SOCG13] and more accurately reflects the actual site capacity within the defined site boundary. The modification is necessary for Policy SE2 to be effective. **MM107** amends the wording of Policy SE2 relating to vehicular access to the site. It provides greater flexibility within the policy in terms of the detailed access arrangements to and from the A5 specifically. This flexibility in the design detail of the access is required to ensure that Policy SE2 and the development of the site is effective.

247. Similarly to other policies, **MM108** adds wording to Policy SE2 relating to the need for screening to be undertaken to determine what the effect on conservation objectives of a designated site might be because of the development proposed. Furthermore, the wording for **MM108** has been agreed by the Council and NE through SOCG8 and applies to all strategic allocations in the Green Belt. The modification is required to provide clarity and for all relevant policies to be effective.

Conclusion

248. Subject to the modifications outlined in the paragraphs above being made, I find that the approach to the Strategic Site Allocations within the Plan is justified and effective and includes clear and precise policies, with deliverable sites identified.

Non-Strategic Site Allocations

Policy SA1: Site Allocations

249. Policy SA1 concerns the site allocations within the Plan which are non-strategic sites. The Table within Policy SA1 identifies sites at three distinct stages: A: those under construction; B: those with planning permission or a resolution to grant permission; and C: those which are proposed allocations. For the policy to be clear, factually correct and effective, it is necessary for modifications to be made. The changes identified are to be supported through the supporting text for the policy also. **MM109** sets out extensive changes to the policy wording and its layout, removing sites from the Table which no longer are to be allocations for reasons such as having gained planning permission or no longer being available. With the changes set out in **MM109**, Policy SA1 sets out site allocations that are deliverable, developable and available and it is therefore sound.
250. I now turn to the site-specific policies that have been set out in the Plan. Site H29, as identified within Policy H29, is allocated for residential development with a capacity of 80 dwellings identified. **MM110** amends the wording of the policy and clarifies existing active on-site community uses that could be re-sited in the local area and, ideally, accommodated on site through proposed development. This is necessary to provide factual updates and clarification within the policy and to ensure that the policy is effective. With this modification, Policy H29 is sound.
251. Site M1 is allocated for residential development with an indicated development capacity of 70 dwellings. Modifications to Policy M1 are necessary to ensure that factual

amendments are incorporated and that the policy requirements are clear and effective. **MM111** amends the wording of the policy to include additional text derived from the evidence within the Heritage Impact Assessment (HIA) (HIS2), resulting in additional wording to conserve and enhance heritage. **MM112** removes reference to a parking issue that has been addressed by the retention and enhancement of Beecroft Road Car Park, Cannock (Site M3) which is no longer proposed for allocation within the Plan as set out in modification **MM115**. With these modifications, Policy M1 is sound.

252. Site H32/M5 is allocated for residential development and is in Cannock town centre, having been identified in the Cannock Town Centre Development Prospectus [EC14]. The Site is identified to come forward for development in 2031/32, is deliverable and available for development with an indicated yield of 22 dwellings in the submitted Plan. **MM113** amends the policy wording by removing reference to H32 in the site title. This is due to H32 being a reference to the site in earlier stages of the Local Plan preparation process which is now referred to as Site M5. The modification is therefore required as a factual correction to provide clarity and ensure the effectiveness of the policy. **MM114** includes additional text within the policy regarding a nearby non-designated heritage asset and is derived from the HIA [HIS2] to conserve and enhance heritage. The modification is necessary for factual correction, clarity and the justification and effectiveness of the policy. With these modifications being made, the policy is sound.
253. **MM115** removes Site M3 from the submitted Plan due to the site no longer being available as an allocation. This is due to the site, Beecroft Road Car Park, being required to be retained in its current use to support the redevelopment and regeneration of Cannock Chase town centre. The modification is therefore necessary for factual update, for clarity and for the effectiveness of the Plan. Subject to the amendment to remove Site M3, the Plan is effective.
254. **MM116** amends the first criteria of Policy H35 regarding access. This modification is necessary to provide a factual correction for vehicle access to the site to align with the proposed site layout plan submitted in planning application CH/21/0476. It is required to provide clarity and ensure the policy is effective and with **MM116**, the policy is sound.
255. Site H36 is allocated for residential development with a development capacity indicated as 25 dwellings in the submitted Plan. A modification, **MM117**, relates to the key development considerations within the policy and provides an additional criterion about the impact of proposals on nearby heritage assets. This is necessary to provide a factual amendment and clarity and to ensure the justification and effectiveness of the policy. Subject to the modification being made, the policy is sound.
256. Site H37 is allocated for residential development and has an indicative yield of 25 dwellings. **MM118** sets out a modification to the submitted Policy which relates to the impact of any proposals on the site on nearby heritage assets, including the Cannock Chase Conservation Area, eleven listed buildings, two scheduled monuments and their setting. This modification incorporates factual amendments and corrections and is

necessary to provide clarity and for the justification and effectiveness of the policy. With this modification, the policy is sound.

257. Site H38 is an allocation for residential development and has an indicated yield of 24 dwellings identified in the Plan. Policy H38 requires modification in a similar way to several other site allocations. This is set out in **MM119** and relates to the impact of proposals on nearby heritage assets and their setting. The modification is necessary for factual amendments to be made and for the clarity, justification and effectiveness of the policy. Subject to the modification being made, the policy is sound.
258. Site H39 is allocated for residential development with a capacity indicated as 25 dwellings in the Plan. **MM120** sets out a modification to the policy amending its wording to include text to retain the non-designated heritage asset (Nos 26-28). It also states that any scheme on the site should retain a gap between the asset and any new development to protect its setting. This is necessary to reflect factual amendments and to ensure the clarity and effectiveness of the policy. Subject to the modification being made, the policy is sound.
259. Site H40 is allocated for residential development with an indicative capacity of 20 dwellings. The site is in the ownership of the Council and is promoted within the Town Centre Development Prospectus [EC14] and it is a brownfield site within Cannock town centre. A modification to the policy is set out in **MM121** and reflects a change identified in Table 1 of EXAM9, the SOCG between HE and the Council. The modification also derives from the HIA [HIS2] and results in additional wording to the policy to conserve and enhance heritage. This is necessary to incorporate factual amendments within the policy, for clarity and to ensure that the policy is justified and effective. Subject to the modification being made, the policy is sound.
260. Site M4 is an allocation for residential development with an indicated capacity of 20 dwellings. **MM122** is a modification required to reflect the HIA [HIS2]. The additional wording provided by the modification ensures that the policy has regard to conserving and enhancing heritage. It is necessary for factual correction, clarity and the justification and effectiveness of the policy. With the modification, the policy is sound.
261. Site M2 is allocated for an indicated yield of 15 dwellings in the submitted Plan. The development of the site will include enhanced cycle and footpath links and connections to the pedestrian area of Cannock town centre. **MM123** is derived from the HIA [HIS2] and adds wording to the policy regarding the conserving and enhancement of heritage. The modification is necessary to provide clarity and for the justification and effectiveness of Policy M2. Subject to that modification being made, the policy is sound.
262. Site H43 is allocated for residential development with an indicative yield of 13 dwellings. The policy is deliverable, justified and effective and therefore sound, subject to the correction of a typographical error relating to green roofs within the policy, as set out in **MM124**.

263. Site H60 is proposed in the submitted Plan for residential development with an indicated yield of 15 dwellings. The policy will require modification (**MM125**) to its wording and include text relating to scale and materials in the design of any new development on the site. **MM125** is necessary for clarity, the justification and effectiveness of the policy. Subject to the modification, the policy is sound.
264. Site H61 is allocated for residential development. Whilst the site area is identified as 4.18ha, the developable area and development yield of this site has not been defined in the Plan. This is due to these figures not having been determined at this stage through a detailed site assessment. Therefore, Site H61 is not included in the housing trajectory. However, the site is confirmed to be developable, deliverable and available. A modification to the Policy is necessary to ensure its clarity and for the Policy to be effective. **MM126** adds an additional point within the key development considerations which sets out the possible requirement for a Transport Assessment and Travel Plan with any proposed development on this developable and deliverable site. With the modification being made, the Policy is sound.
265. Site H62 is allocated for residential development with an indicative yield of 10 dwellings. A modification to the policy to remove the final bullet point under the Key Development Considerations is necessary for factual correction regarding the location of the identified Conservation Area being in Rugeley. As such, **MM127** sets out the changes which are required for factual accuracy and to provide clarity and for the policy to be effective. Subject to the modification, the policy is sound.
266. Site H66 is allocated for residential development in the Plan with an indicative development yield of 18 dwellings. The policy requires a modification to be factually accurate, clear, justified and effective. **MM128** sets out an additional point to be added under the Key Development Considerations concerning education contributions. This modification is derived from discussions and concerns identified by SCC, as the LEA, seeking its inclusion within the policy to ensure that the relevant educational infrastructure is provided. For this reason and the soundness reasons set out, the modification is necessary. With the modification in place, the policy is sound.
267. Site H49 is allocated in the Plan for residential development with an indicated yield of 40 dwellings. The policy requires modification to be sound. **MM129** amends the wording of Policy H49 to include an additional criterion within the Key Development Considerations relating to the archaeological investigation of the site, the materials and architectural styles of any new development proposals and the mitigation of its visual impact on the setting of the Trent and Mersey Canal Conservation Area. The modification derives from the HIA [HIS2] and adds wording to the policy to conserve and enhance heritage. **MM129** is necessary for factual amendment, clarity and for the justification and effectiveness of the policy and with it, Policy H49 is sound.
268. Site H50 is allocated for residential development with an indicated yield of 35 dwellings. The specific criteria of the policy consider the restoration of connections through the site to Main Road for access to local facilities and services. The policy also considers

the design of the site and buildings in any new proposals and that this should respect the setting and structures within the Brereton Conservation Area and the Church of St Michael. Notwithstanding the submitted detailed considerations within the policy, a modification, **MM130**, is necessary to ensure factual amendments to the policy, to provide clarity in its requirements and to ensure that the policy and the Plan are justified and effective. It amends wording in the final bullet point of the submitted policy and with the amendment in place, the policy is sound.

269. Site H52 is allocated within the Plan for residential development with an indicated yield of 23 dwellings. This is reflected within the housing trajectory. However, for Policy H52 to be clear and effective, **MM131** sets out a modification to provide additional text to the policy concerning the design, height and massing of any proposals which should respect the original character of the area. This modification has been derived by the HIA [HIS2] and ensures that the policy seeks to conserve and enhance heritage through any proposals on Site H52. It is necessary for clarity and for Policy H52 to be effective and with it, the policy is sound.
270. Site H53 is allocated for residential development with an indicated yield of 20 dwellings set out in the submitted Plan. One of the specific requirements of the policy relates to conservation and heritage. For the policy to be fully justified, clear and effective, a modification is necessary. **MM132** amends and strengthens the policy wording by replacing the final bullet point of the Key Development Considerations with new wording. The modification to the policy is based on the work undertaken in the HIA [HIS2 and EXAM2] and, subject to it being made, Policy H53 is sound.
271. Site H67 is identified for residential development in the Plan with a development yield of 18 dwellings. In addition to the broader criteria considered within Policy H67, the site-specific criteria consider the remediation of despoiled land and the provision of a Contaminated Land Desktop Study and Remediation Statement. Moreover, there is also consideration of the design of new development respecting the setting of nearby Listed Buildings. Whilst the criteria within the policy provide significant coverage of these key development considerations, there is a need for a modification (**MM133**). This amends wording in the policy, replacing existing text in the final bullet point with wording relating to respecting nearby heritage assets. This is required to provide a factual amendment of the policy, to make the policy clear and for it to be justified and effective. With the modification I have identified in place, the policy is sound.
272. Site H69 is allocated for residential development in the submitted Plan with a development yield of 11 dwellings indicated. The key development considerations in Policy H69 include access from Hednesford Road, the incorporation of existing trees and hedgerows, green infrastructure connectivity and suitable water harvesting and drainage systems on site. In addition, the policy considers the inclusion of new or enhanced cycle and footpath linkages with enhanced connections and alignments to existing public rights of way, where appropriate. However, a modification to Policy H69 is needed to amend wording and include additional text considering the scale, height,

massing and materials of surrounding buildings, particularly regarding those fronting Hednesford Road. **MM134** is necessary to provide a factual correction to the policy and ensure clarity. It also ensures that Policy H69 is justified and effective and with this modification, the policy is sound.

273. Site E6 is allocated for employment use in the Plan and it has an area of 2.1 hectares. The policy includes considerations about access, the incorporation of existing trees and hedgerows in any proposals for the site, suitable ecological mitigation with compensatory measures where required and suitable water harvesting and drainage. Notwithstanding this, having considered the relevant evidence and submissions relating to this policy, a modification (**MM135**) is necessary to provide a factual correction for clarity. The modification specifically relates to conserving and enhancing heritage and provides new policy wording to meet that aim. The modification is required for the policy to be justified and effective and with it in place, the policy is sound.
274. Site E14 is allocated for employment use in the Plan with a site area of 0.56ha identified. The site boundary and site address were debated during the examination and has been considered. However, in my assessment, I find that changes relating to these matters do not relate to matters of soundness and can be addressed separately from this report. The extent of Site E14 therefore remains as submitted. Notwithstanding this, a modification to the policy wording, as set out in **MM136**, is necessary to remove the irrelevant information and provide clarity. The removal of that criterion, relating to the retention of a forklift truck on site, ensures that the policy is precise and effective and with that modification made, the policy is sound.
275. Policy GT1 identifies an allocation of 0.4ha of land for 3 permanent pitches for Gypsy and Traveller accommodation. Policy GT2 identifies an area of 0.13ha of land for 2 permanent pitches also for Gypsy and Traveller accommodation. Both policies identify the point of access and retention of existing trees and hedgerows where possible. Furthermore, these policies seek the provision of ecologically suitable mitigation and compensatory measures for enhancements within the site and green infrastructure connectivity.
276. Both sites (GT1 and GT2) are within the Green Belt. However, the Plan does not propose to remove them from it. Notwithstanding this, exceptional circumstances for development in the Green Belt are required to be demonstrated for the site allocations to be acceptable. The evidence for this has been considered and explains that there is an identified need for such accommodation through the Plan and that there are no alternative Gypsy and Traveller sites in Cannock Chase in non-Green Belt locations. There are also no sites which could expand without developing in the Green Belt. In both cases, there is a specific locational requirement as each site forms an extension to existing sites providing such accommodation and no alternative locations have been identified which could meet the needs of the existing communities.
277. Both existing sites are visible from the highway and the small extensions proposed are unlikely to alter the perception of openness of the Green Belt in their locations. Views of

the sites could be softened by existing trees and hedgerows around the site and their enhancement on the site boundaries. Furthermore, the surrounding land of both sites is to be retained in the Green Belt ensuring durable site boundaries and limiting further expansion.

278. In relation to Policies GT1 and GT2 and the site allocations within them, I have had regard to the Green Belt tests in the NPPF in my assessment as to whether the proposed use of these sites is justified and sound. In each case, exceptional circumstances exist and therefore the site allocations identified for the use specified are found to be suitable and justified for such development in the Green Belt.

Safeguarded Land

279. NPPF Paragraph 143 states that when defining Green Belt boundaries, plans should, where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the Plan period. Plans should also make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development.

280. The Plan identifies four site allocations for safeguarded land, sites S1, S2, S3 and S4 as set out in Policy SO7.7 and totalling around 25ha of land according to the Green Belt Needs Assessment [ENV14]. The supporting text for Policy SO7.7 provides the justification for safeguarding this land. The Green Belt Needs Assessment [ENV14] also provides justification.

281. I have had regard to all the points made in justifying the safeguarded land identified through these sites and to the Green Belt tests in the NPPF. In each case, I find that the site is suitably and justifiably identified for safeguarding for future development. The Plan has been prepared positively in considering the longer-term needs beyond the Plan period. It is important to understand and acknowledge that no change is proposed to the current use of the Green Belt land within these allocations through the Plan other than the new relief road planned for site allocation S1 at Wimblebury Road. Also, it is to be recognised that were these sites to be developed in the future, the exceptional circumstances case for further Green Belt release would need to be met for any site that has been safeguarded.

Conclusion

282. With all the above considered, and subject to the modifications identified, I conclude that the Site Allocations set out in the Plan are based on robust evidence, have been positively prepared and are developable, deliverable and available. As such, they are justified and effective in meeting the identified development needs for Cannock Chase. Therefore, in this regard, the approach of the Plan to site allocations is also justified and

effective and provides a robust strategy for their delivery with clear and precise policy criteria.

Issue 11: Whether the Plan sets out a clear framework for the effective delivery and monitoring of the policies within the Plan that can be measured and assessed.

283. NPPF Paragraph 31 states that all policies are to be reviewed by up-to-date evidence that is relevant in supporting the policies concerned. The Plan’s policies will be monitored, assessed and managed via a range of mechanisms, in part, as set out on page 232 of the Plan – the Monitoring Framework.
284. The Authority Monitoring Report (AMR) will be the main mechanism used to monitor the Strategic Objectives of the Plan, assess the performance of the policies that aim to meet those objectives and to highlight any policy areas that require intervention and management through underperformance. The AMR will use a range of data and other reports and strategies to carry out this task.
285. Furthermore, the Council has indicated that the existing format of the AMR is to be amended to incorporate and reflect the targets identified within the Monitoring Framework of the Plan and its policies. As such, the monitoring of implementation, assessment and effectiveness of the Plan’s policies is to be reasonably and appropriately managed and measured through these yearly reports.
286. The AMR will have a rating system (e.g. traffic light colours and/or symbols) to highlight any objectives that are not being met based on monitoring against targets over the Plan period. Initially targets will be highlighted as an area of concern, but where targets are not being met consistently over a period of time they will be raised through a reporting process to enable action to be taken to address any issues.
287. From this, I am satisfied that the Council will be able to determine whether any actions are required to support better outcomes, including those that may result in changes or updates to current policy which would have to be through an update to the Plan.
288. The Infrastructure Delivery Plan (IDP) [I1] is a supporting document that identifies the physical infrastructure required to support the delivery of the Plan and combines information on planned development projects in the District. It will be reviewed regularly to take into consideration new information and infrastructure requirements. The Infrastructure Funding Schedule (IFS) within the IDP summarises the developer contributions that will be sought by the Council and partners to deliver infrastructure. Both the IDP and IFS will be reviewed regularly to ensure they remain up to date and feed into the reporting undertaken through the Monitoring Framework.
289. The Strategic Housing Land Availability Assessment (SHLAA) incorporating the five-year housing land supply statement [H1] and the ELAA [EC1] provide evidence on housing and employment land supply. This includes the amount of land built out for these uses and the amount of supply remaining to determine if progress on completions and future

supply is being met. The updates to this document, along with others, will also inform the assessment of the implementation of the Plan undertaken through the Monitoring Framework.

290. Overall, I am satisfied that these supporting documents, amongst others, will assist in the effective and appropriate implementation, monitoring and assessment of the policies in the Plan.

Conclusion

291. From the evidence before me in this examination regarding delivery and monitoring, I conclude that the Plan sets out a clear framework for the effective delivery and monitoring of the policies within it that can be measured and assessed. I also conclude that, in this regard, the Plan and its policies are justified, effective and consistent with national policy.

Overall Conclusion and Recommendation

292. The Plan has a number of deficiencies in respect of soundness and/or legal compliance for the reasons I have set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues I have identified.

293. The Council has requested that I recommend main modifications to make the Plan sound, legally compliant and capable of adoption. I conclude that, with the recommended main modifications set out in the Appendix to this report, the Cannock Chase Local Plan 2018-2040 has met the duty to co-operate, satisfies the requirements of Section 20(5)(a) of the 2004 Act and meets the criteria for soundness in the NPPF September 2023.

A McCormack

Inspector

This report is accompanied by an Appendix containing the Main Modifications.