

Regulation 22(1)(c) Statement of Cannock Chase District Council
in support of
Cannock Chase District Local Plan 2018-2040
(June 2024)

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1.0 Introduction

1.1 Purpose

This Consultation Statement sets out how the Council has involved residents and key stakeholders in preparing the Cannock Chase District Local Plan 2018 to 2040 in accordance with Regulations 22(c)(i) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This statement demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement at the time, namely the Statement of Community Involvement (SCI) (2018), Statement of Community Involvement Addendum (December 2020) and the updated Statement of Community Involvement (March 2022).

The SCI document and the Addendum set out how the Council will consult and involve the public and statutory consultees in planning matters. Full details of the current adopted SCI can be viewed here: [Statement of Community Involvement \(SCI\) | Cannock Chase District Council \(cannockchasedc.gov.uk\)](https://www.cannockchasedc.gov.uk/statement-of-community-involvement-sci)

1.2 Background

This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the Local Plan, setting out how such efforts have shaped the Plan and the main issues raised by consultation / representations.

The Council began preparing a new Local Plan for the District in 2018. The new Local Plan will set out the strategic vision, objectives and spatial strategy for the District, as well as, the planning policies which will guide future development. The Plan looks ahead to 2040 and identifies the main areas for sustainable development growth. It establishes policies and guidance to ensure local development is built in accordance with the principles set out in the National Planning Policy Framework (NPPF).

The Local Plan will replace the adopted Cannock Chase Local Plan (Part 1) (2014) that currently forms the development framework for the District.

The following section outlines the plan production timetable and the different stages of consultation undertaken as part of the plan making process.

2.0 Plan Production Timeline

The creation of a new Local Plan requires a number of thorough and robust stages of consultation. This is to enable early and ongoing engagement with the local community, businesses and organisations to develop a comprehensive document, tailored to the needs of the district in terms of strategy and the policies required. As part of the plan making process at each stage the Council consulted specific consultation bodies and statutory bodies, local amenity and residents' groups, businesses and individual residents.

The below timetable outlines the main consultation stages of the emerging Local Plan up to now and then sets out the future stages of consultation in accordance with the published Local Development Scheme.

Table 2.1: Summary of Local Plan Consultations

Stage	Timeframe	What was consulted
Issues and Scope	2 nd July - 28 th August 2018	Scope of the new Local Plan Issues Document
Issues and Options	13 th May - 8 th July 2019	Issues and Options Consultation
Preferred Options (Regulation 18)	19 th March -30 th April 2021	Preferred Options Document
Pre-Submission (Regulation 19)	5 th February - 18 th March 2024	Pre-Submission Document

Key Local Plan Stages Undertaken

1. Identify issues and collect evidence: February 2018.

The resolution to produce a new plan was taken by Full Council on the 21st February 2018.

2. Issues and Scoping Local Plan: July/August 2018

An Issues and Scope paper was produced to consider what matters a new local plan should be considering, and how the current Local Plan (Part 1) and work already undertaken on Part 2 should be incorporated. This was published and consulted upon between 2nd July and 28th August 2018 alongside a Scoping report for the Sustainability Appraisal (SA) and a reviewed SCI.

The consultation responses were published on the website along with how they were considered and the outcome of the consultation was reported to Cabinet on 8th November 2018. The feedback received was used to refine and inform the Local Plan Review. The Council subsequently reviewed existing policies, identified any current gaps in policies or evidence bases and began undertaking further research to inform the Local Plan.

3. Issues and Options Local Plan: May-July 2019

Following the review of the Issues and Scope consultation, an Issues and Options document was produced to consider the issues raised and the suggested scope of the new plan, alongside suggesting various options for consideration to address these. This was published and consulted upon between 13th May and 8th July 2019 alongside a non-technical summary, SA, Habitats Regulations Assessment (HRA) Scoping Report and updated evidence base.

The Issues and Options consultation responses were noted by Cabinet on 17th October 2019 and the next steps of the Local Plan Review were set out.

4. Preferred Options (Regulation 18): February 2021

The Council produced a full draft version of the Local Plan that combined the updated evidence base, technical assessments, previous consultation responses and internal comments. The Council's Preferred Options for the Local Plan and supporting documents, including the SA, were published in accordance with Regulation 18 of the Town & Country Planning (Local Planning) Regulations 2012 for a period of six weeks between 19th March and 20th April 2021. This was a statutory part of the planning process and the document contained draft policies and site allocations based upon the feedback of previous consultations and available evidence.

A variety of consultation techniques were used in accordance with the SCI Addendum December 2020, which was published in accordance with Government guidance to enable plan making progress and for consultations to proceed whilst conforming to legislative changes arising due to the Coronavirus Pandemic.

The Local Plan (Preferred Options) consultation responses were reported to the 16th December 2021 and 25th August 2022 meeting of Cabinet.

5. Pre-Submission Regulation 19: February 2024

The Council produced a full draft version of the Local Plan that combined the updated evidence base, technical assessments, previous consultation responses and internal comments. The Council's Pre-Submission Regulation 19 for the Local Plan and supporting documents, including the SA, were published in accordance with Regulation 19 of the Town & Country Planning (Local Planning) Regulations 2012 for a period of six weeks between 5th February and 18th March 2024. This was a statutory part of the planning process and the document contained draft policies and site allocations taking account of the feedback of previous consultations and based upon the available evidence.

The Local Plan (Regulation 19) consultation responses were reported to the 22nd August 2024 meeting of Cabinet.

The extract from the Councils Local Development Scheme shows the stages of Local Plan preparation and the anticipated timescale for progression to Adoption of the Local Plan.

Document	Preparation Stage	LDS Target Date
New Local Plan	Issues & Options consultation	May/June/July 2019
	Preferred Option Consultation (non statutory stage)	March/April 2021
	Pre-Submission (Regulation 19) consultation	WINTER 2023/24
	Submission	AUTUMN 2024
	Examination in Public	SPRING 2025
	Adoption	WINTER 2025

3.0 Summary of Process and Main Issues

3.1 Introduction

The Council originally intended to prepare a Part 2 Local Plan which would allocate strategic and non-strategic sites for growth. However, with the changes in national policy that had taken place between the adoption of the Part 1 Local Plan and the commencement of preparation of the Local Plan Part 2, a decision was made by Full Council to discontinue work on the Part 2 Local Plan and commence work on a full Local Plan.

3.2 Issues and Scope Consultation

The Issues and Options consultation was the first district-wide public consultation undertaken by the Council with regard to the preparation of the new Local Plan. Consultees were invited to comment on high-level issues that the Council had identified following a review of the existing Local Plan and National and Regional Policy. The public consultation took place over a eight week period between 2nd July 2018 and 28th August 2018 and was carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Issues and Scope document included the following:

- A review of the adopted Local Plan (Part 1) Vision and Objectives;
- A review of the adopted Local Plan (Part 1) Policies (CP1-CP16)

The main issues raised in the Issues and Scope consultation were presented to Cabinet on the 8th November 2018¹ as follows:

- The new National Planning Policy Framework published in July – the need for the plan to take revised national policy into account. Much of this was already anticipated in the consultation document as it was based on the draft NPPF ;
- Housing requirement to be set by the new standard methodology although Government haven't finalised this yet so the number is still unconfirmed. When confirmed it must be treated as a minimum;
- Housing Delivery test to be introduced from November 2018;

¹ [06-local_plan_review_consultation_feedback_rpt_cab_081118.pdf \(cannockchasedc.gov.uk\)](#)

- Duty to Co-operate, ongoing work in relation to the housing shortfall;
- LEPs – being reviewed;
- Viability and deliverability – there is more emphasis on this at the local plan stage;
- Detailed work on brownfield sites needed – but will still be pressure to release some Green Belt; and
- Resource implications of the need to have an up to date evidence base. Some is in the process of being commissioned but there are still gaps especially in relation to infrastructure, transport, biodiversity, open space, green infrastructure

The Councils response to the comments were then used to inform the Issues and Options Consultation, which was presented to Cabinet on the 7th February 2019².

3.3 Issues and Options Consultation

The Issues and Options consultation was the second district-wide public consultation undertaken by the Council with regards to the preparation of the new Local Plan. Consultees were invited to comment on high-level issues that the Council had identified following a review of the existing Local Plan and National and Regional Policy. The public consultation took place over a period of eight weeks between 13th May 2019 and 8th July 2019 and was carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Local Plan period covers a period 2036.

The Issues and Options consultation document included the following:

- A set of eight draft objectives for the new Local Plan that give an indication of the expected scope of the Plan’s Strategy.
- A set of different options to address the issues and objectives raised in the draft Local Plan ;
- Examining other policy issues which included Developer Contributions, Neighbourhood Planning and Safeguarding Land for future development.

The Issues and Options Local Plan consultation material includes the following documents:

- [Local Plan Issues & Options Consultation Document - May 2019](#)
- [Infrastructure Delivery Plan](#)

² [09-local_plan_issues_and_options_paper_rpt_cab_070219_0.pdf \(cannockchasedc.gov.uk\)](#)

- [Equalities Impact Assessment](#)
- [Habitats Regulations Assessment](#)
- [Sustainability Appraisal Report Incorporating Health Impact](#)
- [Economic Development Needs Assessment](#)
- [Gypsy & Traveller Accommodation Assessment](#)
- [Local Housing Needs Assessment](#)

The main issues raised in the Issues and Options consultation were presented to Cabinet on the 17th October 2019³ as follows:

- Concerns expressed about the level of housing growth and the potential impacts of new development on existing highway infrastructure. (Five Ways Island and A5190).
- Green Belt should be protected and sites should not be considered for development where there is potential for sites beyond the Green Belt to accommodate development including sites in neighbouring authorities.
- Conflict between farming activities and residential environments if in close proximity. Negative impacts of development on farming particularly environmental impacts.
- Capacity of train stations and facilities within them are limited. Additional growth may require upgrade.
- Green Belt Study of 2016 should be updated in view of revised NPPF.
- Development should be prioritised on non Green Belt land
- Development should be integrated with open space and green infrastructure
- Developers, land owners and land promoters oppose adoption of National Space Standards that are seen to be onerous and potentially increase house prices. Clear need should be demonstrated and supported by viability appraisal. Similarly, opposition expressed to the Council setting higher energy efficiency standards.
- Future development should make a fair contribution to the provision of community infrastructure.
- Concerns raised in relation to the GL Hearn/Wood Strategic Growth Study and land supply.
- Prioritise affordable homes. Higher housing delivery would deliver and enhance viability of a higher number of affordable homes.
- Clear policies are necessary to support housing for older people. Specific sites for this purpose should be allocated.
- Further detail needed to justify proposed housing mix. Housing mix should not be defined in a Local Plan. Instead, provide routinely updated evidence to determine appropriate housing mix at the time.

³ [05-local_plan_io_consult_feedback_next_steps_rpt_cab_171019.pdf\(cannockchasedc.gov.uk\)](#)

- Highways England considered potential impacts of development and trip generation and distribution of development traffic on the strategic highway network. Concerns raised in relation to the A5 and M6 junctions 11 and 12.
- Local Plan should test potential development contributions required and set clear policies that are assessed for viability to assist developers in costing schemes and acquiring land.
- Additional safeguarded land and/or reserve sites should be considered in the Local Plan as well as definition of the circumstances for the release of these sites.
- Local Plan should provide a mechanism for early review.
- Alternative sites should be identified to provide flexibility and respond to development delays on allocated sites.
- Land should be identified for development 10 years beyond the plan period.
- Lack of local facilities in Rugeley and Brereton area.
- Flood risk, water resources and quality etc. may be a constraint to development. Development may need to contribute to improvements.
- Stronger commitment to addressing HMA shortfall needed, deliver housing in excess of local need and standard methodology requirement.
- Combined Authority and LEP housing delivery should be supported.
- Green Belt boundaries should be assessed to see if appropriate and sustainable sites can be released.
- Green Belt release is necessary to meet wider housing need.
- Consideration of all non Green Belt sites is necessary before exceptional circumstances apply.
- Develop Rugeley bus station and market hall.
- Enhance daytime and evening leisure opportunities in Rugeley.
- Clarity required around biodiversity offsetting
- Local Plan policy should provide a sustainable plan for protection of the SAC with an updated evidence base.
- AONB should not be considered for development.
- Some development in AONB is possible on brownfield sites if it enhances the AONB.
- There should be further employment site release.
- Employment land provision disputed and amount of employment land provided should be at the higher end of the range specified in the Economic Development Needs Assessment.
- Rugeley Power Station could make provision for more employment land.
- Historic assets should enhance development
- Electric Vehicle Charging – clear, unambiguous policy is required supported by a technical feasibility and financial viability report. An assessment of network capacity also needed if policy adopted.
- Air Quality standards require detailed evidence and robust policy setting out requirements.

These matters were taken into consideration when preparing the Preferred Options document.

3.4 Preferred Options Consultation

The Preferred Options consultation was the third district-wide public consultation undertaken by the Council with regards to the preparation of the new Local Plan. Consultees were invited to comment on the Council's preferred approach that the Council had determined following the earlier consultation stages. The public consultation took place over a period of six weeks between 19th March 2021 and 30th April 2021 and was carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Local Plan period covers a period 2038.

The Preferred Options Local Plan consultation material includes the following documents:

- [Local Plan - Preferred Options Consultation Document](#)
- [Local Plan - Preferred Options Policies Map](#)
- [Cannock Chase Local Plan Preferred Options Sustainability Appraisal & Health Impact Assessment \(March 2021\)](#)
- [Cannock Chase Local Plan Preferred Options Equalities Impact Assessment \(March 2021\)](#)
- [Cannock Chase Local Plan Preferred Options Habitat Regulations Assessment Report \(March 2021\)](#)
- [Cannock Chase Local Plan Preferred Options Sustainability Appraisal & Health Impact Assessment \(March 2021\)](#)
- [Cannock Chase Local Plan Preferred Options Development Capacity Study \(March 2021\)](#)
- [Cannock Chase Local Plan Preferred Options Habitat Regulations Assessment Report \(March 2021\)](#)

The Council presented the report to Cabinet on the 4th March 2021⁴.

The main issues raised at the Preferred Options stage were presented to Cabinet on 16th December 2021 as follows:

- Quantum of development
 - The quantum was considered excessive
 - There was opposition to additional land being provided to meet the needs from the GBBCHMA.

⁴ [07-Local Plan Preferred Options Report Cabinet 040321 \(cannockchasedc.gov.uk\)](#)

- There was also support for the contribution to the unmet need in neighbouring authorities and support for further contributions of an additional 2,000 dwellings.
- Lack of sites for Gypsy, Traveller and Travelling Showpeople, employment and housing
 - Plan does not allocate additional sites to meet the need, this should be resolved (site promoter).
 - Norton Canes Parish wish to include providing a long-term future site for the travelling show people currently at Grove colliery.
 - Support for the safeguarding of existing employment areas.
 - Objection to the criteria set for consideration of alternative uses on employment sites as too stringent.
 - Amount of employment land identified is insufficient and a replacement allowance should be included.
 - Should be planning for 63-81 hectares.
 - Difficult to commit to training and net zero carbon on speculative development as occupier not known that would enter into agreements, could impact on market as investment is hampered by conditions.
 - How can Local Authority promote use of new/emerging technology it should keep to Building Regulation requirements.
 - Electric Vehicle Charging Points are not necessary, concerns over electricity infrastructure capacity and increased costs.
 - Support increased role of public transport, active travel and freight.
 - Train service to Birmingham is inadequate.
 - Aldi object to changes to Rugeley Town Centre boundary.
 - Holford Farm and Jubilee Field supported for allocation. Kingswood Lakeside should not develop on open space.
 - Watling Street Business park extension should be developed for small units.
 - Site E4 (off A51) is better suited to residential.
 - Pentalver Site E3 Rumer Hill Industrial Estate wish to develop for residential.
 - Site at York's Bridge, Pelsall should be released from Green Belt (landowner) as should Watling Street Business Park and disagree with conclusions of evidence
- Loss of Green Belt and greenspace
 - Concern at the loss of Green Belt and the green space network.
 - More rigour is required to ensure the unmet need in neighbouring areas is a realistic evaluation of their available land use.
 - Use of brownfield first is supported.
 - Concern at the impact upon biodiversity and the natural environment.

- Support the rejection of so many Green Belt sites in Norton Canes and Norton Canes being a separate settlement.
 - The scale of development around Fiveways is disproportionate, loss of identity of Heath Hayes and Hawks Green due to over development.
- Impact upon viability due to enhanced Building Standards and housing mix
 - Desire for greater flexibility on the housing mix.
 - Should be a greater emphasis on single living, greater provision of specialist housing for older people and more affordable homes.
 - Lack of larger 4 and 5 bedroom does not recognize the demand for larger family homes and could increase the proportion of the community who are elderly as they require smaller housing.
 - Additional 4% to support homeworking is unlikely to deliver superfast broadband connections.
 - Policies on National described space standards (NDSS) and increased standards to increase provision for stock design for people with health problems (Part M4(2) and M4(3) will impact upon viability and higher requirements may result in fewer affordable homes being built.
 - Additional requirements of NDSS, M4(2) and M4(3) and zero carbon should not apply to existing outline permission such as at Rugeley Power Station.
 - Zero carbon target will impact upon viability - needs testing.
- Local infrastructure capacity and provision
 - Concern at infrastructure capacity– education, roads – five ways – congestion and air quality, health care, poor quality of parks and leisure and recreation facilities for young people.
 - Additional education infrastructure required, including for special needs and to improve educational attainment.
 - Need for infrastructure in Norton Canes – indoor sports.
 - Norton Canes has had more than its fair share of major housing taking into account the size of the village and the necessary infrastructure has not been provided- off site sport and recreation facilities, additional primary school, improved bus services.
 - Additional housing should be delayed until infrastructure committed.
- Lack of open space standards within the Plan and a request to include parking requirements in policy so they can be debated at the Examination
 - Parking standards should be clear and not onerous.

- Importance of heritage should be reflected throughout the document and Grove Colliery should be designated a Conservation Area.
- Comments on individual site allocations
 - Concern at congestion and air quality at Fiveways.
 - Support various site allocations and further sites proposed.
 - o Site at Rawnsley Road, Hazelslade should be included in Green Space Network.
 - Hednesford Hills Raceway and Hednesford Town Football Club should be safeguarded.
 - Development should be required to deliver canal infrastructure and pay for maintenance.
 - McArthur Glen Designer Outlet West Midlands should be recognized as major visitor attraction with specific site policy. Object to loss of Green Belt and countryside at Wimblebury.
 - Should include some housing growth in key rural settlements (landowner promoting site).
 - Grove colliery should have specific policy allowing enabling development. Impact upon historic bridge.
 - Potential impact upon the AONB and its setting.
 - Impact upon ancient woodland, water quality of Chasewater and Southern Staffordshire Coalfield Heaths SSSI and Cannock Extension canal SAC.
 - Impact upon sports and recreation sites.
 - o Increase in traffic on A5190 and impact upon air quality at Fiveways, increase in noise.
 - Pressure on Hednesford Park. Intention to relocate football teams from Coppice Colliery Football Ground to Heath Hayes Park or Wimblebury to the north of Five Ways island.
 - Increase in traffic on Wimblebury Road, excessive speeds already and HGV's, congestion at Fiveways.
 - Impact upon Wimblebury mound and wildlife.
 - Concern there may be subsidence to properties in Wimblebury.
 - Concern at all allocations for development in Rugeley impacting upon wildlife, increase in litter, anti - social behaviour, noise, light and air pollution, roads already have heavy traffic, loss of grade A agricultural land.
 - Need more trees.
 - Armitage lane, Brereton is not suitable for a large number of additional vehicles, this would be dangerous to the school children, concern at loss of privacy, school already crowded
- Effectiveness of the consultation
 - Disappointed at advertisement of the consultation and short timescale for comments.
 - Request leaflet through the door as only found out through local Facebook group and then Council website.

- General comments
 - Suggestion for footpath route, alterations to consider bridleways and protection of Public Rights of Way.
 - Homes should have access and spaces for secure cycle storage.
 - Improvements to transport network and linkage of Norton Canes to Kingswood Lakeside, Heath Hayes, Chasewater, employment areas, canal towpath and recreational routes south of the A5, Fiveways to Burntwood.
 - Support the approach to supporting arts and cultural facilities within the town centres.
 - Should be dedicated areas for sustainable energy production. Welcome preparation of Design Codes.

Representations from our duty to cooperate partners on Strategic matters relating to the Duty to Cooperate were:

- Support for partnership working from Transport for West Midlands,
- Site specific comments from Severn Trent Water, National Grid, Staffordshire County Council.
- Current shortfall in housing and employment land within the Black Country and gypsy and traveller sites in neighbouring authorities. The proposed housing contribution is at the lower end of range indicated in the Issues and Options consultation.
- Support continued cross boundary working on Special Areas of Conservation (SAC) and Hatherton Canal Restoration and air quality impacts upon Staffordshire wide SAC.

3.5 Pre-Submission consultation

The Pre-Submission consultation was the final public consultation undertaken by the Council with regards to the preparation of the new Local Plan. Consultees were invited to comment on the Council's final version of the Cannock Chase Local Plan. The public consultation took place over a period of six weeks between 5th February 2024 and 18th March 2024 and was carried out in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Local Plan period covers a period to 2040.

The Regulation 19 Local Plan consultation material includes the following documents:

- [Local Plan - Regulation 19 Consultation Document](#)
- [Local Plan - Regulation 19 Policies Map](#)
- [Cannock Chase Local Plan Regulation 19 Sustainability Appraisal & Health Impact Assessment \(February 2024\)](#)

- [Cannock Chase Local Plan Regulation 19 Equalities Impact Assessment \(February 2024\)](#)
- [Cannock Chase Local Plan Regulation 19 Habitat Regulations Assessment \(January 2024\)](#)
- [Cannock Chase Infrastructure Delivery Plan \(2023\)](#)
- [Cannock Chase Regulation 22\(1\)\(c\) Consultation Statement \(December 2023\)](#)
- [Cannock Chase Local Plan Development Capacity Study \(September 2023\)](#)
- [Cannock Chase Local Plan Housing Needs Assessment \(January 2024\)](#)
- [Cannock Chase Local Plan Site Selection Methodology \(July 2023\)](#)
- [Cannock Chase Local Plan Gypsy and Traveller & Travelling Showpeople Topic Paper \(December 2023\)](#)
- [Cannock Chase Economic Development Needs Assessment Update Report \(January 2024\)](#)
- [Cannock Chase Local Plan and CIL Viability Assessment Part 1 \(August 2022\)](#)
- [Cannock Chase Local Plan and CIL Viability Assessment Part 2 \(August 2022\)](#)
- [Cannock Chase Local Plan Employment Topic Paper \(December 2023\)](#)
- [Cannock Chase Local Plan Part 1: Open Space Assessment 2022-2040 \(November 2023\)](#)

A report was presented to Cabinet on 22nd August 2024 entitled Cannock Chase Local Plan 2018-2040: Response to Regulation 19 Consultation.

Due to the nature of the consultation at this stage, where comments were sought on the soundness and legal compliance of the Local Plan as well as the Duty to Cooperate process that had been undertaken a more comprehensive and detailed summary of the representations is available: [Regulation 19 Consultation Representation Schedule Summary.pdf](#)

An overview of the main issues raised is provided in this general summary below:

The majority of individual representations concerned development proposed for Heath Hayes, particularly Site SH1: Land East of Wimblebury Road and SH2: Land south of Cannock Road. Aside from the redevelopment of Rugeley Power Station, these are the largest housing developments proposed in the plan and they do require the release of land from the Green Belt, of which there was considerable resistance from the public and environmental groups such as CPRE.

Many of the public highlighted concerns about the capacity of local infrastructure, services and facilities to cater for new residents and considered new houses may exacerbate existing issues such as parking and congestion on Wimblebury Road, as well as Five

Ways roundabout. Potential flood risk and drainage issues were raised, and many were concerned about the impact on local wild life and loss of habitat connectivity.

In addition to the many individual responses received from the public; a petition was submitted to the Council containing 304 signatures, which sought to oppose the housing development proposed east of Wimblebury Road, Heath Hayes (site allocations Policy SH2). The petition states: “We, the undersigned, are against any proposed housing development on fields to the East of Wimblebury Road, Heath Hayes. It will destroy Greenbelt, the natural environment, open countryside, spoil the view, cause pollution, overwhelm schools, medical practices, roads with increased traffic, and all of our village infrastructure. These houses are not required by local people.”

There were also concerns raised about some of the safeguarded sites particularly residential sites S1 East of Wimblebury Road and land at Hednesford Road, Norton Canes with similar concerns raised to those for Sites SH1 and SH2. Comments were received by The Environment Agency for Site S2, land at Newlands Lane due to its proximity to the operational waste site and by the Inland Waterways Association at S4 Jubilee Field, Watling Street due to the potential impact on the Canal, its ecology and its occupants.

Some of the representations questioned the level of housing need, suggesting it was too high and queried the contribution to the unmet needs of the Housing Market Area, and were critical of the proposed housing sites which they felt wouldn't cater to buyers seeking affordable properties. Others, primarily developers and land agents sought a higher housing target based on factors such as the need to extend the plan period, the lack of conclusive testing of higher growth figures and the need to deliver more housing to increase affordable housing provision, as well as to address the shortfall from the Housing Market Area pointing to evidence that this is increasing.

There were a number of detailed representations from agents and developers objecting to the plan on grounds of soundness where the development sites they had put forward had not been allocated. The results of the process of site selection and sustainability appraisal were challenged, as well as evidence such as the Green Belt Harm Assessment. There was also a degree of questioning of the employment target and supply, although the proposed strategic employment sites received less comments or objections than the strategic residential sites. Representatives of both proposed allocated strategic residential and employment sites, whilst in support of the allocations commonly objected to clauses in the policy wording, proposing amendments.

Specialist housing providers and house building companies as well as the Home Builders Federation commented on the plan, providing detailed consideration of the policies and specific wording. Some considered modifications were required to make the plan sound. The issue of viability was raised with regard to detailed policy requirements, and this was also reflected in comments by many of the agents and developers.

Individual Councillors, Town and Parish Councils within the District also engaged with the plan by providing comments. Objections were made by some due to the potential impact of proposals in areas of growth and some pointed to errors in the text regarding factual information about their local area.

Responses were received from statutory consultees, including the Environment Agency, Natural England, Coal Authority, Historic England, NHS Property and Sport England as well as Staffordshire County Council. All provided advice regarding the evidence and policies of relevance to their remit and some recommended further work to be undertaken to support the plan. Objections were received with regard to some of the proposed allocated sites by Historic England (where they considered Heritage Impact Assessments were required) and Sport England (where they considered pitch provision was affected). Natural England objected on the basis that the impact of growth on air quality and its effects on designated sites including Cannock Chase SAC and Cannock Extension Canal SAC are not fully understood and therefore the Habitats Regulation Assessment for the plan cannot conclude that there would be no significant effect. This is explored further in this report due to the substantive nature of the issue.

Staffordshire County Council provided detailed information from all departments including about the impact of development on school places and the local highways network. They stressed the need for consideration of the phasing of development to enable funding for the delivery of infrastructure in Heath Hayes to serve both developments to come forward at the same time. A late representation was received from National Highways. Infrastructure providers including Severn Trent Water, National Grid and National Gas Transmission also provided comments.

Representations were received from neighbouring authorities and some within the wider Housing Market Area. Whilst all authorities that commented considered the plan to be legally compliant and complied with the Duty to Cooperate, objections to the soundness of the plan were received from three of the local authorities in the Black Country (Dudley, Walsall and Sandwell) who considered that the plan text should specify that the contribution provided to the unmet need of the Housing Market Area should also be made to the Black Country.

Who we consulted

The Local Planning Authority consults extensively on all planning documents and has an ever-evolving consultee database. All Specific Consultees (as identified under Part 1 of the 'Regulations') have been consulted. Further details on those who were consulted can be found in Appendix 1.

How we consulted

Consultation methods were in accordance with the Councils [Statement of Community Involvement 2022](#).

A wide-ranging effort was undertaken in advertising the consultation and engaging the community in the Local Plan process.

Emails & letters

A notification letter sent to all on the Local Plan consultee database (Appendix 1 details the names of those consulted and those that responded).

3.6 Consultation Events

Issues and Scoping

The following consultation events/ drop in sessions were held:

Date	Venue	Time
Monday 2 nd July	St Lukes Primary school	1.45-2.45pm
Wednesday 4 th July	Hazelslade school	9.15 am
Wednesday 4 th July	Rugeley Town Council Meeting (Council Chamber), Taylors Lane, Rugeley, WS15 2AA	7:30pm
<i>Wednesday 4th July</i>	<i>Heath Hayes & Wimblebury Parish Council Meeting</i>	<i>Attendance not required.</i>
Thursday 6 th July	Chancel Primary School	11am-12pm
Tuesday 10 th July	Rugeley Library (Tables by IT suite), 12 Anson Street, Rugeley, WS15 2BB	10am – 1pm
Tuesday 10 th July	WMT	10.00
Wednesday 11 th July	Prospect Village Hall (Small room), 14 Williamson Avenue, WS12 0QF	4 - 6pm (access to set up 3:45 & lock up at 6:15)
<i>Wednesday 11th July</i>	<i>Bridgtown Council Meeting, Bethel Church, Union Street, Bridgtown</i>	<i>7pm</i>
Thursday 12 th July	Heath Hayes Library (Meeting Room), 194 Hednesford Road, Heath Hayes, WS12 2EQ	3:30 - 6:30pm
Friday 13 th July	Cannock Library, Manor Avenue, Cannock, WS11 1AA	10am – 1pm
Tuesday 17 th July	Brereton Parish Hall (Conference Room), Ravenhill Park, Main Road, Brereton, WS15 1DS	4:00 – 6:30 (Set up at 3:45pm) (event is before Parish Council meeting at 7pm)
Tuesday 17 th July	Brereton & Ravenhill Parish Council Meeting, Brereton Parish Hall (Conference Room), Ravenhill Park, Main Road, Brereton, WS15 1DS	7pm Councillors session, 7.30pm Council Meeting
Wednesday 18 th July	Norton Canes Community Centre, Brownhills Road, Norton Canes, WS11 9SF	4 – 8pm (set up at 3:45pm)(before PC meeting)
Wednesday 18 th July	Norton Canes Parish Council Meeting, Norton Canes Community Centre, Brownhills Road, Norton Canes, WS11 9SF	7pm public participation, 7.30pm Business Meeting

Thursday 19 th July	Cannock Wood & Gentleshaw Village Hall (small hall), Buds Road, Gentleshaw, WS15 4NB	4 – 7pm (set up 3:45pm) (before PC meeting)
Thursday 19 th July	Cannock Wood Parish Council Meeting, Cannock Wood & Gentleshaw Village Hall, Buds Road, Gentleshaw, WS15 4NB	7.30pm
Tuesday 24 th July	Hednesford Library (Table area), 75-79 Market Street, Hednesford, WS12 1AD	10-1pm
Tuesday 24 th July	Brindley Heath Parish Council Meeting, White House, Marquis Drive, Brindley Heath, WS12 4PR	7.00pm (Starts with public participation)
Tuesday 31 st July	Hednesford Town Council Meeting, Pye Green Community Centre, Bradbury Lane, Hednesford, WS12 4EP	7.30pm
Wednesday 1 st August	Tesco (Entrance hall), Victoria Street, Hednesford, WS12 1BT	10am – 12 mid-day
Tuesday 7 th August	Cannock Leisure Centre (reception area), Stafford Road, Cannock, WS11 4AL	5 – 7pm
Thursday 9 th August	Sainsbury's (entrance hall), Voyager Drive, Cannock, WS11 8XP	12 – 2pm
Monday 13 th August	Rugeley Leisure Centre (Reception area), Burnthill Lane, Rugeley, WS15 2HZ	4-6pm
Thursday 16 th August	Tesco (entrance hall), Power Station Road, Rugeley, WS15 2HS	12-2pm
Tuesday 4 th September	U3A, Slitting Mill Village Hall	2pm

Issues and Options

The following consultation events/ drop in sessions were held:

Date	Venue	Time
Monday 3 rd June	Norton Canes Library (small meeting room) - Burntwood Road, Norton Canes, WS11 9RF	4-6pm
Tuesday 4 th June	Rugeley Tesco (entrance hall) - Power Station Road, Rugeley, WS15 2HS	12-2pm
Thursday 6 th June	Heath Hayes Library (meeting room) - 194 Hednesford Road, Heath Hayes, WS12 2EQ	4-6pm
Friday 7 th June	Cannock Library - Manor Avenue, Cannock, WS11 1AA	10am-12
Tuesday 11 th June	Brereton Parish Hall (conference room) - Ravenhill Park, Main Road, Brereton, WS15 1DS	4-6pm
Wednesday 12 th June	Rugeley Library - 12 Anson Street, Rugeley, WS15 2BB	10am-12
Monday 17 th June	Rugeley Leisure Centre (reception area) - Burnthill Lane, Rugeley, WS15 2HZ	5-7pm
Tuesday 18 th June	Cannock Leisure Centre (reception area) - Stafford Road, Cannock, WS11 4AL	5-7pm
Wednesday 19 th June	Hednesford Tesco (entrance hall) - Victoria Street, Hednesford, WS12 1BT	10am-12
Thursday 20 th June	Cannock Sainsbury's (entrance hall) - Voyager Drive, Cannock, WS11 8XP	12-2pm
Friday 21 st June	Cannock Wood & Gentleshaw Village Hall - Buds Road, Gentleshaw, WS15 4NB	5-7pm

Tuesday 25 th June	Cannock Chase Council Civic Centre (reception) - Beecroft Road, Cannock, WS11 1BG	10am-12 & 2-4pm
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Preferred Options

The Preferred Options Consultation was undertaken in line with the SCI Addendum December 2020 and the adjustments required to observe the restrictions put in place by the Government in relation to the Covid-19 Pandemic. In line with the Council being unable to undertake in person consultation events the Council ensured that all relevant documents were available on the Council's website with supporting information to enable people to understand what they were being asked to comment on. Emails and letters were sent to specific, general, and other consultees on the Council consultation database consisting of those that may have an interest in the document or have requested to be kept informed of the Local Plan progress inviting them to make representations and advising where and when the relevant material could be accessed.

The Council issued adverts and press releases to raise awareness of the consultation as well as utilising the Council's website, Chase Matters magazine, and social media platforms informing the public of the consultation period, where to locate the relevant documents and how to provide comments to the team. As well as how the team could be contacted during the consultation period to respond to any queries.

To accompany the social media campaign the Regeneration & High Streets Portfolio Leader (Formerly the District & High Street Development Portfolio Leader) voiced a video providing details on the Preferred Options Document and the Consultation to raise further awareness.

Pre-Submission Regulation 19

The Council issued adverts and press releases to raise awareness of the consultation as well as utilising the Council's website and social media platforms informing the public of the consultation period, consultation events being held, where to locate the relevant documents and how to provide comments to the team.

The following consultation events/drop-in sessions were held:

Date	Venue	Time
Tuesday 6 th February	Cannock Library (First Floor) - Manor Avenue, Cannock, WS11 1AA	10am - 12pm
Tuesday 6 th February	Brereton Library - Talbot Road, Brereton, Rugeley, WS15 1AU	2:30pm - 4:30pm
Wednesday 7 th February	Norton Canes Community Centre - Brownhills Road, Norton Canes, Cannock, WS11 9SF	5pm - 7pm
Monday 12 th February	Hednesford Library (small meeting room) - Market Street, Hednesford, Cannock, WS12 1AD	10:30am - 12:30pm
Monday 12 th February	Wimblebury Community Centre - John Street, Wimblebury, Cannock, WS12 0RN	6pm - 8pm
Tuesday 13 th February	Rugeley Rose Theatre - Taylors Lane, Rugeley, WS15 2AA	5pm - 7pm
Wednesday 14 th February	Sainsbury's (Foyer) - Orbital Retail Centre, Voyager Drive, Norton Canes, Cannock, WS11 8XP	10am - 12pm
Wednesday 14 th February	Tesco (Foyer) - Victoria Street, Hednesford, Cannock, WS12 1BT	5pm - 7pm
Thursday 15 th February	Longford Social Club - Wellington Drive, Cannock, WS11 1PY	5pm - 7pm
Friday 16 th February	Norton Canes Library - Burntwood Road, Norton Canes, Cannock, WS11 9RF	10:30am - 12:30pm
Friday 16 th February	Hayes Green Community Centre - Heath Way, Cannock, WS11 7WA	5pm - 7pm
Monday 19 th February	Heath Hayes Library - 194 Hednesford Road, Heath Hayes, Cannock, WS12 3EA	10am - 12pm
Saturday 2 nd March	Rugeley Library - 12 Anson Street, Rugeley, WS15 2BB	10:30am - 12:30pm

3.7 Social Media

The Council utilised social media to further publicise the consultation with the below figures representing the 'reach' of the social media campaign.

Issues and Scoping Consultation

- 2 Tweets were posted, reaching out to 18,178 people
- 2 Facebook posts were posted, reaching out to 1,170 people

Issues and Options Consultation

- 5 Tweets were posted, reaching out to 42,900 people
- 5 Facebook posts were posted, reaching out to 3,400 people

Preferred Options Consultation

- 7 Tweets were posted, reaching out to 75,056 people.
- 8 Facebook posts were posted, reaching 8,670 people.

Pre-Submission Regulation 19 Consultation

- 13 Tweets were posted, with an engagement rate of 2.73%⁵.
- 11 Facebook posts were posted, reaching 19,644 people.

⁵ Reach was not calculated for X at this stage as such engagement rate has been used

4.0 Summary of Consultation Responses

Issues and Scoping Report Consultation

In total, 567 specific comments were received from 63 respondents, including from Duty to Co-operate bodies. All comments submitted have been fully considered and an individual officer response has been formulated and available in Appendix 2.

Issues and Options Consultation

In total, 700 specific comments were received from 107 respondents, including from Duty to Co-operate bodies. All comments submitted have been fully considered and an individual officer response has been formulated and available in Appendix 3.

Preferred Options Consultation

In total, 518 specific comments were received from 95 respondents, including from Duty to Co-operate bodies. All comments submitted have been fully considered and an individual officer response has been formulated and available in Appendix 4.

Pre-Submission Regulation 19

In total, 215 specific representations were received from 117 respondents, including from Duty to Cooperate bodies. All comments submitted within the Consultation Period have been fully considered and an individual officer response has been formulated alongside a high-level summary officer response available in the Schedules 1 document on the Council's website at: [Regulation 19 Schedule 1 \(High-level Summary\).pdf](#)

Appendix 1 - Bodies and Persons the Local Planning Authority under Consultation Phases

- Parish/Town Councils
 - As community representatives, Parish and Town Councils both within and adjoining the district are consulted as part of the Local Plan consultation process
- Local People
 - The Council wishes to ensure that no one is excluded from the planning process, alongside any social media campaigns, emails and letters are sent to individuals and established community groups that have requested to be included on the Council's Consultation Database
- Neighbouring Authorities
 - The Council ensures that neighbouring local authorities are given the opportunity to be involved in the planning process in Cannock Chase District.
 -
- National, Regional and Local Organisations
 - The Council ensures that statutory bodies are consulted as required and that other existing networks/stakeholder groups that have requested to be on the Council's Consultation Database are also contacted
- Agents/Developers
 - This group includes landowners and those with potential development interests. Many of these are already involved in the Local Plan process through site submissions and are often already on the Council's Consultation Database.
- Business Networks
 - Any existing business networks on the Council's Consultation Database are contacted as part of the process

Appendix 2 - Summary of Consultation Response Received during Issues and Scoping Consultation

Local Plan Review Issues & Scope consultation, summary of responses		
Rep ID No.	Respondent	Comment
Overall / general comments		
LPIS1	Birmingham City Council	Birmingham City Council welcomes the contents of the Issues and Scope Consultation Document and the opportunity for continued engagement and working with Cannock Chase through the Duty to Co-operate.
LPIS2	Canal & River Trust	Within the district there is the Trent & Mersey and Cannock Extension Canal and Cannock Chase reservoir sits adjacent to the boundary in Lichfield District. Stronger references should be made to the canal network throughout the plan – can play a key role in supporting sustainable communities and brings in benefits e.g. tourism, biodiversity, walking and cycling (leisure and commuting).
LPIS3	S Day	<p>I am horrified at the mere idea of another 241 homes per year. Services are already at breaking point- where are doctors, schools, etc. going to come from to cope with increased population. Already roads are full to capacity.</p> <p>We need to take care of the areas' history- the Old Chancel needs to have a lot of TLC and needs to be brought up to a condition where services can be help there again=- even if only for 'special' or occasional services.</p> <p>This is a complete and utter waste of the money I pay in rates. Even if all the people who lived in CCDC tell you what they wanted, you have already decided what you are going to do. All that money spent on 'flood' on the site of the old youth club - how many times has there been a flood there. A million and one better ways to spend that money- e.g. stop sacking librarians and having libraries run by volunteers. Libraries are a vital part of the community and worth every penny spent on them. If money is scarce get rid of Council staff who obviously have far too little to do if they can waste time on 'consultations' like this. How much has this cost.</p>
LPIS4	Preece, Cllr. J	<p><u>General Points</u></p> <p>These comments can be used to apply to several of the questions that have been asked throughout the Issue and Scope Consultation Document but there are specific responses to certain questions below.</p> <p>From recent experience of a planning application in Norton Canes I believe that more emphasis should be placed on ensuring that the statutory authorities such as Health Providers are made to engage as much as possible on the impacts that new developments have on the communities they sit. I understand that steps are being taken to engage health providers more in the planning system, but this should be formally recognised in the Local Plan.</p> <p>A comprehensive public transport network is crucial in ensuring the equal access of our residents to opportunities (jobs) and vital public services (such as doctors' surgeries, hospitals, schools, council facilities and shops). The local plan should recognise that developers must contribute towards ensuring this happens.</p> <p>The Local Plan should include a section looking at how technology can impact on how we live – particularly with reference to alternative forms of energy and energy use (solar panels, energy efficient homes and house design, use of former mining shafts and tunnels), electric charge points on houses, local community initiatives such as community composting facilities and use of building materials and locations.</p>

		I would also like to see a section of the local plan dedicating to how best to manage Cannock Extension Canal SAC, along similar lines to Cannock Chase SAC. Past planning applications have already been assessed with reference to the SAC but I believe there should be a specific section to ensure the greatest possible layer of protection on this area.
LPIS5	Road Haulage Association	<p>The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,000 members, operating near to 100,000 HGVs, range from single-truck firms to those with thousands of vehicles. These companies provide essential services on which the people and businesses of the UK depend.</p> <p>We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of advice, representation and services, including training. The RHA wishes to draw attention to a number of aspects which cause our members concern. We are disappointed that there are only three references to freight and only one of those to road freight in the entire Local Plan Review (Issues and Scope) Consultation Document. None of these references were in the main document body. Given that all the people and businesses of Cannock Chase depend on road freight for almost all food, medical supplies and all essential products this is a fundamental oversight.</p>
LPIS6	St Modwen (Land at Watling Street Business Park) (RPS)	<p>In 2017, Cannock Chase District Council consulted on Local Plan Part 2 (issues and options). Due to changes to the national planning system, the Council has decided to produce a new Local Plan which will utilise the work carried out to date on Local Plan parts 1 and 2 and incorporate any areas which need reviewing and adopting. Until such time as the adopted Local Plan Part 1 is replaced, that document will still continue to set planning policy for the District.</p> <p>Given the work which went into the Part 2, it would have been St Modwen's preference that the Part 2 was continued with, however, the decision to abandon that plan and progress a new Local Plan is acknowledged.</p> <p>RPS is supportive of the Council's decision to review the Local Plan, in particular the decision to roll forward the time period until 2036. Given the work which was at an advanced stage in relation to Local Plan (Part 2) there is some concern that the timetable proposed, will mean that the new review plan is not in place until September 2021 at the earliest. RPS acknowledges that it is important that LPAs are realistic about timescales as all too often LDS timescales are missed. However, given it will be some 6 years on from the adoption of LP Part 1, if possible, it would be beneficial to the development sector to try and seek ways of speeding up this process.</p> <p>An additional, reason for speeding up the process, is that the Submission of the Local Plan Review would be beyond the three year period, set by Inspector Clews when reviewing the Birmingham City Development Plan and the insertion into that plan's policy base, that the City Plan would need reviewing if the overspill from Birmingham (which impacts on Cannock being in the same HMA) had not been addressed in HMA submission plans within three years (i.e. by January 2020). The review of the Cannock Local Plan will miss this timescale.</p> <p>Nonetheless, the process of continuing the work on the Local Plan is essential to ensure a Development Plan led approach as advised in the Revised NPPF (NPPF) which, at paragraph 11 states that local planning authorities should meet objectively assessed needs, with sufficient flexibility to adapt to change.</p> <p>The focus of these representations is to help inform the Council's approach to achieving the objectives of employment growth. These representations also demonstrate the suitability of St Modwen's Watling Street Business Park to assist with meeting part of the District's employment land requirements.</p>

		<p>RPS welcomes the preparation of the Local Plan which takes a generally positive approach in seeking to potentially allocate land to meet the outstanding employment land requirement. RPS welcomes the recognition by the Council that the evidence base relating to employment will need to be updated.</p> <p>RPS is keen to ensure that the evidence base underpinning the plan is robust, particularly when it comes to establishing the reasons for allocating sites and not allocating others. It is noted that of all the potential employment sites located in the Green Belt that Watling Street Business Park has been identified through the Green Belt Study as having the least impact on the five purposes of including land within the Green Belt.</p> <p>This report demonstrates that the land at Watling Street Business Park represents a highly sustainable proposal to assist the Council in meeting elements of its employment land requirements. The land is wholly within St Modwen's control and is therefore available now.</p> <p>In conclusion, the site at Watling Street Business Park can provide an additional 5.5ha within the current plan period to assist the Council in meeting its shortfall of employment land. The site is highly sustainable, does not currently make a significant contribution to the purposes of the Green Belt and is currently in demand from potential future occupiers. Therefore, as shown through this report, the removal of the site from the Green Belt and its allocation within the current plan period is well founded and provides demonstrable evidence that Exceptional Circumstances exist.</p>
LPIS7	Transport for West Midlands (transport arm of the West Midlands Combined Authority- WMCA)	<p>We welcome the opportunity to respond to your consultation as a Combined Authority non-constituent member, given the strategic importance of this document and the key role it plays in meeting future economic and housing demand, attracting and retaining investment and delivering excellent connectivity. Particularly we are pleased with the acknowledgment of the cross boundary relationships/dependencies between your district and areas of the West Midlands metropolitan area.</p> <p>We are also supportive of your aspirations to improve the opportunities for people to use sustainable transport.</p> <p>At this stage, it is also important to note that our organisation should be referred to as Transport for West Midlands (TfWM) and we should no longer be referred to as our precursors (i.e. Centro and the West Midlands ITA). These bodies are no longer in existence and should be replaced by TfWM and/or WMCA, throughout the local plan.</p> <p>As we are predominantly interested in the strategic transport issues related to the transport of people and goods between your district and the West Midlands metropolitan area, we have made efforts to restrict our comments to this area. These issues include the following:</p> <ul style="list-style-type: none"> - Ensure reference is made to TfWM and WMCA and not any other precursor names. - Reference should be made to significant regional WMCA and TfWM documents impacting on Cannock Chase. - Appreciation of how an effective transport network will support people accessing employment opportunities and the wider housing growth agenda. - Reference to rail policy including the new rail franchise and new rail schemes being proposed. - Greater consideration to the West Midlands Stations Alliance. - Greater reference to the M54 to M6/M6 (Toll) Link Road and how it could support local economic growth across Cannock. - Continue to support a partnership approach. <p>We believe that it is important for TfWM to collaborate with non-constituent WMCA members and other relevant local transport authorities (Staffordshire County Council in the case of your own district), to ensure that the necessary infrastructure and high quality transport links are in place to facilitate the movement of people and goods across our region to support local growth. In</p>

		addition we believe that it is important to work together to ensure that land use planning and transport planning are well aligned; given the dependencies between the two.
LPIS8	Waterworth, Kate	<p><u>Page 3 Para 4:</u> With the 'scrapping' of the current plan - will the same happen to the new/ proposed plan - resulting in a 'never ending plan'?</p> <p><u>Page 4 Para 1:</u> Why only Kingswood Lakes - surely there is enough 'activity' in that area what about the Rugeley area?</p> <p><u>Page 4 Para 3:</u> Rugeley Power Station development seems a 'long way off' - Rugeley needs development 'sooner rather than later'.</p> <p><u>Page 4 Para 4:</u> Grimsey Report is a good read and suggests more Community based communication/ educational/recreational/ healthy living facilities e.g. community centres to encourage participation. Transport links are essential - currently there are no buses on a Sunday - can developers assist the public?</p> <p><u>Page 5 Para 1:</u> Disabled facilities are very poor in Rugeley - access to toilets/ car parking/ no buses on a Sunday/access to Town Centre - all discriminatory to a very vulnerable group.</p> <p><u>Page 5 Para 2:</u> All areas are 'unique' and require, in my opinion, their own plan. Rugeley is not Cannock!</p> <p><u>Page 5 Para 3:</u> Grimsey Report (see above) - to also include open spaces- Rugeley Town Park has changed very little in 20 years - is not environmentally (geese)!! / play facilities are very poor and have not been updated in many years. To improve this provision would impact significantly on the improvement of health/ education/ sport / play/ culture/ leisure and community for individuals. A Community Centre / Town Hall would also be of benefit to the public and encourage participation and a Community spirit.</p> <p><u>Page 6 - all of it.</u> Grimsey Report suggests the Councils use 'unused' flats above shops in Town Centres in order to attract more people into the centres. New flats in Market Street (Rugeley) are a good example of providing new housing for disadvantaged and vulnerable people.</p> <p><u>Page 7 Para 4:</u> How can the ageing population be involved in this consultation = some are unable to drive, poor bus service, unable to use on line service. Local plan means local - not Cannock alone. Need to advertise this further, some residents do not use online service and do not have local papers delivered.</p> <p><u>Page 8 Para 1:</u> See above (Page 4) - it is vital that the 'whole' area is developed. Has the Aelfgar site in Rugeley been considered for development?</p> <p><u>Page 8 Para 2:</u> I would like this explained further. Tourism Idea: Bus facility from Rugeley Town and Trent Valley Stations to Birches Valley to attract visitors to the area.</p> <p><u>Page 8 Para 3:</u></p>

		<p>We need more buses - especially on Sundays (vulnerable groups are disadvantaged further). Roads in and out of Cannock at peak times are appalling. Why is Cannock having another development in the area (Retail) where the traffic is at its worst??</p> <p><u>Page 9 - all of it.</u> See page 5 response re Grimsey Report.</p> <p><u>Page 10 Para 1:</u> (See page 8 para 2) Tourism idea. Celebrate to whole area - I do not think the council advertises the areas history sufficiently - need more heritage advertising/ celebration of key characters in our history.</p> <p><u>Page 11: all of it.</u> Disabled facilities/ public conveniences/ celebrate the towns histories/ advertise / require children and young peoples facilities e.g. parks/ youth/ community centres/ clean up the town centres/ council to liaise with landlords/ shop owners / public houses to ensure that they keep their premises in good order and clean in order to attract more visitors to the area and keep 'locals local'.</p>
District Profile		
Question 1 Do you have any comments on the District Profile? Is there anything missing, if so what and what source of information should we use?		
LPIS9	Brereton & Ravenhill Parish Council	<p><u>Page 9, Paragraph 2.4</u> BRPC welcomes inclusion of 'Commencement of regeneration of the Rugeley Power Station site' as one of six strategic objectives. Redevelopment of previously developed land is much preferable to development on greenfield sites. The regeneration should include a country park on land in flood zone 3. The proximity of this country part may allow some increase in density above that which would be appropriate in areas that were not next to new substantial public open space. Assistance should be given to businesses that wish to move from employment areas served by roads through residential areas to employment land on the Power Station site. There must be adequate educational, medical and transport provision for new housing on it.</p> <p><u>Top of page 99</u> BRPC understands that the completion of the electrification has now been further delayed until May 2019. The work that is needed to extend all but one of the platforms from Bloxwich to Rugeley Town (inclusive) has not even started yet.</p>
LPIS10	Canal & River Trust	<p>The Canal & River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK. Our vision is that "living waterways transform places and enrich lives".</p> <p>Following consideration of the document we have the following comments to make: Within Cannock Chase District there is the Trent & Mersey and Cannock Extension Canal. In addition, whilst actually within Lichfield District, Cannock Chase reservoir also sits just adjacent to the administrative boundary. Approximately 28% of the population of Cannock Chase live within 1km of our waterways. The waterways can be used as tools in place making and place shaping and contribute to the creation of sustainable communities. The Trust seek for any development to relate appropriately to the waterway, minimise the ecological impacts and optimise the benefits such a location can generate for all parts of the community. The canal network should be acknowledged as a key feature of the District. The extent of the canal network and the opportunities it provides for recreation should be clearly set out though it should be noted that the canal network can play an important role in supporting sustainable communities and bring benefits to the area from aspects such as tourism, biodiversity and walking / cycling (leisure and commuting).</p>
LPIS11	Highways England	<p>Highways England does not have any comments on the District Profile and welcomes the inclusion of reference to provision of comprehensive transport networks which need to be better supported to help reduce social exclusion and unsuitable development impacts as an issue for the District.</p>

LPIS12	Historic England	Good reference is made to the close relationship between historic activity and the landscape on page 96 – this is a notable heritage element of the plan area. This could be improved further by providing a dedicated section for the historic environment, identifying the types of heritage assets which are key to the area, their contribution to quality of life and other subject areas (e.g. tourism) as well as issues and opportunities facing that heritage. Useful sources of information include; the Historic Environment Record, the National List, Conservation Area Appraisals, Management Plans, local groups, local archives and the expertise of your Conservation Officer and Archaeological Advisors.
LPIS13	KGL (Estates) Ltd (J Heminsley)	The District Profile should include reference to the need for the District to contribute to housing land supply across the wider Birmingham Housing Market Area.
LPIS14	Natural England	On page 98 it is stated “The area is served by a series of major open recreational spaces e.g. Hednesford Hills, a recently designated SSSI, and major parks at Cannock, Hednesford and Heath Hayes.” When referring to the recently designated SSSI, it would be helpful to make it clear that the site has been included as part of the Chasewater and The Southern Staffordshire Coalfield Heaths SSSI.
LPIS15	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>Richborough Estates is generally supportive of the identified District Profile. The acknowledgement that the housing evidence base will need updating as part of the Local Plan Review is supported, particularly to reflect the requirements of the revised National Planning Policy Framework (NPPF) and the introduction of the Standard Method to calculate housing need. However, the District Profile also identifies Cannock Chase District as having a greater employment rate than both the regional and national average. It should be recognised that the Standard Method does not consider economic growth and, therefore, housing provision should be considered in excess of the Standard Method in order to support growth within the District and to ensure a balance between jobs and homes provision to promote sustainable travel patterns and communities.</p> <p>Richborough Estates recognises Cannock Chase District Council's membership of the Greater Birmingham and Solihull Local Enterprise Partnership (LEP). However, it is felt that greater recognition should be given to the importance and ability of Cannock Chase District in meeting the unmet housing need arising from the Greater Birmingham Housing Market Area (GBHMA) and supporting the economic growth ambitions of the LEP.</p> <p>The Profile identifies the importance of the Green Belt in providing a range of benefits, including maintaining the openness of the rural-urban fringe. Richborough Estates acknowledges this; however, Green Belt boundaries should not be maintained to the detriment of sustainable development. It should be recognised that, in certain circumstances, it is appropriate to release sustainable sites from the Green Belt so that they can come forward for development. The Profile also identifies that a Green Belt Study produced in 2016 provides an overview of the District's Green Belt and how it performs against the nationally defined purposes of the Green Belt. This Study should be updated in order to support the Local Plan Review, particularly in light of the publication of the revised NPPF. Richborough Estates has produced representations in respect of the methodology deployed within the Green Belt Study previously.</p> <p>Lastly, the Profile identifies Cannock, Hednesford and Heath Hayes as a continuous urban area, with the greatest abundance of services and facilities. Richborough Estates submits that this should be strengthened to explicitly identify Cannock, Hednesford and Heath Hayes as the most sustainable settlements within the District. Similarly, Norton Canes is identified as a sustainable settlement, with a number of local services and facilities. Nevertheless, it is also felt that the sustainable nature of Norton Canes should be strengthened within the District Profile.</p>

LPIS16	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>Richborough Estates is generally supportive of the identified District Profile. The acknowledgement that the housing evidence base will need updating as part of the Local Plan Review is supported, particularly to reflect the requirements of the revised National Planning Policy Framework (NPPF) and the introduction of the Standard Method to calculate housing need.</p> <p>However, the District Profile also identifies Cannock Chase District as having a greater employment rate than both the regional and national average. It should be recognised that the Standard Method does not consider economic growth and, therefore, housing provision should be considered in excess of the Standard Method in order to support growth within the District and to ensure a balance between jobs and homes provision to promote sustainable travel patterns and communities.</p> <p>Richborough Estates recognises Cannock Chase District Council's membership of the Greater Birmingham and Solihull Local Enterprise Partnership (LEP). However, it is felt that greater recognition should be given to the importance and ability of Cannock Chase District in meeting the unmet housing need arising from the Greater Birmingham Housing Market Area (GBHMA) and supporting the economic growth ambitions of the LEP.</p> <p>The Profile identifies the importance of the Green Belt in providing a range of benefits, including maintaining the openness of the rural-urban fringe. Richborough Estates acknowledges this; however, Green Belt boundaries should not be maintained to the detriment of sustainable development. It should be recognised that, in certain circumstances, it is appropriate to release sustainable sites from the Green Belt so that they can come forward for development. The Profile also identifies that a Green Belt Study produced in 2016 provides an overview of the District's Green Belt and how it performs against the nationally defined purposes of the Green Belt. This Study should be updated in order to support the Local Plan Review, particularly in light of the publication of the revised NPPF. Richborough Estates has produced representations in respect of the methodology deployed within the Green Belt Study previously.</p> <p>Lastly, the Profile identifies Cannock, Hednesford and Heath Hayes as a continuous urban area, with the greatest abundance of services and facilities. Richborough Estates submits that this should be strengthened to explicitly identify Cannock, Hednesford and Heath Hayes as the most sustainable settlements within the District. Similarly, Norton Canes is identified as a sustainable settlement, with a number of local services and facilities. Nevertheless, it is also felt that the sustainable nature of Norton Canes should be strengthened within the District Profile.</p>
LPIS17	Rugeley Town Council	<p>The district profile does not identify the economic sustainability of the towns over time. Rugeley is a market town that has been declining over a number of years. The high street is not vibrant and varied and decline in footfall and care of public realm is evident. The market hall is a shadow of its former self with the majority of units vacant and not enough occupancy to warrant opening 6/7 days per week.</p>
LPIS18	Taylor Wimpey (Lichfield's)	<p>Since the commencement of the LPIS consultation, the revised Framework (July 2018) and associated Practice Guidance documents have been published by the Government. Taylor Wimpey notes that there are references in the Profile to draft documents which have now been published. For example, the section on Housing on page 93 of the LPIS refers to the "draft standard housing methodology" which has now been published. In order to ensure a sound plan, the Council needs to ensure that the District Profile is based on an up to date evidence base which reflects the revised Framework (July 2018) and relevant Practice Guidance. The District Profile should be reviewed in light of the latest national planning policy and guidance issued by the Government and updated accordingly.</p>
LPIS19	St Modwen (Land at Watling Street Business Park) (RPS)	<p>The key issues include recognising that economic growth and regeneration needs have to be met and access to employment opportunities and local labour skills require improvement. The LPR also references the Council's new Corporate Plan covering the period 2018 to 2023 and the strategic objectives, including creating a positive environment in which businesses in the District can</p>

		<p>thrive; increasing the skill levels of residents and the amount of higher skilled jobs in the District, and increasing access to employment opportunities.</p> <p>A key issue for the plan (as addressed later in these representations) will be to establish an employment target which is reflective of the Council's own corporate plan aspirations, but also builds on wider employment growth aspirations including those set out in the Strategic Economic Plans for the area. The Strategic Economic Plan for Stoke-on-Trent and Staffordshire recognises that the "future prosperity of the...economy depends on growth and competitiveness within our business base" (paragraph 1.4). This would mean ensuring the plans objectives to employment provision are appropriately aspirational and set as a minimum.</p> <p>The Council should plan for high levels of employment growth in suitable locations, to enable further growth in the District and support the wider aspirations of the Greater Birmingham & Solihull Local Enterprise Partnership (GBSLEP) and the manufacturing sector in the sub-region. The Greater Birmingham Housing Market Area (HMA) Strategic Growth Study sets out that GL Hearn conclude that "on the basis of the current evidence, provision of between 205,000 – 246,000 homes is needed across the Birmingham HMA to 2031; and provision of between 256,000 – 310,000 homes to 2036 (from a 2011 baseline) to meet the Birmingham HMA's housing needs" (paragraph 1.13). "The analysis indicates that based on current supply assumptions, and taking into account proposed allocations in emerging plans, there is an outstanding minimum shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036 across the Birmingham HMA" (paragraph 1.23). Paragraph 4.38 of the HMA Growth Study also recognises the shortfall of employment land in the District and therefore it is "unclear whether the evidence would justify release of employment land for residential". As well as the provision of housing, this will need to include an uplift for employment land to ensure commuting rates are reduced.</p>
LPIS20	Claire Walker	The evidence base says there is housing requirement of 295 dwellings required per annum from 2016 to 2036 there is currently in excess of this already being built year on year in the area.
LPIS21	Christopher Walker	The evidence base says there is housing requirement of 295 dwellings required per annum from 2016 to 2036 there is currently in excess of this already being built year on year in the area.
LPIS22	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	<p>The 'Sub-national Context' section of the District Profile recognises Cannock Chase District's geographical position and interrelationship with the West Midlands conurbation and wider Staffordshire. In this regard, it is important that the District Profile also recognises Cannock Chase District's role in the functional Birmingham Housing Market Area (HMA).</p> <p>In relation to determining an up-to-date, revised housing requirement for the District, the 'Housing' section of the District Profile refers the draft standardised methodology for objectively assessed housing need (OAHN), published in September 2017, which indicates a housing requirement of 295 dwellings per annum (2016-2036) for Cannock Chase District. The standardised methodology for OAHN is due to be reviewed in the autumn of 2018 and therefore the Local Plan Reviews needs to consider this when published. The use of the standardised methodology as part of a local housing need assessment, to determine the new up-to-date housing requirement for the District is supported by the NPPF, including Paragraph 60.</p> <p>Paragraph 60 is however clear that the standard methodology should be used to determine the minimum number of homes needed for an area. In addition to this the local housing need figure, must take into account the unmet needs of neighbouring areas. Given the Greater Birmingham Housing Market Area shortfall, it is essential that the Local Plan Review addresses this issue. As such, in order to produce a legally compliant and 'sound' plan with a positively prepared and justified strategy, it will be necessary for the revised housing requirement to take additional numbers above that identified under the standardised methodology, in order to meet unmet needs within neighbouring areas, and sufficiently meet the duty to cooperate.</p>

		Furthermore, the 'Employment' section of the District Profile notes the importance of the local economy to the area and that the District's employment rate has increased over the past few years and remains higher than both the regional and national average. A key part of the Council's proposed Vision within the Consultation Document is to achieve a thriving local economy and sustainable economic growth, seeking to address key long standing economic structural weaknesses, as set out with the District Profile; including the District being overly reliant on vulnerable traditional industry and manufacturing employment; and the high proportion of young people in the area with poor skills and educational attainment levels. As such, in order to support such sustainable economic growth, it is necessary for the housing strategy and associated housing requirement to reflect and integrate with the proposed economic strategy for the District, which may inherently lead to the need for additional homes. It is also important that the strategy for improving infrastructure in the District, including educational facilities, and transport options, also aligns with the proposed economic and housing strategies.
Question 2 – do you have any comments identified on the key issues identified here [in the consultation document]? Are there any key issues not covered which the local plan review needs to consider?		
LPIS23	Beaudesert Golf Club (FBC Manby Bowdler LLP)	The connectivity between the key issues identified needs to be understood and highlighted. For example, it is agreed that Future housing needs have to be met and that Economic growth and regeneration needs have to be met, but the latter is not achieved simply through creating employment opportunities and local labour skills, but by creating scope for additional housing beyond the currently identified need, to encourage communities to grow and become more sustainable. Similarly, the low standards of health can be addressed alongside the protection and enhancement of areas of landscape character, the protection and enhancement of which should not only take account of demands for recreation and economic activity but also for housing.
LPIS24	Church Commissioners (Barton Wilmore)	We feel that issue three should be expanded to ensure it is clear that the Council is seeking to meet both its housing need and that of the wider area, including that of the Greater Birmingham Housing Market Area. The protection of the natural/historic environment and landscape character needs to be balanced against the requirement to meet housing need. As such, issue seven needs expanding to include this point alongside the needs for recreation and economic activity.
LPIS25	Highways England	Highways England does not have any comments on the District Profile and welcomes the inclusion of reference to provision of comprehensive transport networks which need to be better supported to help reduce social exclusion and unsuitable development impacts as an issue for the District.
LPIS26	Historic England	See Question 1
LPIS27	Lichfield and Hatherton Canals Restoration Trust	We note that the restoration of the Hatherton Canal, partly on a new alignment, is mentioned in Appendix 2 and welcome and support this as a Key Issue for the District moving forward.
LPIS28	Natural England	We agree that the issues raised are still relevant.
LPIS29	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates supports the identification of housing need and economic growth as key issues. However, it should be made clear that the Council has a requirement to not only test to meet housing need arising from within the District, but also from within the wider HMA. It is also considered that the need to support existing and future services and facilities should be identified, as this plays a key part in delivering and maintaining sustainable communities.
LPIS30	Richborough Estates (Land South of Cannock Rd Heath	Richborough Estates supports the identification of housing need and economic growth as key issues. However, it should be made clear that the Council has a requirement to not only test to meet housing need arising from within the District, but also from within

	Hayes) (Pegasus Group)	the wider HMA. It is also considered that the need to support existing and future services and facilities should be identified, as this plays a key part in delivering and maintaining sustainable communities.
LPIS31	Rugeley Town Council	The para refers to neighbouring authorities and partners to work with. Whilst not strategic, I am surprised that there is no mention of town and parish councils within Cannock Chase as potential partners. With cuts on CCDC and SCC funding, the support of the towns and parishes in implementing works, project management etc. would be an opportunity. The towns and parishes are a recognised tier of local government but have been overlooked.
LPIS32	Sport England	Sport England are supportive of the authority updating its indoor and outdoor sports facilities assessment in the form of an Indoor and Built Facility Strategy and Playing Pitch Strategy, in line with the requirements of NPPF para 96. The Strategies should reflect the growth proposed within the Local Plan, if the figures alter significantly then the strategies should be updated. Following the completion of the assessment the district profile should be updated to reflect its findings. The profile identifies that there are health issues and an ageing population it is therefore suggested that the below key issue should be identified, which also links in with the Council's Corporate Plan strategic objective For Community Wellbeing. "The natural environment and built environment (inclusive of indoor, built and outdoor sports facilities) should be planned effectively to encourage opportunities for healthy and active lifestyles amongst all sections of the community."
LPIS33	Staffs. County Council	At Paragraph 2.2, Key District Issues, it is suggested that reference should also be given to the need to ensure that there are sufficient school places available to mitigate housing development and the implications on the provision of school transport. The relevant Sources of information for securing sufficient school places are the Education Act 2011 (statutory duty to ensure that the supply of school places meets demand) and the NPPF 2018.
LPIS34	Taylor Wimpey (Lichfield's)	With regard to the third key issue of meeting future housing needs, Taylor Wimpey considers that the role of Cannock Chase District Council in helping ensure that the significant housing shortfall across the HMA is addressed should be referred to in this issue as this matter is fundamental to the preparation of policy and decisions on the amount of land which needs to be allocated for residential development.
LPIS35	Claire Walker	There have been lots of development in Hednesford that could have met the affordable housing requirements unfortunately a lot of the housing has been allowed to be that of larger property sizes not meeting the affordable property criteria. Therefore the affordable property housing requirements are obviously not as high as suggested.
LPIS36	Christopher Walker	There have been lots of development in Hednesford that could have met the affordable housing requirements unfortunately a lot of the housing has been allowed to be that of larger property sizes not meeting the affordable property criteria. Therefore the affordable property housing requirements are obviously not as high as suggested.
LPIS37	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	It is considered that the seventh identified key issue within the Consultation Document should also add the need to balance the protection and enhancement of highly valuable and sensitive natural environments, historic environments and landscape character, with meeting demands for housing, alongside the demands for recreation and economic activity, already identified under this key issue. As such it is suggested that this key issue is revised to say; "The highly valuable and sensitive natural environment, historic environment and landscape character need to be protected and enhanced whilst meeting demands for housing , recreation and economic activity".
Wider context		

Question 3 Which strategies and plans do you think our new Local Plan needs to align to and what issues should we be addressing locally to help with the delivery of these? Please provide links and further information as part of your response.		
LPIS38	Brereton & Ravenhill Parish Council	<p><u>Pages 10 to 12, Section 3</u> BRPC strongly supports full compliance with the duty to cooperate introduced by the Localism Act 2011 section 110. This must apply to the relationships with both Lichfield District Council and Stafford Borough Council.</p>
LPIS39	Brindley Heath Parish Council	<p><u>Page 9, Paragraph 2.4</u> Brindley Heath Parish Council (BHPC) welcomes the inclusion of 'Commencement of regeneration of the Rugeley Power Station site' as one of six strategic objectives. Redevelopment of previously developed land is much preferable to development on Greenfield sites.</p> <ol style="list-style-type: none"> 1. We also feel the regeneration should include some form of Country Park on land in flood zone 3. The proximity of this country park may allow some increase in density above that which would be appropriate in areas that were not next to the new substantial public open space. 2. Assistance should be given to businesses that wish to move from employment areas served by roads through residential areas to employment land on the Power Station site. 3. We would also suggest there must be adequate educational, medical and transport provision for new housing on it.
LPIS40	Church Commissioners (Barton Wilmore)	<p>The LPR should be prepared in such a way that the needs of the wider housing market area are met as well as the Council's, with a specific focus on cross boundary working. The meeting of unmet housing need (both locally and regionally) is a specific issue which should be addressed. To this end, the Greater Birmingham HMA Strategic Growth Study (February 2018) should be taken into account in so far that it shows the unmet need within the Greater Birmingham HMA. This identified a housing need of 256,000 – 310,000 dwellings between 2011-2036 including 22,000 dwellings of unmet need from the Black Country authorities.</p> <p>Further to this, the Birmingham Development Plan (January 2017) identified an unmet need of 37,900 dwellings which should be taken into account.</p> <p>The Revised National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) require Councils to prepare and maintain Statements of Common Ground (Paragraph 27) to ensure an effective approach is taken for strategic matters such as housing need. There is a duty for local planning authorities to cooperate with each other on strategic matters (Paragraph 24 and Paragraph: 017 Reference ID: 12-017-20140306).</p> <p>The revised NPPF makes it clear that strategic policies should set out the overall strategy for the pattern, scale and quality of development, including housing, and that strategic policies should look ahead to a minimum timeframe of 15 years. Sufficient sites should also be allocated to deliver the strategic priorities of the area and any relevant cross-boundary issues.</p>
LPIS41	Greenlight Developments (Lichfield's)	<p>Greenlight Developments Limited ('Greenlight') support the Council's recognition within Chapter 3 of the Issues and Scope consultation document ('the Consultation Document') which focuses on how the District fits within the wider, West Midlands context. This aligns with the approach set out in the National Planning Policy Framework (NPPF, 2018) which requires that, to be effective, Local Plans should be "based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred."</p> <p>Primarily, Greenlight support the Council's commitment across paragraphs 3.3 and 3.4 that it will work with neighbouring authorities on a range of strategic issues, with Housing Growth being a key issue within this.</p>

		<p>In addition, Chapter 2 of the consultation document refers to the new Corporate Plan which identifies the key priorities for the District over the next five-year period, to 2023. One of the Council's key priorities is to promote prosperity, including through the strategic objective of increased housing choice. In response to question 4, the Corporate Plan is a key plan which the Council must ensure its strategies are aligned with.</p> <p>This is particularly important given that there is a significant housing shortfall across the Greater Birmingham Housing Market Area (GBHMA) which comprises 28,150 dwellings to 2031 and 60,900 to 2036. It is understood that, as of yet, there have been no commitments regarding how much of the housing shortfall each LPA should accommodate. However, the Greater Birmingham HMA Strategic Growth Study (February 2018) found that LPAs in the HMA are likely to need to seek to maximise opportunities for housing delivery, including making more efficient use of land and that Green Belt release will need to be looked at. This is particularly pertinent in Cannock Chase which is a Borough very constrained by Green Belt (Environmental Capacity Study 2013). This strategy should be used to inform development of the plan's future policies to align with duty to co-operate.</p> <p>Greenlight's site (see site plan at annex 1) is a cross boundary site, 2Ha of which is within Cannock Chase, with the remaining 10.5 Ha falling in South Staffordshire. Greenlight's response to Policies CD6 and CD1 below identifies the parcel of land within Cannock Chase (assessed under the Councils 2017 SHLAA as site C21) as a sustainable site in its own right which, if allocated by the Council in its new local plan, would assist with meeting housing need in Cannock Chase as well as the wider HMA. However, it is also relevant that, in its most recent Housing Delivery Monitor (May 2018), South Staffordshire could only demonstrate a housing land supply position of 3.42 years https://www.sstaffs.gov.uk/doc/179539/name/Final%205%20Year%20Housing%20Land%20Supply%20Statement%20May%202018.pdf/.</p> <p>The wider site therefore offers the additional opportunity to assist with meeting housing needs in South Staffordshire and provide a larger contribution to shortfall across the HMA. Notwithstanding, Greenlight consider there is nothing preventing the allocation of the smaller, predominantly brownfield parcel in Cannock Chase on its own merits; a suitably designed housing scheme could be brought forward for this parcel. This would not prejudice, and could be done in advance and separately to, allocation of the wider site if this is considered to be an appropriate spatial strategy for jointly meeting housing needs under Duty to Cooperate.</p> <p>In sum, Greenlight support the Council's acknowledgement of the plan's role in addressing cross-boundary issues, including Housing needs. The Council must ensure its New Plan is supported by a sufficient, thorough evidence base so that it can meet this need.</p>
LPIS42	Home Builders Federation	<p>The new Cannock Chase Local Plan should be prepared on the basis of joint working on cross boundary issues such as where housing needs cannot be wholly met within individual authorities. As Cannock Chase is part of the Greater Birmingham Housing Market Area (GBHMA) the meeting of unmet housing needs in the GBHMA is a cross boundary matter. To fully meet the legal requirements of the Duty to Co-operate the Council should engage on a constructive, active and on-going basis with the other GBHMA authorities to maximise the effectiveness of plan making. One key outcome from co-operation between the GBHMA authorities should be the meeting of Objectively Assessed Housing Needs (OAHN) in full across the GBHMA. The Birmingham Development Plan adopted in January 2017 identifies an unmet need of 37,900 dwellings for the plan period 2011 – 2031 which to date the GBHMA authorities have failed to re-distribute. The Greater Birmingham & Black Country HMA Strategic Growth Study published in February 2018 identifies an updated housing need of 256,000 – 310,000 dwellings between 2011– 2036 for the HMA. This latest assessment also identifies the potential for circa 22,000 dwellings of unmet need from the Black Country authorities by 2036.</p> <p>The National Planning Practice Guidance (NPPG) states that a key element of examination is ensuring that there is sufficient certainty through formal agreements that an effective strategy will be in place to deal with strategic matters such as unmet housing</p>

		needs when Local Plans are adopted (ID 9-017). The meeting of unmet needs should be set out in a Statement of Common Ground (SoCG) signed by all respective GBHMA authorities (paras 24, 26 & 27 of revised National Planning Policy Framework (NPPF)). The Council should not sign any non-multilateral SoCG for contributions towards meeting unmet needs which provides no certainty that the overall combined sum of such non-multilateral agreements will meet the unmet needs in full of the GBHMA. As identified by the Stratford upon Avon Local Plan Inspector's Final Report a "holistic approach" is required.
LPIS43	Inglewood Investments (SLR Consulting)	The key issues relate to housing land shortfall (and employment land) and the availability of land both within the District and wider West Midlands Conurbation. It is evident that the majority of the District falls within the Green Belt and/or AONB, therefore CCDC need to take a pro-active integrated and robust approach to releasing land from the Green Belt. This should ensure that housing targets are met and avoid pressure from speculative development applications, which would be likely to result should the 'Housing Delivery Test' not be met.
LPIS44	KGL (Estates) Ltd (J Heminsley)	As above, the objective for housing needs to include reference to the evidence in relation to housing land supply in the GBHMA whereby some of Birmingham's housing requirements are required to be dealt with across all the other LPAs in the area.
LPIS45	Natural England	Cannock Chase AONB Management Plan – Recreation See – http://www.cannock-chase.co.uk/assets/downloads/74646AONBmanagementplan2014-19.pdf Staffordshire Minerals Local Plan (MLP) – Sand and gravel sites close to or within the AONB offer great opportunities for lowland heathland creation as part of restoration. The local plan review can refer to such opportunities at a high level, for example through NPPF coverage of e.g. net gain and ecological networks. MLP link here: https://www.staffordshire.gov.uk/environment/planning/policy/thedevelopmentplan/mineralslocalplan/mineralsLocalPlan.aspx Staffordshire Biodiversity Action Plan – The Staffordshire Wildlife Trust website provides useful info and present ecosystem action plans in recognition of the fact that BAPs are now a thing of the past and Local Nature Partnerships may be working on for example biodiversity and habitat mapping to decide where effort should be focused. SBAP link to Ecosystem action plans info here: http://sbap.org.uk/actionplan/index.php
LPIS46	Paris, G (on behalf of the Trustees of the Estate of TB Follows)	Trustees acknowledge and approve that CCDC will be considering the requirement to accommodate a significant number of houses to from GBHMA and the West Midlands during the plan period, in addition to local housing requirements. We hope that the Council will consider again the various sites which were under review in the March 2017 'Housing Site Options' consultation.
LPIS47	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	The Birmingham Development Plan adopted in January 2017 identifies an unmet need of 37,900 dwellings for the plan period 2011 – 2031 which, to date, the GBHMA authorities have failed to re-distribute. The GBHMA Strategic Growth Study published in February 2018 identifies an updated housing need of between 256,000 – 310,000 dwellings between 2011–2036 for the housing market area. This latest assessment also identifies the potential for approximately 22,000 dwellings of unmet need from the Black Country authorities by 2036. Richborough Estates accordingly supports the involvement of Cannock Chase District with the GBHMA and its constituent authorities. The Council will need to ensure that the Local Plan engages fully with the GBHMA authorities in respect of unmet housing need, as well as infrastructure and other cross-boundary issues, in order to satisfy the legal requirements of the Duty-to-Cooperate. This engagement should be on-going and genuine, throughout the period of the plan. There is also a requirement for the Council to align the Local Plan with the Corporate Plan and the Economic Strategy of the LEP.

LPIS48	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>The Birmingham Development Plan adopted in January 2017 identifies an unmet need of 37,900 dwellings for the plan period 2011 – 2031 which, to date, the GBHMA authorities have failed to re-distribute. The GBHMA Strategic Growth Study published in February 2018 identifies an updated housing need of between 256,000 – 310,000 dwellings between 2011–2036 for the housing market area. This latest assessment also identifies the potential for approximately 22,000 dwellings of unmet need from the Black Country authorities by 2036.</p> <p>Richborough Estates accordingly supports the involvement of Cannock Chase District with the GBHMA and its constituent authorities. The Council will need to ensure that the Local Plan engages fully with the GBHMA authorities in respect of unmet housing need, as well as infrastructure and other cross-boundary issues, in order to satisfy the legal requirements of the Duty-to-Cooperate. This engagement should be on-going and genuine, throughout the period of the plan. There is also a requirement for the Council to align the Local Plan with the Corporate Plan and the Economic Strategy of the LEP.</p>
LPIS49	Rugeley Town Council	<p>The town and parish councils may have Neighbourhood Plans which are by their nature recognised by the local plan. However, where Neighbourhood Plans are not developed, the local plan should mention town and parish council strategies and action plans. These are often filled with projects, schemes, partnership working and economic regeneration initiatives that could support the local plan.</p>
LPIS50	Stafford Borough Council	<p>As Stafford Borough is a neighbouring authority to Cannock Chase District a number of the strategic key issues could have development and infrastructure implications for the Borough, although it is worth noting that Stafford Borough is not within the Greater Birmingham Housing Market Area, nor the Greater Birmingham & Solihull LEP area.</p> <p>Based on ‘How the District’s Fits within the Wider Context’ identified for Cannock Chase District, the Borough Council acknowledges the key cross boundary linkages concerning travel to and from Stafford for employment, retail and leisure continuing the broad approach of the current Local Plan. However as a point of clarification further detail should be provided on the relationship between the Rugeley Town Centre Hinterland and Stafford Borough confirming that new development will be contained wholly within the Cannock Chase area from the strategic planning context rather than rural areas of the Borough. Furthermore there should be no future development through the new Cannock Chase Local Plan which impacts on the Green Belt or Area of Outstanding Natural Beauty within Stafford Borough</p>
LPIS51	Staffs. County Council	<p>It is noted at paragraph 3.2 reference is made to infrastructure and delivery strategies citing education as an example. In this context it would be useful to draw your attention to the Staffordshire Learning Infrastructure Framework and the Education Planning Obligation Policy document (including any successor document).</p> <p>The New Local Plan will need to align with both Joint Waste Local Plan and Minerals Local Plan.</p>
LPIS52	Taylor Wimpey (Lichfield’s)	<p>To ensure that the Local Plan is sound, and informed by a robust evidence base, the evidence base will need to be updated to ensure that it fully accords with the revised Framework (July 2018) and the relevant Practice Guidance including that on the Standard OAN Methodology, and Planning Obligations and Viability. In considering the release of Green Belt land, the Council will need to demonstrate that it has examined fully all other reasonable options when considering the release of land from the Green Belt in accordance with the revised Framework (July 2018) [§§135 -139]. Further evidence base work in relation to this matter will be necessary.</p> <p>The 14 authorities comprising the Greater Birmingham and Black Country Housing Market Area [GBHMA] are identified in the LPIS [§3.1] as a key partnership formed under the Duty to Cooperate. Meeting future housing needs is identified as a key issue in the LPIS [§2.2], and the ability of Cannock Chase District Council to help ensure that the significant housing shortfall across the HMA is</p>

		<p>addressed is central to this issue including the existence of exceptional circumstances as set out in the revised Framework [§137©]. Taylor Wimpey considers that any additional identified need from the GBHMA can be accommodated in part by releasing and allocating suitable Green Belt sites in Cannock Chase District for housing. The site at Wimblebury Road, Cannock is considered to be suitable to help meet the future housing need for the District, including any additional identified need from the GBHMA.</p> <p>Notwithstanding the above, Taylor Wimpey has several concerns with the evidence base produced to inform the Local Plan, in particular the Greater Birmingham and Black Country HMA Strategic Growth Study [SGS] (February 2018). We provide further details on this matter in our representations below.</p>
LPIS53	Transport for West Midlands (WMCA)	<p>The draft Local Plan clearly demonstrates a “commitment to work with bus and rail operators, Staffordshire County Council, the West Midlands Combined Authority, the Local Enterprise Partnerships, local transport bodies and developers to help develop and promote sustainable transport modes”. Yet there have been a number of significant regional developments that have occurred over the last year since the publication of Local Plan (Part 1) and the draft Local Plan (Part 2). Items of note include:</p> <ul style="list-style-type: none"> - Midlands Engine and Midlands Connect Strategies - WMCA’s Strategic Economic Plan - WMCA’s Strategic Transport Plan (Movement for Growth) - WMCA’s 10 year Transport Delivery Plan - WM’s HS2 Connectivity Package - Stations Alliance - Rail Investment Strategy - Government’s Road Investment Strategy - WMCA’s draft Park and Ride Strategy <p>Where these documents have impacts for the movement of people and goods to, from and through Cannock Chase District, this may have implications for land use planning. We therefore encourage Cannock Chase District Council to consider any additional information to be supplied within this document that clarifies how it supports Cannock Chase District’s role within the context of recent developments in regional economic development and connectivity policy, strategy and planning. Further detail is provided in the appendix (response provides additional detail on how each strategy/plan may have implications for land use planning in Cannock Chase District).</p>
LPIS54	Upton Trust & Carney Brothers (Wardell Armstrong)	<p>Cannock Chase District is one of fourteen local authority areas which fall within the Greater Birmingham Housing Market Area (GBHMA). It is well established that there is a significant shortfall in planned provision to meet housing requirements in Birmingham. Policy PG1 of the Birmingham Development Plan (adopted January 2017) quantifies this shortfall as 37,900 dwellings (2011 – 2031) and will need to be addressed locally.</p> <p>The apportionment of housing is a matter requiring further understanding and evaluation based on the additional evidence referred to elsewhere within this representation, including:</p> <ul style="list-style-type: none"> • A review and critique of the Greater Birmingham HMA Strategic Growth Study (GL Hearn, 2018) • The Black Country and South Staffordshire Strategic Housing Market Assessment Final report Peter Brett Associates March 2017 • the impact of a standardised methodology for calculating housing need upon housing land supply • A more detailed review and evidence to assess and consider the impact of and appropriateness of a blanket ‘densification’ calculation • Up to date household growth projections released by the Ministry of Housing, Communities & Local Government

		<ul style="list-style-type: none"> • Birmingham Sub-Regional Housing Study – Part 2 (Barton Wilmore, 2014) • The future capacity, potential and delivery timescales for Rugeley Power Station • The impact of such additional evidence upon the scope and purpose of a revised Green Belt Review
LPIS55	Claire Walker	They need to align to environment protection and enhancement. Protection of the green spaces is important to the area.
LPIS56	Christopher Walker	They need to align to environment protection and enhancement. Protection of the green spaces is important to the area.
LPIS57	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	As noted above, it is important that Cannock Chase District Council adequately collaborate on strategic matters that cross administrative boundaries as part of the required duty to cooperate, including the delivery of housing as part of the Birmingham HMA. It is therefore necessary for the new Local Plan Review to align with strategies of authorities in the wider Birmingham HMA. The identified housing requirements and broad identified strategic delivery options set out in the Greater Birmingham HMA Strategic Growth Study (February 2018) should therefore be considered in this regard.
Question 4 – do you think there are other cross boundary issues we should be considering		
LPIS58	Beaudesert Golf Club (FBC Manby Bowdler LLP)	The connectivity between the key issues identified needs to be understood and highlighted. For example, it is agreed that Future housing needs have to be met and that Economic growth and regeneration needs have to be met, but the latter is not achieved simply through creating employment opportunities and local labour skills, but by creating scope for additional housing beyond the currently identified need, to encourage communities to grow and become more sustainable. Similarly, the low standards of health can be addressed alongside the protection and enhancement of areas of landscape character, the protection and enhancement of which should not only take account of demands for recreation and economic activity but also for housing.
LPIS59	Birmingham City Council	Paragraph 3.4 correctly identified the key cross-boundary issues that will need to be taken into account in the Local Plan review.
LPIS60	Black Country Authorities	<p>Thank you for your email of 2nd July. Please accept my apologies for the time that we have taken in bringing together a response on behalf of the 4 Black Country Councils. In the meantime, of course, the Black Country Authorities have written to your authority in respect of strategic development needs, and we have received a helpful response from your Managing Director.</p> <p>Besides the wide-ranging strategic issues about the scale and location of housing, industry and other forms of development, we recognise there will be more localised issues (perhaps as a result of the implications of the strategic issues) and also cross-boundary issues especially in relation to Walsall borough. In the circumstances, we have sought to identify the issues on a ‘topic’ basis and to order them in a way that seems logical, at least for the moment. Thus, the matters that we think should be the subject of the Duty to Cooperate in respect of Cannock Chase District’s Local Plan Review are as follows.</p> <ol style="list-style-type: none"> 1. Meeting projected housing needs - including through cooperation on the shortfalls in provision projected for Birmingham and the Black Country. 2. Meeting projected needs for gypsies and travellers there is a potential issue about the ability to meet such needs generally as well as issues regarding particular sites, such as at Lime lane near the boundary with Walsall. 3. The scale and location of development for employment (including offices) there will be a need to consider strategic issues of location and in terms of impacts on investment and access to jobs. 4. The scale and location of retail development (and other consumer services) - not least in light of Cannock Chase Council’s decision to support the scheme for a designer outlet centre at Mill Green. 5. Green Belt - including the possible need to plan for sites that across local authority boundaries. 6. Green infrastructure - especially if Natural England wishes to pursue the idea of linkages between Cannock Chase and Sutton Park.

		<p>7. Green corridors - for wildlife and for people.</p> <p>8. Water supply and drainage - in relation to existing issues as well as new developments and potential canal restoration.</p> <p>9. Cannock Extension Canal SAC - in terms of the potential for restoration of the Hatherton Canal and effects on the SAC.</p> <p>10. Cannock Chase SAC - continuing work on an up-to-date evidence base and in the context of recent EU Court judgements.</p> <p>11. Cross-boundary transport links and potential impacts - including rail and road connections and recognising the role of Staffordshire County Council.</p> <p>12. The implications of mineral resources for development proposals in the area - whilst we recognise the role of Staffordshire County Council, the identification of mineral resources will have implications for potential sites across local authority boundaries (notably at Yorks Bridge).</p> <p>I have set the issues down briefly, because the list is quite a long one, but also because I think we share mutual recognition of the issues. Some of the issues (notably housing growth and matters relating to European sites) are already included in current discussions involving a number of authorities, whilst others (including the Green Belt, green infrastructure and green corridors) are to be addressed (at least to some degree) by work towards the Black Country Core Strategy Review. I would anticipate that your authority will already have envisaged the need to consider the issues in your work.</p> <p>I, and Black Country colleagues, will be happy to discuss more detailed definitions of the matters I have listed. We will also be interested to identify who might be best placed to deal with particular issues and the mechanisms for progressing matters. For our part, we would be most interested to be advised as to how you will be working with Staffordshire County Council to address transport and mineral resource issues.</p>
LPIS61	Canal & River Trust	<p>Green Infrastructure should be identified as a key cross boundary issue with the canal network identified as forming part of this infrastructure. The canals span several local authority boundaries, and, in the case of Cannock, this includes a small section of the Cannock Extension Canal and its junction with the Wyrley & Essington Canal, which are within Walsall. As identified above the Cannock chase reservoir is on the administrative boundary in Lichfield, this links to the Wyrley & Essington Canal.</p> <p>In addition, there is also the line of the proposed Hatherton Canal restoration which would connect to the wider canal network and also falls within Walsall and South Staffordshire Districts. This can present certain considerations as proposals falling within different local authority areas could have implications for the canal developments in another local authority area. It is therefore important to ensure that these are identified as key cross boundary issues and the LPAs work together and in consultation with the Trust when considering issues that may affect the canal network.</p>
LPIS62	Church Commissioners (Barton Wilmore)	See Question 3.
LPIS63	Greenlight Developments (Lichfield's)	See question 3
LPIS64	Inglewood Investments (SLR Consulting)	<p>The release of the GBHMA Strategic Growth Study requires Local Authorities to consider the housing needs of their neighbouring LPAs and their cross plan boundary market areas. The study clearly demonstrates that there is a significant shortfall within the West Midlands area, and therefore LPAs should be co-operating with each other in order to address this.</p> <p>Our Client's site is on the border of CCDC and Lichfield District Council. CCDC and all LPAs within the West Midlands region should be considering sites which can help serve the development needs of neighbouring authorities, particularly where their release would not compromise the objectives of Green Belt.</p>

LPIS65	Lichfield and Hatherton Canals Restoration Trust	The Plan should explicitly mention cross-boundary co-ordination issues to ensure a protected through route for the restored Hatherton Canal. This will require working with Walsall Council and South Staffordshire District Council.
LPIS66	Natural England	Natural environment issues include: <ul style="list-style-type: none"> • Air and water quality impacts under the Habitats Regulations 2017 e.g. Cannock Extension Canal SAC/SSSI. • Ecological networks including green and blue infrastructure, biodiversity net gain etc. . This theme would benefit from a strategic approach in its own right. We note that the Greater Birmingham Housing Market area dialogue emphasises the need for further cross border working. Synergies may be realised through the formulation and implementation of neighbouring LPAs' infrastructure delivery plans e.g. GI as part of transport improvements. • Existing strategic projects for European designated sites – Managing recreational pressure on Cannock Chase SAC.
LPIS67	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates agrees with the cross-boundary issues identified by Cannock Chase District Council.
LPIS68	South Staffs Council	South Staffordshire Council welcomes the opportunity to submit comments at this initial stage of the process. The Council supports the timetable as outlined in paragraph 1.11 culminating in a proposed adoption date of September 2021. It is recognised that this is just the first stage in what will be an ongoing dialogue and South Staffordshire is confident that both authorities will be able to work cooperatively to address issues of mutual interest and concern. The Scoping and Issues Paper covers a broad range of topics and issues. In submitting this representation we have sought to provide our initial thoughts on those issues which we consider are the matters of joint relevance and concern, most notably in relation to housing supply issues and economic development considerations where both authorities share an inter-related geography.
LPIS69	Rugeley Town Council	The plan on page 12 shows clearly that the main conurbation of Cannock/Hednesford identifies with the West Midlands conurbation and links to it for economic and social development. Rugeley is divided from this by the Chase and is not close enough to other urban areas to get support/benefits. The plan clearly demonstrates that Rugeley has different needs to the rest of Cannock which are not being picked up in strategies and plans. Even with the development of the former power station site, Cannock's influence is limited as the area comes under Lichfield District. Care should be taken that Rugeley is not seen as a floating island, struggling to link to other economic areas but is brought into regeneration schemes for the district. Left to fend for itself, a market town will struggle to develop and bring itself out of a depression.
LPIS70	St Modwen (Land at Watling Street Business Park) (RPS)	Section 3 of the LPR recognises the complexity of the geography of the West Midlands and also sets out the new Local Plan will need to help the various organisations and partnerships to deliver their ambitions and objectives. Cross-boundary issues that the Council have identified include housing and economic growth, as well as transport and Green Belt. The Sustainability Appraisal (SA) Scoping Report references at footnotes 79 and 80 (on page 26), the Stoke-on-Trent and Staffordshire Local Enterprise Partnership (March 2014) Strategic Economic Plan and the Greater Birmingham & Solihull LEP (September 2016) GBSLEP Strategic Economic Plan 2016–2030, and the vision to create a significant increase in the number of

		<p>jobs as well as an increase in the size of the economy. The Stoke-on-Trent and Staffordshire Strategic Economic Plan (SEP) has a “stated aim to grow the economy by 50% and generate 50,000 new jobs in the next 10 years”.</p> <p>Paragraph 3.2 of the LPR refers to the need to ensure that the plan links to a range of strategies and plans, such as the Strategic Economic Plans; the Government’s Industrial Strategy; the West Midlands Engine Growth Strategy and Midlands Connect Strategy . All of these documents should be included within Appendix 1 of the SA Scoping Report and reviewed, which should then inform the issues that the plan needs to address.</p> <p>Economic Growth is acknowledged by the Council at paragraph 3.4 of the LPR as a key cross-boundary issue. To help address these issues, the need to provide employment development site allocations and address longer term needs / safeguarding employment is appropriate. However, the plan needs to go further in terms of ensuring that any employment target is based on up-to-date data as well as ensuring that it responds to the changes that have taken place already as well as the implications of helping to meet Birmingham’s overspill need. Without making sufficient employment land available, this will have a significant constraining factor on the economy of the area. The allocation of sufficient employment land should also inform the amount of housing that is needed.</p>
LPIS71	Staffs. County Council	We agree that you have covered the relevant cross boundary issues by theme. As the plan evolves it will be necessary to consider the detailed impacts and relevant parties who will need to be involved in discussions.
LPIS72	Upton Trust & Carney Brothers (Wardell Armstrong)	<p>Unmet housing need is a key cross boundary issue that has been identified by Cannock Chase District Council. Cannock Chase District is one of fourteen local authority areas which fall within the Greater Birmingham Housing Market Area (GBHMA) It is well established that there is a significant shortfall in planned provision to meet housing requirements in Birmingham. Policy PG1 of the Birmingham Development Plan (adopted January 2017) quantifies this shortfall as 37,900 dwellings (2011 – 2031). It is proposed that this shortfall is met elsewhere in the Greater Birmingham Housing Market Area (HMA) through the Duty to Co-operate, including within Cannock Chase.</p> <p>The Rugeley Power Station site will need to be considered further as part of the site options as discussed under the section on Policy CP1. The adopted SPD for this site suggests that the preferred vision is for a cross boundary mixed use scheme, with primarily employment-led development in Cannock Chase District.</p> <p>The Lichfield Local Plan Allocations submission document 31 May 2018 contains the Rugeley Power Station Concept Statement. This Concept Statement provides further details in support of Policy R1 of the Local Plan Allocations for the Rugeley Power Station site.</p> <p>The listed strategic objectives for the site include: “To integrate the development of a minimum of 800 homes and associated facilities within a landscape setting” No housing capacity related to Rugeley Power Station is identified within the Issues and Scope consultation document and this is fully supported. The anomaly is that as illustrated above, Lichfield District are already ascribing a certain capacity to the site, which is an inconsistent planning approach.</p> <p>Even where Rugeley Power Station’s potential may be identified in the future, it cannot be robustly assessed or included as anything other than a notional housing site of limited potential, bearing in mind its de-commissioning, decontamination and practical future re-use for energy and or other commercial uses.</p>
LPIS73	Claire Walker	We should not be providing housing for other districts if this impacts on our greenbelt/green spaces as consequence.

LPIS74	Christopher Walker	We should not be providing housing for other districts if this impacts on our greenbelt/green spaces as consequence.
Vision & Objectives		
Question 5: Do you have any comments on the Vision and Objectives (including the priorities set out in Appendix 4)? What changes do you think may need to be made?		
LPIS75	Beaudesert Golf Club (FBC Manby Bowdler LLP)	<p>Vision: The emphasis on local people having pride in where they live is supported, to include the AONB and protected countryside areas; as is the concept of new development complementing and enhancing the area. A vision which includes a choice of new housing, encouraging professionals into the area with aspirational housing is also supported, as is improved accessibility to leisure facilities, all of which will facilitate sustainable economic growth.</p> <p>Objectives: The focus on:</p> <ul style="list-style-type: none"> • promoting sustainable communities to include retaining and enhancing District character (Objective 1) ; • creating healthy living opportunities, to include facilitating accessible good quality sustainably managed open space sport physical activity and leisure facilities (Objective 2); • sustainable housing provision, including aspirational housing (Objective 3); • the inclusion of walking, cycling health and leisure within the concepts of sustainable transport infrastructure (Objective 5); and • the protection, conservation and enhancement of the AONB including maximizing opportunities for access and enjoyment promoting new development which enhances the natural and environmental assets (Objective 7) are supported. <p>The Local Plan policies will need to ensure that these aspects are not considered in isolation – sustainable and well-designed housing development close to or within the Green Belt and AONB, for example particularly where brownfield land can be utilised and improved, can be used to facilitate enhancements to the AONB and provide funds to enable opportunities to provide leisure facilities and the improvement of habitat and accessibility of the existing open space assets within the District.</p>
LPIS76	Brereton & Ravenhill Parish Council	<p><u>Page 13, paragraph 4.1</u> BRPC welcomes the vision in paragraph 4.1. It is essential that strong and prompt action is taken and seen through to the end against those who harm the Cannock Chase Area of Outstanding Natural Beauty if this vision is to be fulfilled.</p>
LPIS77	Brindley Heath Parish Council	<p><u>Page 13, Paragraph 4.1</u> 4. BHPC supports the idea in paragraph 4.1. as we feel it is essential that strong and prompt action is taken and carried out against those who harm the Cannock Chase Area of Outstanding Natural Beauty if this vision/objective is to be fulfilled/achieved.</p>
LPIS78	Canal & River Trust	<p>The canal network should be included as making a contribution to addressing key issues facing the district and this should be included in the vision (see 'overall / general comments' section for examples). The waterways are significant Green Infrastructure, but they also function as 'Blue infrastructure' which serves in a variety of roles, including: an agent of or catalyst for regeneration; a contributor to water supply and transfer, drainage and flood management; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape, open space and ecological resource; sustainable modes of transport; and routes for telecommunications. They also offer opportunities for leisure, recreation and sporting activities as part of the 'natural health service' acting as 'blue gyms' and supporting physical and healthy outdoor activity. The canal network can therefore make an important contribution to addressing the key issues facing the District over the Plan period and achieving the 'Vision' and 'objectives' for the District'.</p>

		The Trust consider that stronger references to the canal network should be included within the existing policies across the Plan. The review also offers the opportunity to incorporate a canal specific policy into the Plan and the Trust are happy to advise and work with the Authority on the wording for such a policy.
LPIS79	Greenlight Developments (Lichfield's)	At Chapter 4 of the consultation document, the Council lists the objectives included in the Local Plan (Part 1) document. This includes Objective 3 which is to 'provide for housing choice' and within this, the intention, 'to manage the release of sufficient land for housing in appropriate locations'. Performance against this objective forms part of the Council's annual monitoring. Greenlight supports the premise of this objective; it is important that the Council retains a housing focused objective in its new plan in order to align with government objectives to significantly boost the supply of homes and ensure housing needs of the locality are met.
LPIS80	Highways England	Highways England particularly supports Objective 5 which encourages sustainable transport infrastructure. We welcome the sub-priorities set out at Appendix 4 and would like to see reference in the sub-priorities to partnership working on transport issues and modelling the impact of proposed development on the Strategic Road Network.
LPIS81	Historic England	<p>The reference to enjoyment and conservation/enhancement of the historic environment in Appendix 3 is very welcome. We advise that heritage is given specific mention within the associated 'headline text' to ensure it is properly reflected. This section could also be further enhanced by mention of the local planning authority taking making the most of opportunities for heritage to better contribute to local quality of life through partnership working and focussing effort through local strategic priorities. In the vision generally, it would also be beneficial to make reference to the interrelationship between heritage and other subject areas, including the contribution that it makes at present and potential for enhancing this (e.g. landscape and tourism).</p> <p>With regards to the objectives, we strongly advise that the conservation and enhancement of the historic environment, and opportunities to enhance its contribution to quality of life in the area has a dedicated objective in the development Local Plan (i.e. not subsumed within other wider environmental objectives).</p> <p>We would also strongly advise that, where this has not already been done, an up-to-date evidence base is developed to provide a robust understanding of the significance of heritage assets in the area, the contribution they currently make to quality of life and other subject areas, the issues facing the historic environment, and the opportunities they represent. This information should then go on to inform areas of focus and action and policies within the local plan.</p>
LPIS82	KGL (Estates) Ltd (J Heminsley)	See Question 3
LPIS83	Natural England	In Appendix 3 page 102 under the Vision - People will lead greener more environmentally friendly lifestyles, inspired by Cannock Chase Area of Outstanding Natural Beauty paragraph there is no mention of ensuring good water quality or preventing the loss of soils.
LPIS84	Paris, G (on behalf of the Trustees of the Estate of TB Follows)	<p><u>Link: para 4.2. Trustees approve the list of Principles, Visions and Objectives.</u></p> <p>We hope that the Councils listed 'principles' can be applied so that there is an appropriate match of housing need to suitable locations, and in particular that there should be to a real attempt to provide a range of housing types, (with varied housing densities also considered), in sustainable development areas. This evaluation should not preclude considering development within the Green Belt around the conurbations, provided the AONB and the Green Belt itself are protected through proper design and other sites are proven to be less sustainable. Apart from fulfilling housing need there will be opportunity thereby to increase public access to Green Space corridors and thereby to afford some protection of the Cannock Chase SAC.</p>

		<p>Deliverability (in legal, planning and practical terms) of sites under consideration in the Review should be an important factor, when considering allocating sites to the Local Plan. It may be important also to reconsider whether larger sites allocated are deliverable in entirety.</p> <p>The Trustees interest is in site R33 (where there is shared ownership with Gallagher Estates) and we would be pleased to answer any questions about this representation.</p>
LPIS85	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>Richborough Estates is generally supportive of the vision as set out at Appendix 3. However, it is considered that the vision as currently drafted is unduly long and should be shortened. In its current form, it is considered that the vision is not deliverable.</p> <p>Richborough Estates is supportive of the objectives set out within the Local Plan Review Document, insofar as they collectively promote sustainable development. In particular, Richborough Estates supports Objective 3, Providing for Housing Choice. Richborough Estates also supports the recognition of the economic benefits that providing for increased housing choice can bring, as well as the need to release land for housing development in appropriate locations.</p> <p>However, it is considered than an additional strategic objective should be added, which underlines the requirement to support the needs of neighbouring authorities through the Duty-to-Cooperate. This will strengthen the requirement and ensure that the Duty-to-Cooperate is fully engaged with throughout the plan period.</p> <p>It is also considered that Objective 3 can be strengthened, so as to not only provide for housing choice, but to also meet housing need. It should be clear that this relates to both local need and need arising from the wider HMA. This should be clearly identified within Appendix 4.</p>
LPIS86	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>Richborough Estates is generally supportive of the vision as set out at Appendix 3. However, it is considered that the vision as currently drafted is unduly long and should be shortened. In its current form, it is considered that the vision is not deliverable.</p> <p>Richborough Estates is supportive of the objectives set out within the Local Plan Review Document, insofar as they collectively promote sustainable development. In particular, Richborough Estates supports Objective 3, Providing for Housing Choice. Richborough Estates also supports the recognition of the economic benefits that providing for increased housing choice can bring, as well as the need to release land for housing development in appropriate locations.</p> <p>However, it is considered than an additional strategic objective should be added, which underlines the requirement to support the needs of neighbouring authorities through the Duty-to-Cooperate. This will strengthen the requirement and ensure that the Duty-to-Cooperate is fully engaged with throughout the plan period.</p> <p>It is also considered that Objective 3 can be strengthened, so as to not only provide for housing choice, but to also meet housing need. It should be clear that this relates to both local need and need arising from the wider HMA. This should be clearly identified within Appendix 4.</p>
LPIS87	Rugeley Power Ltd (Savills)	<p>Re Para 2.4 - The identification of the regeneration of Rugeley Power Station as one of the key objectives of the Local Plan Review is supported. The title should be updated to reflect the addition of Rugeley Power Station as a seventh strategic objective. This is appropriate recognition of the important contribution this site can make to the delivery of the development needs of the District over the Plan period, and is an appropriate part of the pattern, scale and quality of development at a strategic level in accordance with the guidance of NPPF para 20 – 23.</p> <p>Rugeley Power Station is a significant site which has been recognised in the draft Issues & Scope. It is a strategic brownfield redevelopment opportunity within the urban area of Rugeley and is unique in its scale and potential contribution to meeting the</p>

	<p>development needs of the District. The site as a whole, and that part just within Cannock Chase District, should be regarded as being housing led, rather than employment led. The draft Plan suggests (para 5.78) an employment led approach based upon the supplementary planning document adopted by both Cannock Chase and Lichfield District Councils. We make specific comment on that under CP8. The comments submitted by Rugeley Power Limited are directed to realising the full redevelopment potential of the Power Station site as a strategic redevelopment opportunity embracing forward thinking and partnership.</p> <p>A Statement of Common Ground has recently been agreed between Rugeley Power Limited and Lichfield District Council in respect of the planned delivery of housing led development on that part of the Power Station site in Lichfield District. The SoCG includes a commitment from both parties to work collaboratively to register a planning application for development of at least 800 dwellings in the Lichfield part of the site by 1 April 2019 and to seek to achieve an implementable planning permission by 1 October 2019. It is hoped that a similar joint objective can be agreed with Cannock Chase District in early course.</p> <p>At this stage proposals for the redevelopment of the Power Station are not fixed, but background work continues to prepare the way to bring the site forward. With the successful redevelopment of the Power Station in mind, we do not respond to all potentially relevant questions the Council has posed in the consultation document. Instead, we wish to encourage more general thinking in relation to issues concerning the delivery of the Power Station which has unique connections, scale of critical mass in terms of the potential to make new place, and challenges due to its straddling the boundary between Lichfield District and Cannock Chase District.</p> <p>The Council must plan for its own needs and those arising from the duty to cooperate with neighbouring authorities. It is noted that the requests for housing provision arising from overspill from Birmingham City in the Birmingham housing market area remain to be confirmed. It can be expected however that CCDC will be required to make some accommodation for the overspill. It is therefore important that housing provision is located where it is appropriate both to Cannock Chase District and to the needs of the Birmingham focused housing market area, which will need convenient access to Birmingham as the workplace focus for that component of the housing supply. Where sites meet these credentials they should be given priority for delivery of development.</p> <p>The appropriate focus of the Local Plan should be to continue to promote sustainable development. This should seek to make maximum use of previously developed sites, and to make maximum use of sites within the existing urban area. Where there are major previously developed sites within the urban area, it is vital that policy is supportive of development and is sufficiently flexible to respond to the opportunities and constraints that sites may have.</p> <p>The potential for new, innovative and market leading developments should be encouraged. This should not just be by the 'stick' of policy requirements for all development to comply with, but could also include policy 'carrots' where concessions are granted in certain policy requirements where an exemplar development embracing new thinking is proposed. The Local Plan needs to be sufficiently flexible to not constrain innovation in the components of a development or the configuration of development. This could include where a development will deliver new housing tenures, new forms of mixed communities, new technology for energy creation and storage, and high levels of sustainability. New forms of construction including modular and smart constructions should also be encouraged. The approach to considering community could be enhanced, and design should be encouraged to make most efficient use of land whilst contributing to sustainable communities including supporting health outcomes and later living.</p> <p>With specific regard to sites such as the Power Station which cross Council administrative boundaries, yet where comprehensive development is preferred, there is a need for a creative approach to policy to deal with issues such as different rates of affordable housing, open space, education and S106 requirements. Differential rates and requirements in all these areas, together with different CIL charges between LPAs could result in undesired consequences for how the site is planned and delivered, potentially</p>
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		<p>resulting in a less than optimal outcome. Consideration should therefore be given to site specific policy for the Power Station, or more generally, to allow flexibility in the application of policy such that policy requirements are dealt with on an apportioned basis across LPA boundaries. This could also extend to CIL by having a policy that makes provision for how CIL is applied to cross border sites. Without policy exempting or importing express flexibility, CIL is necessarily applied rigidly.</p> <p>We envisage that the Power Station site is capable of being developed to create a leading sustainable new place, building on the infrastructure connections of the site and Rugeley town of which it is part. We seek a policy context which enables emerging ideas for new forms of development to be brought to fruition successfully. We would be pleased to discuss these thoughts further as the Plan progresses and as proposals for the redevelopment of the Power Station take shape.</p>
LPIS88	Rugeley Town Council	<p>The vision and objectives are all very well-meaning but Rugeley Town Council are concerned that the structure of Cannock council is such that there is not the funding or the officer support to implement or support schemes to help bring about the objectives. Unless it is made clear what the commitment is from Cannock District Council and how it intends to develop schemes in partnership giving officer and financial support, they are just words.</p>
LPIS89	Sport England	<p>Sport England are supportive of the vision and objectives which are aligned to the key issues facing the Council. Sport England would seek the retention of the reference to Active Design within objective 1 though it also plays a role in objective 2. It is also viewed that Objective 5 should make reference to Active Travel.</p>
LPIS90	St Modwen (Land at Watling Street Business Park) (RPS)	<p>The full Vision can be viewed in Appendix 3 of the LPR and the 8 Objectives along with their respective sub-objectives can be seen in Appendix 4 of the LPR. Generally, the approach is agreed with and considered appropriate.</p>
LPIS91	Stafford Borough Council	<p>The Borough Council are generally supportive of the Vision and Objectives within the Local Plan (Part 1) to be used as the basis for the new Cannock Chase Local Plan to cover the period to 2036. It is important to ensure that a balanced approach takes place between the development requirements of neighbouring areas and the focus for new infrastructure, housing and employment growth within the Cannock Chase District area. In particular the Council supports the approach to maintaining the Green Belt areas confirmed through the Green Belt Study 2016 for Cannock Chase District whilst maximising the use of brownfield land and potentially discussing with neighbouring authorities the potential to accommodate needs in nearby urban areas. However Stafford Borough Council can confirm it is not in a position to provide for any unmet gypsy, traveller & travelling show-people needs within Stafford Borough.</p> <p>The adopted Plan for Stafford Borough (June 2014) focuses the majority of new housing and employment provision at Stafford Town, without releasing Green Belt areas, and a number of significant development sites are now being delivered. As you may be aware the Borough Council is currently consulting on a Scoping the Issues document and Settlement Assessment for the New Local Plan leading towards a future development strategy beyond the adopted Plan period of 2031. In particular Stafford Borough will continue to work with Cannock Chase District concerning the Cannock Chase Special Area of Conservation Partnership and the Cannock Chase Area of Outstanding Natural Beauty.</p>
LPIS92	Staffs. Police	<p>Staffordshire Police request that Cannock Chase District Council Local Plan Part 1 & Design SPD Designing Out Crime Policy Local Plan (Part 1) Policy CP3 are retained, Retention will assist in underpinning CCDC's statutory duty relating to Section 17 of the 'Crime and Disorder Act 1998 that places a duty on each local authority 'to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area' which includes anti-social behaviour, substance misuse and behaviour which adversely affects the environment and the National Planning Policy Framework that says:</p>

		<p>“Planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion”, and that “Planning policies and decisions, in turn, should aim to achieve places which promote: Safe and accessible developments where crime and disorder, and the fear of crime, do not undermine quality of life and community cohesion”</p> <p>Residential developers must comply with Approved Document ‘Q’ Security Dwelling Building Regs 2010, in order to prevent crime and reduce the fear of crime I recommend where-ever possible that such developments attain Police Secured by Design (SBD) accreditation. There is no charge to the Council or developer for the award, and once awarded the Police SBD logo can be used on advertising material.</p> <p>Research shows that adopting SBD can reduce burglary by 50%, car crime and criminal damage by 25%, therefore the carbon costs of replacing door-sets and windows on SBD developments as a result of criminal activity is more than 50% less than on non SBD developments, the cost of installing SBD approved products equals 0.2% of the total build cost.</p> <p>One of the most revealing elements of research into SBD is how much ‘safer’ residents feel if they occupy a dwelling on an accredited development, even if they are not aware of the award status. There are few other initiatives which can deliver a measurable reduction in fear like this.</p> <p>SBD supports one of the Government’s key planning objectives – the creation of safe, secure, quality places where people wish to live and work. SBD applies quality standards to a range of security measures and should be seen as a positive marketing opportunity.</p> <p>SBD can contribute towards BREEAM assessments.</p> <p>The British Parking Associations’ ‘Parkmark’ accreditation has been shown to reduce crime on public car-parks, the award is given to car parking facilities that have demonstrated they are concerned with safety and have taken steps to ensure that they’re secured and safe from crime. The Park Mark award scheme is managed by the British Parking Association and fully supported by the Home Office.</p> <p>What does a Park Mark award mean?</p> <ul style="list-style-type: none"> • A car park that has been vetted by Police to ensure it’s fully secured. • Measures taken to deter anti-social behaviour and criminal activity. • The site receives expert consultation from Development Managers to help keep the security up to a high standard. • The site belongs to a nationwide scheme dedicated to combating crime and raising standards for public services. <p>Awarded by the National Police Chiefs Council, the Park Mark award scheme is dedicated to providing safer surroundings for the public, further information can be found at www.parkmark.co.uk</p>
LPIS93	Staffs. County Council	It is noted that education is not included in the current vision and objectives, but is referred to in the District Profile in relation to educational attainment. All other key issues identified in the District Profile (para 2.2) have been translated into an objective bar education. We would suggest that the objectives should now include and specifically refer to access to high quality education provision and a sufficient supply of local school places.
LPIS94	Claire Walker	Agreement to the vision, however for the district to be made up of distinct communities then green belt must be protected to prevent urban sprawl.

LPIS95	Christopher Walker	Agreement to the vision, however for the district to be made up of distinct communities then green belt must be protected to prevent urban sprawl.
LPIS96	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	<p>One of the key headlines of the identified Vision is;</p> <p>“The potential of the Districts’ accessible location along major transport routes will be maximised to achieve a thriving local economy”.</p> <p>We believe this should be expanded to say; “and sustainable housing growth to meet identified needs” to recognise the strategic importance of delivering a sufficient number of homes to meet the needs of present and future generations.</p> <p>In line with Chapter 5 of the NPPF, we also believe that Objective 3 should be expanded to say;</p> <p>“Provide for housing choice and deliver a sufficient supply of homes”.</p>
Review of CP1: strategy		
Question 6. Do you have any comments on our current strategy? Are there new issues (not covered by other policy topics) which we should be considering?		
LPIS97	Beaudesert Golf Club (FBC Manby Bowdler LLP)	<p>It is not considered that the Policy as drafted provides sufficient scope for the use of suitable brownfield sites and underused land. The spatial strategy should take a forward thinking approach to new development, in particular in the context of Green Belt and AONB land where there are opportunities to alter the Green Belt Boundaries to facilitate the development of brownfield land. Policies which allow scope for ‘enabling’ residential development which facilitates the enhancement and improvement of adjacent open space to allow for both improvements to the habitat as well as improved public accessibility alongside additional leisure facilities, would support the Vision and Objectives identified, in the context of providing aspirational housing, and improved health and access to the countryside and the AONB.</p> <p>A less restrictive policy approach which specifically envisages the release of small parts of Green Belt and AONB for enabling schemes would open up opportunities which would support the vision for the District, whilst also facilitating the objectives of the wider area beyond the District.</p> <p>For example, The Beau Desert Golf Club have a particular vision for the land to the West of the existing Golf Club (allocated reference C375 in the 2017 SHLAA), which is brownfield land, over which there is limited public accessibility in that there is a bridleway that crosses the site, but the quality of the open space is limited due to the nature and extent of past tipping activities. Releasing a small area of this site close to the existing settlement, alongside Rugeley Road, for residential development, would allow the Beau Desert Golf Club to fund (i) the opening up and reinstatement to a more natural landscape and habitat of what is currently an area of poor quality open land affected by steep slopes and difficult terrain, to provide a more accessible area of managed open space for public access, between Rugeley Road and the Golf Club, which in turn would facilitate improved access to the wider AONB beyond; and (ii) a modest extension of the existing golf course with the objective of raising the competitive status of the course regionally and nationally. Further submissions will be made in the SHLAA in relation to this site which is currently (incorrectly) categorised as ‘unavailable’.</p> <p>The current strategy does not make sufficient provision to steer the review of, and amendment to Green Belt boundaries where this would allow the allocation of brownfield sites which are in the Green Belt, nor is it sufficiently forward thinking to ensure that the housing land supply requirement for the District and beyond can be accommodated for the later part of the Plan period. The vision and objectives look to achieve economic growth – this will require a strategy which allows scope for release of Green Belt sites, particularly those which would allow the re-use of previously developed land such as site C375, where the benefits to the District</p>

		include not only the provision of housing that will attract residents to facilitate growth and investment, but which will its elf fund localised improvements to open space, natural landscape and habitat and leisure facilities.
LPIS98	Brereton & Ravenhill Parish Council	<p><u>Page 14, paragraph 5.1</u> BRPC is concerned that the housing being built on Wolseley Road immediately next to Rugeley but in Stafford district is being counted towards Stafford's housing figures, not Cannock Chase's. This housing very clearly contributes to the needs of the Rugeley/Brereton built-up area, not those of Stafford (or even of Colwich). Its treatment indicates a failure of the duty to cooperate and risks leading to an increase in the amount of new housing being required of the Rugeley/Brereton which is neither fair, nor justified.</p> <p><u>Page 15, Page 5.8</u> BRPC notes the statement that the "strategy for development in the District up to 2028 did not require any strategic amendments to existing Green Belt boundaries to meet growth requirements at that time". With the unexpected additional availability of the Power Station site, in the north of the district at least there should be no need for any amendments to Green Belt boundaries (strategic or otherwise) and no need for a Green Belt boundary review</p>
LPIS99	Brindley Heath Parish Council	<p><u>Page 14, Paragraph 5.1</u> 5. BHPC is concerned that the housing being built on Wolseley Road immediately next to Rugeley but in Stafford district is being counted towards Stafford's housing figures, not Cannock Chase's. This housing very clearly contributes to the needs of the Rugeley, Brereton and Brindley Heath, not those of Stafford (or even of Colwich). We feel this is a failure of duty to cooperate and risks leading to an increase in the amount of new housing being required of Rugeley, Brereton and Brindley Heath, which is neither fair, nor justified.</p> <p><u>Page 15, Paragraph 5.8</u> 6. BHPC notes the statement that the 'strategy for development in the District up to 2028 did not require any strategic amend ments to existing Green Belt boundaries to meet growth requirements at that time'. With the unexpected additional availability of t he Power Station site, in the north of the district at least there should be no need for any amendments to Green Belt boundaries (strategic or otherwise) and no need for a Green Belt boundary review.</p>
LPIS100	Church Commissioners (Barton Wilmore)	<p>The current strategy set out in Policy CP1 is unlikely to be fit for purpose moving forward given that urban capacity in the District and the wider HMA is limited (Greater Birmingham HMA Strategic Growth Study). The environmental constraints within the District further reduce capacity in potential sites (see Environmental Capacity in Cannock Chase District January 2013).</p> <p>The publication of the Standardised Methodology in the Revised NPPF, alongside the ONS 2016-based household projections to be published in September 2018 will also potentially impact on the Council's housing need and the requirement for sites to accommodate such need. We note that the Standardised Methodology is also only the minimum starting point. As such, there is a strong likelihood that the Council will need to consider sites beyond the urban area within the Green Belt. Revised NPPF Paragraph 137 sets out that local planning authorities should demonstrate that all other reasonable options have been assessed before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries.</p> <p>Due to the housing needs of the District and GBHMA, lack of urban capacity and environmental constraints covering large areas of the District we consider that the exceptional circumstances to justify Green Belt changes will likely exist and suggest that the Council amend the strategy accordingly.</p>

		<p>We note that large-scale sustainable urban extensions also have the benefit of providing the infrastructure required in a way smaller schemes would not. They would also have the dual benefit of, in many instances, providing and utilising existing public transport links as set out in Paragraph 138 of the Revised NPPF. The Site at Bleak House falls within this category given the existing sustainable transport links available. For these reasons we consider the strategy should support strategic housing sites on sustainable land that adjoins the urban area.</p>
LPIS101	Greenlight Developments (Lichfield's)	<p>The existing Spatial Strategy (CP1 'Strategy' Local Plan, Part 1) focuses development, investment and regeneration, mainly on the built up urban areas. The policy seeks to focus delivery of new housing growth in urban areas, to be distributed in broad proportion to the size of existing communities (including Cannock). Greenlight supports the principal of the approach and considers that Cannock should continue to be the main focus for development; however, considers this should be extended to refer to sustainable sites on the edge of existing urban areas.</p> <p>Existing policy CD1 also restricts development on sites within the Green Belt, such as Greenlight's which is located on the western edge of Cannock District, abutting the edge of Cannock built up area. To inform the future spatial strategy for Cannock Chase, Greenlight supports the Council's recognition at paragraph 5.9 of the consultation document that, as part of its work on identifying what may be appropriate development site options for the future, the Council will need to take into account the national planning policy context on Green Belt, including the possibility of reviewing the Green Belt boundary.</p> <p>Greenlight consider this approach to be reasonable, particularly given the result of the Council's Environmental Capacity Study (2013), which identifies how the District is heavily constrained by Green Belt (a non-environmental policy constraint) and some environmental constraints, with the majority of the District, not already developed, designated. Therefore, additional development outside the existing urban areas in the District would require the release of Green Belt land. At paragraph 5.13 of the Consultation Document, the Council refer to its Green Belt Study (2016). The study assesses Greenlight's site in Cannock Chase, including the portion of land in South Staffordshire and additional greenfield land extending beyond this to the west under reference 'Parcel C21'. The review concludes on a total score of 14/20, 'mid-performing', for the parcel (as shown on Figure 4.2, Overall Parcel Performance against Green Belt Purposes).</p> <p>However, Greenlight considers there is an error in the way the Council has assessed this parcel in the Green Belt Review (2016), in relation to Green Belt purpose 2 'to prevent neighbouring towns merging into each other' (NPPF paragraph 134 'b').</p> <p>Parcel C21 is given the highest performing score of 4/4. The justification provided in the C21 parcel assessment is that there are two settlements within close proximity to this portion of Cannock's urban edge, the 'small hamlet' of Four Crosses (1.2km to the west) and the 'village' of Hatherton to the north west. The NPPF (2018) makes clear reference that this Green Belt purpose relates to towns rather than all forms of settlements. It is therefore clear that there is an error in the Council's methodology relating how this green belt purpose has been assessed (see page 13). The methodology states:</p> <p>"All towns and villages within the study area and adjacent Districts are considered settlements in the assessment."</p> <p>On this basis, Greenlight consider that the score for parcel C21 should be amended. The methodology table on page 13 states if the gap is greater than 2km between the parcel and a settlement then a score of '0' should be given. The assessment for parcel C21 should therefore be amended to 10/20; this would mean that the site performs lower in Green Belt purposes that the Council has originally assessed.</p>

		<p>In addition, a finer grain analysis of the parcels at the stage of site allocations will inevitably provide a more graded assessment of the contribution individual sites may make to the Green Belt purposes (rather than the larger parcels they may currently sit within). The NPPF (2018) lends clear support for sites such as Greenlight's to be removed from the Green Belt and allocation of Greenlight's site (C121 in the SHLAA) would accord with the principles established within the NPPF. At paragraph 138 it states:</p> <p>“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”</p> <p>In summary, given the heavily constrained nature of the District as well as the shortfall/growth ambitions of the wider HMA (referred to at previous points in these representations), Greenlight support CDC's commitment to considering the option to release Green Belt Land as part of a revised spatial strategy. However, the Council needs to ensure it is correctly applying NPPF policy to ensure that, if the option of green belt release is confirmed as required, the most appropriate and sustainable sites are released to meet future housing needs.</p>
LPIS102	Inglewood Investments (SLR Consulting)	<p>The current Strategy focuses development and regeneration mainly on the built up and urban areas, whilst conserving and enhancing the landscape of the AONB, Green Belt and Green Infrastructure of the District.</p> <p>To ensure that the strategy remains 'fit for purpose' over the plan period, SLR would recommend that CCDC take a strategic view on the release of land, and ensure an appropriate amount of land is safeguarded within your strategy and for this to be clearly quantified. This will ensure that CCDC are not under pressure from speculative planning applications if there is a failure to meeting the 'Housing Delivery Test'. Releasing sufficient, deliverable housing land and safeguarded land will ensure that the new Local Plan can be responsive and remain up to date throughout the plan period. This should help to avoid the need for an early plan review.</p> <p>As Green Belt Boundaries can only be formally amended during a Local Plan Review, CCDC should ensure that appropriate and suitable land within the Green Belt, which does not perform well against the NPPF purposes, is identified and released through the current review process. The Strategy, which appears to rely substantially on brownfield land is considered to be unsustainable and unachievable, particularly as the majority of the undeveloped part of the District is designated Green Belt. We consider that the plan strategy needs to be sufficiently flexible to deal with any shortfall in delivery and to cater for a reasonable time horizon, to avoid the need to trigger a subsequent review if the 'Housing Delivery Test' is not met. As set out above a failure to build in</p>
LPIS103	KGL (Estates) Ltd (J Heminsley)	<p>In relation to policy CP1 Strategy, it is considered that the current approach to distributing growth in proportion to the size of the three main settlements is unlikely to be capable of being sustained. Growth in Rugeley/Brereton is significantly constrained by the proximity of the AONB notwithstanding the potential for housing development at the Power Station. In this context it is noted that housing numbers on this site have been constrained by the decision to retain the "Borrow Pit" as open space in the adopted SPD.</p> <p>As stated in the document, the 2013 environmental capacity study noted that virtually all of the District that is not already developed is in the Green Belt. The key recent piece of evidence, the Greater Birmingham Housing Market Area Strategic Growth Study produced on behalf of the LPAs by G L Hearn/Wood in February 2018 advises that there will still be a significant shortfall in housing land supply even with density increases and limited brownfield opportunities so some release of Green Belt (GB) appears to be</p>

		<p>inevitable. As part of the “proportionate dispersal” option in this report, it is recommended that the GB in the area which includes the KGL land shown on the attached plan should be considered as part of a local GB analysis of potential for release of land for housing. The land has good public transport access including to Cannock railway station and no major environmental constraints unlike the GB east of Heath Hayes. Opportunities exist to improve public access in this area for recreation purposes as now required in the new NPPF where GB release is being proposed.</p> <p>So given constraints in other parts of the District it is considered that housing growth will need to be concentrated in the area between Cannock and Heath Hayes.</p>
LPIS104	Lawrence, Richard	<p>Low standards of health and educational attainment require improvement.</p> <p>This is a subject, particularly education, which is an endemic problem in Cannock Chase. There is a general malaise in the area, with multi-generational unemployment, that there is no work and little opportunity for such. This means that those individuals who want to advance their education will move out of the District, as an example, the Campus Building on the Green, one of the reasons that they closed originally, was that given the opportunity to complete a course either in Cannock or elsewhere, the second option was selected. Once these individuals have left Cannock, they rarely return. The infrastructure is not available to support those who wish to advance their education and employability in Cannock. This requires support services such as business mentoring (there are no innovation centres in Cannock or Stafford that offer support at the level required [including the new Innovation Hub at the old college building], support services offered by the LEP and the Chamber are focussed on Stoke). Education is not valued in Cannock as it is seen as being of no use or of a substandard quality.</p> <p>Economic growth and regeneration needs have to be met and access to employment opportunities and local labour skills require improvement.</p> <p>When Cannock is promoted, nationally, as a logistics hub, it is promoted for two reasons:</p> <ol style="list-style-type: none"> 1) The excellent transport infrastructure (positive) 2) An area where the local population will accept low wages, zero hour contracts and poor working conditions, simply so that they can get some employment (extremely poor) <p>Another issue with the approach of logistics hubs: the buildings themselves are massive for the level of internal employment. Cannock Chase District needs to look beyond simply employment and into ensuring it is well paid, well supported and with prospects.</p> <p>The town centres need to adapt and increase their competitiveness to maintain local shopping provision and contribute to regeneration</p> <p>There are many individuals and organisations who would love to start a business in the town centre, they have the drive and the ideas, what they lack (in general terms) is money! Especially in retail, but for any start-up business, the access to grants and funding support is non-existent. Established businesses can get a lot of support financially, and the Chamber offer excellent support for start-ups, but the funding goes to the established enterprises, who, in many cases, just don't need it. In this area, those who want to start businesses often have no personal capital, something is needed instead of loans</p> <p>Commencement of regeneration of the Rugeley Power Station site</p> <p>This is a major issue that needs to be addressed. Whilst it is understood that Rugeley Power Station (RPS) is privately owned (Rugeley Power Station Ltd is a joint venture between Engie and Mitsui) and is, therefore, private. The site is so important to the local and national infrastructure, it cannot afford to be left fallow.</p>

		<p>It is known that the first round of bidding was abandoned and the second round has been kept so quiet that no-one knows what is happening. Whilst it is known that Homes England withdrew from the bidding process (reason unknown) and there are rumours of another bidder, there is no public knowledge of what is happening. It is also understood that Stafford County Council have a compulsory purchase order on part of the site for the HS2 development.</p> <p>There have been several plans for the redevelopment of the site, one in particular comes to mind where high quality jobs, excellent housing, and a real community spirit was included (the organisation developing these is called Capinal Ltd), this is the sort of development the district requires, a development that will generate wealth, and attract businesses, rather than turning Cannock, Rugeley and Lichfield into a commuter belt. Losing income for the region (and thereby Commencement of regeneration of the Rugeley Power Station site.</p> <p>This is a major issue that needs to be addressed. Whilst it is understood that Rugeley Power Station (RPS) is privately owned (Rugeley Power Station Ltd is a joint venture between Engie and Mitsui) and is, therefore, private. The site is so important to the local and national infrastructure, it cannot afford to be left fallow.</p> <p>It is known that the first round of bidding was abandoned and the second round has been kept so quiet that no-one knows what is happening. Whilst it is known that Homes England withdrew from the bidding process (reason unknown) and there are rumours of another bidder, there is no public knowledge of what is happening. It is also understood that Stafford County Council have a compulsory purchase order on part of the site for the HS2 development.</p> <p>There have been several plans for the redevelopment of the site, one in particular comes to mind where high quality jobs, excellent housing, and a real community spirit was included (the organisation developing these is called Capinal Ltd), this is the sort of development the district requires, a development that will generate wealth, and attract businesses, rather than turning Cannock, Rugeley and Lichfield into a commuter belt. Losing income for the region (and thereby decimating the town centres). The regeneration of RPS is so important that it requires a development plan with vision, that will push the boundaries and create a redevelopment that will enhance the district, not simply add a pile of 'Barratt Boxes' and logistics sheds.</p> <p>The Capinal plan represents superb housing, high quality housing at all levels, innovative and novel energy systems, a green environment and so on. This is precisely the type of development this area needs. If you haven't already seen the outline plans, I am sure that Capinal will be happy to forward them.</p>
LPIS105	Lichfield District Council	<p>Thank you for acknowledging the common ground on travel to and from Burntwood and Lichfield for employment, retail and leisure; and movement between Cannock and Lichfield housing markets. Also, for the acknowledgement at paragraph 5.5; "One new issue of strategic significance is the brownfield site of the closed Rugeley Power Station and we will need to consider the implications and opportunities afforded by this cross boundary regeneration scheme. The 139 hectare site straddles the boundary between Cannock Chase and Lichfield Districts and the two Councils jointly adopted a development brief SPD in February 2018, for a mixed housing and employment use."</p>
LPIS106	Little Wyrley Estate (Fisher German)	<p>We discussed the Grove Colliery site recently and understand the Council is seeking views on the provision of employment and housing land in the district. Given the brown field status of The Grove site, in our opinion the site could be allocated for employment uses without impact on the green belt and we would be pleased to discuss proposals for the same with you in more detail. The site is well screened, has good access to the highway and situated close to other established employment uses. The council has recently old the old colliery offices, which will presumably be re-developed for employment and the area would benefit from the opportunity for investment brought about by a planning permission for a similar uses on the estate land.</p>

LPIS107	Natural England	Natural England is conscious that the district is geographically constrained and that this will pose significant challenges in meeting new land use development objectives. We will therefore continue to work closely with Cannock Chase District Council (CCDC), for example through our work with the Cannock Chase SAC Partnership but also through focused dialogue on matters within our remit in order to inform the local plan's progress
LPIS108	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>The current strategy for development in the District up to 2028 seeks to promote development within the existing urban area, encouraging the recycling and re-use of brownfield sites. The current strategy did not require any strategic amendments to existing Green Belt boundaries to meet growth requirements at the time of adoption. An Environmental Capacity Study for the District produced in 2013 noted that virtually all the District that is not already developed is designated as Green Belt, so additional development outside of existing urban areas would require the release of Green Belt land. Development under the current strategy is therefore focused upon the existing urban areas and urban extensions.</p> <p>Whilst this practice should be continued, brownfield opportunities are finite and will not on their own deliver the level of development the District requires. There is, therefore, a need to look towards settlement edges and greenfield sites. The strategy should therefore be amended to reflect the changing context in respect of the GBHMA and the adoption of the Birmingham Development Plan. Furthermore, it is considered that the current spatial distribution of development should be reviewed in the context of a higher housing requirement for the District of 295 dwellings per annum compared to 241 dwellings per annum as defined by the standard method for calculating housing need, recognising that this only represents a starting point.</p> <p>As previously stated, the Local Plan is being reviewed in the context of significant unmet housing need arising within the GHMA. To this end, the Local Plan strategy should revisit the need to release appropriate and sustainable sites within the Green Belt for residential development, to meet needs arising both within Cannock Chase District and needs arising within the wider housing market area (see also Richborough Estates' response to Question 7).</p> <p>Cannock Chase District Council carried out a Green Belt Study in 2016, which assessed the extent to which land within the Cannock Chase Green Belt performs against the purposes of Green Belts as set out in national planning policy. The study provides evidence on the relative performance of land parcels and also identifies minor anomalies in the current Green Belt boundaries. The Local Plan Review Scoping and Issues Document indicates that the Council considers that this Study remains up to date.</p> <p>Richborough Estates submits that this Study should be revisited, particularly in light of the revisions to the National Planning Policy Framework which have been made since the publication of the Council's Green Belt Study. Furthermore, as set out in Chapter 5 of this representation, it is submitted that the 'strategic' nature of the Green Belt Study means that it fails to consider the constraints and opportunities of smaller sites within the identified land parcels. This strategic study may have previously been appropriate when the Council was not required to release Green Belt land for development under the previous Local Plan. However, in the revised context of the unmet need of the GBHMA, it is submitted that there is a significant need to release land from the Green Belt for development. In this context, the Green Belt Study is not an appropriate tool for assessing the constraints and opportunities of individual development sites within the Green Belt. As such, a more detailed Study is required.</p>
LPIS109	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	The current strategy for development in the District up to 2028 seeks to promote development within the existing urban area, encouraging the recycling and re-use of brownfield sites. The current strategy did not require any strategic amendments to existing Green Belt boundaries to meet growth requirements at the time of adoption. An Environmental Capacity Study for the District produced in 2013 noted that virtually all the District that is not already developed is designated as Green Belt, so additional development outside of existing urban areas would require the release of Green Belt land. Development under the current strategy is therefore focused upon the existing urban areas and urban extensions.

		<p>Whilst this practice should be continued, brownfield opportunities are finite and will not on their own deliver the level of development the District requires. There is, therefore, a need to look towards settlement edges and greenfield sites. The strategy should therefore be amended to reflect the changing context in respect of the GBHMA and the adoption of the Birmingham Development Plan. Furthermore, it is considered that the current spatial distribution of development should be reviewed in the context of a higher housing requirement for the District of 295 dwellings per annum compared to 241 dwellings per annum as defined by the standard method for calculating housing need, recognising that this only represents a starting point.</p> <p>As previously stated, the Local Plan is being reviewed in the context of significant unmet housing need arising within the GHMA. To this end, the Local Plan strategy should revisit the need to release appropriate and sustainable sites within the Green Belt for residential development, to meet needs arising both within Cannock Chase District and needs arising within the wider housing market area (see also Richborough Estates' response to Question 7).</p> <p>Cannock Chase District Council carried out a Green Belt Study in 2016, which assessed the extent to which land within the Cannock Chase Green Belt performs against the purposes of Green Belts as set out in national planning policy. The study provides evidence on the relative performance of land parcels and also identifies minor anomalies in the current Green Belt boundaries. The Local Plan Review</p> <p>Scoping and Issues Document indicates that the Council considers that this Study remains up to date.</p> <p>Richborough Estates submits that this Study should be revisited, particularly in light of the revisions to the National Planning Policy Framework which have been made since the publication of the Council's Green Belt Study. Furthermore, as set out in Chapter 5 of this representation, it is submitted that the 'strategic' nature of the Green Belt Study means that it fails to consider the constraints and opportunities of smaller sites within the identified land parcels. This strategic study may have previously been appropriate when the Council was not required to release Green Belt land for development under the previous Local Plan. However, in the revised context of the unmet need of the GBHMA, it is submitted that there is a significant need to release land from the Green Belt for development. In this context, the Green Belt Study is not an appropriate tool for assessing the constraints and opportunities of individual development sites within the Green Belt. As such, a more detailed Study is required.</p>
LPIS110	Rugeley Power Ltd (Savills)	Policy CP 1 and para 5.5. Please refer to comments on 2.4 [question 5] for the general approach to planning for the redevelopment of Rugeley Power Station.
LPIS111	Rugeley Town Council	Given the size of the power station site – it is in a unique position in that geographically it lies in Lichfield with a small section in Cannock but when developed, will have greatest significance on Rugeley in Cannock. The SPD for the site is high level strategic but is very general; the town council look forward to being consulted on the detailed documents to support future development.
LPIS112	St Modwen (Land at Watling Street Business Park) (RPS)	<p>It is agreed that a review of the existing Green Belt boundaries is both required and essential to ensure that sufficient and appropriate land is made available for development within the future Local Plan Period.</p> <p>In this context, the Council does not need to reinvent the wheel and much of the evidence base for Local Plan (Part 2) can be utilised. This includes the Green Belt Study (2016) which should be used as the starting point for assessing which parcels of land are potentially to be removed, and in establishing what physical features will create recognisable and permanent boundaries. In particular, the Council should consider expansion of existing employment sites within the Green Belt, as it was appropriately doing for LPP2.</p>

LPIS113	Staffs. County Council	<p>Current Local Plan Policy CP1 states that the distribution of housing is broadly in proportion to the size of the existing larger communities of Cannock/Hednesford/Heath Hayes, Rugeley/Brereton and Norton Canes. The housing distribution in the emerging Local Plan needs to take into account existing school capacity and the requirement for the expansion of existing schools and/or the provision of new schools if necessary.</p> <p>It is acknowledged that the review picks up the significance of the closure of Rugeley power station and the need to address the redevelopment of the site. The County Council is actively involved with both Cannock and Lichfield councils on this matter and will continue to do so.</p> <p>When considering locations for new development, and potential need for more housing / higher densities, it will be important to ensure that new sites do not encroach on existing waste management infrastructure, bringing the risk of poor neighbour relations or even constraints on the operation of the sites.</p>
LPIS114	Taylor Wimpey (Lichfield's)	<p>The Council should review the current strategy in light of in the revised Framework and Practice Guidance, together with the updated District Profile as suggested above in order to help the scale and distribution of development within the District. The adopted Local Plan Part 1 (Policy CP1) identifies the existing settlements in the District as the focus of investment and regeneration and focuses the majority of development towards Cannock, Hednesford and Heath Hayes, although Cannock is not specifically identified as being at the top of the hierarchy.</p> <p>Based on its knowledge of the District, the role and function played by the settlements, and the availability of services, Taylor Wimpey considers that Cannock (including Wimblebury) should continue to be the main focus for development. It is the main strategic centre for the District and focussing development in the settlement will help to retain and strengthen its role as a strategic sub-regional centre in the West Midlands. The settlement of Cannock (including Wimblebury) should therefore be identified as the priority for development in a settlement hierarchy and the majority of new residential development should be focussed within and around the settlement.</p>
LPIS115	Claire Walker	The current strategy is excellent, especially the conservation of greenbelt and AONB.
LPIS116	Christopher Walker	The current strategy is excellent, especially the conservation of greenbelt and AONB.
LPIS117	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	<p>As noted above, the draft standardised methodology for OAHN indicates a housing requirement of 295 dwellings per annum (2016-2036) for Cannock Chase District, which would be a significant increase in the housing requirement for the District. In addition to this local requirement, there will also need to be an uplift resulting from a positive economic strategy and contributing towards unmet needs from neighbouring areas. The strategy will therefore need to be updated to account for these additional housing requirements, as well as the additional requirements resulting from the strategies for employment and other uses, with new strategic development sites identified and allocated within the new Local Plan.</p> <p>As paragraph 8.8 of the Consultation Document notes, the Environmental Capacity in Cannock Chase District Report (January 2013) states that 'virtually all the District that is not already developed is designated as Green Belt, so additional development outside of existing urban areas would require the release of Green Belt land' (para. 5.7). The closed Rugeley Power Station site, as noted in paragraph 5.5 of the Consultation Document, provides a potential opportunity to meet some of these additional development needs; but with much of this site falling within neighbouring Lichfield District and constraints relating to its former use, and with limited other brownfield or underutilised sites within the settlements of the District; it will inevitably be necessary for the Council's strategy to seek strategic sites outside of existing settlement boundaries to meet development needs, which will involve the need to release land from the Green Belt to meet future growth needs. Paragraph 5.8 makes reference to existing safeguarded</p>

		<p>land at 'land east of Wimblebury Road' and 'land at Kingswood Lakeside', which will need to be considered for release along with additional strategic sites to meet the significant uplift in development needs that will be required.</p> <p>Consequently, the current strategy outlined in the existing Local Plan (Part 1), which did not require any strategic amendments to existing Green Belt boundaries, will therefore require an alternative strategy for future development distribution, with land being allocated for release from the Green Belt to deliver strategic development sites, alongside any limited derivable sites within existing settlements.</p> <p>As part of the process of identifying suitable and deliverable sites to meet the District's new development requirements, it is important to reiterate that, in line with the NPPF, the strategy must seek to deliver sustainable patterns of developments (paragraph 138 of the NPPF), contributing to the achievement of sustainable development which is first and foremost the purpose of the planning system.</p> <p>As noted under paragraph 72 of the NPPF, the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. In the context of Cannock Chase District, it is considered that strategic extensions to the District's main settlements of Cannock, Rugeley and Hednesford would represent a reasonable alternative strategy for sustainably delivering the District's development needs. Such sites would deliver sustainable housing and employment development to deliver sustainable strategies for housing and economic growth, which integrates with strategies for enhanced infrastructure and town centre growth within these main settlements.</p> <p>We agree with the proposed Plan period (at least 2036), but we would recommend that there is a policy commitment to reviewing the plan every 5 years if there has been any change in circumstance.</p>
Question 7. What 'reasonable alternatives' do you think we should be considering for the spatial distribution of development across the District? Please explain why they would be 'reasonable'.		
LPIS118	Beaudesert Golf Club (FBC Manby Bowdler LLP)	See response to Q6
LPIS119	Church Commissioners (Barton Wilmore)	<p>The overall distribution of development and spatial strategy should be reviewed with the potential increased housing requirement and evidenced wider need in mind.</p> <p>Given the need for additional dwellings to be accommodated within the District and the information set out in our responses to Questions 3 and 6, we consider that a reasonable alternative is to support sustainable sites that can provide housing and associated infrastructure within the Green Belt. As set out in Paragraphs 137 and 138 of the Revised NPPF, sustainable patterns of development should be taken into account and sustainable development channelled towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt. "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".</p> <p>The Commissioner's site at Bleak House adjoins the urban area and is very well served by public transport, as demonstrated in our appended Vision Document.</p>

LPIS120	Greenlight Developments (Lichfield's)	See Question 6
LPIS121	Home Builders Federation	The current spatial distribution of development should be reviewed in the context of the GBHMA including its unmet housing needs (see HBF answer to Q3) and the meeting of a higher housing requirement for the District of 295 dwellings per annum compared to 241 dwellings per annum (see HBF answer to Q24). The Council's spatial distribution of housing and settlement hierarchy should provide sufficient opportunities to allow identified housing needs to be met in full by providing a clear framework to ensure that policies in the new Local Plan can be effectively applied. It is important that the Council's proposed housing distribution re-considers the permitting of development adjacent to as well as within settlement boundaries which addresses the recognised difficulties facing rural communities in particular housing supply and affordability issues. The proposed distribution of housing should meet the housing needs of both urban and rural communities.
LPIS122	Inglewood Investments (SLR Consulting)	<p>As discussed in the response to the previous Question, development should be spatially distributed across the District in sustainable locations, and not concentrated towards 'built up areas.'</p> <p>It is evident that the lack of available land is a common theme across most Districts in the HMA, and, particularly within built up areas. Available sites are typically brownfield land which take longer to develop, are more complex and we consider that the District will not accommodate housing requirements relying on the allocation of these sites alone. It is important to achieve balanced growth, and therefore the new Local Plan should accommodate a mixture of brownfield and greenfield/Green Belt land releases, in a sustainable location which can deliver other additional benefits including access to the open space and the countryside, through well planned strategic release.</p> <p>To summarise, CCDC should pro-actively seek and secure a range of sites within their new Local Plan, and not 'rule out' larger scale strategic sites which are typically located on the edge of settlement boundaries. These sites can be effectively managed and planned for in a sustainable and sympathetic manner, and offer sufficient land supply for the District to comfortably deliver its longer term housing requirements, without resorting to urban cramming. In addition, urban extension sites can be popular with communities, as these sites can deliver mixed-use development. This type of development can include complementary services to ensure that the increase in residential development will not cause strain on existing services.</p>
LPIS123	Natural England	See question 6
LPIS124	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>As set out in Richborough Estates' response to Question 6, the Council is required to reconsider the appropriate Spatial Strategy in order to meet additional housing need arising from within the GBHMA. The Council's spatial distribution of housing and settlement hierarchy should provide sufficient opportunities to allow identified housing needs to be met in full and to make and agreed contribution to meet cross-boundary needs. To this end, it is submitted that the release of land from within the Green Belt represents a 'reasonable alternative' to the existing spatial strategy in order to deliver future growth requirements.</p> <p>Paragraph 136 of the NPPF advises that, once established, Green Belt boundaries should only be altered in 'exceptional circumstances' through the preparation or review of a local plan. It is submitted that the significant un-met housing need arising from both within Cannock Chase District and the GBHMA, combined with the fact that around 60% of the District lies within the West Midlands Green Belt and around 30% lies within the Cannock Chase Area of Outstanding Natural Beauty, constitutes such exceptional circumstances. Furthermore, it has been recognised through the recent examination of a number of Local Plans, including Lichfield and Warwick Districts, that Green Belt release should not be avoided at the overall detriment to sustainability, resulting in an a less sustainable distribution of development as required by the overarching vision for the Local Plan, as well as the NPPF.</p>

		<p>In examining the Lichfield District Local Plan Strategy, the Inspector, at paragraph 200, wrote:</p> <p>“...I can find no justification in the Framework, in Planning Guidance or indeed in the case of I M Properties for the proposition that Green Belt land should be released only as a last resort. This would be to accept that sustainability is the servant of Green Belt designation – which it is not. On the contrary, as has already been established, the duty in determining Green Belt boundaries is to take account of the need to promote sustainable patterns of development.”</p> <p>The Inspector goes on to note in terms of the demonstration of exceptional circumstances that:</p> <p>“...in my judgement the lack of more sustainable sites outside the Green Belt to meet the identified need for housing in a way that is consistent with the Plan’s urban and key centre strategy amount, in this instance, to the exceptional circumstances that justify the release of Green Belt.”</p> <p>It is therefore clear that the release of Green Belt land constitutes a ‘reasonable alternative’ in respect of the spatial distribution of development within the District. Furthermore, it is submitted that exceptional circumstances exist to justify such release.</p> <p>Richborough Estates has produced a separate paper which sets out its position on the interpretation of the Government’s Green Belt policy in the formulation of new Local Plans across the country. The paper includes an examination of the Government’s Housing White Paper (February 2017), which stated that:</p> <p>“Maintaining existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements” (Pg. 18).</p> <p>The term ‘all other reasonable options’ has been erroneously interpreted in some quarters as meaning that Green Belt release has become a last resort that should be avoided, even if the restriction of Green Belt release will lead to dire outcomes against the achievement of wider sustainability objectives. Such an approach is the antithesis of sound and robust planning, and if the housing crisis is to be tackled in a sustainable manner then it is a mindset and approach that must not be allowed to perpetuate. A full copy of the paper is included at Appendix 1 to this Representation.</p>
LPIS125	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>As set out in Richborough Estates’ response to Question 6, the Council is required to reconsider the appropriate Spatial Strategy in order to meet additional housing need arising from within the GBHMA. The Council’s spatial distribution of housing and settlement hierarchy should provide sufficient opportunities to allow identified housing needs to be met in full and to make and agreed contribution to meet cross-boundary needs. To this end, it is submitted that the release of land from within the Green Belt represents a ‘reasonable alternative’ to the existing spatial strategy in order to deliver future growth requirements.</p> <p>Paragraph 136 of the NPPF advises that, once established, Green Belt boundaries should only be altered in ‘exceptional circumstances’ through the preparation or review of a local plan. It is submitted that the significant un-met housing need arising from both within Cannock Chase District and the GBHMA, combined with the fact that around 60% of the District lies within the West Midlands Green Belt and around 30% lies within the Cannock Chase Area of Outstanding Natural Beauty, constitutes such exceptional circumstances. Furthermore, it has been recognised through the recent examination of a number of Local Plans, including Lichfield and Warwick Districts, that Green Belt release should not be avoided at the overall detriment to sustainability, resulting in an a less sustainable distribution of development as required by the overarching vision for the Local Plan, as well as the NPPF.</p> <p>In examining the Lichfield District Local Plan Strategy, the Inspector, at paragraph 200, wrote:</p>

		<p>“...I can find no justification in the Framework, in Planning Guidance or indeed in the case of I M Properties for the proposition that Green Belt land should be released only as a last resort. This would be to accept that sustainability is the servant of Green Belt designation – which it is not. On the contrary, as has already been established, the duty in determining Green Belt boundaries is to take account of the need to promote sustainable patterns of development.”</p> <p>The Inspector goes on to note in terms of the demonstration of exceptional circumstances that:</p> <p>“...in my judgement the lack of more sustainable sites outside the Green Belt to meet the identified need for housing in a way that is consistent with the Plan’s urban and key centre strategy amount, in this instance, to the exceptional circumstances that justify the release of Green Belt.”</p> <p>It is therefore clear that the release of Green Belt land constitutes a ‘reasonable alternative’ in respect of the spatial distribution of development within the District. Furthermore, it is submitted that exceptional circumstances exist to justify such release.</p> <p>Richborough Estates has produced a separate paper which sets out its position on the interpretation of the Government’s Green Belt policy in the formulation of new Local Plans across the country. The paper includes an examination of the Government’s Housing White Paper (February 2017), which stated that:</p> <p>“Maintaining existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements” (Pg. 18).</p> <p>The term ‘all other reasonable options’ has been erroneously interpreted in some quarters as meaning that Green Belt release has become a last resort that should be avoided, even if the restriction of Green Belt release will lead to dire outcomes against the achievement of wider sustainability objectives. Such an approach is the antithesis of sound and robust planning, and if the housing crisis is to be tackled in a sustainable manner then it is a mindset and approach that must not be allowed to perpetuate. A full copy of the paper is included at Appendix 1 to this Representation.</p>
LPIS126	Rugeley Town Council	Once again, Rugeley Town Council would like to see commitment from Cannock council itself to development across the district. Whilst it is appreciated that CCDC is limited in bringing forward development from the private sector, there is still a feeling that Rugeley being left to the mercies of a tired private sector who show no signs of wanting to see development in the town.
LPIS127	Staffs. County Council	Consideration should be given to identification of large strategic sites and /or urban extensions. Developments of such scale afford greater opportunity to plan for and deliver any necessary infrastructure improvements.
LPIS128	Taylor Wimpey (Lichfield’s)	Please see our response to Question 6 for our position of spatial distribution.
LPIS129	Transport for West Midlands (WMCA)	<p>In particular the local plan makes comment on the importance of employment outside of Cannock Chase District to residents of the district. One role of an effective transport network is to ensure that people can access employment opportunities wherever they exist. We believe that in allocating housing, it is therefore important to have regard to (amongst other considerations):</p> <ul style="list-style-type: none"> - Existing employment trends in terms of travel to work; - Anticipating employment growth in the surrounding area; - Existing transport networks that can link people to jobs; and - Planned enhancement to transport networks that may present new opportunities for labour markets.

		<p>For this reason, in addition to consideration of regional strategies and plans (as above) TfWM encourages Cannock Chase District to have regard to residents' tendencies to access employment in the West Midlands metropolitan area and where employment growth is forecast when identifying sites for allocation for residential allocation.</p> <p>We understand that Cannock Chase District is one of fourteen local authority areas which fall within the Greater Birmingham Housing Market Area. Across this area, there is a significant housing shortfall of around 28,000 dwellings to 2031 and 60,900 to 2036. Under the legal Duty to Co-operate, work has been ongoing to look at ways of addressing this shortfall.</p> <p>A similar process (in terms of identifying existing trends and opportunity) should be applied to the allocation of employment sites. In particular logistics and supply chains are reliant on the effective transportation of goods both of which are important to the region and Cannock Chase district.</p> <p>TfWM is interested in the potential role of a rail freight facility at the Rugeley Power Station site and agree that the freight facilities should be protected until future development options have been identified.</p>
LPIS130	Upton Trust & Carney Brothers (Wardell Armstrong)	We note that reasonable alternatives may include the investigation of smaller scale 'proportionate dispersal' (i.e. smaller extensions to existing settlements) in the area as part of the other options for accommodating housing in the District. This could form a small but important contribution to meeting the pressing housing need within the District and the region and should include all sites, including those sites within the Green Belt where this becomes necessary.
LPIS131	Claire Walker	The use of neglected or little used sites should be used.
LPIS132	Christopher Walker	The use of neglected or little used sites should be used.
LPIS133	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	See response to Question 6
Question 8. Are there any potential options for the overall distribution of development which you feel would be unreasonable and if so, why?		
LPIS134	Beaudesert Golf Club (FBC Manby Bowdler LLP)	See response to Q6
LPIS135	Burntwood Town Council	There is concern that the Green Belt Barrier between Burntwood and Heath Hayes (From the A5190 from Five ways to Chase Terrace) needs to be preserved and that there should be no coalescence between the two districts (Lichfield and Cannock Chase). No doubt you will take that into account.
LPIS136	Elphick, Raymond	<p>It has been brought to our attention the intended plan of development South of Cannock Road. Here we see a proposal for near on 600 new dwellings. The average number of cars per household, according to statistics in the area is 1.22. This would equate to an extra 732 cars, minimum, with exit points only onto the Cannock Road.</p> <p>We live on the Cannock Road and have witnessed substantial increases of traffic during the last twenty five years, especially heavy goods. This increase has provided a large amount of both noise and air pollution (A5190 at Five</p>

		Ways already above national levels) Considering that in the immediate future, work is to commence on the Mill Green Shopping Complex. This in turn will generate even more traffic to a congested area. The Area in question is a Green Belt, maybe consideration should be funnelled to the Brown Belt area's.
LPIS137	Hazelslade & Rawnsley community association	<p>Site option C64 has been the subject of a prior Planning Application in 1999/2000 (CH/98/0339) and was rejected on two counts by the Councils Planning Committee. There have been no subsequent planning applications, and the land has not been subject to any prior use other than grazing. The land is located alongside the Cannock Chase AONB, and overlooked by the Hednesford Hills SSI. It forms a valuable green space wedge between the communities of Hazel Slade and Rawnsley. Both communities are well served by affordable housing that already form a significant proportion of the housing stock, particularly in Rawnsley. The contours of the land are severe, resulting in high visual impact from within and outside the locality (reference previous planning application evidence). Development that has taken place in the adjacent AONB has been carefully controlled infill development that harmonises well with its location.</p> <p>The Community Association believe that the extensive areas of land that have been subject to prior (brownfield) use are more suited to meeting the Council's need to provide additional housing over the coming decade. The Communities' ambition for the site to be ultimately designated as open space remains a key feature of its long-term vision for the community as a whole. A range of other environmental constraints exist relating to the biodiversity of the northern tip of the land, and the hedgerows that define its eastern and western boundaries. The watercourse which will be the primary conduit for rain water run-off is also a habitat for protected species. The CPRE strongly objected to development of this site both on principal and from the 'massing effect of the design in relation to each other and the surrounding countryside' when consulted in 1998. Any development on this site is therefore opposed by H&RCA.</p> <p>Site option C171 is located both within the AONB and Green Belt. Any housing development on this site would be contrary to the aims of Policy CP14 of Landscape Character and Cannock Chase AONB and would have an adverse visual impact on the local environment and its wildlife. Any development on this site is therefore opposed by H&RCA.</p> <p>Any proposed development of the former Youth and Community Education Centre in Cannock Wood St. would further exacerbate the existing child safety, traffic and parking difficulties around the school particularly at school drop off and pick up times. Any development in this site is therefore opposed by H&RCA.</p>
LPIS138	Natural England	See question 6
LPIS139	Norton Canes Parish Council	<p>According to the Green Belt review of March 2016 most of Norton Canes Green Belt ranks in the top half of importance for Green Belt designation. Therefore, should the Council be minded taking anymore Green Belt out of its designation, the Green Belt in Norton Canes should not be considered first. Over the last few years green belt sites have been used for larger housing developments and there are a number with planning permissions yet to be developed. Green belt site has also been used for the large business park at Kingswood Lakeside which sits within the Norton Canes border. We feel that the countryside is a fundamental part of our village and would not wish to see any areas of green belt being taken out for further development. We appreciate the assurances that our comments regarding the last Greenbelt Review will be taken forward into this review – but we felt this is something we needed to reiterate.</p> <p>In relation to the number of houses required across the District, the Parish Council feels that Norton Canes has already met its target by the housing developments that have already been built and those that currently have planning permission for development. We strongly feel that the District Council should not consider Norton Canes in terms of meeting their housing targets. We do not have an issue with infill developments but would strongly oppose larger developments.</p>

LPIS140	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	In line with the response to Question 7, it is considered that it would be unreasonable for the Council to not consider the release of Green Belt land, at the detriment of achieving sustainable development.
LPIS141	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	In line with the response to Question 7, it is considered that it would be unreasonable for the Council to not consider the release of Green Belt land, at the detriment of achieving sustainable development.
LPIS142	Rugeley Town Council	Rugeley is well served with development areas but the employment at these sites is not perceived to be local employment. The town centre is unable to capture trade from the employment sites as they are on highways designed to move employees quickly away from Rugeley to the settlements of Lichfield and Stafford.
LPIS143	Staffs. County Council	A scattered approach of multiple small to medium sized sites could prove problematic in the planning, funding and subsequent delivery of infrastructure improvements required for the cumulative level of growth.
LPIS144	Taylor Wimpey (Lichfield's)	Taylor Wimpey considers that any distribution of development which does not prioritise the settlement of Cannock (including Wimblebury) as the focus for development would be unreasonable given its role as a strategic sub -regional centre and its role in providing the majority of employment opportunities for the District.
LPIS145	Upton Trust & Carney Brothers (Wardell Armstrong)	The assessment of sites and options should be undertaken as part of the Sustainability Appraisal process. As demonstrated in the recent case of the North Essex Authorities, Strategic (Section 1) Plan, and comments from the Inspector Roger Clewes, it is the role of the appraisal to determine what may be considered reasonable alternatives and then for the chosen spatial strategy to be the most appropriate one when considered against the reasonable alternatives, based on an updated evidence base, as the tests of soundness required. To discard options at an early stage would fail to meet this test of soundness.
LPIS146	Claire Walker	The use of AONB and greenbelt is unreasonable
LPIS147	Christopher Walker	The use of AONB and greenbelt is unreasonable
Question 9. Do you have any comments on the time period for the plan?		
LPIS148	Church Commissioners (Barton Wilmore)	We would agree that the proposed plan period (until 2036) is appropriate and welcome the fact it corresponds with the Greater Birmingham HMA Strategic Growth Study (the 'Strategic Growth Study') published February 2018. This period should, however, be aligned with other authorities within the Greater Birmingham Housing Market Area (HMA) in line with the guidance contained in the NPPG. Further, paragraph 22 of the Revised NPPF states that a 15-year timeline is appropriate.
LPIS149	Home Builders Federation	The timeframe of the new Local Plan should provide a period of at least 15 years after its adoption date set out in the revised NPPF (para 22). The NPPG also advises that plan dates should be co-ordinated therefore the new Local Plan timeframe should be aligned with the plan periods of other GBHMA authorities.
LPIS150	Inglewood Investments (SLR Consulting)	<u>Question 9: Do you have any comments on the time period for the plan?</u> From analysing the GBHMA, we feel that the time period for the new Local Plan should cover the period up to 2036. This will align with this wider study and ensure that housing delivery targets can be measured with a consistent approach across the HMA.

		CCDC should ensure that they undertake a comprehensive Green Belt Review which enables the allocation of safeguarded land which can serve the District for at least two plan periods. Given the timeframe proposed for the Plan we consider that this would provide a robust evidence base for defending a re-drawn Green Belt boundary following this review.
LPIS151	Natural England	See question 6
LPIS152	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	It is noted that the Council anticipate that the Plan would be adopted by 2021 and therefore the plan period of 2021 to 2036 would give a 15-year timeframe. This is considered appropriate and in line with the guidance contained in the NPPF at paragraph 2, which advises that strategic policies should look ahead over a minimum 15-year period from adoption. In addition, the Plan period to 2036 would be aligned with the Greater Birmingham HMA Strategic Growth Study, published in February 2018, which considers the housing need, supply and shortfall across this wider area to the same timeframe of 2036.
LPIS153	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	It is noted that the Council anticipate that the Plan would be adopted by 2021 and therefore the plan period of 2021 to 2036 would give a 15-year timeframe. This is considered appropriate and in line with the guidance contained in the NPPF at paragraph 2, which advises that strategic policies should look ahead over a minimum 15-year period from adoption. In addition, the Plan period to 2036 would be aligned with the Greater Birmingham HMA Strategic Growth Study, published in February 2018, which considers the housing need, supply and shortfall across this wider area to the same timeframe of 2036.
LPIS154	Staffs. County Council	The time period is considered appropriate.
LPIS155	Taylor Wimpey (Lichfield's)	Taylor Wimpey considers that a time period of 15 years from the adoption date of the Local Plan is appropriate. The plan period should run beyond 2036 accordingly if there is any delay to adoption beyond the December 2021 date currently envisaged. As noted in these representations sufficient safeguarded land must be provided in the Local Plan to provide enough flexibility to deal with changing circumstances and provide greater certainty over the Green Belt boundaries beyond the plan period.
Question 10. Do you have any other comments on our review of Policy CP1 Strategy?		
LPIS156	Natural England	See question 6
LPIS157	South Staffs Council	<u>Plan Strategy (CP1) and Housing Land (CP6)</u> We welcome the discussion regarding the identified shortfall within the wider GBHMA and the acknowledgement of the work undertaken by the constituent authorities in supporting the publication of the GL Hearn Growth Study. The recognition in para 5.2 that the revised plan strategy will need to take into account the wider West Midlands including the shortfall in housing supply is supported. In addition to identifying potential strategic growth options the GL Hearn study promoted the need for small and medium sites to be identified to contribute to increasing the supply of housing within the HMA. It was considered that such sites could have a particularly significant role to play in the short to medium term prior to the release and development of the larger strategic site options. In promoting such sites the study was clear that consideration is likely to be required to releasing Green Belt sites and that this should be undertaken within the context of a finer grained Green Belt assessment. It is suggested that such a fine grained study would provide a key element in the evidence base of a future plan review and should be incorporated in the review process.
LPIS158	Staffs. County Council	It is noted that as part of the examination of the Plan you will be considering the Green Belt and previously safeguarded land. In relation to the safeguarded land at Wimblebury Road, as stated in our Local Plan Part 2 consultation response, any significant housing development in this area would put significant pressure on schools in this school place planning area, and may require additional school places to mitigate its impact. Release of further land around Wimblebury may not be able to be accommodated in the existing school infrastructure and therefore may require the provision of a new primary school. There are also highway constraints around Five Ways Island in this location. In considering the possible release of safeguarded land and/or other land

		around Wimblebury careful consideration should be given to infrastructure requirements, which may influence the scale of development. Further dialogue with the County Council in this respect will be necessary.
LPIS159	Taylor Wimpey (Lichfield's)	Taylor Wimpey does not have any further comments in respect of this matter at the current time.
Review of CP2: Developer Contributions for Infrastructure		
Question 11. Do you have any comments on what issues need to be addressed in relation to developer contributions and what policy options may need to be considered?		
LPIS160	Canal & River Trust	The Canal & River Trust generally seeks to maintain its assets in a "steady state", and this is based on current usage. Where new development has the likelihood to increase usage we consider that it is reasonable to request a financial contribution from developers to mitigate this impact by addressing issues such as those set out above.
LPIS161	Church Commissioners (Barton Wilmore)	Any developer contributions need to be fully evidenced and any policy relating to contributions needs to take into account the specific circumstances that may apply to sites. This includes unforeseen remedial costs. As such, a generalised approach may not be appropriate. For example, the costs associated with greenfield sites may differ throughout the District, so sufficient flexibility will need to be built into any policy to ensure it does not stifle the delivery of much needed housing. Viability at the plan-making stage should not compromise sustainable development (Paragraph: 002 Reference ID: 10-002-20180724). Further to this, in Paragraph 5.18 the Council set out that they may need to set out what 'exceptional circumstances' might be in terms of viability. The updated NPPG (Paragraph: 007 Reference ID: 10-007-20180724) sets out that planning applications are expected to comply with the up-to-date policies but where particular circumstances justify the need for a viability assessment the applicant must demonstrate this. A list of potential circumstances is set out in the guidance. As such, it is considered the Council should take this into account and provide suitably flexible policies which reflect national guidance.
LPIS162	Highways England	Highways England welcomes the opportunity to comment on what issues need to be addressed in relation to developer contributions and is committed to full engagement in infrastructure planning and delivery processes in Cannock Chase District. Highways England welcomes the intention to update the Infrastructure Delivery Plan (IDP). Highways England would be happy to meet to discuss any implications of updating the IDP on the Strategic Road Network to help to add detail at this early stage.
LPIS163	Natural England	Natural England looks forward to dialogue with the Council in order to explore and develop suitable policy/ies for green and blue infrastructure. Developer contributions are very likely to form an important consideration in seeking to establish mechanisms for the delivery of such resources.
LPIS164	Rentplus UK Ltd (Tetlow King)	We represent Rentplus UK Ltd, an innovative company providing affordable rent to buy housing for working people aspiring to home ownership with an accessible route to achieve their dream through the rent – save – own model. This is achieved through a combination of a secure affordable rented period (whichever is the lower of 80% of open market rent, including any service charge, or Local Housing Allowance), giving time to save, and a 10% gifted deposit to enable tenants to buy their own home in 5, 10, 15 or 20 years. We previously responded to the Local Plan Part 2 consultation in March 2017. In the time since then the Government has published a revised NPPF, containing within it new policies relating to the assessment of housing needs and the tenures of affordable housing that local planning authorities must assess and seek to deliver. It is important for the Council to consider how its policies will be used in determining planning applications in the long term, assessing the need and planning for the delivery of the new, wider types of affordable housing to meet local housing needs.

		<p>As noted in our previous representation, rent to buy affordable housing seeks to meet the needs of those households who cannot access home ownership without intervention. This model has now been fully recognised and incorporated within the definition of affordable housing set out in the revised NPPF under the new category of ‘other affordable routes to home ownership’:</p> <p>“Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and <u>rent to buy (which includes a period of intermediate rent)</u>. Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.” (Our emphasis)</p> <p>It is clear from the changes to the NPPF that the Council will need not only to reconsider its core policies, but also the Developer Contributions and Housing Choices SPD. To support that review the Council should also undertake a review of its Strategic Housing Market Assessment, to ensure that its evidence base is up to date, reflecting the new affordable housing definition. This will require a further update to the Council’s viability assessment which is now very dated.</p> <p>A new assessment of local housing need must take into account the revised NPPF definition of affordable housing as this alters the types of housing that households may be able to afford. This work may uncover additional levels of concealed housing need and point more directly to the need for tenures assisting working households into home ownership. A methodology for assessing housing need, including rent to buy has been produced by Lichfield’s and is enclosed with this representation to assist with this work. We encourage the Council to look closely at the need for all types of affordable housing as this will widen the Council’s ability to meet all housing needs over the lifetime of the new plan. In response to Question 11 we recommend that the Council review its housing need and consider the viability of its affordable housing policy, including its threshold and percentage requirement, and the way in which it seeks developer contributions to this.</p> <p>Rentplus works closely with locally active housing associations to ensure that rent-to-buy is affordable in each area, and works with individual local planning authorities to encourage allocations from the housing register, reducing the numbers waiting for appropriate housing and freeing up resources to target households with higher priority needs. The findings of those households who have already moved to completed Rentplus schemes, as shown in the enclosed ‘outcomes’ document, is useful to note here.</p> <p>The first Rentplus scheme delivered with Tamar Housing received bids from 200 households in the first 24 hours, and was subsequently 41% filled by households in Band C of the local choice based lettings scheme. 30% of scheme tenants moved from social rented housing, while a further 35% were previously living in overcrowded households, with family. The significance of existing social housing tenants moving to Rentplus properties cannot be underestimated – this outcome frees up social housing for others in need on the housing register, enabling local authorities to meet their affordable housing policy objectives by effective use of the affordable housing portfolio. By delivering rent to buy housing, the Council is able to free up existing affordable housing and to deliver more affordable housing of all tenures.</p>
LPIS165	Staffs. County Council	<p>We agree that ensuring appropriate levels of infrastructure provision to support new development is a key issue for the plan. It is acknowledged that you propose to collect evidence to demonstrate viability of sites at the Plan stage.</p> <p>This is supported to ensure that infrastructure and policy requirements set out at the plan stage and expected by local communities are actually delivered and not watered down at the development management stage.</p> <p>It is noted that Government recently consulted on potential changes to CIL legislation, in particular in relation to Regulation 123 that governs the use of CIL and operation of S106. It will be necessary to take on board what the changes to legislation actually are</p>

		<p>when made and how this may affect the operation of the developer contributions policy and what infrastructure is funded by CIL and what by S106. We would welcome working with you on the process for reviewing the CIL list as part of this Local Plan review. We would also welcome information on how and when this list will be reviewed in the shorter term as the Local Plan continues to be developed. Clarity is also sought on the decision making process and prioritisation criteria for allocation of CIL funds on infrastructure.</p> <p>Recreational pressure on Cannock Chase AONB is increasing as a result of housing development, which puts the key sensitive habitats that are integral to the designated landscape of the AONB at risk of detrimental impacts. There could be opportunities to address increasing user pressure through CIL allocations to Green Infrastructure, to support new parks, woodlands and open space, providing for recreational use away from sensitive areas and potentially outside the AONB. This objective could be supported by strengthening and cross-referencing to Policy CP14 Landscape Character and Cannock Chase AONB for conserving and enhancing the AONB and its wildlife and cultural heritage.</p>
LPIS166	Staffordshire Commissioner, Police, Fire & Rescue, Crime	<p>The Commissioner (formerly known as the PCC) has previously highlighted to you the potential impact on local policing services of the expected population increase to 101,000 people in the district area by 2028, an increase of 7,200 (or 8%) on the baselined 2006 population of 93,600. The original plan also provided for 5,300 new houses over this period. Commercial development, particularly the Mill Green Retail Village, will add significant additional pressure to policing; 8 million visitors to the retail village are anticipated every year.</p> <p>The Commissioner remains of the view that community safety and policing issues should be more clearly reflected in your proposals. Policing is a population based service and any growth in population, whether residential or visiting inevitably places significant additional demands on existing policing services. It requires additional capacity to patrol in order to provide visible policing to deter crime and anti-social behaviour and respond to, and investigate, incidents and reported crime.</p> <p>In the context of your policy CP5, safe communities are a pre-requisite to achieving sustainable communities, by encouraging community cohesion and stability, resident wellbeing and vibrancy. A degree of criminal and anti-social behaviour can be designed out of new development but design measures alone will not address community safety fully. Neighbourhood policing puts communities, their needs, their issues and their priorities at the heart of local policing. This is achieved through collaboration between police, partners and the public to reduce crime and disorder, improve quality of life and ensure communities feel safer. In respect of questions 11 and 12, we feel that this needs to be more explicit in the policy.</p> <p>There is no existing funding source from central or local taxation for the police service to meet additional infrastructure need resulting from development growth. Nor does the Commissioner receive sufficient capital funding for new development related growth. The funding allocated to Police & Crime Commissioners via Home Office grants, council tax and other specific limited grants is generally insufficient to fund additional capital expenditure. There is also a time lag before extra revenue funding based on population from new development is received.</p> <p>In 2014, we requested inclusion of policing infrastructure in the CIL and Regulation 123 list, using the following definition, which we are advised have been incorporated into similar CIL arrangements elsewhere nationally: “Staffing, infrastructure (staff and Custody provision), human resources and ‘start up’ costs which covers such items as:</p> <ul style="list-style-type: none"> • Uniform and Protective Equipment (personal issue); • Patrol Vehicles; • Recruitment costs; • Probationer Constable and PCSO training;

		<ul style="list-style-type: none"> IT equipment (including personal issue radio and mobile data systems); Furniture” <p>You advised that, based on legal advice you had received, you did not accept this definition as infrastructure, but would consider potential specific infrastructure projects which we might wish to put forward for possible inclusion in the R123 list in future years. In respect of question 13, we would wish to highlight the need to either a) develop a single police custody facility for the south of the county or b) expand the existing custody facility at Watling St Police Station at Gailey. This will be required in order to achieve operating efficiencies and improve the effectiveness of police custody provision with increasing demand resulting from the expansion of communities in all districts in the south of the county.</p>
LPIS167	Taylor Wimpey (Lichfield’s)	<p>In accordance with the Practice Guidance [Reference ID: 10-001-20180724], the Local Plan will need to clearly set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Any policy requirements will need to be informed by evidence of infrastructure and affordable housing need. And a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Importantly for developers, policy requirements should be clear so that they can be accurately accounted for in the price paid for land. Policies will need to be realistic and ensure that the total cumulative cost of all relevant policies will not undermine deliverability of the Local Plan.</p> <p>In formulating any policy requirements for developer contributions, the Council will need to have regard to the revised Framework (July 2018) [§56] which is clear that planning obligations must only be sought where they meet all of the following tests:</p> <ol style="list-style-type: none"> necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.
LPIS168	Claire Walker	It is stated that not all items can put to the developer because it can be cost prohibitive. But if it is cost prohibitive for the developer to put in the ALL the necessary contributions required then the development surely is not viable option.
LPIS169	Christopher Walker	It is stated that not all items can put to the developer because it can be cost prohibitive. But if it is cost prohibitive for the developer to put in the ALL the necessary contributions required then the development surely is not viable option.
LPIS170	West Midlands HARP (Housing Assoc. Registered Providers) Planning Consortium (Tetlow King)	<p>All affordable housing types and specialist housing for the elderly or people with disabilities should be counted as a nil contribution. We would like to draw the Council’s attention to a recent appeal in Coventry City (APP/U4610/W/18/3196439) which we have also enclosed within this letter which relates to contributions to health care. The proposal would provide affordable housing in an area with a latent demand for 1,949 affordable homes. The development’s intended occupants would comprise those on waiting lists in the City and who are therefore already resident there. The Inspector found no substantive evidence to suggest they are not already accounted for in terms of the use of NHS services. The Inspector also found no clear evidence on why the Council was seeking a contribution to generic health infrastructure.</p> <p>Consideration should also be given to exceptions or discounts for extra care and care home developments which provide health care facilities on-site as these have been shown to reduce the burden on local primary healthcare facilities, reducing costs that may otherwise need to be met by the public purse.</p>
Question 12. Do you have any comments on the evidence base updates required in relation to developer contributions?		

LPIS171	Canal & River Trust	The Review offers the opportunity to reassess the mechanisms through which improvements to the canal corridors are provided and ensure the impacts of developments on the canal network are mitigated. The Trust are happy to engage further with the Authority on this.
LPIS172	Church Commissioners (Barton Wilmore)	We consider that the evidence base should be fully updated to show up-to-date costs associated with infrastructure provision taking into account the Council's CIL Charging Schedule.
LPIS173	Highways England	See Question 11
LPIS174	KGL (Estates) Ltd (J Heminsley)	In relation to policy CP2 developer contributions for infrastructure it is agreed that evidence on viability issues needs to be updated and a review of CIL should proceed in parallel with the Local Plan Review.
LPIS175	Natural England	See question 11
LPIS176	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates welcomes the production of an Economic Viability Assessment for Housing Developments, as greater clarity is required in respect of all potential developer contributions including affordable housing, Community Infrastructure Levy charges and potential site-specific requirements, prior to the submission of any planning application. The Infrastructure Delivery Plan (IDP) also requires updating to take into account the adoption of the Community Infrastructure Levy (CIL) Charging Schedule, which was adopted after the publication of the latest revision of the IDP. Similarly, the identified projects within the IDP need updating, as some are now completed. Any policy in respect of 'exceptional circumstances' and viability should reflect national guidance. The IDP also needs to be updated to reflect the latest guidance in respect of the 'pooling' of contributions.
LPIS177	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates welcomes the production of an Economic Viability Assessment for Housing Developments, as greater clarity is required in respect of all potential developer contributions including affordable housing, Community Infrastructure Levy charges and potential site-specific requirements, prior to the submission of any planning application. The Infrastructure Delivery Plan (IDP) also requires updating to take into account the adoption of the Community Infrastructure Levy (CIL) Charging Schedule, which was adopted after the publication of the latest revision of the IDP. Similarly, the identified projects within the IDP need updating, as some are now completed. Any policy in respect of 'exceptional circumstances' and viability should reflect national guidance. The IDP also needs to be updated to reflect the latest guidance in respect of the 'pooling' of contributions.
LPIS178	Staffs. County Council	The evidence proposed to be collected seems appropriate. It is noted that included within this is the expected level of developer contributions required. It will be necessary for there to be a dialogue with Staffordshire County Council on possible infrastructure costs, in particular in relation to transport and education infrastructure.
LPIS179	Taylor Wimpey (Lichfield's)	The evidence base will need to be updated to ensure that it fully accords with the revised Framework (July 2018) and the relevant Practice Guidance including that on Planning Obligations and Viability. The Practice Guidance [Reference ID: 10-002-20180724] is clear that the role for viability assessment is primarily at the plan making stage and should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. It is therefore essential that the Council produces a robust evidence base now to ensure any policy requirements achieve this aim and ensure a sound plan. In accordance with the revised Framework (July 2018) [§57] and in order to ensure transparency, any viability assessments should

		reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.
Question 13. What elements of the Infrastructure Delivery Plan will need updating? If you are an infrastructure provider how can you help us add in the detail at this early stage so we can feed this into our viability calculations?		
LPIS180	Church Commissioners (Barton Wilmore)	We consider that the Infrastructure Delivery Plan should be updated to reflect up-to-date evidence and to reflect the Council's planned delivery of development within the District.
LPIS181	Highways England	See Question 11
LPIS182	Lichfield and Hatherton Canals Restoration Trust	The IDP needs updating in respect of the Hatherton Canal restoration project. There is a need to engage with the two adjacent local authorities and with the Lichfield & Hatherton Canals Restoration Trust to ensure proper and adequate through-route protection. It is also necessary to gain a better understanding of the funds which could be made available from or via the local authorities to enable the project to progress during the life of the present Local Plan. The IDP currently mentions boat movements as an issue likely to impact the CEC SAC, this can now be deleted. There has been progress with land acquisition since May 2014.
LPIS183	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	See response to Question 12.
LPIS184	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	See response to Question 12.
LPIS185	Rugeley Town Council	The local rail lines have recently been updated with improved rail services. Funding to support local bus trips from/to the Chase for recreation has been called for locally to get people to enjoy recreation space. Further enhanced links between the canal and the town centre are supported. The works undertaken to Horsefair have met with a less than positive local response and issues are still evident. Improvements in the footway from Rugeley Trent Valley into town should be developed. Town centre parking in Rugeley is chaos with prices being charged to deter shoppers who can travel to out of town sites and not pay a fee. The reciprocal arrangement of parking fees for CCTV is not working and this issue should be revisited. Issue over parking for blue badge holders in town and the poor enforcement of the pedestrianisation scheme in the town centre. Possible need to look at reducing pedestrianised area to just the core streets but enforcing and restricting access with bollards.
LPIS186	Sport England	An updated Built Facility and Playing Pitch Strategy, reflective of the Local Plan timescales and growth levels, will help to provide evidence to understand if facilities at Rugeley Power Station are needed to be protected, if they should be replaced and whether new facilities are needed to meet the increase in demand and if so what and where.
LPIS187	Staffs. County Council	The Transport and Education infrastructure requirements will need to be updated in the IDP. In order for us to provide detail, we need to know overall dwelling numbers, site locations and build rates for each proposed development. As discussed it will be beneficial for an on-going dialogue to be in place between County and District so that infrastructure considerations can be factored into options testing, this will help ensure an informed approach is taken and negate any potential abortive work.

LPIS188	Taylor Wimpey (Lichfield's)	Taylor Wimpey does not have any comments in respect of the Infrastructure Delivery Plan at the current time.
Review of CP3: Design		
Question 14. Are there any issues which you think our Design policy should now be covering which are currently not included? If so, what are they and what information could we use to support this?		
LPIS189	Brindley Heath Parish Council	<u>Page 85, Policy CP14 - Landscape Character and Cannock Chase Area of Outstanding Natural Beauty (AONB)</u> 13. BHPC Agrees and strongly supports these policies.
LPIS190	Canal & River Trust	<p>Any development close to the network has the potential to impact on the character and setting of the canal network. In many locations and particularly in green belt locations, the canals currently enjoy picturesque rural outward views and development in such locations would have the potential to significantly alter the character of the canal network and this should be considered within the Review. Opportunities for unlocking the potential of the canal network should also be supported through the development of any sites in close proximity to the network. The provision of services for canal users, pedestrians/cyclists and boaters, could be explored within comprehensive Development Briefs. We recommend a number of guiding principles for waterside developments and individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation. Water should not be treated as just a setting or backdrop for development but as a space and leisure and commercial resource in its own right. The 'added value' of the water space needs to be fully explored.</p> <p>Therefore, whilst references to the canal network could be included within existing Policies it is considered that the particular and specific design/ layout considerations for development adjacent / near the canal network would be more appropriately set out within a canal specific policy.</p> <p>In addition, as you will be aware, land stability is a material planning consideration and is referred to in paragraphs 170, 178 & 179 of the NPPF, as well as being the subject of more detailed discussion in the current National Planning Practice Guidance. We consider therefore that this advice and guidance clearly identifies that the planning system has a role to play in minimising the risk and effects of land stability on property, infrastructure and the public. We appreciate that the issue of land stability can be complex and often also involves other regimes such as Building Regulations, however the NPPF is clear that planning decisions should ensure that new development is appropriate for its location in the context of avoiding unacceptable risks from land instability and being satisfied that a site is suitable for its new use, taking account of ground conditions and land instability.</p> <p>The network is up to 200 years old and includes water retaining earth structures which were not built to modern standards. A specialist knowledge and understanding of this network is therefore necessary to fully assess the likely impact of development upon it. Even minor development, such as householder extensions can have significant impacts on the integrity of the waterway. For example, developments, could adversely impact on embankments, cuttings or expose or introduce leakage paths which could all affect land stability.</p> <p>This adds further weight to the requirement for a Policy specifically dealing with the canal network which would highlight the considerations for developments in close proximity to the waterway and aid in ensuring the network is adequately protected.</p>

LPIS191	Church Commissioners (Barton Wilmore)	<p>We would support the Council's approach relating to Policy CP3 and design of developments in line with the Revised NPPF (Paragraphs 122 – 123). Appropriate densities can ensure efficient use of land and can secure much needed housing when well-designed.</p> <p>However, given the nature of the District and the range of sites for allocation, a policy enforcing a specific density across all sites should be avoided as it would not allow for the character of a place and its setting to be fully considered. Density within a site will also change dependant on landscape and topography meaning a 'blanket policy' has the potential to stifle good design and amenity provision. Further, the Council should consider the ability of developers to manage and design schemes taking into account factors such as viability as well as potential occupiers; flexibility is therefore needed when considering density of schemes.</p> <p>With regards to parking standards, Paragraph 105 of the Revised NPPF states that policies should take into account the accessibility, type of development, accessibility to public transport, local car ownership and the need to ensure adequate provision of charging for electric vehicles. As such, any policies should take the above into account when assessing any standards and should justify these standards accordingly. Further, maximum standards should only be set where there is a clear and compelling reason (Paragraph 106).</p>
LPIS192	KGL (Estates) Ltd (J Heminsley)	<p>In relation to policy CP3 the following comments cover responses to questions 14 to 17 –</p> <ul style="list-style-type: none"> • Policy needs to be updated to reflect the latest NPPF. • Minimum density standards should be set for specific areas taking account of existing character with more flexibility adopted for major new development sites. • Current parking and amenity space standards are considered to be generally appropriate but reduced parking standards should apply in and adjoining town centres and near to railway stations. Amenity space standards could also be relaxed where infill development is proposed in existing high density locations including in and on the edge of town centres. Stafford Borough Council has adopted a space standard between principal windows facing a 2 storey blank wall of 12 metres and the current Cannock Chase standard of 13.7 metres should be reduced to this to assist with achieving higher densities. Similarly the facing two storey principal window standard of 21 metres could be reduced across a street frontage of new developments to provide a more urban character in appropriate locations and assist with achieving higher densities.
LPIS193	Natural England	<p>Q15&16 Design - Regarding housing density – Our comments above indicate Natural England's desire to engage with the Council regarding green and blue infrastructure. Long established research has shown that even where higher density development is proposed good design can ensure that such schemes deliver effective green infrastructure assets. Reference material = Biodiversity by Design – Available from the TCPA website: http://www.tcpa.org.uk/content_files/TCPA%20biodiversity%20guide_lowres.pdf</p>
LPIS194	Rugeley Town Council	<p>The desire for good design of buildings is not being matched by planning applications coming through. The area action plan and conservation area plans are not being utilised to their full potential and it appears that the fear of planning appeals is leading to poor design and planning decisions which are eroding the historic feel in Rugeley. Design statements are there but the town council would question their strength when decisions are made.</p>
LPIS195	Sport England	<p>It is viewed that the principles of active design should be embedded into the Design SPD. The Essex Design Guide is a good example where Active Design principles are an overarching theme in the way town's, villages, neighbourhoods, buildings, streets and open spaces are designed to promote activity, health and stronger communities.</p>

		A link to the Essex Design Guide can be viewed here: https://www.essexdesignguide.co.uk/
LPIS196	Staffs. County Council	<p>As Lead Local Flood Authority we have produced a SuDS handbook, which sets out the issues that we consider to be important and the Standards that we apply to achieve multiple benefits: https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/SuDS-Handbook.pdf</p> <p>The handbook was consulted on as if it were an SPD and it would be helpful now to include reference to the handbook in Local Plan policy.</p> <p>It should be noted that setting minimum density standards could conflict with achieving above ground SuDS.</p> <p>In relation Parking Standards further dialogue with the County Highway officers should be undertaken. Whilst standards can be useful consideration also needs to be given to the location of parking and whether a garage counts towards a parking space. Certain types of provision e.g. rear parking courts can be undesirable and lead to street parking that detracts from the design of the development.</p>
LPIS197	Taylor Wimpey (Lichfield's)	<p>The Government is now placing increased emphasis on good design and the recent findings of the Letwin review suggests that design is a key consideration in helping to ensure that sufficient homes are brought forward.</p> <p>Any design policy in the Local Plan will need to be clear on design expectations and how these will be tested so that applicants have as much certainty as possible about what is likely to be acceptable. Visual tools such as design guides and codes will assist in the process and provide greater clarity on design expectations. However, if such tools are used, their level of detail and degree of prescription should be tailored to local circumstances and should allow a suitable degree of variety where this would be justified, in accordance with the revised Framework (July 2018) [§126] and they should not prevent or discourage appropriate innovation or change.</p>
Question 15. Should we now set minimum density standards as discussed in the section on Policy CP6 (Housing land)? If so, should these be set in strategic policy or in an updated SPD?		
LPIS198	Church Commissioners (Barton Wilmore)	See Question 14.
LPIS199	Home Builders federation	<p>The HBF is supportive of the efficient use of land. The setting of any density standards in the new Local Plan should only be undertaken in accordance with the revised NPPF (para 123) whereby in the circumstances of an existing or anticipated shortage of land for meeting identified housing needs a minimum density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate. However a blanket approach to a minimum density across all the District would be inappropriate and unlikely to provide a variety of typologies to meet the housing needs of different groups. The inter-relationship between density, house size (any implications from the introduction of optional space and accessible / adaptable homes standards), house mix and developable acreage on viability should also be carefully considered especially if future development is located in less financially viable areas.</p> <p>The setting of any minimum density standards should be specified in a strategic policy rather than in a Supplementary Planning Document (SPD). An SPD should not add to the financial burden of development so the Council should not be seeking to impose any housing standards that have not been subject to viability testing. The Regulations are equally explicit in limiting the remit of an SPD so that policies dealing with development management cannot be hidden. In this context the Council is referred to the recent High Court Judgement between William Davis Ltd, Bloor Homes Ltd, Jelson Homes Ltd, Davidson Homes Ltd & Barwood Homes</p>

		Ltd and Charnwood Borough Council Neutral Citation Number : [2017] EWHC 3006 (Admin) Case No. CO/2920/2017 which deals with a policy within a document that should have been issued in the form of a Development Plan Document (DPD) and not in the form of an SPD because DPDs must, if objection is taken to them, be subject to independent examination whereas SPDs are not.
LPIS200	KGL (Estates) Ltd (J Heminsley)	See Question 14
LPIS201	Natural England	See question 14
LPIS202	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>Richborough Estates supports the efficient use of land, in accordance with National Planning Policy and Guidance. The setting of any density standards in the new Local Plan should only be undertaken in accordance with Paragraph 123 of the NPPF, which stipulates that such standards should be utilised 'where there is an existing or anticipated shortage of land'. Standards should be applied in suitable locations such as town centres and those benefiting from good public transport links. Paragraph 123 of the NPPF also indicates that it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range across an entire local authority area. Richborough Estates would endorse this approach. Any standard should also retain a degree of flexibility to allow for development to reflect local character.</p> <p>Regarding the application of such standards, Richborough Estates considers that any standard should be set within a Local Plan Policy rather than in a Supplementary Planning Document (SPD). The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.</p>
LPIS203	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>Richborough Estates supports the efficient use of land, in accordance with National Planning Policy and Guidance. The setting of any density standards in the new Local Plan should only be undertaken in accordance with Paragraph 123 of the NPPF, which stipulates that such standards should be utilised 'where there is an existing or anticipated shortage of land'. Standards should be applied in suitable locations such as town centres and those benefiting from good public transport links. Paragraph 123 of the NPPF also indicates that it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range across an entire local authority area. Richborough Estates would endorse this approach. Any standard should also retain a degree of flexibility to allow for development to reflect local character.</p> <p>Regarding the application of such standards, Richborough Estates considers that any standard should be set within a Local Plan Policy rather than in a Supplementary Planning Document (SPD). The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.</p>
LPIS204	Rugeley Town Council	A range of housing density should be encouraged. In Rugeley where current housing development is small scale infill development, care should be taken that the range of housing designs including 'accessible' properties close to town centre amenities, are being provided. The largest housing opportunity for Rugeley will be the power station and details of this development are awaited.
LPIS205	Staffs. County Council	See question 14
LPIS206	Taylor Wimpey (Lichfield's)	Housing density will be central to determining the amount of land that needs to be allocated for residential development and it is therefore essential that the Council applies realistic density assumptions in order to ensure that sufficient land will be delivered. In the interests of transparency, Taylor Wimpey considers that any density standards need to be considered through the Local Plan Review rather than in an updated SPD. This will help ensure that there is a clear alignment between density standards being

		applied and the assumptions used by the Council when determining the amount of land required to meet housing need. We provide further comments in relation to density and upon the need for housing land in our response to the section on Policy CP6 (Housing land) below.
LPIS207	West Midlands HARP (Housing Assoc. Registered Providers) Planning Consortium (Tetlow King)	We support the Council's commitment to support development that makes efficient use of land provided that good design is also encouraged. We strongly recommend that if the minimum densities are set to be applied within the area then any optional space standard is applied across all tenures not just affordable. Applying standards to only affordable housing development can cause problems in terms of viability and as market schemes can be developed at higher densities where the standard is applied to affordable housing only, this has left Registered Providers in the position of being unable to compete on an equal basis with other developers for land. This will help deliver more effective density policies.
Question 16. Are there additional 'high density design criteria' which should be added to policy or guidance to ensure the attractiveness and convenience of use within such developments is maintained? Can you suggest any matters where leeway/trade off might be allowed in meeting higher densities e.g. reduced parking or amenity space? Or should other space saving options such as basement parking be considered (bearing in mind this may affect the viability of development)?		
LPIS208	KGL (Estates) Ltd (J Heminsley)	See Question 14
LPIS209	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates submits that the introduction of the Nationally Described Space Standard would have a significant detrimental effect on the efficiency of land use within Cannock Chase District. The Standard should only be introduced where its application can be justified, in accordance with footnote 46 of Paragraph 127 of the NPPF.
LPIS210	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates submits that the introduction of the Nationally Described Space Standard would have a significant detrimental effect on the efficiency of land use within Cannock Chase District. The Standard should only be introduced where its application can be justified, in accordance with footnote 46 of Paragraph 127 of the NPPF.
LPIS211	Rugeley Town Council	See question 15
LPIS212	Staffs. County Council	See question 14
LPIS213	Taylor Wimpey (Lichfield's)	Any high density design criteria should take into account the desirability of maintaining an area's prevailing character and setting and providing well-designed, attractive and healthy places. They should also ensure that technical matters such as the provision of suitable vehicular access, can still be adequately addressed.
Question 17. Should we consider setting minimum/maximum off-street parking standards for different types of development or locations? What would the justification for this be and how would it be evidenced?		
LPIS214	Church Commissioners (Barton Wilmore)	See Question 14.
LPIS215	Home Builders Federation	The setting of any minimum or maximum car parking standards for residential development should be undertaken in accordance with the revised NPPF (paras 105 & 106).
LPIS216	KGL (Estates) Ltd (J Heminsley)	See Question 14

LPIS217	Preece, Cllr. J	I believe the threshold for minimum parking levels is too low and does not reflect levels of car ownership in households. To have the level set to low is to create more issues for the wider community in the form of on-street parking. I believe house design can play a role in this by requiring houses in denser areas to have garages set below ground level or building above driveways.
LPIS218	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>The setting of any minimum or maximum car parking standards for residential development should be undertaken in accordance with the Paragraphs 105 and 106 of the NPPF, which states that maximum parking standards should only be set where there is a clear justification that they are necessary for managing the local road network.</p> <p>Richborough Estates nevertheless agrees with the Council that the existing Parking Standards, Travel Plans and Developer Contributions for Sustainable Transport SPD dating from 2005 which sets out maximum off-street parking standards for different types of developments including parking for the disabled is out-of-date and is in need of updating.</p>
LPIS219	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>The setting of any minimum or maximum car parking standards for residential development should be undertaken in accordance with the Paragraphs 105 and 106 of the NPPF, which states that maximum parking standards should only be set where there is a clear justification that they are necessary for managing the local road network.</p> <p>Richborough Estates nevertheless agrees with the Council that the existing Parking Standards, Travel Plans and Developer Contributions for Sustainable Transport SPD dating from 2005 which sets out maximum off-street parking standards for different types of developments including parking for the disabled is out-of-date and is in need of updating.</p>
LPIS220	Rugeley Town Council	See question 15
LPIS221	Staffs. County Council	See question 14
LPIS222	Taylor Wimpey (Lichfield's)	The revised Framework (July 2018) [§105] identifies the factors which should be taken into account in setting local parking standards. It states [§106] that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport. In considering whether to apply parking standards and formulating policy the Council will need to ensure that any standards applied are appropriately evidenced in accordance with these requirements.
Question 18. Do you have any other comments on our review of Policy CP3: Design?		
LPIS223	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates submits that Policy CP3 should be amended to allow for flexibility in design, to allow for innovative designs to come forward, in accordance with Paragraph 127 of the NPPF.
LPIS224	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates submits that Policy CP3 should be amended to allow for flexibility in design, to allow for innovative designs to come forward, in accordance with Paragraph 127 of the NPPF.
LPIS225	Rugeley Town Council	See question 15
LPIS226	Staffs. County Council	See question 14
LPIS227	Taylor Wimpey (Lichfield's)	Taylor Wimpey does not have any further comments in respect of this matter at the current time.

Review of CP4: Neighbourhood-led planning		
Question 19. Do we still need a specific Local Plan policy on Neighbourhood Plans given that they are already extensively covered by national policy and legislation? If so, what issues should the policy be dealing with which avoids duplication?		
LPIS228	Home Builders Federation	The relationship between the new Local Plan and Neighbourhood Plans should be clearly set out in accordance with the revised NPPF (paras 13, 29 & 30 and Footnote 16).
LPIS229	KGL (Estates) Ltd (J Heminsley)	It is agreed that comprehensive coverage in the new NPPF makes Policy CP4 redundant.
LPIS230	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates considers that a Local Plan Policy in reference to Neighbourhood Plans is unnecessary as they are sufficiently considered within National Policy and Guidance.
LPIS231	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates considers that a Local Plan Policy in reference to Neighbourhood Plans is unnecessary as they are sufficiently considered within National Policy and Guidance.
LPIS232	Rugeley Town Council	Rugeley Town Council would support the continued guidance at a district level for Neighbourhood Planning. Given the voluntary work to develop the plans and the expense of them, they take a longer time to develop than district plans.
LPIS233	Taylor Wimpey (Lichfield's)	Unless the Council considers that there are matters outwith the revised Framework and the Practice Guidance which need to be addressed, Taylor Wimpey considers that a specific Local Plan policy on Neighbourhood Plans is not required.
LPIS234	Claire Walker	Yes if neighbourhood plans allocate sites for housing
LPIS235	Christopher Walker	Yes if neighbourhood plans allocate sites for housing
Review of CP5: Social Inclusion & Healthy Living		
Question 20. Do you have any comments on what issues need to be addressed in relation to healthy living and what policy options may need to be considered?		
LPIS236	Beaudesert Golf Club (FBC Manby Bowdler LLP)	Whilst the Plan provides for developer contributions to be put towards the improvement of leisure facilities and open space, schemes which take a holistic approach to such matters by utilising residential development to enable and facilitate the improvement to open spaces and golf course provision (for example) should equally be supported by the Local Plan policies. The focus in CP5 on financial contributions means that Policy CP1 and Policy CP5 do not dove-tail sufficiently to achieve the stated vision and objective in this regard.
LPIS237	Brindley Heath Parish Council	<u>Page 65/84, Policy CP5 – Policy CP13</u> 12. BHPC Agrees and strongly supports these policies.
LPIS238	Canal & River Trust	Personal wellbeing is measured by how satisfied people say they are with their life – the greater feeling of connectivity with place, the greater the feeling of wellbeing. With approximately 28% of Cannock Chase District population living within 1km of the waterway there is a substantial portion of the population who have access to this 'free to use and enjoy' resource on their doorstep. This presents significant opportunities to enhance personal and community wellbeing across many communities. Waterways can provide a strong sense of place and connection and help shape the way people live their lives, feel about themselves and their

		relationships with others in their community – all creating better outcomes in terms of individual, community and societal wellbeing. The potential to utilise waterways to increase activity levels and improve physical health inequalities and outcomes is significant. The benefits of the waterways however are not always acknowledged or considered as part of development proposals. The Policy should be amended to include specific references to the canal network within the District, acknowledging it as a key local asset.
LPIS239	Lichfield and Hatherton Canals Restoration Trust	Paragraphs 5.36 and 5.37 mention accessible open spaces and protection for them. The projected route of the towpath of the restored Hatherton Canal is an area where local improvements could be considered and supported by the Council to make more sections of the route accessible.
LPIS240	National Farmers Union West Midlands Region	<p>As stated in section 5.31 “Access to good quality healthy living opportunities from recreational footpaths and cycle-ways to informal spaces to formal sports provision can assist in improving peoples’ health”. We also agree that the maintenance and enhancement of the Districts open spaces and Green Space Network is a key issue.</p> <p>The health benefits of access to the countryside are well known and are currently being promoted by various bodies and organisations. As a result of this renewed promotion of the outdoors there is likely to be an uplift in user numbers using the routes. Health Authorities increasingly recognise the role of public rights of way in improving public health and wellbeing. Therefore it is very important to increase user’s awareness of their responsibilities as rights of way users and for those promoting the outdoors to consider how adequate resources can be delivered to support the maintenance of the network.</p> <p>Farmers and Landowners are largely responsible for the maintenance of footpaths across their land. Therefore the impacts of new residential development on adjacent agricultural land need to be carefully thought through. Many field parcels adjacent to housing developments are unfortunately then subject to repeated trespass, fly tipping (particularly of garden waste), dog worrying and concerns about disease carried in dog faeces (such as Neosporosis)</p> <p>Therefore where new housing is proposed adequate green space must be incorporated into the development in order to relieve pressure on adjacent farmland and investment must be made (with prior consultation of local farmers) in the surrounding areas access infrastructure. This is to mitigate the impact of new urban development on the surrounding farmland. We have heard of instances where farmers on the urban fringe have had to radically change their management practices in order to accommodate such pressure which often leads to a financial penalty for farm businesses.</p> <p>Farmers and landowners must be fully engaged with discussions on Green Space as they own and manage many of the areas key Green Infrastructure assets.</p>
LPIS241	Natural England	Green and blue infrastructure are characterised by their multi-functional nature. We anticipate that our dialogue with the Council on this fundamental theme will allow further discussion and the identification of the interaction between these assets and the role they have in promoting and supporting people’s mental and physical well-being.
LPIS242	Norton Canes Parish Council	With the number of houses being built in the village we are of the opinion that there should be some re-generation of the centre of the village as we are currently very poorly served by the availability of shops etc.
LPIS243	Preece C	Need to consider schools and doctors when new developments in Norton canes are being applied © know we need new houses but they need look into it.
LPIS244	Preece, Cllr. J	I would challenge the automatic placing of play equipment on any new development without first auditing the play equipment around the proposed developments. An example can be seen in Norton Canes whereby a new play area was provided by developers,

		despite there already being a playground with the same distance of the estate but in the other direction (and well linked by pathways within the new estate). I believe it would have been more beneficial to the council, and to residents, for the council to have asked instead for money to upgrade the existing park. By not doing this the council will ultimately now be responsible for the maintenance of 2 sets of play equipment within relatively close distance to each other.
LPIS245	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	As with Question 15, Richborough Estates considers that any open space standards should be set within a Local Plan Policy rather than in a SPD. The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable. Standards should be clear and not onerous to allow for clear guidance in formulating any scheme.
LPIS246	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	As with Question 15, Richborough Estates considers that any open space standards should be set within a Local Plan Policy rather than in a SPD. The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable. Standards should be clear and not onerous to allow for clear guidance in formulating any scheme.
LPIS247	Rugeley Power Ltd (Savills)	<p>CP5: Social Inclusion and Healthy Living and 5.35. It is appropriate for the Plan to seek to encourage an appropriate range and level of provision of social infrastructure, however, it is important that the social infrastructure identified in policy is relevant and is focused on what is most important. Some elements listed in CP5 currently, such as golf courses, are not necessarily required or desired by the community in general, and may not be the best use of land. It is important that CP5 or its replacement embodies flexibility to enable the range, breadth and depth of community and social infrastructure proposed by a development to be considered as a whole. Development proposals should not be required to deliver every item of infrastructure that may be desirable across the District as a whole. Instead, developments should be encouraged and facilitated to deliver those elements of social infrastructure to which they are best suited and able to make the most appropriate contribution to the greater whole.</p> <p>It is noted that NPPF para 11 in promoting the presumption in favour of sustainable development directs that local plans should be flexible to adapt to rapid change. It is also vitally important that policy requirements for social infrastructure are realistic and viable for development to deliver. NPPF para 34 makes clear that policies should not undermine the deliverability of the Plan.</p> <p>For these reasons it is important that the Plan enables flexibility in how development sites are delivered. This correlates with a policy backed approach supporting offsetting of social infrastructure requirements. Please refer to comments made under para 5.38 on the subject of off-setting.</p> <p>SPD can continue to play a role in this by being a more flexible tool for reviewing and developing material considerations, but if it is to be effective, SPD should be reviewed and updated and should not be regarded as rigid policy. In the context of strategic priorities, SPD should not lead policy. Plan policy including development control policy supporting strategic priorities, should be flexible and able to respond to changing circumstances and priorities. SPD remains a valid tool in developing thinking on sub-issues, providing it is responsive and also embodies flexibility, which can be taken into consideration in decision making.</p>
LPIS248	Rugeley Town Council	Cannock District provides the play areas within Rugeley but these are limited in their appeal and dated. Play provision is a key benefit of development and with the increasing numbers of young families living in accommodation with smaller gardens, public open space is essential. The policies re play areas to support healthy living will only be of effect if funding is there from CCDG and/or partners to develop and add to play areas ensuring that they meet the needs of the younger people.
LPIS249	Sport England	Please see comments regarding embedding Active Design in the Design SPD.

LPIS250	Staffs. County Council	<p>We agree that Health and social inclusion is something which should run through all policies and further agree that it is important that health and social inclusion matters are given specific attention.</p> <p>It is noted that existing policy CP5 makes reference to provision of appropriate infrastructure, which includes education. There may be potential through the Plan review to consider enhancing the role of schools in promoting healthy living through shared use of playing fields and sports halls. However, it should be borne in mind that schools are primarily designed for the education of children and therefore additional infrastructure may be required to facilitate community use. In relation to any new schools which may be required through the plan period appropriate community use could be designed in from the outset, but it needs to be noted that this will incur extra costs over and above what is necessary for education use only and would therefore need to be reflected in the IDP policy on developer contributions.</p>
LPIS251	Taylor Wimpey (Lichfield's)	Taylor Wimpey generally supports the development of policy which promotes healthy living and social inclusion. For the reasons set out in these representations, it is considered that any such policy should be dealt with through the application of policy within the Local Plan rather than through the use of Supplementary Planning Documents [SPD].
LPIS252	Theatres Trust	As well as focusing on the delivery of new social infrastructure, we would recommend that you include a policy protecting existing community, cultural and social facilities from loss. Such a policy should include a need to provide robust evidence that the facility is no longer required by the community and that marketing has been undertaken over a period of at least one year at a price/rent appropriate to existing use without development potential and condition.
LPIS253	Claire Walker	We need more access to health centres and preserving green spaces and not developing on them and only conserving small parts. Large green areas help with clean air
LPIS254	Christopher Walker	We need more access to health centres and preserving green spaces and not developing on them and only conserving small parts. Large green areas help with clean air
Question 21. Do you have any comments on the evidence base updates required		
LPIS255	Beaudesert Golf Club (FBC Manby Bowdler LLP)	The SHLAA and Brownfield Register need to be reviewed and updated to ensure that Green Belt sites are not all regarded as excluded, so that a qualitative approach can be taken to brownfield sites within Green Belt and AONB areas so as to make the Development Plan better serve the community.
LPIS256	Church Commissioners (Barton Wilmore)	We believe that the evidence base should be updated to ensure it is up-to-date. Further, sufficient flexibility should be given within any policy to ensure sustainable development is not stifled and innovative solutions can be brought forwards.
LPIS257	Natural England	<p>The Local Planning Authority may find it useful to refer to the following Natural England and DEFRA publications:</p> <p>Connection to Nature: evidence briefing</p> <p>Links between natural environments and obesity</p> <p>Links between natural environments and physical activity</p> <p>Links between natural environments and physiological health</p> <p>Links between natural environments and mental health</p> <p>Good practice in social prescribing for mental health: the role of nature-based interventions (NECR228)</p> <p>NECR211 – Is it nice outside? – Consulting people living with dementia and their carers about engaging with the natural environment</p> <p>DEFRA- Evidence Statement on the links between natural environments and human health</p>

LPIS258	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates has previously commented upon the need to update the Infrastructure Delivery Plan.
LPIS259	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates has previously commented upon the need to update the Infrastructure Delivery Plan.
LPIS260	Rugeley Town Council	See question 20
LPIS261	Sport England	An updated Indoor and Built Facility Strategy and Playing Pitch Strategy should inform items listed within Policy CP5. It would be beneficial to identify what the open space, sport and recreational provision requirements are for the specific area within the authority and how they will be accommodated.
LPIS262	Staffs. County Council	It will be important that the evidence base updates link to the wider determinants of health. It is suggested that you liaise with colleagues in our public health department to determine what data is available to assist.
LPIS263	Taylor Wimpey (Lichfield's)	The evidence base required to address this issue will need to address the revised Framework (July 2018) and the relevant Practice Guidance including, that on Health and Wellbeing, Viability, Planning Obligations, and Open space, sports and recreation facilities, public rights of way and local green space.
Question 22. Where do you think we should be setting standards e.g. for open space provision? Should these be in the Local Plan or should they remain as supplementary policy i.e. in a revised Supplementary Planning Document?		
LPIS264	Lichfield and Hatherton Canals Restoration Trust	I feel that active work should be done to enhance and improve the open space provision and green infrastructure provision. Having such standards set in the Local Plan presumably means they come into force sooner so that would be my preference.
LPIS265	Natural England	We would advise that standards should be set in Planning policy. This subject forms another strand of the green and blue infrastructure theme (see above). You may find it useful to refer to the below document which though is now archived, still provides useful and relevant information. Natural England –Nature Nearby – Accessible Natural Greenspace Guidance (NE265)
LPIS266	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	See response to Question 20.
LPIS267	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	See response to Question 20.
LPIS268	Rugeley Town Council	See question 20

LPIS269	Sport England	<p>Sport England are supportive of no standards being set for playing pitches it instead being informed by an up to date playing pitch strategy (which should be monitored and reviewed yearly).</p> <p>For clarity Sport England would not like to see the use of standards for playing pitches as it is not always appropriate with it potentially providing single pitch sites, without ancillary facilities and in the wrong location. Therefore, the pitches are not attractive to sports teams for match play or training. Instead using that information in the updated playing pitch strategy should be used to identify whether:</p> <ol style="list-style-type: none"> a. There are pitches within the analysis area that already have spare capacity that can accommodate the additional demand for that pitch type; or b. There are pitches of that type in the area that are poor quality and improving them would create the additional capacity required; or c. All pitches of that type in the area are overplayed and new pitches are required. New pitches should be located on existing sites, where possible, to take advantage of ancillary facilities. Where there are a large number of pitches required as a result of a large strategic housing allocation, for example, then a new site might be appropriate; or in some analysis areas the lack of capacity is as a result of a lack of ancillary facilities rather than pitches. In some circumstances it might be more appropriate to improve changing rooms than provide a new pitch <p>As a guide a draft Sports and Recreation policy (DM6) from Cheshire West and Chester Council is provided below:</p> <p>“Developer contributions will be required to enhance existing provision of playing pitches, based on additional demand generated by the new residential development and the sufficiency of existing provision to meet current and projected need.</p> <p>The Council will have regard to Sport England’s strategic planning tools and findings of the Playing Pitch Strategy to determine an appropriate amount and type of contribution or provision with new development.</p> <p>Where it is agreed by the Council that on-site pitch provision is appropriate to meet identified demand, the applicant is required to provide the new pitch(es) and make provision for its management and maintenance in perpetuity, and clarify these arrangements within a management plan to be agreed by the Council.</p> <p>Provision of new sport and recreation facilities will be supported in line with the priorities of the Sports Facilities Strategy, subject to relevant development plan policies.”</p> <p>An Indoor and Built Facility Strategy and Playing Pitch Strategy will help to inform whether the sporting facilities at Rugeley Power Station are required to meet current and future demand.</p>
LPIS270	Staffs. County Council	<p>It is suggested that the plan itself may be the best place for setting standards with the SPD used to provide further guidance on delivery. As supplementary planning documents (SPD) should build upon and provide more detailed advice/guidance on the policies in the Local Plan.</p>
LPIS271	Taylor Wimpey (Lichfield’s)	<p>Given the increased emphasis upon viability in the revised Framework (July 2018), Taylor Wimpey considers that any policies in relation to healthy living, including policies for the provision of open space and levels of open space provision should be included within the Local plan. The development of such policies at a later stage, through SPD for example, would not provide the certainty required to properly assess the viability implications, which is an essential process to ensure that a sound and deliverable plan is achieved.</p>

LPIS272	West Midlands HARP (Housing Assoc. Registered Providers) Planning Consortium (Tetlow King)	We would recommend adding any open space standard provisions in a policy within the Local Plan to ensure that the policy is viability tested and subject to rigorous testing to ensure that the standards don't make developments (especially affordable housing developments) unviable.
Question 23. How might we be able to demonstrate 'offsetting' and 'net gain' in a way which is meaningful and measurable? Do you have any examples of good practice which you could share?		
LPIS273	Beaudesert Golf Club (FBC Manby Bowdler LLP)	The proposed allocation of a small part of SHLAA site C375 for residential use, to facilitate the improvement of the open space and leisure facilities within that site, would be a prime example of providing net gain within a single site allocation – allowing the opening up of a previously inaccessible area of countryside to provide opportunities for recreation as envisaged by at para 5.38 of the Local Plan Review (Issues and Scope) Consultation document.
LPIS274	Lichfield and Hatherton Canals Restoration Trust	I feel that net gain in terms of footpath provision needs to reflect additional lengths of footpath which are made accessible and which are connected at both ends so that they become useful and used additional open space. We in the LHCRT supported by our colleagues in the Inland Waterways Association can provide many examples of sections of former canal towpath which have been opened and added to local open space networks. We would support similar work to enable access to the Hatherton Canal towpath.
LPIS275	Natural England	<p>Is the LPA looking at delivering biodiversity net gain outcomes or would it like to secure wider ecosystem service/natural capital outcomes? Currently metrics used for calculating biodiversity net gain cannot calculate or capture ecosystem service or natural capital value. To maximise the achievement of such outcomes alongside the biodiversity net gain outcomes will likely require the provision of additional advice and expertise, for example from the relevant LNP for the local area.</p> <p>Biodiversity net gain can be sought in a proportionate manner for most types of development and should be a consideration at each step in the mitigation hierarchy. Requirements for net gain include good ecological baseline data (i.e. Phase 1 habitat survey data) and metric for calculating net gain/loss. Metrics exist for calculating the amount of biodiversity required to achieve net gain. The most commonly used are variants of the Defra metric which calculates the biodiversity units required to achieve biodiversity net gain. Natural Capital is currently more challenging to measure.</p> <p>We have attached an Environment Bank document which provides examples of policy wording in approved Local Plans and Core Strategies, which you may find helpful.</p>
LPIS276	Rugeley Power Ltd	<p>The principle of offsetting is supported, whereby a policy requirement in one area is offset in recognition of a contribution a development makes in making available to the public an amenity or element of infrastructure which was not previously available to them either in the same policy area or in a different policy area.</p> <p>Policy should reflect the contribution that sites can make in this regard. In order to embody the flexibility that the NPPF calls for, policy should refer to the fact that such recognition will be applied and considered as and when planning applications are brought forward. It may be appropriate for the policy to identify the types of infrastructure and facilities it is envisaged offsetting could be applied to and whether any specific metrics apply, or whether the degree of offset is a qualitative judgement. Policy should not be overly prescriptive on the items that can be taken into consideration in order to retain flexibility.</p> <p>Such policy should include recognition for existing sports and recreational facilities which are not currently accessible to the public but could be made so, and areas of land with potential amenity value not currently accessible to the public but which could be made accessible.</p>

LPIS277	Rugeley Town Council	See question 20
LPIS278	Staffs. County Council	<p>Offsetting is usually used to provide biodiversity gains in compensation where habitat is unavoidably lost (avoid, mitigate, compensate hierarchy). Therefore, it should not be used to provide land where the primary purpose is sport or recreation. We would welcome biodiversity offsetting in itself (see comments referring to net gain applies). Where recreation is desired then the best means might be through provision of SANGS using SAC funding. SANGS could also provide space for offsetting, provided habitats were not compromised by damage / disturbance from recreation, which could be designed out).</p> <p>In terms of measurability this could be demonstrated by the use of a metric*, such as the one devised by Warwickshire County Council. Staffordshire Ecological Record plans to devise a similar Staffordshire metric and DEFRA is in the process of updating their metric. The Plan might therefore just refer to metrics in general and allow future adoption of the most suitable system. We have examples of good practice we can share, for example Lichfield District has a net gain for biodiversity policy which requires a 20% measurable net gain. *In short a metric calculates the habitats present on say, a development site, taking into account condition and quality. Likely loss to habitats is then factored in, plus whatever additional new or restored habitat within the site is taken into account. If a net loss (or net gain lower than 20%) is then predicted, offsetting is required, and the metric indicates what level of offsetting is necessary. (Metrics may also be known as biodiversity calculators)</p>
LPIS279	Taylor Wimpey (Lichfield's)	<p>The revised Framework (July 2018) [§138] advises that plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Whilst Taylor Wimpey is not aware of any specific examples of good practice, it is noted that the wording of the guidance suggests that such offsetting would not need to be based in the immediate vicinity of the land to be removed. It provides the potential to improve the quality of other parts of the</p> <p>Green Belt in the wider area where the benefits may be more widely felt. The Council will need to explore ways in which such offsetting can be provided, including through financial contributions towards the improvements of other parts of the Green Belt within the wider District where such offsetting may be of most benefit. In terms of the improvements which could be sought, those falling within the category of environmental quality could include schemes such as landscape enhancement, and those relating to accessibility could include recreation enhancement schemes such as improvements to pedestrian and cycle routes. 8.6 Any approach to compensatory improvement needs to be considered in the context of viability and will need to be fully considered in any viability evidence base work undertaken to inform the Local Plan.</p>
Review of CP6: Housing Land		
Question 24. Do you have any comments on what issues in relation to housing requirements and land supply need to be addressed and what policy options may need to be considered?		
LPIS280	Beaudesert Golf Club (FBC Manby Bowdler LLP)	A review of Green Belt Boundaries to allow allocation of suitable, particularly for brownfield, sites that offer natural capital (such as site C375)
LPIS281	Birmingham City Council	<p>We are pleased to see that the document recognises that Cannock District is one of fourteen local authority areas which fall within the Greater Birmingham Housing Market Area (GBHMA) where there is a significant housing shortfall of 28,150 dwellings to 2031 and 60,900 to 2036 as established by the Strategic Growth Locations Study undertaken by GL Hearn/ Wood Plc.</p> <p>The study identified 24 areas of search for large scale strategic growth (new settlements and large urban extensions) were narrowed down by the study to a short list of 11 areas, none of which are located in Cannock.</p>

		<p>We also welcome the reference to the investigation of smaller scale 'proportionate dispersal' (i.e. smaller extensions to existing settlements) in the area to the south-east of the District as recommended in the Strategic Growth Locations Study. We support the approach of "consider these 'in the round' with other options for accommodating housing in the District" as stated in Paragraph 5.6.</p> <p>On densities, evidence from The Greater Birmingham HMA Strategic Growth Study indicates that if the Cannock were to require a minimum density of 30-40 dwellings per hectare that could generate an additional 75-200 dwellings (from sites that are currently considered suitable for development but do not yet have planning permission, which are expected to deliver around 1,000 dwellings at present).</p> <p>This is consistent with the revised National Planning Policy Framework which emphasises making avoiding homes being built at low densities, optimising the potential of each site and setting minimum housing density standards for city and town centres and other locations well served by public transport, where there is an existing or anticipated shortage of land for meeting identified housing needs.</p> <p>We would therefore encourage Cannock to consider setting minimum housing density standards. We appreciate that lower densities may be needed to reflect the Districts' rural areas but a flexibly written policy could allow for this. We also support the intention to undertake further work on brownfield capacity and potential underused assets.</p>
LPIS282	Church Commissioners (Barton Wilmore)	<p>Given the stage the LPR is at, and the provisions within Annex 1 of the Revised NPPF, we consider the standardised methodology (including ONS 2016-based household projections to be published in September 2018) should be used as a starting point for assessing housing need. This is likely to raise the housing requirement set out in the Part 1 Local Plan. This is, also, only a starting point and any additional need or growth aspirations will have to be included as well. This includes the provision of affordable housing as a direct benefit of housing provision. The national aim of boosting housing supply and the needs of the wider region should also be considered.</p>
LPIS283	Greenlight Developments (Lichfield's)	<p>The NPPF (2018, para 60) requires the Council to determine the minimum number of homes needed, on the basis of local housing need assessment, conducted using the standard methodology. As it stands this gives a figure of 295 dwellings per year for Cannock Chase compared to the current Local Plan (Part 1) requirement of 241 dwellings per annum (for the period 2006-2028). The Council might therefore expect to see an increase in housing requirement which its future plan must ensure it is equipped to accommodate. However, this standard figure could be subject to change in September with the release of new household projections, whilst Government have signalled that further guidance on the standard method will be forthcoming later in 2018 which may alter the formula. At this stage, Greenlight do not therefore wish to comment further on the housing requirement figure in advance of the anticipated future changes. Notwithstanding this, it is clear that there exists a significant housing shortfall across the Greater Birmingham HMA (GMHMA, Growth Study February 2018). There is a recognised shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036. It is understood that, although the technical evidence undertaken so far as part of the Duty to Co-operate does not set out how much each Local Authority should take, it is likely that under Duty to Co-operate Cannock Chase District will be required to accommodate a portion of this need.</p> <p>Greenlight also support the Council's recognition at paragraph 5.41 of the consultation document that "Acceleration of housing delivery is also a key aim of the West Midlands Combined Authority which is producing a Strategic Investment and Delivery Plan". The Council will need to be mindful of this as it prepares the new plan.</p> <p>Given the growth ambitions of the wider area and significant shortfall in the HMA, it is therefore likely that the District will need to plan to deliver an increased number of homes to what is currently required, in the future. The Council must therefore ensure its evidence base sufficiently assesses all reasonable options to supply this land for housing.</p>

LPIS284	Highways England	Highways England is not in a position to indicate alternative locations for housing development or comment in detail on specific sites. However, the transport implications of potential sites must be properly assessed in considering them for an allocation and should be key criteria for screening out sites for development. Reference should be made in the emerging plan as it evolves to appropriate transport assessments to be undertaken by the developers of sites and the benefits of early liaison with Highways England where there are potential impacts on the SRN. Highways England would expect to comment on the spatial distribution of development in relation to the SRN once determined.
LPIS285	Home Builders Federation	<p>By the time of the submission of the new Cannock Chase Local Plan for Examination the Government's standard methodology for the calculation of OAHN will have been implemented. The Government's proposed methodology is summarised as :-</p> <ul style="list-style-type: none"> • Demographic baseline based on annual average household growth over a 10 year period ; • Workplace-based median house price to median earnings ratio ; • Adjustment factor = $\frac{\text{Local affordability ratio} - 4}{4} \times 0.25$; <p>• Local Housing Need = (1 + adjustment factor) x projected household growth.</p> <p>Using this standardised methodology the OAHN for Cannock Chase is 295 dwellings per annum (based on 2014 data) which is more than the adopted Local Plan housing requirement of 241 dwellings per annum. It should also be remembered that the standard methodology is only a minimum starting point. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are additional to this figure. The Government's objective of significantly boosting the supply of homes remains. It is important that future housing needs are not under-estimated.</p>
LPIS286	Inglewood Investments (SLR Consulting)	<p>CCDC need to adopt the latest Government standards in terms of housing delivery targets. Critically, housing requirements need to be informed by;</p> <ul style="list-style-type: none"> • the Standard Methodology, • will need to have due regard to the Housing Delivery Test and its implications should targets not be met; and • should take a proactive approach to ensuring that the wider HMA requirements are positively addressed. <p>Please refer to the main body of this letter which addresses this topic also.</p>
LPIS287	KGL (Estates) Ltd (J Heminsley)	<p>In relation to Policy CP6 the recent evidence in the GL Hearn study referred to above and the new methodology for calculating housing need, together with the limited brownfield opportunities within the urban area of Cannock/Hednesford/Heath Hayes indicate that green Belt release based on the proportionate dispersal principle will be required. The land south of the A5190 Heath Hayes has the fewest constraints and best access to public transport of all possible GB locations and is therefore should be considered as a key location for housing development. In relation to question 26, the issues have been covered in the response above relating to Policy CP3.</p>
LPIS288	Lichfield District Council	<p>In paragraph 5.55, it is stated that; "Whilst there was general support for the use of urban, brownfield sites some responses also suggested there could be difficulties in developing such sites (e.g. demolition and land remediation) which would mean they could not meet all of the Districts' growth requirements. Clearly, the Rugeley Power Station site will need to be considered further as part of the site options (as discussed under the section on Policy CP1)." Lichfield District Council looks forward to ongoing cooperation on this issue. Generally, Lichfield District Council welcomes continuous engagement within the Greater Birmingham and Black Country HMA, in accordance with the Revised NPPF:-</p>

		<p>https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Local-plan/Local-plan.aspx</p> <p>[Question 3]</p> <p>Lichfield District Council recognizes the, shared, constraints in Cannock Chase, and welcomes that your Council, within the context of these policy constraints, is seeking to help meet the needs of the GBBCHMA; “the areas of search which we will need to investigate relate to smaller scale ‘proportionate dispersal’... in the area to the south-east of the District.”[5.46]</p>
LPIS289	National Farmers Union West Midlands Region	<p><u>Livestock units and residential development</u></p> <p>We have not made a detailed examination of all the locations outlined as site allocations for employment or housing development. However, where sites are allocated for development, the proximity of the land to existing livestock units must be examined. Sites should not be allocated for residential development if they are found to be in near proximity to an existing livestock unit. Farms can be sources of noise and odour and therefore neighbouring land could be unsuited to residential development. We are keen to ensure that development in the countryside does not result in conflict between new residents and existing farm businesses.</p>
LPIS290	Natural England	Q24 & 25 – The Cannock Chase SAC Partnership project is actively addressing the need for suitable evidence to inform the council’s decision-making on this important matter. Please refer to our response to Q48.
LPIS291	Preece, Cllr. J	I have already made a submission to the previous Greenbelt review that I understand is to be taken forward with this piece of work. I would like to add, however, that I do not believe that any new housing should be even considered in Norton Canes until there has been a substantial investment in the health and education infrastructure of the village.
LPIS292	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>The current Local Plan identifies a housing requirement of 5,300 new homes between 2008 and 2028, at a rate of 241 dwellings per annum. The Local Plan Review is taking place in the context of the Government’s standard methodology for the calculation of objectively assessed housing need (OAHN). Using this standardised methodology, the OAHN for Cannock Chase District is 295 dwellings per annum which is significantly more than the adopted Local Plan housing requirement of 241 dwellings per annum. It should also be stressed that the standard methodology is only a minimum starting point, which does not consider increased housing demand through economic growth or cross-boundary needs. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere within the GBHMA are to be provided for in addition to this figure. It is therefore important that future housing needs are not under-estimated, and that sufficient housing supply is provided over and above this figure in order to provide flexibility and competition within the market.</p> <p>As set out elsewhere within this Representation, it is submitted by Richborough Estates that exceptional circumstances exist to justify the release of Green Belt land in appropriate and sustainable locations in order to assist in meeting housing need.</p>
LPIS293	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	<p>The current Local Plan identifies a housing requirement of 5,300 new homes between 2008 and 2028, at a rate of 241 dwellings per annum. The Local Plan Review is taking place in the context of the Government’s standard methodology for the calculation of objectively assessed housing need (OAHN). Using this standardised methodology, the OAHN for Cannock Chase District is 295 dwellings per annum which is significantly more than the adopted Local Plan housing requirement of 241 dwellings per annum. It should also be stressed that the standard methodology is only a minimum starting point, which does not consider increased housing demand through economic growth or cross-boundary needs. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere within the GBHMA are to be provided for in addition to this figure. It is therefore important that future housing needs are not under-estimated, and that sufficient housing supply is provided over and above this figure in order to provide flexibility and competition within the market.</p>

		As set out elsewhere within this Representation, it is submitted by Richborough Estates that exceptional circumstances exist to justify the release of Green Belt land in appropriate and sustainable locations in order to assist in meeting housing need.
LPIS294	Rugeley Power Ltd (Savills)	<p>Housing delivery is a priority of national policy and should be a priority of Local Plan policy. The housing policy should be based upon the new standardised methodology as and when that approach becomes fixed. The Plan should also make provision for an appropriate contribution to the shortfall in the Birmingham housing market area. Housing provision should be focused in the urban area of the principal towns where it can contribute to urban regeneration and maximise the principles of sustainable development. Given the focus of at least part of the housing provision will be to meet the needs of Birmingham as an economic centre, the housing to meet that need should be sustainably located with convenient access to Birmingham. The electrification of the Birmingham to Rugeley railway line due to complete soon, will enhance the accessibility of Rugeley to and from a number of locations on the line.</p> <p>Cross boundary co-operation between Cannock Chase District and neighbouring authorities including Lichfield District should continue to be a feature of the Plan. The contribution of development in Lichfield to meet the needs of Cannock, and vice versa should be considered and included within the Plan as appropriate. Policies connected with social infrastructure and affordable housing should recognise the issues involved with cross local authority boundary provision, and should propose solutions for how such provision should be planned in a cross boundary context, with appropriate agreement on such policy approach with neighbouring authorities. If it is most appropriate for the provision of social infrastructure to be located in one local authority area, and / or for such provision to be focused towards the needs of one or other authority, then policy should enable that. Cross boundary housing provision therefore needs to consider objectives and issues wider than just the provision of the headline housing number.</p>
LPIS295	Staffs. County Council	<p>It will be essential to understand early what level of housing the plan will be looking to deliver in order to fully understand and plan for the infrastructure requirements. This includes both Cannock Chase's local need (OAN) and how much of the Greater Birmingham Housing Market Area shortfall may need to be accommodated. It is noted that in relation to the latter the Plan will investigate 'proportional dispersal' in the area to the south-east of the District. It will be important to ensure that the scale of any proposed extension to existing settlements is considered against current infrastructure capacity and any opportunities to provide new infrastructure if required. Further engagement with the County Council on this matter will assist in informed decision making.</p> <p>The Countryside and Rights of Way Act (2000) requires that Planning Authorities have regard to the purpose of conservation and enhancement of the landscape and scenic beauty of AONBs. This is supported by Revised National Planning Policy Framework (NPPF) July 2018, which in Paragraph 172 requires that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues." Allocation of housing sites where development might affect Cannock Chase AONB and its setting will need to be mindful of these requirements. Whether a proposal is 'major development' remains a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.</p> <p>The Plan could consider defining 'major development' in relation to potential impacts on the AONB and its setting, with reference to different scales and types of development. This process could be supported by evidence in the recent Review of Landscape Character for Cannock Chase District (2016), which includes a desk-based assessment of inherent sensitivity and visual sensitivity. Inherent sensitivity is 'based upon the assumption that a landscape with a clearly defined and strongly unified character will be more sensitive to change by virtue of the fact that such landscapes are less able to accommodate 'alien' features that do not conform to</p>

		<p>the existing pattern' (Review of Landscape Character for Cannock Chase District (2016)), and therefore could provide support for a decision to scope out potential allocation sites. A cautionary approach should be used in interpreting the visual sensitivity data provided in the Review, as the assessment does not consider a particular development type, size or the specific nature and constraints of the land cover parcel. To be robust, the Authority would be advised to consider commissioning area or site specific Landscape Sensitivity Studies to assess potential sensitivity of development types and areas where development would potentially impact on the AONB or on the setting of the AONB.</p>
LPIS296	St. Modwen (RPS)	<p>RPS Planning and Development (RPS) is instructed by St Modwen Properties Plc (St Modwen) to submit these comments relating to Land West of Pye Green Road (the Site). These comments are structured to provide a site description, an overview of the current policy position and recommended alterations to the policy wording. RPS is supportive of the Council's decision to review the Local Plan, in particular the decision to roll forward the time period until 2036.</p> <p>Given the work which was at an advanced stage in relation to Local Plan (Part 2) there is some concern that the timetable proposed, will mean that the new review plan is not in place until September 2021 at the earliest. RPS acknowledges that it is important that LPAs are realistic about timescales as all too often LDS timescales are missed. However, given it will be some 6 years on from the adoption of LP Part 1, if possible, it would be beneficial to the development sector to try and seek ways of speeding up this process.</p> <p>An additional, reason for speeding up the process, is that the Submission of the Local Plan Review would be beyond the three year period, set by Inspector Clews when reviewing the Birmingham City Development Plan and the insertion into that plan's policy base, that it would need reviewing if the overspill from Birmingham (which impacts on Cannock being in the same HMA) had not been addressed in HMA submission plans within three years (i.e. by January 2020). The review of the Cannock Local Plan will miss this timescale.</p> <p><u>Housing Requirements</u></p> <p>In light of the comments raised above, we note that the LP is appropriately intending to address the GBSLEP issues (paragraph 5.52) and potential 60,900 dwelling shortfall to 2036. In this regard, we urge the Council to re-consider the findings of the GL Hearn GBSLEP report and the 60,900 is to be regarded as a minimum figure and there are significant uncertainties about the basis on which that figure was reached, which in RPS view requires testing at Examination and the likelihood of the figure increasing. The Local Plan Review should therefore treat this as a minimum baseline figure in terms of assessments of its future housing requirement.</p> <p>Additionally, it is noted at paragraph 5.41, the standardised OAN methodology indicates an increased housing requirement for Cannock from 241 dpa to 295 dpa. However, as the document has acknowledged, even though NPPF2 has recently been published, the Government's advice on the standardised OAN is that the approach to the assessment may well change, particularly in light of the imminent 2016 household projections coming out in September 2018. This is likely to illustrate that utilising the standardised approach the Government will fall short in terms of delivering 300,000 dwellings annually across the country and is likely to result in a change to the methodology that could see an increase for Cannock. This will require addressing in relation to the future Issues and Options Consultation.</p> <p><u>Land West of Pye Green Road</u></p> <p>As indicated above, St Modwen has controlling land interests in relation to the Land West of Pye Green Road. St Modwen has worked very closely and collaboratively over the years to secure a suitable and agreeable position in respect of the site.</p> <p>We note that the Local Plan is indicating under Policy CP6 the following wording:</p>

		<p>The policy sets out how the housing will be distributed proportionate to the size of the existing communities, and identifies strategic development areas including urban extensions to each main urban area (with a Strategic Housing Site allocated for up to 900 homes at Land West of Pye Green Road).</p> <p>We are supportive of the Local Plan Review's continued identification of the whole site. As the Council is aware, the site measures over 60ha and is allocated as a Strategic Housing Site under Policy CP6 – Housing Land within the current Local Plan (Part 1) 2014. The Site is recognised in contributing to delivering 5,300 new homes in the District over the plan period and the policy states:</p> <p>“A strategic site allocated for an urban extension on land west of Pye Green Road for 750 new houses to be delivered as identified in the housing trajectory (identified on the Policies Map and Key Diagram and elaborated in an adopted development brief). In addition there is potential for the site's capacity to increase to 900 dwellings, consistent with the site's strategic allocation.”</p> <p>Currently on the Site c.338 dwellings have been committed/pending construction and the development of a further 481 dwellings have been submitted for approval of reserved matters under CH/18/080. As the Council is aware the phasing agreement as part of the original outline permission CH/11/0395 was revised. There remain areas of the site, that are still subject to future development proposals. Until such time as the development process has been completed on the site, uncertainty exists over the true capacity for the site. In light of this, it is proposed that the policy should be re-worded to state the Site's capacity is approximately 900 dwellings, “...for approximately 900 new houses to be delivered...”</p> <p>By simply stating the Site will deliver approximately 900 new houses it provides appropriate flexibility in the policy to ensure that the site's maximum non-Green Belt potential can be delivered and not causing a ceiling or cap to future (more limited) growth to come forward should, ultimately that prove possible to secure. As currently worded the policy indicates that 900 dwellings is an absolute ceiling to growth on the site. Whilst it might be that figure is correct, it might also be that there is some potential for a slightly higher capacity to come forward and the policy wording should not prevent that from happening. Such wording is also reflective of how Planning Inspector's view allocations on strategic sites and RPS would recommend this is carried forward into a revised Policy CP6.</p> <p>This flexibility will benefit the Council by not being held to an absolute limit of 900 new dwellings whilst also allowing the capacity to address any increase in annual housing delivery and contribute towards the Greater Birmingham Housing Market Area. Also, by delivering additional homes on this allocated site, it also alleviates pressure to develop Green Belt land.</p>
LPIS297	Taylor Wimpey (Lichfield's)	<p><u>Housing Need</u></p> <p>Following the publication of the revised Framework a new standardised methodology for calculating housing needs has been formally introduced:</p> <p>“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.” [§60]</p> <p>At the time of writing, the Planning Practice Guidance has not been updated to reflect the new Framework. The Government has, however, inserted an additional page to the Planning Practice Guidance relating to housing and economic development needs assessments. This states that:</p> <p>“Planning Practice Guidance will, where necessary, be updated in due course to reflect changes to the National Planning Policy Framework...Where plans are being prepared under the transitional arrangements set out in Annex 1 to the revised National</p>

	<p>Planning Policy Framework, the policies in the previous version of the framework published in 2012 will continue to apply, as will any previous guidance which has been superseded since the new framework was published in July 2018.”</p> <p>Given that the Council is likely to submit its new Local Plan to the SoS in December 2020, the transitional arrangements set out in §214 of the revised Framework will not apply. As such, CCDC is correct to state in §5.41 that it will need to use the figure provided by the new standardised methodology to inform its local housing need once this methodology is finalised.</p> <p>To accompany the new Framework, MHCLG released a short methodological note on how to calculate the standard method (MHCLG (July 2018): How is a minimum annual local housing need figure calculated using the standard method?), setting out the three-stage process used to calculate a minimum annual local housing need figure. This starts with the average annual household growth (using the latest national household growth projections) over a 10-year period, with the current year being the first year. The projected annual household figure should then be adjusted based on the affordability of the area (using the most recent median workplace-based affordability ratios).</p> <p>For each 1% increase in the ratio of house prices to earnings, where the ratio is above 4, the average household growth should be increased by a quarter of a percent. The final stage applies a cap, which limits the increase in the minimum annual housing need figure an individual local authority can face (capped at 40% above the average annual housing requirement figure set out in the existing policies, is adopted within the last 5 years).</p> <p>For Cannock Chase District Council, the figure using the September 2017 standardised methodology is 295 dwellings per annum [dpa] as CDDC correctly states in paragraph 5.41, although Taylor Wimpey notes that this figure is defined as the ‘minimum’ annual local housing need figure for an area – there is clearly scope for an authority to go above and beyond this.</p> <p>Furthermore, this standard figure could be expected to be subject to change in September with the release of new household projections. At this stage, Taylor Wimpey does not therefore wish to comment on the housing requirement figure.</p> <p>Notwithstanding this, there is a clear requirement to go for a higher housing need figure where needs cannot be met within neighbouring areas. This is particularly relevant for CCDC, as Cannock Chase District is one of 14 local authority areas which fall within the Greater Birmingham Housing Market Area [GBHMA]. Whilst the Issues and Options report notes in paragraph 5.42 that there is a “significant housing shortfall of 28,150 dwellings to 2031 and 60,900 to 2036” across the GBHMA, no attempt has been made to identify how Cannock Chase District might contribute to this very substantial shortfall.</p> <p>Whilst this is partly due to the fact that the SGS does not apportion additional housing need to each individual authority in the HMA, this does not obviate CCDC from its likely requirement to increase its local housing need figure above and beyond the minimum figure derived from the standardised methodology to meet some of the GBHMA shortfall. Taylor Wimpey strongly requests that subsequent iterations of the Cannock Chase Local Plan make suitable provision for this shortfall in its uplifted housing requirement.</p> <p>In relation to the standard methodology, Taylor Wimpey also notes the Government’s response to the draft revised NPPF consultation [pages 26-27] which notes that the methodology may be adjusted after the household projections are released in September: “A number of responses to this question provided comment on the proposed local housing need method. The Government is aware that lower than previously forecast population projections have an impact on the outputs associated with the method. Specifically, it is noted that the revised projections are likely to result in the minimum need numbers generated by the method being subject to a significant reduction, once the relevant household projection figures are released in September.</p>
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		<p>Whilst increasing densities is very clearly a Government policy objective, applying this approach on such a broad-brush level to the Greater Birmingham HMA in order to reduce the extent of the shortfall is flawed without more detailed, and site-specific, analysis. In particular, there is no consideration as to whether imposing higher density levels would make the sites less attractive for some of the volume housebuilders delivering the larger allocations, and who may be seeking to provide larger family/executive housing at necessarily lower densities. In practice, the reduction in housing shortfall is not therefore likely to be as great as GL Hearn envisages in the SGS.</p> <p>The LPIS notes that the approach suggested in the SGS could potentially generate a 20% increase in capacity but recognises [§5.50] that there are variations between the District’s suburban areas, with some delivering below 30 dwellings per hectare and with densities below 30 dwellings per hectare also being delivered in the Districts rural areas. Taylor Wimpey therefore considers that the potential for housing land need to be absorbed by higher density development in Cannock Chase District is not likely to be as great as the SGS currently envisages and the Council will need to find land to accommodate this additional need.</p> <p><u>Meeting Longer Term Needs</u></p> <p>The revised Framework [§139] sets out how local authorities should identify safeguarded Green Belt land in order to meet development needs stretching well beyond the plan period. Therefore, sufficient safeguarded land must be provided in the Local Plan to provide enough flexibility to deal with changing circumstances. Taylor Wimpey supports the allocation of safeguarded land in general as it will provide greater certainty over the Green Belt boundaries beyond the plan period.</p>
LPIS298	Upton Trust & Carney Brothers (Wardell Armstrong)	<p>The Greater Birmingham HMA Strategic Growth Study (GL Hearn, 2018) was commissioned to consider strategic development options to meet housing need across the area. This included a strategic review of existing housing land supply across the HMA. The review of existing housing land supply throughout the HMA indicated potential capacity to reduce the minimum shortfall to 28,150 (2011 – 2031). However, it is considered that the Greater Birmingham HMA Growth Study significantly underestimates unmet housing need.</p> <p>The calculated HMA housing land supply baseline is based on the assumption that objectively assessed housing need will remain constant throughout the Local Plan period (until 2031). As such base evidence has been projected into the future with no consideration for contextual situations which may impact growth. This does not take into consideration that each local authority will undertake a Local Plan review, as part of the Duty to Cooperate. It is notable that the Peter Brett Associates (2017) study has increased objectively assessed need (OAN) by 133 dwellings per annum across Dudley, Sandwell, Walsall, Wolverhampton and South Staffordshire (Black Country and South Staffordshire Strategic Housing Market Assessment Final report Peter Brett Associates March 2017). This increase to OAN excludes unmet housing need from Birmingham.</p> <p>On a similar note, the impact of a standardised methodology for calculating housing need upon housing land supply will need to be considered. This is notwithstanding the effects of more up to date household growth projections released by the Ministry of Housing, Communities & Local Government (see below). The Greater Birmingham HMA Strategic Growth Study provides a snapshot, which is now outdated.</p> <p>A ‘densification’ calculation has been applied to the revised baseline for HMA housing land supply which has been demonstrated to be inaccurate and unrepresentative. The increase in housing delivery is therefore flawed. Indeed, it is also accepted that: “In applying the density standards sets out, consideration should be given to site characteristics and the local context, as well as Councils’ evidence base on need of different types/sizes of homes ...” (Paragraph 6.56 of the Greater Birmingham HMA Strategic Growth Study)</p>

		<p>The appropriateness of a blanket 'densification' calculation is highly questionable given that it does not take into consideration contextual site characteristics that affect all sites within the HMA. Moreover the calculation seeks to quantify the potential contribution which increasing development densities could have, by assuming a minimum density of 35 dph. This figure is the average density achieved across the HMA from 1996-2011.</p> <p>GL Hearn considers that it is unlikely that the market would support densities of 50+ dph across the board given the nature of commercial demand and the need to provide a range of housing types and sizes. It is also notable that this average density (35dph) is less than the density reached in more recent years in Cannock Chase District (41dph in 2004-07 and 43 dph in 2008-11). The reduced shortfall outlined in Greater Birmingham HMA Strategic Growth Study is not representative and should therefore be discounted from consideration as an effective and reliable measure. It is therefore contended that the Birmingham Development Plan figure for unmet need, as endorsed by an Independent Planning Inspector, is the starting point for any consideration of Cannock's objectively assessed housing need and not the subsequently 'capped' figure which appears at para 5.42 of the Issues and Scope Consultation.</p> <p>As promoted within the consultation document for standardised housing need methodology (Planning for the right homes in the right places: consultation proposals (DCLG, 2017) higher levels of OAN will no doubt need to be agreed under the Duty to Cooperate to meet unmet need.</p> <p>As indicated in the Report on the Examination of the Birmingham Development Plan, at paragraph 71, "...evidence at this examination demonstrates that around 51,000 is the maximum that can be provided in the city over the Plan period..." Therefore, the 37,900 housing delivery shortfall outlined within the Birmingham Development Plan is a minimum shortfall.</p> <p>Paragraph 71 goes onto to state that the capacity for housing delivery within Birmingham may change. As Birmingham may not achieve the 51,000 housing delivery target it is necessary to plan for a larger shortfall.</p> <p>The Department of Communities and Local Government (2016) Housing Statistical Release indicates higher levels of annual growth across England when the most recent 2014-based household projections are compared to the 2012-based household projections. As such, there is a principle of an upward trend in annual growth.</p> <p>The 2014-based household projections have not been subject to sensitivity analysis i.e. indexed method or full return method. However, it is widely acknowledged that that standard household projections are heavily affected by the last recession and are consequently too low. Furthermore we would also draw our attention to the fact that the Birmingham Development Plan considers housing need until 2031. The Cannock Chase District Local Plan Review suggests an adoption date of 2021 and whilst not specifically stated, would be expected to follow the NPPF advice and look forward to a minimum 15-year period. It is necessary to consider unmet need arising from Birmingham during the additional 5 years period not covered by the Birmingham Development Plan.</p> <p>Apportionment of unmet housing need was not considered to be a material matter at the time of the examination of the Birmingham Development Plan. As yet, formal agreements have not been reached regarding the apportionment of Birmingham's unmet housing need across the HMA. The most recent study on apportionment of unmet housing need within the Greater Birmingham HMA is contained within the Birmingham Sub-Regional Housing Study – Part 2 (Barton Wilmore, 2014). The table below outlines the share of the unmet need each of the local authorities the Greater Birmingham HMA should take.</p>
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		<table border="1"> <thead> <tr> <th colspan="2">Table 1: Suggested apportionment of Birmingham's unmet housing need within the Greater Birmingham HMA (Barton Willmore, 2014)</th> </tr> <tr> <th>Local Authority</th> <th>Weight Share (%)</th> </tr> </thead> <tbody> <tr> <td>Solihull</td> <td>16</td> </tr> <tr> <td>Bromsgrove</td> <td>6</td> </tr> <tr> <td>North Warwickshire</td> <td>4</td> </tr> <tr> <td>Stratford-on-Avon</td> <td>7</td> </tr> <tr> <td>Lichfield</td> <td>5</td> </tr> <tr> <td>Tamworth</td> <td>3</td> </tr> <tr> <td>Redditch</td> <td>3</td> </tr> <tr> <td>Cannock Chase</td> <td>3</td> </tr> <tr> <td>South Staffordshire</td> <td>2</td> </tr> <tr> <td colspan="2" style="text-align: center;"><i>Black Country</i></td> </tr> <tr> <td>Sandwell</td> <td>18</td> </tr> <tr> <td>Dudley</td> <td>12</td> </tr> <tr> <td>Walsall</td> <td>12</td> </tr> <tr> <td>Wolverhampton</td> <td>9</td> </tr> </tbody> </table> <p>The Table above indicates at least 3% of the housing need across the HMA should be apportioned to Cannock Chase. Assuming this apportionment, based on the minimum this would mean that Cannock Chase would need to deliver a minimum 1,137 further dwellings in addition to its own objectively assessed need.</p>	Table 1: Suggested apportionment of Birmingham's unmet housing need within the Greater Birmingham HMA (Barton Willmore, 2014)		Local Authority	Weight Share (%)	Solihull	16	Bromsgrove	6	North Warwickshire	4	Stratford-on-Avon	7	Lichfield	5	Tamworth	3	Redditch	3	Cannock Chase	3	South Staffordshire	2	<i>Black Country</i>		Sandwell	18	Dudley	12	Walsall	12	Wolverhampton	9
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LPIS299	Claire Walker	There should be no review of greenbelt; land should come from existing urban areas, in particular industrial sites that are not fully used.																																
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LPIS301	West Midlands HARP (Housing Assoc. Registered Providers) Planning Consortium (Tetlow King)	<p>We support the Council's intention to deliver 5,300 new homes between 2006 to 2028. However we would recommend the inclusion of the word 'minimum' before the 5,300 figure or any subsequent figure as this is the minimum that the Council should be seeking to deliver. This is particularly pertinent as the Greater Birmingham HMA Strategic Growth Study (February 2018) identified a minimum shortfall of 28,150 dwellings across the Birmingham housing market area between up to 2031.</p> <p>Should the Council introduce a policy approach towards self- and custom-build housing, any requirement should not be in place of traditional affordable housing requirements. Self- and custom build have complex requirements for funding and as such is out of the reach of most households who seek affordable housing, nor is this included within the NPPF affordable housing definition. Any policy requirement should be fully viability tested when assessed alongside all other policy requirements to ensure that any requirement will not result in affordable housing being reduced on viability grounds.</p>																																
LPIS302	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	As noted above, the draft standardised methodology for OAHN, which is due for review in Autumn 2018, indicates a housing requirement of 295 dwellings per annum for Cannock Chase District from 2016 to 2036, which ties up with the proposed revised plan period of this new Local Plan, as set out under Policy CP1. Consequently, in line with paragraph 60 of the NPPF, there is a minimum housing requirement of 295 dwellings per annum across the plan period. This would represent a minimum uplift of 54 dwellings per annum or a minimum addition of 1080 dwellings across the new plan period, when compared to the 241 dwellings per																																

		<p>annum (5300 new houses in total) across the 2006 – 2028 plan period of the existing Local Plan (Part 1). Sufficient land will therefore need to be identified to meet this additional minimum housing requirement.</p> <p>Furthermore, as already noted, paragraph 60 also states that “in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”. In this regard, in line with the NPPF and Localism Act, local planning authorities are under a duty to cooperate with each other on strategic matters that cross administrative boundaries, which includes meeting the discussed unmet housing need of the Birmingham HMA.</p> <p>In order for the new Local Plan to pass the tests of ‘soundness’ set out under paragraph 35 of the NPPF, it will therefore be necessary for the District to accommodate additional development needs over and above the minimum requirements outlined above. This additional need, plus any necessary uplifts in housing numbers required to support a positive economic strategy for the District, will result in the need for further land to be identified for housing.</p> <p>In terms of future development, as noted above, there are very few suitable and available sites outside of the West Midlands Green Belt. Whilst the closed Rugeley Power Station does provide an opportunity for redevelopment clearly this will be a complicated site to bring forward, with housing delivery rates likely to be slow. Green Belt release is therefore considered necessary and therefore it will be necessary for the Council to provide an up-to-date Green Belt Review Study as part of the Local Plan Review process to explore the most sustainable locations to meet growth needs. We strongly believe that land at Upper Birches Farm should be removed from the Green Belt to allow for a sustainable urban extension to Rugeley.</p> <p>In order to achieve sustainable patterns of development, in line with the NPPF, we believe it will be necessary to release the necessary Green Belt land on the edge of the District’s most sustainable settlements, which will integrate with proposed strategies for infrastructure and employment, and this would tie with paragraph 72 of the NPPF.</p> <p>It is considered that Rugeley will play a key role in accommodating the growth needs of the District. Given its sustainability credentials, the settlement should play a key role in providing new homes to meet the objectively assessed housing needs of the District, including identified local needs for affordable homes and smaller properties. The potential employment growth options for Rugeley including the Towers Business Park as an identified strategic high-quality employment site highlights the key role that Rugeley will play in accommodating the growth needs of the District. However, with the existing Green Belt drawn tightly around the existing urban area, and lying on the edge of neighbouring authority boundaries to the north and east, Rugeley is clearly constrained. It will therefore be necessary to release land from the Green Belt in sustainable locations on the edge of Rugeley to ensure future needs can be met, and the vitality of services and facilities can be maximised in the longer term.</p> <p>Opportunities to meet needs within Cannock Chase District should be explored first before seeking other neighbouring authority areas to take identified needs, particularly when other neighbouring authority areas already have their own constraints and development growth pressures.</p>
<p>Question 25. Do you have any comments on the evidence base required, including housing growth requirements and housing site options?</p>		
LPIS303	Church Commissioners (Barton Wilmore)	<p>The evidence base relating to urban capacity should be updated to give an up-to-date view of what capacity there is within the urban areas of the District. The Council should also undertake an update of its housing needs in line with the Revised NPPF (and include for the unmet needs of the GBHMA and Black Country).</p> <p>Given the concerns we raised with regard to the Green Belt Review Revised Method Statement in May 2015 (enclosed at appendix 3), we consider the Green Belt Study March 2016 should be updated taking account of the changes we proposed. In summary we</p>

		consider that there is significant redefinition needed to Broad Area 4 to achieve smaller parcels of land, which would deliver a more exact and well-defined Green Belt Review in respect of our client's land.
LPIS304	Greenlight Developments (Lichfield's)	See Question 24
LPIS305	Highways England	See Question 24
LPIS306	Home Builders Federation	As set out in the revised NPPF (para 60) the housing requirement should be based on the standard methodology (see HBF answer to Q24) and account for unmet housing needs in the GBHMA (see HBF answer to Q3). The preparation and review of housing policies should be underpinned by relevant and up to date evidence which supports and justifies the policies concerned (revised NPPF para 31). The housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (revised NPPF paras 61 & 62).
LPIS307	Inglewood Investments (SLR Consulting)	It is noted that CCDC's last formal Green Belt review was 1997, where land was removed from the Green Belt. The Green Belt Review Study 2016 should therefore be reviewed and firm conclusions made about the release of sites. CCDC should hold a formal Green Belt Review Consultation, and any sites within the Green Belt which are considered to perform less well against the Green Belt Review objectives should be considered for release within your new Local Plan. As part of this process any other benefits which can be delivered should weigh in the balance when assessing sites under consideration; as should whether the key objectives of the Green Belt are still served by land retained in open use following development, particularly where public access and ecological enhancements can be combined. This will necessitate landowners demonstrating why their land is preferable through the provision of technical studies which enable your Authority to compare sites based on a robust evidence base.
LPIS308	KGL (Estates) Ltd (J Heminsley)	See Question 24
LPIS309	National Farmers Union West Midlands Region	See Question 24
LPIS310	Natural England	See question 24
LPIS311	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	As set out elsewhere within this Representation, it is submitted that the 2016 Green Belt Study is not sufficient for the identification of specific sites for development due to its 'strategic' nature. As such, the Study should either be updated, or a further study commissioned, which assesses the ability of Green Belt sites to come forward for development, including an assessment of their suitability against the purposes of the Green Belt as set out within the NPPF.
LPIS312	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	As set out elsewhere within this Representation, it is submitted that the 2016 Green Belt Study is not sufficient for the identification of specific sites for development due to its 'strategic' nature. As such, the Study should either be updated, or a further study commissioned, which assesses the ability of Green Belt sites to come forward for development, including an assessment of their suitability against the purposes of the Green Belt as set out within the NPPF.
LPIS313	Rugeley Town Council	Housing development is the most contentious development. Rugeley recognises that at present housing is focussed on infill development and the future power station site. The town council do not wish to see the erosion of the green belt adjacent to the

		Chase. The power station site has issues being close to the river and should not be seen as an opportunity to breach the green belt to the east of the town.
LPIS314	Staffs. County Council	At paragraph 5.48 the plan sets out evidence will be required in relation to infrastructure capacity and other impacts, listing a number of examples including transport and education. It is agreed that evidence on infrastructure capacity will be required and we would welcome further opportunity to discuss with you what this may entail, particularly where it relates to infrastructure for which Staffordshire County Council is a provider.
LPIS315	Taylor Wimpey (Lichfield's)	<p>The revised Framework sets out the national policies which the Council will need to consider in ensuring that its Local Plan evidence base is robust. The revised Framework and the accompanying updated Practice Guidance including that in relation to the standard methodology on the calculation of the housing requirement (and any subsequent updates to this methodology), and on viability, will need to be considered. The Council, when formulating the Local Plan, will need to take account of this policy and its implications for the Local Plan.</p> <p>In order to accord with the revised Framework, it is imperative that the Local Plan is supported by the appropriate viability evidence. In accordance with the Practice Guidance [Reference ID: 10-001-20180724], policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106</p> <p><u>Green Belt Evidence</u></p> <p>The LPIS [5.48] notes that the Council may need to consider site options that lie within the Green Belt but this would also require a range of evidence base work to be utilised e.g. information on potential capacity from non-Green Belt land and the District Green Belt Study (2016). The LPIS [5.13] suggests that the evidence in the Green Belt Study is still up to date. 9.24 With regard to the release of Green Belt land, the Council will need to demonstrate that it has examined fully all other reasonable options when considering the release of land from the Green Belt in accordance with the revised Framework (July 2018) [135 -139]. Further evidence base work in relation to this matter will be necessary.</p> <p>Turning to the existing evidence base, Taylor Wimpey acknowledges the methodology set out in the Green Belt Study and reserves the right to provide further responses on this matter as the Local Plan progresses. However, in relation to land to the east of Wimblebury Road, Taylor Wimpey considers that the Council has incorrectly applied its methodology in scoring the site (parcel reference C14) against two of the Green Belt purposes.</p> <p>In relation to purpose 2 (preventing neighbouring towns merging into one another) the Green Belt study measures the narrowest point between each Green Belt parcel and the nearest neighbouring settlement. The Green Belt Study identifies that Prospect Village is the nearest settlement to 'this portion' of Cannock's urban edge and is around 1.6km away. On this basis, the site is scored 2 against this purpose according to the methodology. However, Taylor Wimpey has concerns over this approach for two reasons:</p> <ol style="list-style-type: none"> 1. The scoring of the parcel appears to be based on the separation distance between the existing settlement of Cannock and Prospect Village (1.6km) rather than, as set out in the methodology, the distance from the edge of the Green Belt parcel to Prospect Village (1.3km); and, 2. The methodology fails to consider the existing separation distances between two settlements. In this case, Prospect Village is no nearer to the eastern edge of the parcel than it is to the closest part of Wimblebury (both approximately 1.35km). Prospect Village is also considerably closer (800m separation distance) to the nearest part of the

		<p>Cannock/Hednesford/Heath Hayes built up area. Therefore, the development of this site would not result in reduced separation distance between Cannock and Prospect Village. The Development Statement accompanying these representations provides further details on the second point.</p> <p>Taylor Wimpey also has concerns over the treatment of the site in relation to purpose 3 (assisting in the safeguarding of the countryside from encroachment) and more specifically 3b relating to the significance of boundaries/features to contain development and prevent encroachment. The Green Belt Study scores the site 2 for purpose 3b. According to the methodology, a score of 2 should be given if 'no' significant boundary is present. The Wimblebury Road site is substantially contained by built development or other strong physical boundaries to the north, south, east and west and therefore should be scored zero.</p> <p>On this basis, Taylor Wimpey considers that the site (parcel reference C14) has been scored too highly overall and should therefore have a lower overall score and be higher up in the hierarchy of parcels (in terms of overall score) set out at Appendix 2 of the Green Belt Study. More fundamentally however, the above points call into question the robustness of the methodology and how it has been applied to all parcels in the District.</p> <p>Taylor Wimpey also considers that the Strategic Green Belt Review in the SGS is fundamentally flawed. The SGS approach is a high level one and uses permanent boundaries in a consistent fashion – specifically Motorways/Trunk Roads, A-Roads and railway lines to identify some 120 parcels. However, whilst there is logic to this, the failure to use strong boundaries from other physical features results in very large sites that are appraised as a whole. As a result, certain sites may have been erroneously discounted; if they had been broken down into smaller units for appraisal, part of the site may not have fulfilled the five purposes of the Green Belt and could have been put forward for release.</p> <p>The Green Belt review also applies a somewhat arbitrary process of selection and boundary setting, and therefore does not fully assess the viability and sustainability of releasing certain areas of land from the Green Belt. Many of the identified areas do not seem to be logically formed and are not well defined or enclosed by strong boundaries.</p> <p>Furthermore, there appear to be serious inconsistencies regarding how the Potential Areas of Search have been identified. In particular, several of the Areas of Search, notably NS2, NS4 and NS6 are clearly areas that (according to GL Hearn's analysis) make a Principal Contribution to the Green Belt purposes, yet these are preferred to other areas that only make a Supporting Contribution.</p> <p>The revised Framework also clearly states that when reviewing Green Belt boundaries, "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" [§138]. It is unclear whether the Green Belt Review has undertaken this on a thorough and transparent basis, as many of the areas identified are clearly unsustainable, located many miles away from rail stations and comprise greenfield land. Indeed, the SGS states that no significant areas of PDL were identified at all.</p> <p>In general, the methodology for site selection going forward is currently unclear. It is therefore difficult to understand exactly how the removal of sites from the Green Belt, and their subsequent allocation, would be determined.</p> <p>The fundamental failing with the Green Belt Review undertaken to date is that it is at such a large scale many suitable small and medium-sized development sites have not been properly assessed at a fine-grain level, a point recognised by GL Hearn [§8.84].</p> <p>Taylor Wimpey requests the Council to reconsider the contribution of the Wimblebury Road site to the Green Belt and score it appropriately in accordance with the Green Belt Study methodology. Taylor Wimpey reserves the right to provide a further response on these points at the next stage of consultation on the Local Plan if this request is not addressed.</p>
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LPIS316	Upton Trust & Carney Brothers (Wardell Armstrong)	The response to Question 24 highlights the current evidence base relating to housing requirements in the wider area. The Strategic Housing Market Assessment for the C3 Housing Market Area of the West Midlands dates from 2008. There will need to be an updated SHMA to reflect the revised evidence base. The clear housing needs for the local area also suggest a need to consider site options that lie within the Green Belt and potentially areas within the AONB and in our view will require the Green Belt Study to be entirely reconsidered.
LPIS317	Claire Walker	The choice of greenbelt land is cost based because it cheaper to build on green belt for houses that other types of land. Greenbelt should never be chosen because it's the cheaper option!
LPIS318	Christopher Walker	The choice of greenbelt land is cost based because it cheaper to build on green belt for houses that other types of land. Greenbelt should never be chosen because it's the cheaper option!
LPIS319	Mr T Wright (Land at Upper Birches Farm) (Pegasus Group)	See response to Question 24
Question 26. In what type of locations would it be appropriate to increase housing densities? Can you suggest any ideas for how this could be done while retaining space for soft planting, car parking etc.?		
LPIS320	Church Commissioners (Barton Wilmore)	Town centre locations would be appropriate to increase densities of development given their existing character. Higher densities should, however, not be sought over well-designed schemes. Locations on the edge of existing settlements and in more rural areas should be designed based on the character of the existing area and landscape.
LPIS321	Highways England	See Question 24
LPIS322	Home Builders Federation	The appropriate types of location for increased housing densities are identified in the HBF answers to Q15 and Q17.
LPIS323	Inglewood Investments (SLR Consulting)	CCDC should consider housing densities on a site by site basis. As discussed in Question 7, the District should appropriately accommodate a range of housing needs, and therefore high density development is only appropriate in certain locations, typically central urban areas. By enabling the release of appropriate Green Belt land, this will allow sites to be developed on a strategic scale, and offer a mixture and range of high quality housing for the District. To summarise, although CCDC may prefer to opt to deliver high density developments due to the pressure on housing delivery, we urge you to take a strategic view, and assess each site based on its own merits.
LPIS324	KGL (Estates) Ltd (J Heminsley)	See Question 24
LPIS325	Natural England	Q26 – Please see our response to Q15&16.
LPIS326	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates' response in respect of development density is considered at Question 15.
LPIS327	Richborough Estates (Land South of Cannock Rd Heath)	Richborough Estates' response in respect of development density is considered at Question 15.

	Hayes) (Pegasus Group)	
LPIS328	Rugeley Power Ltd (Savills)	Density of housing development should be flexible. Higher densities should be encouraged in urban areas and more sustainable locations, whilst lower densities may be appropriate and should be allowed where appropriate. That does not necessarily mean simply lower density in rural areas, because there should be an overall efficiency in the use of land for housing. Simply because land is in the countryside or in smaller settlements does not mean it should be used any less efficiently or sustainably. The appropriateness of density should take account of the site as a whole and the various components of the development proposal and the context in which it is being delivered. This should allow for a range of densities across a site, including where development is to be delivered on a phased basis. Self-build provision can be a valid component of housing delivery if proportionate with the level of need identified. Policy should enable flexibility for how any element of self-build provision may be delivered. There are likely to be differing levels of knowledge and skills amongst the community interested in self-build projects. There is more than one way in which flexibility for the consumer to design and procure a house can be achieved. Policy should be receptive to a range of possible solutions and delivery methods.
LPIS329	Rugeley Town Council	See question 25
LPIS330	Staffs. County Council	As you start to consider what locations may be suitable for increased housing densities we would welcome a dialogue on the 'how' in relation to parking and SuDS.
LPIS331	Taylor Wimpey (Lichfield's)	Taylor Wimpey does not have any comments on this matter at the current time.
LPIS332	Mr H Thornton	The Sustainability Appraisal Scoping Report (pages 27 and 30) shows that 82% of work-related travel in the Cannock Chase District is by people using their own transport compared with the national average of 64%, therefore if housing density in the District is increased further it would lead to an unacceptable level of parking on the narrow and already congested roads of new housing areas, causing more annoyance and frustration to residents and visitors, and create a more dangerous and unwelcoming street scene. Already drivers of delivery vehicles often have difficulty in accessing new housing areas.
Question 27. How can the Council ensure that it has considered all the potential brownfield site opportunities, as far as possible? Are there any sites you can suggest which may be underused?		
LPIS333	Beaudesert Golf Club (FBC Manby Bowdler LLP)	SHLAA Site C375 has been submitted as a brownfield site but which does not currently appear on the Brownfield register as such and which is currently (incorrectly) identified as not 'available' – on the contrary, it is available, and the present sieving approach is discouraging its allocation. It is a site of a former sand and gravel quarry as well as extensive tipping activity where there remains clear evidence of the former development, Earlier proposals to provide additional holes as a separate golfing entity were not subsequently pursued. As such it is an unnatural feature in the landscape. The active management of this area would mean that the landscape could be reinstated to a more natural Forest Heathland appropriate to its location; the habitat and biodiversity improved and the public access improved, in accordance with the 2016 'Review of Landscape Character Assessment for Cannock Chase District', thus enhancing the AONB. This requires funding, and the proposal would therefore include the use of a small proportion of the site along Rugeley Road, between the existing settlement boundary and the existing brownfield development at Fallow Parkas enabling development to facilitate this improvement.
LPIS334	Church Commissioners (Barton Wilmore)	The Council should ensure that a pragmatic approach is taken when considering development on brownfield sites and whether these sites can provide for the quantity of housing required and within an appropriate time frame Development on brownfield land generally takes longer to deliver and can be more expensive. This may inhibit the delivery of affordable housing if viable

		developments cannot be found. Therefore, this should be taken into account when allocating sites to meet the identified housing need and sufficient flexibility should be included (i.e. sites with more certainty of delivery).
LPIS335	Greenlight Developments (Lichfield's)	<p>It has been assessed above that the new plan is likely to need to plan for more homes than is currently required. Relating to this, Greenlight notes the Council's stated intention at paragraph 5.51 of the consultation document and that it may be useful to undertake further work on brownfield capacity and potential underused assets.</p> <p>In response to questions 27 and 28, Greenlight's site (see site plan at annex 1), which is located off Wellington Drive in Cannock Chase, represents a brownfield site which is currently underused. The site comprises a disused car auction site of 2Ha on the edge of Cannock Chase settlement and is also a cross boundary site, with the remaining 10.5 Ha falling within South Staffordshire District Council.</p> <p>Given the site's location on the edge of a main settlement, it has high sustainability credentials in terms of proximity to existing shops and services, relation to existing settlements and access to existing transport routes and infrastructure. The site should be considered, in its own right, a reasonable option for future housing land supply for the delivery of c. 55 – 70 homes through allocation in Cannock Chase District. The wider site provides the opportunity for a larger allocation of a total of c.250 homes across Cannock Chase and South Staffordshire.</p> <p>Greenlight is aware that CDC has assessed the site (the parcel within Cannock Chase District) in both its 2016 and 2017 SHLAA documents under reference C121 'land to the rear of Longford House, Watling Street, Cannock'. The site was also included in the Council's Issues and Options Part 2 Local Plan at Appendix 1 as a potential site option for allocation to be assessed in line with options in the plan; albeit noting that as a Green Belt site it falls within the category of restricted sites. Greenlight supports the Council's recognition here that the site could provide a reasonable option for housing provision. It should be considered both suitable and available.</p> <p>The HMA Growth Study is clear that in order to accommodate future housing requirement from the HMA, Councils should look at further options for allocations on non-green belt land, maximise capacity on brownfield land and that Green Belt release will need to be looked at (para. 5.45 of the consultation document). It is understood that it is not an option for Cannock Chase to identify further supply on other non-green belt sites on a strategic scale due to Green Belt and other environmental constraints.</p> <p>Given these recommendations and previous assessments, Greenlight's site should be continued to be assessed through the forthcoming plan stages and supporting evidence documents as a reasonable option for housing delivery on a currently underutilised brownfield site. This is particularly so given requirements of the new NPPF (2018, para. 138) which states:</p> <p>"...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."</p>
LPIS336	Highways England	See Question 24
LPIS337	Home Builders Federation	The Council should make as much use as possible of previously developed land known as brownfield land (revised NPPF para 117). However there are associated risks with an over reliance on brownfield sites because as a finite resource the availability of such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites and it may inhibit the delivery of affordable housing.
LPIS338	Inglewood Investments (SLR Consulting)	It is a requirement under Regulation 3 of the Town and Country Planning (Brownfield Land Register Regulations 2017) for LPAs to prepare, maintain and publish a Brownfield Land Register of previously developed land, and review these sites yearly. CCDC

		<p>should therefore provide up to date and publically available information on brownfield land that is suitable for housing, as this will encourage investment, and also advocate a 'brownfield first' approach which the NPPF favours.</p> <p>It is understood that the site options suggested as part of the Local Plan (Part 2) Issues and Options Consultation will be brought forward and used as a starting point for the latest SHLAA. In addition to the Brownfield Land Register, it is important for the CCDC to consider other options as a fall-back position; we therefore support CCDC's approach in terms of utilising the previous evidence base, provided that this is refreshed and updated.</p>
LPIS339	KGL (Estates) Ltd (J Heminsley)	See Question 24
LPIS340	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates submits that maintaining an up to date Strategic Housing Land Availability Assessment (SHLAA) in conjunction with a Brownfield Land Register is a sufficient evidence base to identify all brownfield land opportunities.
LPIS341	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates submits that maintaining an up to date Strategic Housing Land Availability Assessment (SHLAA) in conjunction with a Brownfield Land Register is a sufficient evidence base to identify all brownfield land opportunities.
LPIS342	Rugeley Town Council	See question 25
LPIS343	Staffs. County Council	The proposals put forward in paragraphs 5.51 – 5.53 are supported.
LPIS344	Taylor Wimpey (Lichfield's)	Taylor Wimpey considers that the most effective method of identifying brownfield site opportunities will be through the SHLAA and the 'call for sites' process. As required by the revised Framework [§67], the supply of sites, identified will need to take into account their availability, suitability and likely economic viability to ensure that they are genuinely deliverable or developable.
LPIS345	Claire Walker	Unused industrial sites at cross keys, industrial land behind Sainsbury's (lakeside), Town centre unusable multi-storey carpark. Disused office buildings etc. etc.
LPIS346	Christopher Walker	Unused industrial sites at cross keys, industrial land behind Sainsbury's (lakeside), Town centre unusable multi-storey carpark. Disused office buildings etc. etc.
Question 28. What key locations or sites within the District, or cross boundary sites, should be considered reasonable options for future housing land supply?		
LPIS347	Beaudesert Golf Club (FBC Manby Bowdler LLP)	SHLAA Site C375 – the allocation of a small part of which for housing presents an opportunity to facilitate improvements to the remainder of that site in terms of landscape character, habitat, public accessibility and provision of leisure facilities.
LPIS348	Church Commissioners (Barton Wilmore)	The site at 'Bleak House' previously promoted, with details appended to this representation in the form of a Vision Document, should be considered by the Council as a suitable and sustainable site for housing development, which is deliverable and available for development now. The site can accommodate around 1,000 dwellings, can be delivered in phases and provide new readily recognisable Green Belt boundaries using physical features.

LPIS349	Greenlight Developments (Lichfield's)	See question 27
LPIS350	Highways England	See Question 24
LPIS351	Home Builders Federation	<p>The strategic policies of the new Local Plan should provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address housing needs over the plan period including planning for and allocating sufficient sites to deliver strategic priorities (revised NPPF para 23). The Council should have a clear understanding of land availability in the District by preparing a strategic housing land availability assessment which should be used to identify sufficient supply and mix of sites taking account of availability, suitability and economic viability. The policies of the new Local plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 (revised NPPF para 67). The Council should also identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). The new Local Plan should include a trajectory illustrating the expected rate of housing delivery over the plan period. A minimum 5 years supply of specific deliverable sites including a buffer should be maintained (paras 73 & 74).</p> <p>For the Council to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increasing housing supply is increasing the number of sales outlets whilst large strategic sites may have multiple outlets usually increasing the number of sales outlets available inevitably means increasing the number of housing site allocations. Large strategic sites should be complimented by smaller scale non-strategic sites. This approach is also advocated in the Housing White Paper “Fixing the Broken Housing Market” because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p> <p>The Council should also apply a flexibility contingency to its overall housing land supply (HLS) in order that the new Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling. The HBF acknowledge that there can be no numerical formula to determine the appropriate quantum for a flexibility contingency but where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. As identified in Sir Oliver Letwin’s interim findings large housing sites may be held back by numerous constraints including discharge of pre-commencement planning conditions, limited availability of skilled labour, limited supplies of building materials, limited availability of capital, constrained logistics of sites, slow speed of installation by utility companies, difficulties of land remediation, provision of local transport infrastructure, absorption sales rates of open market housing and limitations on open market housing receipts to cross subsidise affordable housing. Therefore, the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces. If during the new Local Plan Examination any of the Council’s assumptions on lapse rates, windfall allowances and delivery rates were to be adjusted or any proposed housing site allocations were to be found unsound then any proposed contingency would be eroded. The DCLG presentation slide from the HBF Planning Conference September 2015 (see below) which illustrates a 10 – 20% non-implementation gap together with 15 – 20% lapse rate. The slide also suggests “the need to plan for permissions on more units than the housing start / completions ambition”.</p>

		<p>Department for Communities and Local Government</p> <p>In recent years there has been a 30-40% gap between permissions and housing starts</p> <ul style="list-style-type: none"> • Gap of around 30-40% between the number of permissions given for housing and starts on site within a year. Estimate that for a year's permissions for housing around: • 10-20% do not materialise into a start, the permission 'drops out': this could be because - <ul style="list-style-type: none"> • the landowner cannot get the price for the site that they want • a developer cannot secure finance or meet the terms of an option • the development is later not considered to be financially worthwhile • there are supply chain constraints hindering a start. <p>There may be scope to reduce this through policy.</p> • 15-20% are not abandoned but a re-permission is sought, for example to make a major change to plans or to extend the development period. • Recent data and realities of private market suggests need to plan for permissions on more units than housing start/completion ambition. <p>Extract from slide presentation "DCLG Planning Update" by Ruth Stanier Director of Planning – HBF Planning Conference Sept 2015</p>
LPIS352	Inglewood Investments (SLR Consulting)	<p>Rugeley is considered a Town Centre as defined under your current Policy CP11. Rugeley is also subject to a Town Centre Area Action Plan which was adopted as part of the Local Plan Part 1 Document. It is therefore evident that Rugeley is a key growth area within the District and is a strategic development location; we therefore consider that Rugeley should be prioritised as a preferable location for future growth, particularly given its location and its potential to deliver cross boundary benefits.</p> <p>Our Client's site adjoins the southern edge of Rugeley and is suitable, available and achievable, as demonstrated within our Site Promotional Document which we urge you to re-visit. Inglewood intend to continue the promotion of this site and are currently preparing a concept masterplan to demonstrate how an appropriate development can be delivered.</p>
LPIS353	KGL (Estates) Ltd (J Heminsley)	See Question 24
LPIS354	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	<p>As set out elsewhere within the Representation, development should be considered in the most sustainable locations, including sites located within the Green Belt and those which fall across multiple boundaries.</p> <p>The Local Plan should identify sufficient housing sites to bring forward at a rate necessary in order to maintain at least a five-year supply of housing land, in accordance with the NPPF. The policies of the new Local plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15, in accordance with Paragraph 67 of the NPPF.</p> <p>The Council should maximize housing supply through identifying a wide range of sites in terms size and location to allow for house builders of all types and sizes to contribute towards the delivery of housing.</p>
LPIS355	Richborough Estates (Land South of Cannock Rd Heath)	As set out elsewhere within the Representation, development should be considered in the most sustainable locations, including sites located within the Green Belt and those which fall across multiple boundaries.

	Hayes) (Pegasus Group)	<p>The Local Plan should identify sufficient housing sites to bring forward at a rate necessary in order to maintain at least a five-year supply of housing land, in accordance with the NPPF. The policies of the new Local plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15, in accordance with Paragraph 67 of the NPPF.</p> <p>The Council should maximize housing supply through identifying a wide range of sites in terms size and location to allow for house builders of all types and sizes to contribute towards the delivery of housing.</p>
LPIS356	Rugeley Town Council	See question 25
LPIS357	Staffs. County Council	As sites/location for development are being considered it will be useful to have an early dialogue with the County Council so we can provide information and commentary on potential infrastructure issues that may need to be considered.
LPIS358	Taylor Wimpey (Lichfield's)	<p>Taylor Wimpey considers that land to the east of Wimblebury Road, Cannock should be allocated for residential development. The adopted Cannock Chase Local Plan (2014) Policies Map identifies the south western portion of the Wimblebury Road site as Safeguarded Land for possible development post 2028. The northern and eastern portions of the site are identified as Green Belt. Taylor Wimpey is seeking the release of all of the site from the Green Belt/safeguarded land and its allocation for residential development.</p> <p>The Development Statement that accompanies these representations promotes the allocation of land at Wimblebury Road, Cannock for residential development. Its purpose is to explain why the site is appropriate for development, demonstrate that the Green Belt part of the site no longer fulfils the Green Belt purposes and provide an analysis of the physical and technical limitations of the site.</p> <p>In relation to Green Belt release, the LPIS [§5.46] states that the areas of search which will need to be investigated relate to smaller scale 'proportionate dispersal' (i.e. smaller extensions to existing settlements) in the area to the south-east of the District (considered 'in the round' with other options for accommodating housing in the District). Taylor Wimpey considers that the allocation of land to the east of Wimblebury Road for housing development would help meet the identified need for housing and falls within this part of the district.</p> <p>Whilst the content of the Development Statement is not repeated here, Taylor Wimpey wishes to highlight that the site is within the control of a major housebuilder with a strong track record of delivery in the region, and Cannock Chase District specifically. The Development Statement demonstrates that the land at Wimblebury Road, Cannock represents an ideal opportunity to create a sustainable, distinctive and attractive development which will help meet the needs of the community for housing in the short term.</p> <p>The removal of the land at Wimblebury Road, Cannock from the Green Belt will not compromise the five purposes of the Green Belt. In particular:</p> <ol style="list-style-type: none"> 1. The site is well contained on all sides, the boundaries of the site are strong and defensible and will have permanence beyond the plan period. 2. The removal of the site from the Green Belt will not result in unrestricted sprawl of Cannock but will remove a site that is well contained and well related to the residential built up area of Cannock. 3. The development of the site will provide an opportunity to establish a strong landscaped boundary to Cannock and will not result in the merging of neighbouring settlements. 4. The site does not fulfil any strategic Green Belt function and its loss will not lead to any issues of coalescence.

		<p>It is evident that the removal of the site from the Green Belt and its allocation for housing will not harm any of the five purposes of the Green Belt set out in the Framework [§80].</p> <p>The principle of residential development at Wimblebury Road and its release from the Green Belt should be supported because:</p> <ol style="list-style-type: none"> 1. The site is a sustainable location for development; 2. There are 'exceptional circumstances' to justify its release from the Green Belt and its development would not harm Green Belt objectives in this location; 3. Aside from Green Belt, the land is not subject to any policy constraints, ecological, environmental or landscape designations; 4. It is not subject to any significant technical or environmental constraints that will prevent it coming forward for housing; 5. The proposed development offers significant economic, social and environmental benefits and meets the Government's objectives for the creation of sustainable development; and, 6. The site could be brought forward for development within the first five years of the plan period.
LPIS359	Upton Trust & Carney Brothers (Wardell Armstrong)	<p>Options for allowing the development of more edge of settlements as part of a wider strategy of allowing greater densities in more central areas would have to be considered as a reasonable alternative when considering the chosen spatial strategy as part of an objective and evidenced Sustainability Appraisal process.</p> <p>This may include, where exceptional circumstances exist, sites within the Green Belt. The Council will need to consider the most sustainable and deliverable options for ensuring that the required housing supply for the plan period is identified. The plan will have to recognise that Green Belt and AONB sites will need to be considered in relation to longer term needs and any additional housing requirement which arise (The Greater Birmingham factor).</p>
LPIS360	Claire Walker	See question 27 response.
LPIS361	Christopher Walker	See question 27 response.
Question 29. Can you suggest specific criteria for screening out sites which are not reasonable options for development at an early stage? How might this be justified?		
LPIS362	Church Commissioners (Barton Wilmore)	<p>Footnote 6 of the Revised NPPF should be used as a starting point for screening sites and their suitability for development. However, we feel that the Green Belt should be removed from this list in recognising the likely need for development beyond the urban area to meet housing need. The Council should also have regard to the provisions of Paragraph 138 of the Revised NPPF when considering sites and their suitability: a full range of criteria should be used to ensure the site is sustainable.</p> <p>We would advocate to you the approach of Cheshire East Council in selecting sites for residential allocation. Cheshire East, like Cannock Chase District, is significantly constrained by the Green Belt and as a result has limited urban capacity. Cheshire East have gone through three stages of Plan examination which has resulted in the refinement of their site selection methodology. Cheshire East use a 'traffic light' criteria to assess Availability, Achievability, Suitability and compatibility with the Vision and Strategic Priorities, and this included the release of Green Belt sites.</p>
LPIS363	Highways England	See Question 24
LPIS364	Inglewood Investments (SLR Consulting)	Any sites within the AONB or sites which are subject to European and national designations relating to ecological or heritage value should not be considered appropriate for development. We suggest that when screening out sites, this should be positioned at forefront of the criteria, and it will help CCDC narrow down the options being considered. Given that these are national and

		international designations which are afforded other legislative protection; this would provide a robust baseline which aligns with this legislative position.
LPIS365	Lichfield District Council	With reference to; “may be appropriate to scope out sites before this comprehensive assessment stage using a defined set of criteria e.g. some responses suggested all sites that lie within the AONB should be scoped out from any further consideration for development at an earlier stage in the process. We would welcome your views on what criteria could be used to scope out sites at an early stage in the process (i.e. discounting sites that are not ‘reasonable options’)[5.57]; although some areas are sensitive, Lichfield District Council would be concerned about scoping sites out simply because the AONB exists. Instead Lichfield District Council suggest that you undertake a thorough assessment which examines the scope to deliver sensitive development within and adjoining the AONB.
LPIS366	Natural England	When considering specific criteria for screening out sites, the LPA could use information available on SSSI risk zones and best and most versatile land. See below for more information. Protected sites and SSSI Impact Risk Zones Natural England published the SSSI Impact Risk Zones (IRZs) on MAGIC and as a downloadable GIS dataset, so that as Local Planning Authorities (LPAs) you can use them on your own systems. The published IRZs are designed to be used in the planning application validation process to help planners consider if a proposed development is likely to affect a SSSI and decide whether they will need to consult Natural England for advice. However they may also be helpful during the site allocations phase of local plans. <u>Best and most versatile land (BMV)</u> Strategic provisional agricultural land classification data and post 1988 agricultural land classification can be found in MAGIC under Landscape classification along with general mapped information on soil types available as ‘Soilscapes’. The LandIS website contains more information about obtaining soil data.
LPIS367	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates submit that sites should be considered ‘in the round’ and on their own merits, rather than screened using pre-defined criteria. The Green Belt should not be used to screen out sites. Sites that are remote from sustainable settlements should be screened in the first instance.
LPIS368	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates submit that sites should be considered ‘in the round’ and on their own merits, rather than screened using pre-defined criteria. The Green Belt should not be used to screen out sites. Sites that are remote from sustainable settlements should be screened in the first instance.
LPIS369	Rugeley Town Council	See question 25
LPIS370	Sport England	An updated Indoor and Built Facility Strategy and Playing Pitch Strategy will help to inform sites that should be protected unless replacement provision is made in line with NPPF para 97 and Sport England Playing Field Policy (https://www.sportengland.org/media/12940/final-playing-fields-policy-and-guidance-document.pdf). It should be noted that if a playing pitch is currently underutilised it still might be required to meet future demand, again this will be informed by the updated strategy.
LPIS371	Staffs. County Council	Any criteria for screening out potential housing sites not suitable to go forward should include waste related factors to safeguard existing infrastructure. We would be happy to contribute to their development.
LPIS372	Taylor Wimpey (Lichfield’s)	Taylor Wimpey does not have specific comments on how sites may be screened out at an early stage but wishes to comment on the overall approach to identifying suitable sites for residential development.

		<p>In order to ensure consistency of approach when identifying which sites are suitable for allocation and Green Belt release, the Council will need to apply a transparent methodology and the use of a site assessment matrix may be appropriate for this purpose. The weight given to criteria applied and a clear scoring mechanism will need to be established in the methodology. For example, the weight to be applied to a sites Green Belt status against other sustainability criteria needs to be clearly identified. Site deliverability should be clearly identified within any assessment as it is important to identify those sites which could come forward for development in years 1-5, 5-10, and 10-15.</p> <p>This will help to ensure that the Council's site identification process stands up to scrutiny by stakeholders and that a sound plan is delivered.</p>
LPIS373	Upton Trust & Carney Brothers (Wardell Armstrong)	<p>Planning Practice Guidance explains that reasonable alternatives comprise “the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable” (ID: 11-018-20140306).</p> <p>All reasonable alternatives must be assessed in the same level of detail. This is important to allow the assessment arising from the Sustainability Appraisal to outline the reason why a preferred approach has been selected in light of the alternatives not taken forward as well as documenting the overall sustainability of all the different alternatives identified.</p> <p>Reasonable alternatives should be identified and considered at an early stage in the plan making process, as the assessment of these should inform the local planning authority in choosing its preferred approach (when developing alternatives, paragraph 152 of the National Planning Policy Framework should be referred to). Paragraph: 017 Reference ID: 11-017-20140306.</p> <p>The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach).</p> <p>Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.</p> <p>The NPPF defines the meaning of deliverable being</p> <ul style="list-style-type: none"> • sites for housing should be available now, • offer a suitable location for development now, and • be achievable with a realistic prospect that housing will be delivered on the site within five years. <p>Whilst para 172 confirms that “Great weight should be given to conserving and enhancing landscape and scenic beauty in...Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues”, it continues: The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development (55) other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:</p> <ol style="list-style-type: none"> a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

		<p>Footnote 55 clarifies that for the purposes of paragraphs 172 and 173, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.</p> <p>Thus, whilst the designation of AONB is a constraint to major development the NPPF considers that there may be circumstances in which such an alternative may be necessary, reasonable and indeed justified.</p> <p>To screen out such options at an early stage would directly conflict with the advice within the PPG, excluding potentially reasonable alternatives that may perform well against other sustainability criteria.</p> <p>We note the recent letter of 08 June 2018 to North Essex Authorities in relation to their Strategic (Section 1 Plan by Roger Clewes (Inspector) and the need to demonstrate, in particular, the objectivity of the assessment of the chosen spatial strategy and the alternatives to it.</p> <p>Options for allowing the development of more edge of settlements as part of a wider strategy of allowing greater densities in more central areas would have to be considered as a reasonable alternative when considering the chosen spatial strategy as part of an objective and evidenced Sustainability Appraisal process.</p>
LPIS374	Claire Walker	All Greenbelt and AONB.
LPIS375	Christopher Walker	All Greenbelt and AONB.
Review of CP7: Housing Choice		
Question 30. Do you have any comments on what issues in relation to housing needs need to be addressed and what policy options may need to be considered, taking account of key local issues including affordable housing needs and an ageing population?		
LPIS376	Church Commissioners (Barton Wilmore)	The LPR should take account of the full range of housing need by different groups and should allocate a range of sites which will deliver this need. As set out in Question 27, if there is an overreliance on brownfield sites the supply may be reduced by viability issues.
LPIS377	Greenlight Developments (Lichfield's)	The District Corporate Plan identifies 'Promoting Prosperity' as one of its two corporate priorities for 2018-2023. One of its strategic objectives is increased housing choice. Greenlight support this the principle of this objective as well as the Council's statement at paragraph 5.65 of the consultation document that this will be based on up to date evidence base with the production of a housing needs assessment (including affordable housing needs) and an economic viability assessment for housing developments. The Council will need to take into account the requirements of the revised Framework (July 2018) and changes to the Practice Guidance.
LPIS378	Highways England	See Question 24
LPIS379	Home Builders Federation	<p>The new Local Plan should deliver housing to meet the full range of local needs including affordable housing and specialist housing. The HBF recognise that all households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as the elderly without seeking a specific housing mix on individual sites. Indeed, the housing needs of older people is a diverse sector so the new Local Plan should be ensuring that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.</p> <p>The Written Ministerial Statement dated 25th March 2015 stated that "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been</p>

		considered, in accordance with the NPPG". If the Council wishes to adopt the higher optional standards for accessible/adaptable homes the Council should only do so by applying the criteria set out in the NPPG. All new homes are built to Building Regulation Part M standards. So it is incumbent on the Council to provide a local assessment evidencing the specific case for Cannock Chase which justifies the inclusion of optional higher standards for accessible / adaptable homes and the quantum thereof. The District's ageing population is not unusual and is not a phenomenon specific to Cannock Chase. If it had been the Government's intention that generic statements about an ageing population justified adoption of higher optional accessible/adaptable standards then the logical solution would have been to incorporate the standard as mandatory via the Building Regulations which the Government has not done. The optional higher standards should only be introduced on a "need to have" rather than "nice to have" basis. The Council should also consider the potential unintended consequence of encouraging the under-occupation of its housing stock by discouraging older households from moving.
LPIS380	Inglewood Investments (SLR Consulting)	<p>The District should deliver a mix of housing choice options to meet the needs of the District, including:</p> <ul style="list-style-type: none"> • Intermediate housing; • Private Rented Sector housing; • Open market housing; • Share Ownership housing; • Social Rented housing; • Supported and Assisted living; • Retirement housing; and • Care home provision. <p>We consider that there should be an explicit recognition of the importance of intermediate housing comprising of discounted products (in perpetuity) which are not managed through the Registered Provider process, which provide access to 'mortgageable' property for a wider range of people. This form of housing can help to provide real affordability for those not meeting the criteria for social housing, and can help to make marginal sites more viable and deliverable, while still providing more affordable housing options.</p>
LPIS381	Jukes, June	Having helped with a local food bank affordable housing should be a priority. Many families on low incomes cannot afford huge commercial rents.
LPIS382	KGL (Estates) Ltd (J Heminsley)	In relation to Policy CP7 it is agreed that the evidence on the full range of housing need including affordable and housing an ageing population needs to be updated with a new housing needs study.
LPIS383	National Farmers Union West Midlands Region	<p>The document does not include any reference to rural or agricultural workers dwellings. This is a significant omission and could be detrimental to the development of agricultural businesses.</p> <p>The revised NPPF states that the needs of groups with specific housing requirements be addressed. It also outlines an exemption allowing a new dwelling for new entrants taking on a farm and measures to accommodate additional worker homes on farms.</p> <p>Therefore it is critical that the Council addresses this omission and sets out a policy to take into consideration the housing needs of people employed in agriculture and rural businesses, particularly when those businesses are located within the green belt.</p>
LPIS384	Rentplus UK Ltd (Tetlow King)	In response to Questions 30 and 31 we agree, as per our earlier comments, that the Council's evidence base would benefit from an update and for this to include an assessment against the revised NPPF definition of affordable housing. For a change in delivery of

		affordable housing to take place, encouraging a much greater supply, policy needs to be robust in seeking the most ambitious level of affordable housing, from as wide an array of developments as possible. We ask that the Council engage directly with local providers of affordable housing, including Rentplus, to discuss the most useful policy approaches to encouraging this delivery and in reducing the barriers to development coming forward more quickly to meet needs.
LPIS385	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	The new Local Plan should deliver housing to meet the full range of local needs, including affordable and specialist housing, in addition to un-met affordable need from within the GBHMA. Richborough Estates submits that, whilst it is important to identify a wide range of sites for housing, larger sites provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure.
LPIS386	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	The new Local Plan should deliver housing to meet the full range of local needs, including affordable and specialist housing, in addition to un-met affordable need from within the GBHMA. Richborough Estates submits that, whilst it is important to identify a wide range of sites for housing, larger sites provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure.
LPIS387	Rugeley Power Ltd (Savills)	Provision of a mix of housing types, sizes and tenures is supported. Consistent with our other comments on the Plan, flexibility is key and should be enabled through policy. Strategic objectives and viability are important considerations to achieving a balanced mixed development. The overriding pre-requisite however, is that to be achieved, development must be viable. Policy aspirations for type, size and tenure should therefore take account of cross local authority boundary issues, by seeking to achieve the policy objective for balanced communities across sites as a whole. Viability should also be considered across sites as a whole, including across local authority boundaries, taking account of the benefits of achieving sustainable new development in general terms and weighing that in the balance with more specific policy requirements.
LPIS388	Rugeley Town Council	Accessible housing for an ageing population would be encouraged near to the town centre or on good transport links. Elderly residents that are unable to get out need to be part of the community rather than on the edge in order to feel included and have the opportunity to link in to local support services and groups.
LPIS389	Staffs. County Council	<p>In relation to the ageing population issue the County Council is in the process of undertaking a countywide project to provide an insight and intelligence around the need for and supply of specialist housing for older people across Staffordshire up to 2037. The 'Next Generation Care' project is directed at helping potential suppliers and developers of specialist accommodation to make informed business decisions around future development opportunities in Staffordshire but the evidence base and assessment is relevant to plan making.</p> <p>One of our key reports, the 'Staffordshire-wide evidence base: Extra Care and Care Homes,' provides evidence on the current and future extra care and care home needs of the people in Staffordshire, and provides the outcomes of modelling based on current and predicted needs and gaps or pressure points. This report could be useful in helping break determine the proportion of specialist accommodation for older people needed for the District and plan for that accordingly.</p> <p>In addition to the evidence base, we are developing a series of district focused Locality Analysis reports. These will provide information on the current supply and location of all specialist accommodation for older people, including any major developments which have planning approval, in the main towns and conurbations. They also explore accessibility by foot and public transport of the main services and amenities that are important for supporting an independent living model, using reasonable walking distance calculations for an older person.</p> <p>The evidence base and locality analysis, can be found at</p>

		<p>https://www.staffordshire.gov.uk/health/Information-for-providers/Information-for-providers.aspx</p> <p>In addition to the above documents officers at the County are available to discuss options and considerations for mainstream housing suitable for older person with lower or no care needs such as adaptable housing, bungalows etc. This may include providing data to support use of enhanced buildings regulations part M.</p>
LPIS390	Taylor Wimpey (Lichfield's)	<p>The Council needs to base its approach to affordable housing delivery on the proposals set out in the revised Framework (July 2018) and the Practice Guidance on housing and economic development needs assessments. To provide certainty on viability, affordable housing requirements should be expressed as a single figure rather than a range, as recommended in the Practice Guidance [Reference ID: 10-001-20180724]. It will be important to ensure that local market housing needs are met in full as well as the need for other housing tenures including affordable.</p>
LPIS391	West Midlands HARP (Housing Assoc. Registered Providers) Planning Consortium (Tetlow King)	<p>Policy CP7</p> <p>We agree that Policy CP7 needs to be updated. This needs to take account not only of more recent evidence of housing needs, but also the updates to the affordable housing definition set out in the new NPPF. This retains social and affordable rented but expands the definitions of other types of housing considered by the Government to fall within the affordable category. The Council should consider through its review of need, to what extent those types of affordable housing will directly meet needs across Cannock Chase and in meeting neighbouring authorities' needs.</p> <p>Affordable Housing</p> <p>As set out in Section 5 of this consultation document, the Greater Birmingham Housing Market Area Strategic Growth Study evidenced a significant increase in need for all housing tenures, of all sizes. In translating these needs into suitable policies, the Council should look to involve Housing Associations as far as possible in setting a local definition of affordable housing that will encourage delivery of all affordable housing types. As the presumption should always be in favour of on-site affordable housing delivery, the preference for early engagement with local Housing Associations should be emphasised in the Plan policies.</p> <p>Affordable Housing in perpetuity</p> <p>We would like to remind the Council that the Government guidance states that affordable housing may be secured for future eligible households, however the requirement for affordable housing to be retained in perpetuity in planning policies is only raised in relation to housing delivered on rural exception sites. The term has a clear legal meaning which is recognised within the NPPF (2012). This principle is appropriate and supported by our members on rural exception sites as this helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported.</p> <p>Securing affordable housing in perpetuity more widely is not supported for a number of reasons, foremost of which is that it restricts lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. As the availability of public grant funding has been significantly restricted in recent years, the ability of Registered Providers to obtain private finance for the development of new affordable housing should not be further restricted by unnecessary Section 106 clauses.</p> <p>As well as restricting future ability to recycle housing stock where necessary to respond to local circumstances, and when used in a rigid fashion also prevents tenants from being able to staircase to full home ownership in intermediate affordable housing. This latter point is particularly critical as inability to staircase to full home ownership depresses interest in such housing, as potential purchasers look instead to Help to Buy products. This is unhelpful and restricts Registered Providers' ability to fund development</p>

		<p>over the long term; as receipts from the sales of shared ownership properties are funnelled directly back into delivering more affordable housing it is perverse to prevent staircasing. We ask that the Council reconsider this approach and look to other mechanisms where necessary, allowing Registered Providers to recycle public subsidy to reinvest in new stock. Securing affordable housing through conditions and Section 106 Agreements can be achieved without further restricting development potential. We have enclosed a Proposed Standard Mortgagee Exclusion Clause wording for your information.</p> <p>Ageing Population We welcome the Council seeking to address housing choice across the council area including the ageing population. We are of the opinion that a separate policy is needed to fully represent the needs of housing and care for older people. An example of positive policy wording is set out below.</p> <p>“The Council will, through the identification of sites and/or granting of planning consents, provide for the development of residential care homes, nursing homes, close care, extra care and assisted care housing, and Continuing Care Retirement Communities which encompass an integrated range of such provision.</p> <p>In identifying sites and/or determining planning applications, regard will be had to:</p> <ul style="list-style-type: none"> • Commission for Social Care Inspection and other operational requirements; • Locational sustainability. Suitable sites at defined settlements will be prioritised, but where such sites are not available, regard will be had to the availability of public transport and the potential for developments to be self-contained, thereby reducing travel requirements; • The potential to co-locate a nursing/residential care home and other care related accommodation on the site where there are demonstrated needs.”
Question 31. Do you have any comments on the evidence base updates required?		
LPIS392	Church Commissioners (Barton Wilmore)	We agree with the proposed evidence to be updated. Any updated evidence should take into account the Revised NPPF, the Standardised Methodology, the housing needs of Greater Birmingham and the Black Country and the requirement to prepare and maintain Statements of Common Ground.
LPIS393	Greenlight Developments (Lichfield's)	See Question 30
LPIS394	Hargreaves M	As well as updating the Gypsy and Traveller Accommodation Needs Assessment (GTANA) on the basis of the 2015 Gypsy & Traveller definition, the Council is required to assess needs for caravan & houseboat accommodation. Many of those the GTANA determines do not meet the 2015 definition will require caravan accommodation, and the GTANA should be designed so as to also identify such needs from Gypsies & Travellers.
LPIS395	Highways England	See Question 24
LPIS396	Home Builders Federation	The supporting evidence should be renewed and updated. Any updating of evidence should be undertaken in accordance with the revised NPPF including the preparation of Statements of Common Ground, the standardised methodology for the calculation of housing needs, the housing delivery test and whole plan viability assessment (see HBF answers to Q3, Q24 & Q25). The Council's supporting evidence should also align with the proposed new Local Plan timeframe of 2020 – 2036 (see HBF answer to Q9).
LPIS397	KGL (Estates) Ltd (J Heminsley)	See Question 30

LPIS398	Rentplus UK Ltd (Tetlow King)	See Question 30
LPIS399	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates submit that housing mix should not be specified in any Local Plan Policy, which only presents snapshot in time. Instead, Policy should direct the reader to the latest evidence base, such as the Strategic Housing Market Assessment (SHMA), which should be routinely updated across the 15-year Plan Period. This ensures that housing mix is reflective of market-driven need.
LPIS400	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates submit that housing mix should not be specified in any Local Plan Policy, which only presents snapshot in time. Instead, Policy should direct the reader to the latest evidence base, such as the Strategic Housing Market Assessment (SHMA), which should be routinely updated across the 15-year Plan Period. This ensures that housing mix is reflective of market-driven need.
LPIS401	Rugeley Town Council	See question 30
LPIS402	Staffs. County Council	The two evidence studies proposed to be produced are deemed to be appropriate. The Housing needs assessment can be informed in part by the work discussed above. In relation to the Economic Viability Assessment for housing developments it is acknowledged that this will take into account S106 and CIL charges. We are mindful that government has proposed to amend legislation around operation of CIL, in particular Regulation 123, and how S106 operates alongside. It will be important to have regard to these changes in the assessment and how infrastructure requirements will be funded.
LPIS403	Taylor Wimpey (Lichfield's)	The Council will need to take into account the requirements of the revised Framework (July 2018) and changes to the Practice Guidance, including that on housing and economic development needs assessments to account for updates in national policy since the Council undertook its Strategic Housing Market Assessment in 2012.
Question 32. Do you have any suggestions for appropriate areas of search/additional sites that could be considered for Gypsy, Traveller and Travelling Showpeople provision?		
LPIS404	Hargreaves M	In practice there will be considerable overlap between the accommodation required for Gypsies and Travellers who meet the 2015 Gypsy & Traveller definition, & those who fall outside it. It will often be the case that some households within an extended family will meet the definition & others will not (& their Article 8 human rights may be engaged if accommodation is approved for some but not others). Sites should be allocated as suitable for both groups of Travellers. A range of factors including high land values with hope value mean it is increasingly difficult for Gypsies & Travellers to acquire land. As well as the A5 area of search Traveller sites should be supported in appropriate locations across the District. Given the failure to approve sites, the policy framework should require the provision of sites through the largest housing development sites. Much of the demand from Gypsies & Travellers is for small – up to the equivalent of 5 or 6 pitch extended family sites. Many would be interested in pitches provided with services which they could develop themselves.
LPIS405	Highways England	See Question 24
LPIS406	Rugeley Town Council	See question 30
LPIS407	Staffs. Police	Staffordshire Police acknowledges and supports the need for additional pitches; however, this provision should not be met simply by increasing the size of existing sites by adding additional pitches, but by increasing the number of sites themselves. Consultation in other areas with the Gypsy and Traveller community along with other consultation documents supports the view that the size of sites should be small (five to ten pitches) and, where possible occupied by one extended family group (Menter Briefing Paper, John Day, April 2007).

		Transit sites do not affect the large majority of Gypsies and Travellers. There should be a transit site for those who have been moved from unauthorised encampments, however, any transit site should not be situated near existing Gypsy and Traveller sites. There is a need on occasions for transit sites to be available for those sections of the community passing through who may wish to temporarily stop for a short period of time whilst working in the area or travelling through the area such as show people, a transit site would assist with preventing the unauthorised encampments that occur within the locality and would alleviate some of the costs incurred by the Force and other public services policing such encampments and evicting illegal campers, as well as costs incurred from cleaning up an area after an encampment has left.
LPIS408	Taylor Wimpey (Lichfield's)	Taylor Wimpey does not have any comments in respect of sites to meet the requirements of Gypsy, Traveller and Travelling Showpeople.
Question 33. Can you suggest specific criteria for screening out sites which are not reasonable options for development at an early stage? How might this be justified?		
LPIS409	Highways England	See Question 24
LPIS410	Natural England	Q33 – Please see our response to Q29 with reference to SSSI impact risk zones.
LPIS411	Rugeley Town Council	See question 30
LPIS412	Taylor Wimpey (Lichfield's)	Taylor Wimpey does not have any comments in respect of sites to meet the requirements of Gypsy, Traveller and Travelling Showpeople.
Review of CP8: Employment Land		
Question 34. Do you have any comments on what issues in relation to employment land supply need to be addressed and what policy options may need to be considered?		
LPIS413	Digibits Ltd (Marcus Clay)	With regards to employment land, with specific reference to Rugeley, we would hope that, in order to encourage growth in the SAME economy, at least part of the decommissioned Power site was allocated to small business and industrial units. In this way the local authority can encourage both the growth of existing small businesses and the establishment of new ones. Much recent use of land has tended to favour larger businesses from those at the very upper SME size, to multi-national corporations. To support businesses in all areas of the Local Authority, it is vital that the issue of overnight and long term HGV parking is addressed. At present, large numbers of HGV's are parking on industrial estate roads, often for days at a time, waiting for return loads or undertaking their mandatory weekly/fortnightly drivers breaks. On Wheelhouse Road, there are now sometimes as many as eight, articulated lorries parked astern. Many are blocking junctions and, when challenged on this issue, their standard response is they can park anywhere where there are no double-yellow lines. This situation is out of control, it makes it very difficult and dangerous not only for employees but also for HGV's with legitimate business on the estate to gain access, especially at peak times. On many days, there is nowhere for any vehicle to wait for an appointed visit or loading/unloading time at any of the businesses because all available parking is occupied.
LPIS414	Highways England	Highways England is not in a position to indicate alternative locations for employment development or comment in detail on specific sites. However, the transport implications of potential sites must be properly assessed in considering them for an allocation and should be key criteria for screening out sites for development. Reference should be made in the emerging plan to appropriate transport assessments to be undertaken by the developers of sites and the benefits of early liaison with Highways England where there are potential impacts on the SRN. Highways England would expect to comment on the spatial distribution of employment development in relation to the SRN once determined.
LPIS415	KGL (Estates) Ltd (J Heminsley)	There is already an acknowledged shortfall in employment land supply, some of which can be met on the former Rugeley Power Station site. However in the south of the District the existing infrastructure at Kingswood Lakes suggests that this is the most

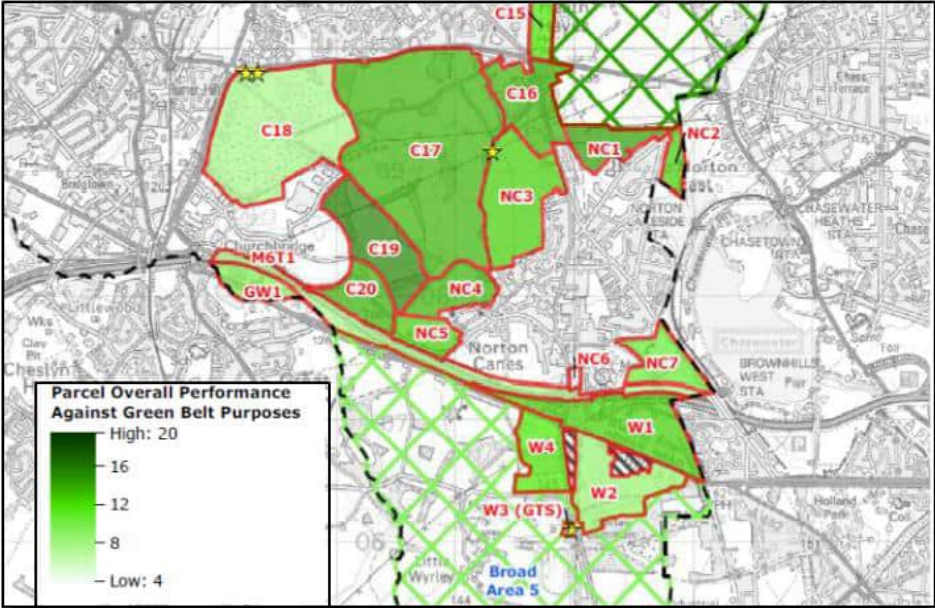
		appropriate location to provide additional supply and could be brought forward as part of a comprehensive approach with the housing location referred to above.
LPIS416	Natural England	See answer to question 29.
LPIS417	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Cannock Chase District Council should ensure that a balance between the provision of jobs and homes is achieved to ensure the delivery of sustainable communities. Similarly, jobs should be disseminated throughout the District to promote sustainable travel patterns.
LPIS418	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Cannock Chase District Council should ensure that a balance between the provision of jobs and homes is achieved to ensure the delivery of sustainable communities. Similarly, jobs should be disseminated throughout the District to promote sustainable travel patterns.
LPIS419	Rugeley Power Ltd (Savills)	<p>CP8: Employment Land & 5.78. Planned provision for employment land is supported, and the provision of employment uses should be encouraged on suitable sites where appropriate and sustainable. Employment development of B classes and other forms of development which generate employment but which fall within other use classes should also be recognised for the contribution they make to sustainable communities and economic prosperity. Other employment generating uses should be encouraged on appropriate sites either alongside or instead of B class uses where such employment can contribute to regeneration and the creation of sustainable communities.</p> <p>It is relevant to recognise the contribution to employment that regeneration brings indirectly, through attracting both increased workforce and increased consumers and through raising perceptions of investment in an area. Housing led regeneration in one area of a settlement, can therefore encourage employment regeneration of another area of the same settlement.</p> <p>At 5.78 the Plan refers to adopted SPG stating that the SPG suggests primarily employment led development of the Rugeley Power Station site in Cannock. This statement in the Plan appears to be in deference to the SPD. This is the wrong way around. The Plan should take the lead on the policy and the SPD must be subordinate to the plan. This is absolutely necessary in respect of a Strategic policy. Comments made in respect of 2.4 explain the approach of Rugeley power Limited to achieving housing led regeneration of the Power Station site. The policy of the Local Plan should promote housing led rather than employment led, regeneration of the Power Station.</p> <p>Consistent with our comments to CP5 and 5.35, SPD should not lead policy and certainly not strategic policy. The appropriate development mix for the Rugeley Power Station site remains to be defined, taking account of market factors, the physical requirements of the site and the needs for different forms of development. It is important that flexibility is retained, to enable proposals to respond to these factors and to be able to respond to change rapidly as advocated by the NPPF. The thoughts which were expressed in the Rugeley Power Station SPD at the time it was prepared, may no longer reflect priorities of need, economics or the market. The employment policy should not therefore impose a specific level of employment provision on the Rugeley Power Station site, but should be supportive of the site accommodating employment provision in a range of formats as may be appropriate to a new sustainable community.</p>
LPIS420	Rugeley Town Council	The largest employment potential for Rugeley is the power station site. The concern is that as this is the far side of the bypass, employees will primarily come in from outside areas and bypass Rugeley services. The need to create links from the power station site to the town centre will be essential in order to see the growth of the retail sector in the town centre. The town council welcomes

		the opportunity to be consulted on the development of the site to ensure that it forms part of the community rather than a remote development area.
LPIS421	St Modwen (Land at Watling Street Business Park) (RPS)	<p>The District Corporate Plan, which identifies ‘Promoting Prosperity’ as one of its two corporate priorities for 2018-2023 is referenced in paragraph 5.72 of the LPR Issues and Options document. This plan should also be reviewed within the SA Scoping Report at Appendix 1. In relation to employment land provision, it is recommended that the LPR addresses the following:</p> <p><u>Employment Land Requirements</u> RPS welcomes the Council’s recognition at paragraph 5.82 of the LPR Issues & Options report that there is a need to update both the assessment of future employment land requirements for the plan period (taking account of the latest economic trends and forecasts) as well as assessing existing employment areas. Labour supply analysis is also affected by population and household forecasts within the district. The Council will need to test different scenarios in terms of how they will meet any unmet need including that from the wider Birmingham Housing Market Area (HMA).</p> <p><u>Employment Land Portfolio</u> An assessment into the type of employment land that is available needs to be undertaken to ensure opportunities to balance out the employment land portfolio can be undertaken. It is recommended that the site assessment for employment land considers the likely type of development that would be expected on a site and seeks to ensure that this is balanced across all B-classes. The Council recognises that there is the need to retain a varied supply of employment land. LPP1 seeks “to ensure that not just the right amount, but the right type of employment land in the right locations” (para 4.57 RPS emphasis).</p> <p><u>Employment Land Shortfall</u> It will also be essential that the Council accurately assesses what the shortfall is in terms of employment land. The relative merits of the Watling Street Business Park have been set out in the previously submitted Vision Document that demonstrated the site provides a genuine, deliverable development that would assist the Council in meeting its land requirement. When taken with the Green Belt Review, it is also clear that the site at Watling Street Business Park would have the least impact upon the Green Belt. Sufficient sites should be allocated to ensure that the Plan passes the test of being positive prepared and being effective. To rely on windfalls to make up a shortfall would be not appropriate plan making.</p> <p>Policy CP8 seeks to address a number of other issues which the Council considers remain locally relevant (and elaborates upon related national planning policy). These are:</p> <ul style="list-style-type: none"> • Redevelopment and modernisation of existing employment sites for continued employment use, including those within the Green Belt (as there remain a number of existing in-use employment sites within the Green Belt in our District with recent demand for redevelopment schemes); • Considering the loss of employment land to non-employment uses (given that there are a number of employment sites being suggested for residential redevelopment in the District and that there is currently a small shortfall in employment land supply against requirements). <p>Whilst RPS supports the Council’s acknowledgement that there is a shortfall in employment land supply, in RPS’ view there exists a significantly larger shortfall in employment land.</p> <p><u>Employment Land Infrastructure</u> Whilst supporting this approach, the Council must also take account of options to extend sites that are currently located within the Green Belt. The extension of current sites which exist within the Green Belt would be far more sustainable, due partly to existing</p>

		<p>links and established uses in the area, compared with releasing Green Belt land for wholly new employment sites. A new employment site in the Green Belt would be more likely to impact heavily on the surrounding countryside due to the new infrastructure requirements. Extension of existing employment sites would enable the economies of scale for existing infrastructure along with enabling expansion of existing businesses.</p> <p><u>Employment Land Availability</u></p> <p>The Council must also ensure that sufficient land is allocated. It is noted that the most recent Employment Land Availability Assessment (ELAA) published in October 2017 states (on page 11) that some sites which had been previously considered 'available' were now not available and also that some sites had come forward for residential development resulting in the loss of sites along the A5 Corridor in particular from the employment land supply. Table 3 Employment Land Supply in the ELAA also showed that there was only a shortfall of 3ha in providing for the Local Plan target, which demonstrates that on the Council's own evidence there exists virtually no available supply of employment land, which is not a viable position. Paragraph 11 of the Revised NPPF (July 2018) makes it clear that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.</p> <p>The information relating to outstanding sources of supply will also need to be robustly assessed by the Council to ensure that the supply figure is realistic. This will include ensuring that any sites which are wholly for retail are excluded from the figure. It should also exclude:</p> <ul style="list-style-type: none"> • Un-started sites which are due to expire within the next few months; • sites which have historically not come forward over a long period of time and are therefore not considered likely to come forward; and • sites where there are discrepancies between the site area (as assessed in the ELAA) and proposals within planning consents. <p>The land at Watling Street Business Park is within the wider A5 corridor and is identified within LPP1 Policy CP8 as an existing employment location where "development is encouraged and supported". This demonstrates that expansion of the Business Park to assist the Council in meeting its current requirements is in accordance with the established strategy.</p> <p><u>Commentary on Rugeley Power Station</u></p> <p>Whilst the Rugeley Power Station may provide a long-term opportunity to provide a mixed-use development, the Council should not be over-optimistic in appraising the likely time frame for such development to come forward. Despite initial work commencing on masterplanning for the site, there is considerable ground investigation, demolition and remediation works that will need to be undertaken – particularly on the half of the site that is within Cannock Chase District. This could potentially take a significant amount of time to complete and could result in much of the potential allocated uses not been completed within the period of the plan. Whilst it is appropriate to monitor the development of the site, given the size and scale of the site any proposals for the site would significantly alter the strategy for the District.</p>
LPIS422		<p>RPS welcomes the preparation of the Local Plan which takes a generally positive approach in seeking to potentially allocate land to meet the outstanding employment land requirement. RPS welcomes the recognition by the Council that the evidence base relating to employment will need to be updated.</p> <p>RPS is keen to ensure that the evidence base underpinning the plan is robust, particularly when it comes to establishing the reasons for allocating sites and not allocating others. It is noted that of all the potential employment sites located in the Green Belt</p>

		<p>that Watling Street Business Park has been identified through the Green Belt Study as having the least impact on the five purposes of including land within the Green Belt.</p> <p>This report demonstrates that the land at Watling Street Business Park represents a highly sustainable proposal to assist the Council in meeting elements of its employment land requirements. The land is wholly within St Modwen's control and is therefore available now.</p> <p>In conclusion, the site at Watling Street Business Park can provide an additional 5.5ha within the current plan period to assist the Council in meeting its shortfall of employment land. The site is highly sustainable, does not currently make a significant contribution to the purposes of the Green Belt and is currently in demand from potential future occupiers. Therefore, as shown through this report, the removal of the site from the Green Belt and its allocation within the current plan period is well founded and provides demonstrable evidence that Exceptional Circumstances exist.</p>
LPIS423	Staffs. County Council	<p>We agree that up to date evidence on employment land is required and following a similar approach as previously is sensible. The only additional issue we would suggest it is worth considering is what industrial sectors have grown / contracted in recent years compared against previous forecasts. In many (if not all) parts of the county, economic forecasts have predicted contractions in the manufacturing sectors but the opposite has actually been seen. This type of issue is therefore a useful consideration in determining the need for land by use class.</p> <p>At this stage we will not make specific comments on specific sites and locations as the need for certain types of site and land will clearly be dependent on the employment land requirement evidence. However whilst it is noted that there is some degree of, "Support for the retention and redevelopment of existing lower quality employment areas," we believe that this would need to be based on an assessment of the viability of these sites. If these sites are unviable for employment uses then we believe that other uses. In this regard the assessment of such sites will be important, and we'd suggest that the criteria for assessment should be similar to those used by other areas (such as those proposed by Stafford Borough Council in their recent Strategic Housing and Economic Land Availability Assessment Draft Methodology – Consultation).</p> <p>As per Q28 as sites begin to emerge it will be useful to have a dialogue with the County council on infrastructure requirements</p>
LPIS424	Mr H Thornton	<p>As the Review is aiming to extend the Local Plan to year 2036, it is important that a very large proportion of the unused Power Station land is allocated for employment use, especially as the proportion of workers commuting from the Rugeley area to other places is already unacceptably high and getting worse due to the large number of new houses built in the locality over the past 6 years with no increase in the already minimal amount of local employment land.</p> <p>It also important that new employment land should not be fragmented, as at present, and create good quality jobs few of which now exist in the Rugeley area. An example of the urgent need for good quality jobs on land that is not fragmented is that 'JCB Cab Systems' which currently employs some 400 skilled workers is relocating elsewhere in 2019 to a site where it can double its production - the Express and Star newspaper of 30-6-2018 reporting this, added "JCB said in 2013 that it had outgrown its Riverway site and the firm had tried unsuccessfully to find a suitable replacement plot in the Rugeley area".</p> <p>The M.P. for Cannock Chase, Amanda Milling, is also known for expressing her desire to see the Power Station site used for good quality jobs.</p> <p>Regarding para. 5.80, because of the lack of jobs in the Rugeley area it is important that any redevelopment of low quality employment sites in the area for housing should be replaced by equivalent employment sites <u>in the same area</u>, not "in the District" as mentioned.</p>

LPIS425	Claire Walker	Enough land has already been allocated and is left dormant and vacated within the area.
LPIS426	Christopher Walker	Enough land has already been allocated and is left dormant and vacated within the area.
LPIS427	West Midlands HARP (Housing Assoc. Registered Providers) Planning Consortium (Tetlow King)	In the drafting of any employment policies we would encourage the Council to consider the wording of paragraph 22 of the NPPF which asserts that: “Planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.” Employment land has not been designated in perpetuity so if suitable and more practical uses are available we suggest that the Council takes this into consideration, via policy which gives the same flexibility as is set out under paragraph 22 of the NPPF; this will ensure that the Local Plan Review is in accordance with national policy and therefore passes the tests it will be assessed against in order to be found ‘sound’ at the eventual examination.
Question 35. Do you have any comments on the evidence base updates required in relation to identifying appropriate employment land requirements and employment land supply?		
LPIS428	Highways England	See Question 34
LPIS429	Natural England	See answer to question 29.
LPIS430	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	The evidence base in respect of employment land should be updated so as to reflect the aspirations of the LEP.
LPIS431	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	The evidence base in respect of employment land should be updated so as to reflect the aspirations of the LEP.
LPIS432	Rugeley Town Council	See question 34
LPIS433	South Staffs Council	Work undertaken as part of the Local Plan review in South Staffordshire has indicated that Cannock Chase and South Staffordshire are within a shared Function Economic Market Area along with Dudley, Walsall and Wolverhampton. This is recognition of the strong economic inter-relationships which exist between the authorities and suggests that consideration needs to be given towards collaborative working to identify and address those issues which arise within this sub-regional market area geography.
LPIS434	Staffs. County Council	See question 34
Question 36. How can the Council ensure that it has considered all the potential brownfield site opportunities, as far as possible? Are there any sites you can suggest which may be underused?		
LPIS435	Highways England	See Question 34
LPIS436	Natural England	See answer to question 29.
LPIS437	Rugeley Town Council	See question 34

LPIS438	Staffs. County Council	See question 34
Question 37. What key locations or sites within the District, or cross boundary sites, should be considered reasonable options for future employment land supply?		
LPIS439	Highways England	See Question 34
LPIS440	Natural England	See answer to question 29.
LPIS441	Rugeley Town Council	See question 34
LPIS442	St Modwen (Watling Street Business Park) (RPS)	<p>When taken with the Green Belt Review, it is also clear that the site at Watling Street Business Park would have the least impact upon the Green Belt. As illustrated in the extract of the Green Belt scoring summary within the Green Belt Study (below), the parcels containing the extensions to Kingswood Lakeside score notably higher (i.e. have a greater contribution to the Green Belt) than the parcel at Watling Street Business Park.</p>  <p>The expansion area of Watling Street Business Park is included within parcel W2 in the Green Belt Review. This parcel is shown to provide a low contribution to the Green Belt and is given an overall scoring of 9 out of 20. In this context, Table 1 below summarises the Green Belt Study scores for all of the parcels that were being considered as options for employment land within LPP2. On the basis that the Council recognises that the LPR will utilise the work to be carried out to date on LP Parts 1 and 2, this information is still considered relevant.</p> <p style="text-align: center;"><u>Table 1: Results of Green Belt Study – LPP2 Employment Options</u></p>

LPP2 Ref	GBS Ref	Location	P1	P2	P3	P4	P5	Total
CE18	C19	Kingswood Lakeside 2 (north)	4	4	4	0	4	16
CE17	C20	Kingswood Lakeside 1 (south)	3	4	3	0	4	14
CE56	C16	Wider parcel including land at junction	3	4	3	0	4	14
NE5	W1	Land Parcel including Turf Field	2	4	3	0	4	13
CE19	GW1	Land between A5 and M6 Toll	1	4	1	0	4	10
RE25	R9	Land south of "The Levels" Industrial Estate, Rugeley	2	0	3	0	4	9
CE20	W2	Land at Watling Street Business Park	2	0	3	0	4	9

It is clear from the above table that the site making the least contribution to the Green Belt is the land at Watling Street. Further, the parcels that make up other potential employment sites including Kingswood Lakeside have a higher score in the GBS and so are of greater importance for the contribution they provide to the Green Belt. These include Kingswood Lakeside parcels; C19 which scored 16 out of 20 and C20 scored 14 out of 20. These parcels generally scored more highly than the land adjacent to Watling Street Business Park due to the crucial role they provide in preventing the coalescence of Cannock and Norton Canes urban areas. It is also noted that Sites NE8, NE10 and NE11 which were being considered for allocation were not included for detailed Green Belt assessment as they are within the "Broad Areas Assessment". This omission of a detailed assessment highlights the remote nature of these sites specifically.

From the scores given in the Green Belt review it is clear that the parcel including Watling Street Business Park (Site W2) provides the least contribution to the purposes of the Green Belt of all the employment sites being considered and has no impact on the coalescence of Cannock and Norton Canes.

The Council must assess all available and deliverable parcels of land for employment allocation to ensure that the Council meet the NPPF requirements for plan making. To rely on windfalls to make up a shortfall is not appropriate plan making and not in accordance with the NPPF; it would not pass the test of being positively prepared and would not be effective. The proposed extension to Watling Street Business Park is deliverable, the site would help to balance the employment land portfolio going forward and would have the least impact upon the Green Belt compared to the other available and sustainable sites that are currently being promoted. Therefore, the land is suitable for allocation.

The Council rightly references that it is only through a Local Plan Review that Green Belt boundaries can be altered. The allocation of additional land for employment use will require Green Belt boundaries to be amended, which must be informed in terms of both current and longer term needs for employment land. The Green Belt Study (LUC) concludes that the site at Watling Street Business Park does not currently make a significant contribution towards the Green Belt and therefore its release would have the least impact upon the Green Belt compared to other potential employment allocations, particularly those at Kingswood Lakeside. The site would be the most appropriate to be released for future development based on the Green Belt considerations alone.

Existing sites must be able to improve or being modernised in the future, including existing employment sites within the Green Belt. The policy provisions currently in LPP1 and the Design SPD (2016) encourage modernisation and development at the existing Green Belt employment sites. Until such time as the Council allocates additional land for development at Watling Street Business

		<p>Park, the policy provision is likely to be sufficient. It is recommended that any future expansion at Watling Street Business Park is encouraged to come forward in a flexible manner, primarily matching the design principles of the existing Business Park and minimising, as far as possible, visual or landscape impacts upon the wider area.</p> <p>Watling Street Business Park is a long-established, popular business park with the opportunity to expand on the surrounding field parcels. The Green Belt Study demonstrates that the developable land would not have a significant impact upon the Green Belt.</p>
LPIS443	Staffs. County Council	See question 34
Question 38. Can you suggest specific criteria for screening out sites which are not reasonable options for development at an early stage? How might this be justified?		
LPIS444	Highways England	See Question 34
LPIS445	Natural England	See answer to question 29.
LPIS446	Rugeley Town Council	See question 34
LPIS447	Staffs. County Council	See question 34
Review of CP9: A Balanced Economy		
Question 39. Do you have any comments on what issues in relation to economic growth need to be addressed and what policy options may need to be considered, taking account of key local issues such as local skill levels and improving access to higher skilled job opportunities?		
LPIS448	Canal & River Trust	<p>As identified in the current policy the canal network and use of it can result in significant economic benefits for the local community. The Policy seeks to maximise the potential of the canal network particularly in relation to links between the Trent & Mersey Canal and Rugeley town centre. The Trust supports proposals that will help to improve access to and use of the canal by the local community and also strengthen the visitor economy. To further support the visitor economy on the canal network, it is also important to support improvements to visitor moorings and facilities for boaters. The Lichfield and Hatherton Canals Restoration Trust (LHCRT) is working towards the restoration of the former Hatherton Canal to navigable status and although we do not own the route of the former canal, it will ultimately connect to the existing canal network that we manage. Canal restoration projects have a number of benefits for a local community and can be a catalyst for redevelopment and regeneration. In addition to environmental benefits canal restoration can also have positive economic and social impacts and therefore aid in achieving other key objectives of the Plan. We are supportive of the work of the LHCRT in restoring the canal. The existing Plan includes details of the indicative route in support of the Hatherton restoration. The Review however provides an opportunity to strengthen this protection and the Policy should be amended to ensure developments are required to consider it in their proposals and ensure the route is safeguard from development which may sever the line or prevent its restoration.</p>
LPIS449	Lichfield and Hatherton Canals Restoration Trust	<p>I wish to record some disappointment that the progress towards effective through-route protection for the restored Hatherton Canal in the Part 2 document has been slowed by the decision to review the present Local Plan Part 1 document. We note that paragraph 5.89 of the present document mentions 'consider' which is a step backwards. The next step should be to write the necessary policies and then adopt them to give effective and explicit route protection throughout, aligning with progress made by Walsall Council and South Staffordshire District Council.</p>
LPIS450	National Farmers Union West Midlands Region	<p>As stated in our response to the previous consultation, Cannock Chase District is home to many agricultural, food and rural based businesses. However there is no other mention of farms and rural businesses within the paper or within Policy CP9. The NFU would like to see a considerable strengthening of the support shown for the rural economy in this document and a reference to rural business in CP9. We are concerned that many thriving agricultural businesses in the area will be disadvantaged by the lack of specific support for the continued development of the rural economy in the current draft.</p>

		Bearing the above in mind the NFU would appreciate the opportunity to become involved in the formation of guidance on agricultural or horticultural developments in order to ensure that it is fit for purpose. The industry needs are evolving and therefore some future proofing should be built into the policy in order to ensure that it keeps pace with developments in the industry. This is particularly important for those businesses located within the green belt.
LPIS451	Rugeley Town Council	Rugeley town centre is struggling to be a destination location and will need to be seen as a unique market town with independent shops rather than a location for high street chains. This regeneration will take time but requires direction and support. If local developments can improve the links to the town centre and create a market for the retailers, the stronger the town centre can become. Recent jobs fairs and the weekly jobs club in Rugeley identify the need to local jobs for local people.
LPIS452	St Modwen (Land at Watling Street Business Park) (RPS)	As outlined in the previous chapter, the District Corporate Plan identifies 'Promoting Prosperity' as one of its two corporate priorities for 2018-2023. This has an immediate vision for continued business growth, attracting higher skilled employment and raising skill levels (as well as other elements). The clear merits of the Watling Street Business Park 5.5ha were set out in the previously submitted Vision Document that demonstrated the site provides a genuine, deliverable development that would assist the Council in meeting its land requirement. The Council's own evidence (in the ELAA) outlines the importance of retaining a balanced supply of type of employment land, as well as considering the quantity of floorspace provided; there will also be a need to consider qualitative provision. The expansion of Watling Street Business Park offers an excellent opportunity to provide a market specific provision which would help to meet the demonstrable demand for unit formats where demand is strong and assist the Council with closing the existing supply gap.
LPIS453	Staffs. County Council	See question 34
LPIS454	Claire Walker	If the town centre is improved then people may actually visit and shop there.
LPIS455	Christopher Walker	If the town centre is improved then people may actually visit and shop there.
Question 40. Do you have any comments on the evidence base updates required, or the evidence and strategies of other organisations that need to be taken into account?		
LPIS456	Canal & River Trust	There is currently a reference within the Policy that requires the restoration proposal to demonstrate that additional boat movements along the Cannock Extension Canal SAC can be prevented. This should be removed from the Policy. The Cannock Extension Canal, and navigation along it, is the responsibility of the Canal & River Trust and it is not considered appropriate for a planning policy to specifically restrict boat movements. As you are aware the SAC is designated for its Floating water-plantain, Luronium natans and the population of these in the Cannock Extension Canal is dependent upon a balanced level of boat traffic. Whilst future detailed restoration proposals may be required to assess the impact of any additional boat movements Policy CP9, as currently worded, seeks to prevent additional boat movements. This presupposes the likely impact of any additional boat movements as having a negative impact on the SAC. There is however no current data available on the number of boats using the Cannock Extension Canal, there is a lack of evidence as to what an acceptable level of boat movements along the Cannock Extension would be and critically a lack of evidence as to whether more or less boats would be beneficial to the SAC. If future evidence suggests that there will be an increase in boat movements and that these could have a negative impact on the SAC, there are also other means to mitigate any harm to the SAC which would need to be considered, such as restricting the speed of boats, type of boats (the hull type impacts on the level of disturbance created from the boat movement), tree management,

		<p>control of invasive species, management of activities on adjacent land and control of land drainage to the canal. The Trust are not aware of any consideration or assessment of these alternative means that has been undertaken to support the current Policy and the restriction on boat movements. There are currently no restrictions on boat movements on the Cannock Extension Canal and it is unclear to the Trust how the LPA could restrict boat movements. In summary therefore, whilst the Trust is supportive of a Policy which seeks to protect the line of the Hatherton canal, the current Policy is not supported by evidence that demonstrates prevention of further boat movements is necessary and this restriction may itself have a negative impact on the SAC designation. The Policy should not presume the outcomes of any subsequent appropriate assessment to be undertaken at detailed design stage. As identified in Paragraph 5.89 this issue was raised as part of the Examination Hearings of the Walsall SAD and their Policy subsequently amended to reflect the above and remove reference to boat restrictions from the Policy. Policy CP9 should therefore also similarly be amended and the review provides the opportunity to have a separate specific policy relating to the restoration of canals.</p>
LPIS457	Inland Waterways Association (Lichfield branch)	<p>The Inland Waterways Association (Lichfield Branch) regrets the decision to stop work on the Local Plan Part 2 in favour of a review of the whole Local Plan, in so far as this will delay the effective safeguarding of the route of the Hatherton Canal restoration.</p> <p>The indicative safeguarded route in the 1997 Local Plan was altered by construction of the M6 Toll and later by the decision to link it to the Lords Hayes Branch of the Wyrley & Essington Canal rather than to the Cannock Extension Canal to avoid the SSSI and SAC.</p> <p>The Hatherton Canal route crosses the boundary between Cannock Chase DC and South Staffordshire DC in several places, and now also has a short section in Walsall MBC, requiring co-operation between the Councils to ensure continuity and consistency of policies and maps.</p> <p>The route as identified by the Lichfield & Hatherton Canals Restoration Trust (LHCRT) is shown in detail on Policies Map, Inset Plan 50 and safeguarded in Policy SAD8 of the South Staffordshire Site Allocations document, which has now been examined and found Sound.</p> <p>The Walsall Site Allocations document, Policy SAD4 safeguards the Hatherton Canal route and has also been examined and modifications agreed. Cannock Chase Local Plan (Part 1) 2014 undertakes in Policy CP9 to identify and safeguard a firm route on the Policies Map via the Local Plan Part 2, subject to certain conditions. However, that will not now happen, leaving important parts of the route unprotected and with no detailed mapping to guide applicants in avoiding any prejudicial impacts from their development proposals.</p> <p>It is vital therefore that the necessary safeguarding of the route is implemented through the reviewed Local Plan, and IWA is pleased that this is recognised in paragraph 5.89.</p> <p>Of the conditions referenced in Policy CP9, those concerning water supply (a) and ecology (c) are accepted in principle, but the reference to boat movements on the Cannock Extension Canal (b) is both unnecessary and undeliverable, and should be removed, as has been a similar provision from the Walsall SAD by agreement with Natural England during the Examination.</p> <p>An 'Appropriate Assessment' of the Cannock Extension Canal SAC is not required at the safeguarding stage although it may need to be considered as part of a planning application (in accordance with the Sustainability Appraisal Scoping Report table A2.1, SA Objective 1). IWA therefore looks forward to working with the Council and LHCRT to define suitable policy wording and sufficiently detailed mapping to complete the safeguarding of the Hatherton Canal restoration route throughout in a consistent manner.</p>

LPIS458	Lichfield and Hatherton Canals Restoration Trust	The key 'other organisations' regarding the Hatherton Canal restoration project are the Lichfield & Hatherton Canals Restoration Trust, the Inland Waterways Association and the Canal and River Trust.
LPIS459	Rugeley Town Council	See question 39
LPIS460	Staffs. County Council	See question 34
Review of CP10: Sustainable Transport		
Question 41. Which elements of the policy now need updating (e.g. to reflect changes in delivery or new partnership arrangements) or to address issues not currently covered? Please provide details and links where appropriate		
LPIS461	Brereton & Ravenhill Parish Council	<u>Page 43, paragraph 5.93</u> BRPC welcomed the July 2012 decision to electrify the Chase Line between Rugeley and Walsall and, despite concern about the delay in the project in recent years, strongly supports it. The lack of late evening services remains a serious problem. In this respect, a comparison may be made with the reopened Borders Line between Tweedbank and Edinburgh, which has an otherwise similar level of service, but much better late evening services. The provision for disabled people at the Rugeley stations is dire with no means of crossing the tracks so that two of Rugeley Trent Valley's three platforms are inaccessible to many disabled people and disabled people wishing to travel to and from Rugeley Town station may have to travel to Rugeley Trent Valley and back. The equivalent Lichfield stations have much better provision for disabled people. BRPC is greatly concerned about the decline in and the high price of bus services. Developers of the Power Station site and of any land whose development is facilitated by the flood defence works in Rugeley should be expected to make a contribution to such services.
LPIS462	Brindley Heath Parish Council	<u>Page 43, Paragraph 5.93</u> 7. The lack of late evening services remains a serious problem. The provision for disabled people at the Rugeley stations is very poor with no means of crossing the tracks so that two of Rugeley Trent Valley's three platforms are inaccessible to many disabled people and disabled people wishing to travel to and from Rugeley Town station may have to travel to Rugeley Trent Valley and back. The equivalent Lichfield stations have much better provision for disabled people. 8. BHPC is greatly concerned about the decline in and the high price of bus services. Developers of the Power Station site and of any land whose development is helped by the flood defence works in Rugeley should be expected to make a contribution to such services. Stafford Brook Road (Brindley Heath) now has no service at all.
LPIS463	Canal & River Trust	The canal towpath is an important traffic free route for walking / cycling for both leisure and utility walkers. The towpath also aids in providing a safe, convenient and attractive walking and cycling network to promote health and well-being, consistent with the aims of the NPPF. Opportunities for utilising, enhancing and linking in to this existing infrastructure should be fully considered. Future developments should be encouraged to consider this at an early stage in the development process and to aid this the potential of the canal network should be clearly referenced within the revised Policies. The existing Policies require Applications to assess the impact of the proposed development on the capacity of the highway infrastructure. It should be ensured that this includes the capacity of any existing canal crossings to accommodate additional traffic. In addition, modelling or assessment of pedestrian, cycling and recreational use of the towpath should be required within the Policy. This should assess the impact of the proposed development and the extent of the impact, beyond the development site, that the towpath / canal infrastructure will realise from increased usage. Applications should also be required to detail any necessary mitigation measures.
LPIS464	Highways England	Highways England welcomes the opportunity to comment on what elements of the Sustainable Transport policy need updating. We would reiterate that which has already been expressed in the consultation on Stage 2: that emphasis is needed on more partnership

		working on transport issues with Highways England and the need to consider and model the impact on the Strategic Road Network . Once the spatial distribution of residential and employment development has been determined, further engagement will be needed with Highways England in order to determine the technical analysis required to understand the impacts on the SRN and any necessary mitigation. We note that Highways England are not specifically referred to in the current Policy CP10 and would welcome being included in the list of partners if set out in the revised policy.
LPIS465	Jukes, June	Yet again public transport is being reduced. Encouraging people to use public transport could help reduce pollution but if buses are not available then cars and taxis have to be used for individual journeys.
LPIS466	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	Richborough Estates acknowledges that Policy CP10 should be updated to reflect the latest position in respect of transport infrastructure projects and their delivery.
LPIS467	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	Richborough Estates acknowledges that Policy CP10 should be updated to reflect the latest position in respect of transport infrastructure projects and their delivery.
LPIS468	Road haulage association	<p>Reliable and consistent journey times are key for road users. It is vital that clear and correctly placed signage is provided to guide freight vehicles to logistics parks and via the most suitable route. This is vital where height and weight restrictions exist. We ask that Lorry Parking is given a high priority. The National Survey of Lorry Parking, published by the Department for Transport in May 2018 identifies a Serious shortage of overnight lorry parking facilities in the West Midlands area.</p> <p>It is estimated that there is a national deficit, each night, of between 9000 and 11000 spaces. 2500 of these being in the West Midlands. Lay-by's must be retained and maintained for HGV drivers to stop and take mandatory rest breaks. Provision must also be made for HGV's to park in the vicinity of town centres, so that drivers can take mandatory 45 minute breaks, or wait prior and after delivering goods to town centres.</p> <p>When Logistics Parks, Regional Distribution Centres, or warehousing developments are being built, or developed, then Paragraph 107 National Planning Policy Framework, published in July 2018 must be considered. This ensures that lorry parking provision is mandated in planning applications. Parking provision should be considered within the curtilage of logistics parks where possible. S.106 Planning agreements can provide a solution in providing proper lorry parking facilities.</p> <p>Air quality is a concern for everyone, the council must ensure that any policies seeking to address air quality take account of the need for people and businesses to be able to move the goods they need. The RHA welcomes the opportunity to become involved as a key stakeholder in developing systems and processes to manage freight movements.</p>
LPIS469	St Modwen (Watling Street Business Park) (RPS)	Paragraph 5.91 which supports policy CP10 acknowledges that the Council will need to ensure that the policy wording is brought up to date to reflect the most current situation and partnerships (for example Transport for the West Midlands / West Midlands Combined Authority and Midlands Connect as a Sub-National Transport body) and will need to update its evidence particularly with regard to the impacts of growth upon the road and rail network and any infrastructure upgrades and investment which would be necessary to enable delivery.

		As set out in paragraph 3.8 of the Sustainability Appraisal Scoping Report (June 2018), key links to the east and west are provided by a number of A roads, including the A5. Staffordshire County Council have produced the Cannock Chase District Integrated Transport Strategy 2013-2028, which was published in November 2013. The Strategy references in paragraph 4.1 and under the heading of Economic Prosperity that the Strategy will guide the Local Enterprise Partnership's Strategic Economic Plan, specifically in terms of supporting access to economic opportunities both inside and outside the District, including particularly along the A5 (T) corridor.
LPIS470	Staffs. County Council	It is noted that paragraph 5.91 mentions the need to reflect new and current partnerships, we will happily review with you those suggested in due course. It is acknowledged that Paragraphs 5.93 and 5.94 mention the declining delivery and sustainability of public bus services which reflects the current circumstance.
LPIS471	Transport for West Midlands (WMCA)	<p>Rail Policy</p> <p>Demand for rail travel across the TfWM area is continuing to increase with this area witnessing more than a 70% increase in rail travel over the last 10 years. The new rail franchise, which was awarded to West Midlands Trains will provide better local rail services, including better quality facilities for passengers, more seats and longer trains. It is therefore important that the following rail schemes are fully referenced and that the local plan includes the following:</p> <ul style="list-style-type: none"> - Promotion of the new electric rail services and through trains to/from Birmingham International and London that will be introduced in May 2019 - Delivery of the major redevelopment of Cannock Station, supporting the development of the Mill Green Designer Outlet Village - Support in the delivery of station and accessibility improvements at Hednesford and Rugeley Town stations - Improvements at Rugeley Trent Valley station and connections into the Crewe – Rugeley TV – London Euston train service - Promotion of the extension of Chase Line services beyond Rugeley Trent Valley post HS2 Phase 2A - Support the development of plans to improve connections into HS2 - Promotion of improved bus and rail integration at Hednesford, Cannock and Rugeley Town stations - Promotion of initiatives to develop rail freight, and in particular support the development of the Mid-Cannock site as a multi-modal freight terminal <p>West Midlands Stations Alliance</p> <p>The West Midlands Station Alliance has also been developed which sees industry partners working together to create a shared vision. In particular, creating quality gateways between communities and the railways, supporting the changing needs of passengers, residents and visitors and developing station master plans.</p> <p>Cannock station is one of the station master planning pilots selected by West Midlands Station Alliance partners and local authorities to improve station facilities, community opportunities, the urban realm and local roads and station parking issues. It is vital that the local plan makes reference to the West Midlands Station Alliance and the community opportunities which may result.</p> <p>M6/M54/M6 Toll</p> <p>A new link road from the M54 to the M6 and the M6 Toll has been referenced in the local plan and will support local economic growth for Cannock by improving traffic flow and enhancing the east-west and north-south routes across the region. Current routes such as the A460 and A449/A5 suffer significant congestion, high accident rates and air quality issues due to large traffic volumes and poor journey time reliability. The importance of this scheme should therefore play a greater role in the local plan.</p>

		Finally, TfWM notes the existing infrastructure delivery plan. We like to further reiterate our support for a partnership approach in addressing the strategic needs of the plan and the wider area and we would welcome further dialogue with Cannock Chase District Council and Staffordshire County Council as this plan develops.
LPIS472	Claire Walker	Very little has been done for the very poor train transport in the area and whilst we have M6 and M6 toll very little has been done about in town road infrastructure.
LPIS473	Christopher Walker	Very little has been done for the very poor train transport in the area and whilst we have M6 and M6 toll very little has been done about in town road infrastructure.
Question 42. What evidence do we need to help us decide what options for growth are feasible, sustainable, realistic and deliverable? Is there already any up to date evidence which we can use to help us and if so, what?		
LPIS474	Highways England	See Question 41
LPIS475	Sport England	Support the identification of Active Travel which is supported and highlighted within the West Midlands Combined Authority Physical Activity Strategy 2017-2030
LPIS476	Staffs. County Council	The evidence base work set out in paragraph 5.100 seems appropriate. It will be necessary to maintain a close dialogue with the County Council on transport related evidence as the Plan progresses. There may be some potential to use the Midlands Region Transport Model, which is a Highways England model and appears to cover the strategic road network in the Cannock area to more fully understand the traffic impacts of potential development proposals/locations. Highways England will need to clarify and confirm. New evidence may be developed as the plan progresses as you indicate and we will work with the District Council on this through the process.
Review of CP11: Centres Hierarchy		
Question 43. Do you have any comments on what issues need to be addressed in relation to centres?		
LPIS477	Brereton & Ravenhill Parish Council	<u>Page 46, Existing policy CP11</u> The inclusion of Brereton in the list of local centres continues to be appropriate.
LPIS478	Brindley Heath Parish Council	<u>Page 46, Existing policy CP11: Centres Hierarchy</u> 9. Regeneration and maximising appropriate tourism as a gateway to the Cannock Chase AONB should be given careful consideration and inappropriate use of such sites should be avoided.
LPIS479	Rugeley Power Ltd (Savills)	It is appropriate that Rugeley continues to be identified as a high order centre in the hierarchy and supported in policy terms as such. Consideration should be given to the potential for development of the Rugeley Power Station site to contribute to the vitality and viability of the town as a whole, through increasing the catchment population within an easy walk of the town centre. It may be appropriate for the Rugeley Power Station site to include some small scale town centre uses to support a new sustainable community on the edge of the town centre, as a complement to the functions of the town centre. The imposition of a requirement for testing impact at a floorspace level below the 2,500sqm nationally set threshold may be unhelpful in this context. Policy should enable appropriate scale town centre uses below the national impact test threshold as part of residential led mixed use proposals.
LPIS480	Rugeley Town Council	Area Action Plans are only of use if they are supported by planning decisions. In Rugeley there is decreasing confidence in the planning decisions being made which are undermining the AAP and the Conservation Areas.
LPIS481	Staffs. County Council	It is considered that the Plan broadly identifies the main issues that need to be addressed in relation to centres.

LPIS482	Mr H Thornton	My view is that the Rugeley Town Action Plan needs to be reassessed with regard to the proposed replacement of the run-down indoor Market Hall and its surroundings with a high quality shopping mall. Such a large and expensive redevelopment is no longer viable given the current state of the retail sector. The closing of many town centre shops, mainly as a result of out-of-town and on-line shopping, is now irreversible.
LPIS483	Claire Walker	The town centre needs clearing up and we need a stronger Police presence to deal with petty crime and drug use.
LPIS484	Christopher Walker	The town centre needs clearing up and we need a stronger Police presence to deal with petty crime and drug use.
Question 44. Do you have any comments on the evidence base updates required, or any existing evidence or information of which you think we should be aware?		
LPIS485	Rugeley Town Council	See question 43
LPIS486	Staffs. Police	Staffordshire Police request that H.M. Gov's Prevent and Crowded Places documents are utilised when making changes or re-developing town centres, we request that emphasis be given to preventing vehicles being able to drive through pedestrian areas and that town centre CCTV systems are retained.
Question 45. Are Area Action Plans the most appropriate way of regenerating town centres, or do you think we should be considering other approaches? If so, what options should we be considering? Do you have any examples of good practice which might be helpful and relevant to this District?		
LPIS487	Rugeley Town Council	See question 43
LPIS488	Mr H Thornton	My opinion is that the Town Centre Action plans should remain as separate documents to enable the Policies and related information to be seen in one package and more easily understood and monitored.
Review of CP12: Biodiversity & Geodiversity		
Question 46. Do you have any comments on what issues need to be addressed in terms of biodiversity and geodiversity and what policy options may need to be considered, taking account of key local issues and features e.g. the range of designations covering the District?		
LPIS489	Canal & River Trust	The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations. Developments can have an adverse impact on the ecology of the waterways. The Cannock Extension Canal is a designated SSSI and SAC for its Floating water-plantain, Luronium natans. It is important to ensure that any increased recreational use of the canal and towpath and any development proposals in the vicinity of the canal take full account of its status as a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) and ensure adequate protection of the biodiversity importance of the canal.
LPIS490	National Farmers Union West Midlands Region	Farmers and landowners must be fully engaged with discussions on biodiversity and geodiversity as they own and manage many of the districts key natural capital assets. For the majority of farmers environmental management is a core business activity, but this is not acknowledged by the document. Previous studies have shown that agricultural businesses routinely invest in landscape management and enhancement works for example hedging, tree planting, cutting and grazing. For many farmers the landscape management and biodiversity enhancements on their farms are a source of great pride and it does them a disservice to not have this aspect of land management recognised by this paper. The work of the Campaign for the Farmed Environment (www.cfeonline.org.uk) has demonstrated how farmers use a range of voluntary techniques to enhance the environment and that this management is funded by farm businesses.
LPIS491	Natural England	The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

		A strategic approach for networks of biodiversity should support a similar approach for green infrastructure. New development should incorporate opportunities to enhance biodiversity, wherever possible.
LPIS492	Rugeley Town Council	The Chase, Canal and River are key areas of recreational space, natural biodiversity and physical boundaries to urban sprawl. Rugeley Town Council wish to see protected spaces remain with interpretation of the environment support development in tourism – local, regional and national.
LPIS493	Staffs. County Council	<p>Whilst Policy CP12 is broadly reasonable and well thought out a move should now be made to a measurable net gain in biodiversity, in line with NPPF 2018 170 (d) & 174 (b). Lichfield has an established 20% net gain policy, and there is no reason why this could not be adopted in Cannock Chase District; indeed neighbouring districts with similar policies would be reinforcing each other. It is important to give a quantified net gain because otherwise the tendency is for developers etc. to produce a very minor / insignificant net gain (e.g. 0.05%.)</p> <p>In relation to Paragraph 5.114, although the Green Flag Award is a good aspiration for sites with a high degree of public access, it is not the best indication of biodiversity quality. There is a three tier system in place in the county; the aim should be where possible to get Biodiversity Alert Sites up to Local Wildlife Site status, and to get Local Wildlife Sites up to Site of Special Scientific Interest (SSSI) quality (even if SSSI designation does not follow). Cannock Chase District has an excellent track record with Hednesford Hills.</p> <p>With regards to Paragraph 5.115 the NPPF (2018) 175(c) makes clear that irreplaceable habitats should be given special consideration in the planning system, with ancient woodland and veteran trees cited as examples. Cannock Chase District does have veteran trees outside ancient woodlands, which will need specific consideration as isolated veteran trees are often vulnerable. Additional guidance beyond the Local Plan as SPD or advice notes might go on to outline good practice when dealing with these trees, such as preservation of fallen or lopped wood. Our Ecologist is happy to provide further advice on this matter.</p> <p>Para 5.117 states that: 'The Council is a member of the Staffordshire Wildlife Trust Partnership and therefore has access to a significant resource of existing information on locally designated sites, priority habitats and species via the Staffordshire Ecological Record.' This is slightly incorrect and should read: 'The Council is a member of the Staffordshire Ecological Record Partnership, hosted by Staffordshire Wildlife Trust, and therefore has access to a significant resource of existing information on locally designated sites, priority habitats and species.'</p> <p>At 5.118 it is noted that the Council is likely to supplement this existing evidence with any further survey work that may needed e.g. potentially an Extended Phase 1 Biodiversity Study similar to that undertaken for Local Plan (Part 1) for the District and any site specific survey work required (the need for which can be identified via continued joint working with other agencies and site landowners/promoters). This would be an excellent initiative and would provide vital evidence for a strategic approach. We would welcome the opportunity to be involved in devising this study.</p>
Question 47. Do you have any comments on the evidence base updates required, including any site specific information that may be required?		
LPIS494	Natural England	The Conservation objectives for each European site are now available and explain how the site should be restored and/or maintained and may be helpful in assessing what, if any, potential impacts a plan or project may have.
LPIS495	Rugeley Town Council	See question 46

LPIS496	South Staffs Council	National policy promotes the mapping of ecological networks including the hierarchy of designated sites and the identification of areas for habitat management, enhancement, restoration or creation. Collaboration and sharing of information in respect of the mapping of such networks has possible mutual benefits given the potential that such ecological networks will have cross boundary linkages.
LPIS497	Staffs. County Council	<p><u>Site specific</u></p> <p>At least a basic assessment for any likely biodiversity issues, including habitats, protected and key species should be undertaken on any sites likely to be allocated for development. This is because any constraints need to be identified early and may reduce the area of developable land within a site. NPPF makes clear that the first priority is to avoid harm (avoid, mitigate compensate hierarchy.) In some cases the basic assessment might only involve confirming existing information, and in other areas such as ploughed land aerial photographs may provide sufficient information.</p> <p>Where owners / developers are bringing forward land for inclusion the onus might be on them to provide this information in the form of a Preliminary Ecological Appraisal (PEA.) If this is the case it is important to note (and make clear to the developer) that this work will likely have to be re-done at development stage because surveys such as PEA are only valid for two years.</p> <p>Ecological networks and opportunity mapping NPPF makes several references to ecological networks including (171)</p> <p>171. Plans should:... ..take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries</p> <p>The most recent county strategy for biodiversity is the Staffordshire Biodiversity Action Plan (BAP)(3rd edition, 2001) which is probably at too broad a scale and rather out of date, although providing a starting point (http://sbap.org.uk/actionplan/index.php). Further work is needed to devise a detailed strategy for Cannock Chase District, ideally in cooperation with neighbouring districts, and by using ecological modelling methods. Staffordshire Ecological Record holds suitable data and expertise for this process, although further survey work may be needed.</p> <p>It is probable that timescales will not allow for a network / opportunity strategy to be developed within the Local Plan timescale. It would be helpful if a Policy were incorporated that recognises that a strategy will emerge during the plan period.</p> <p>Policy CP12 currently recognises BAP targets; however it does not set out a strategy for the water environment. Cannock Chase District contains the headwaters of several important tributaries (Saredon Brook and Penk to the west for example.) This makes it important to achieve good water quality within the district (NPPF, 170 e) so as to provide good water quality downstream. New (NPPF, 165) and retrofitted SUDS, buffering waterside habitat and removal of artificial barriers such as weirs and culverts may all form part of a strategy for achieving this. These may also help with flood management (NPPF, 157c refers).</p>
Review of CP13: Cannock Chase Special Area of Conservation		
Question 48. Do you have any comments on our review of Policy CP13: Cannock Chase Special Area Of Conservation (SAC)?		
LPIS498	Brindley Heath Parish Council	<p><u>Page 65/84, Policy CP5 – Policy CP13</u></p> <p>12. BHPC Agrees and strongly supports these policies.</p>
LPIS499	Natural England	We note that as a result of the review additional growth is expected which cannot be accommodated within the existing mitigation. As a member of the Cannock Chase Special Area of Conservation (SAC) Partnership the Council is involved in active discussions to ensure the project's evidence base is up to date and able to inform decisions regarding any changes to the mitigation package. Examples of related work include last year's Evidence Base Review report (Footprint Ecology) and the current repeat visitor survey

		work which is due for completion in the autumn. We will continue to provide support on this matter via the Cannock Chase SAC partnership and at further stages of the Plan.
LPIS500	Rugeley Town Council	Rugeley is surrounded by the Chase, Canal and River - all of which proved physical boundaries to development. The town council do not wish to see any adjustment to the green belt surrounding the town as this would erode significant natural landscape features.
LPIS501	Staffs. County Council	It is important to keep the policy in place in order to mitigate the effects on Cannock Chase SAC, and the implicit intention to do so in the consultation is welcomed, as is the intention to take on board new evidence by producing a modified policy.
Review of CP14: Landscape Character & Cannock Chase AONB		
Question 49. Do you have any comments on landscape issues facing the District and the need for any updates to evidence or policy?		
LPIS502	Beaudesert Golf Club (FBC Manby Bowdler LLP)	Within the AONB, policy provision should be made, exceptionally, for new development on brownfield land which enables, supports and enhances local distinctiveness in the AONB and/or the management objectives for the AONB.
LPIS503	Brereton & Ravenhill Parish Council	<u>Page 52, Existing Policy CP14</u> BRPC agrees with the statement that the District's landscape character will be protected, conserved and enhanced. This must involve strong enforcement action, including the collection of fines and requiring full reinstatement of land in the AONB that has been harmed by criminal behaviour.
LPIS504	Brindley Heath Parish Council	<u>Page 52, Existing Policy CP14: Landscape Character and Cannock Chase AONB</u> 10. BHPC agrees with the statement that the District's landscape character will be protected, conserved and enhanced. This must involve strong enforcement action, including the collection of fines and requiring full reinstatement of land in the AONB that has been harmed by misuse or criminal behaviour.
LPIS505	Historic England	As identified within the district context, there is a strong relationship between landscape and heritage in the Cannock Chase area, including notable Scheduled Monuments and their long-distance settings. It will be advisable to appropriately reflect this within any new policy regarding landscape character and the Cannock Chase AONB. As you will be aware, the Cannock Chase AONB is currently undertaking a Management Plan review. Historic England is contributing advice to this process, and as this work develops it will identify useful areas for focus relevant to policy CP14 (and CP15) with respect to the historic environment.
LPIS506	Inglewood Investments (SLR Consulting)	As discussed within the letter and in our responses to previous questions, housing pressure is increasing, and despite the NPPF requiring Local Authorities to protect the Green Belt as much as possible, CCDC need to take a pro-active and sensible view to tackle this need. As the majority of your District is Green Belt or AONB, it would be impractical and unachievable for all site allocations to be delivered outside of these current designations, particularly to cover a Plan period to 2036 and a successive review. It is imperative that a robust review and release of appropriate Green Belt land is undertaken at this time with some early evidence provided on the quantity of land which might need to be released. Green Belt land can be developed sensitively through the implementation of high quality design and the incorporation of ecological and biodiversity mitigation strategies. This is something that SLR specialises in and is considering in the concept masterplan which is currently being prepared for the Inglewood land holding discussed above. Opening up and utilising parts of the Green Belt to improve local access will help to deliver a number of benefits to the District, and also ensure that released sites are appropriately managed and maximised to their full potential.
LPIS507	Jukes, June	As a member of Friends of Cannock Chase my concern is with the environment. The protection of Cannock Chase to preserve habitats is essential the area of lowland heath is of national and international importance. Some work has already been carried out

		to create a heathland corridor so that species are able to move freely between habitats to avoid isolation. This fact needs to be considered when releasing land for development. While not part of the AONB, Hednesford Hills is an important habitat and recreational facility for local people and can be used to help promote outdoor walking and special interest events.
LPIS508	National Farmers Union West Midlands Region	It is disappointing that the comments made about the challenges faced by farming businesses in the Green Belt have not been included in the current draft. Policy CP14 should make a specific reference to the need for agricultural and diversified businesses to develop within the Green Belt. Agricultural business located within Green Belt have to respond to the same pressures to comply with higher welfare and environmental management standards in the same way as those businesses located in other areas of the county. They may also need to diversify their businesses, perhaps by supplying local produce through farm shops or by developing a tourism offer. Other Authorities have recognised the need for new small-scale economic development in the rural economy and for farm diversification schemes. Even if the support for businesses in these areas is implied elsewhere within the document, it ought to be more stridently expressed within this section of the plan. We would like to see a can do attitude to development that recognises that farming businesses have an essential role in maintaining the high quality local landscape by grazing livestock, maintaining hedgerows and participating in agri-environment schemes.
LPIS509	Natural England	We have no comments to make at this stage.
LPIS510	Staffs. County Council	Issues relating to potential sites for new development are made under Policy CP6, Q24. As stated under Q24 further evidence for decision making, could be provided through site specific Landscape Sensitivity Studies to assess potential sensitivity of development types and areas/sites where development would potentially impact on the AONB or on the setting of the AONB. Suggestions for potentially maximising wider benefits for the Green Belt outside the AONB are made in the response to Q11.
LPIS511	Taylor Wimpey (Lichfield's)	For the reasons set out in this representation, Taylor Wimpey considers that the Green Belt evidence base should be reviewed as the methodology has not been properly applied to the Wimblebury Road site. As a general comment, in identifying land for release from the Green Belt and allocation, Taylor Wimpey considers that development should be steered towards sustainable sites which are not designated for any landscape or ecological reason (and accord with other policy in terms of settlement hierarchy and distribution).
LPIS512	Upton Trust & Carney Brothers (Wardell Armstrong)	This Local Plan review needs to consider what the Council's growth requirements are for the plan period (discussed under sections Policy CP6, CP8 and CP1). Para 5.57 suggests that the Local Plan (Part 2) consultation suggested that it may be appropriate to scope out sites before this comprehensive assessment stage using a defined set of criteria e.g. some responses suggested all sites that lie within the AONB should be scoped out from any further consideration for development at an earlier stage in the process. Options for allowing the development of more edge of settlements as part of a wider strategy of allowing greater densities in more central areas would have to be considered as a reasonable alternative when considering the chosen spatial strategy as part of an objective and evidenced Sustainability Appraisal process. To screen out such options at an early stage would directly conflict with the advice within the PPG, excluding potentially reasonable alternatives that may perform well against other sustainability criteria. As stated within the NPPF (para. 138) where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Such improvements could therefore arise from compensatory landscaping and ecological enhancements to sustainable locations where these can be secured and delivered.
Review of CP15: Historic Environment		

Question 50. How might the existing policy be expanded to embrace the historic environment as a catalyst for positive regeneration?		
LPIS513	Brindley Heath Parish Council	<p><u>Page 54, Existing policy CP15: Historic Environment</u></p> <p>11. It is important to recognise that protection of historic assets requires a willingness to use statutory powers in respect of deteriorating buildings including the use of section 215 notices and a willingness to acquire land compulsorily.</p>
LPIS514	Canal & River Trust	<p>The Trent & Mersey Canal corridor is a designated conservation area though the canals (and associated infrastructure) within the District are themselves are non-designated heritage assets in their own right. It is important for development to build on, and respond appropriately, to the historic significance of the canals whilst protecting their character and historical integrity and specific reference to the designated and non-designated status of the canal network should be included within this Policy. The canal network has the potential to offer a variety of opportunities for a historic environment focus. The canal network is a valuable reminder of the industrial heritage of the area and is a multi-functional resource which can play a wide range of roles in supporting and helping to deliver new development which can bring a variety of benefits which can enhance overall prosperity within the District. As a 200-year-old network, the canals represent a working heritage asset which can provide an attractive and positive setting for new development as well as being an important leisure and recreational resource for both visitors and the local community and can thus help to support social and economic regeneration schemes.</p>
LPIS515	Historic England	<p>It will be important to ensure that the Local Plan provides a positive and proactive strategy for conserving and enhancing heritage assets (including any contribution made by their setting) in a locally sensitive way, while making the most of the opportunities they pose and addressing the challenges they face. More information on the contribution of heritage assets to quality of life, the economy and other areas can be found on our 'Heritage Counts' webpages here: https://historicengland.org.uk/research/heritage-counts/.</p> <p>We note that the heritage policy should not be 'stand alone', and should be considered in light of the interaction with other subject areas. Page 4 of our guidance note on Local Plans (see here: https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/) poses some useful questions to help aid this thinking process. Similarly any policies relating to specific areas or sites should very careful consider the historic environment in line with our guidance documents (see link at the top of this letter).</p> <p>The references to heritage-led regeneration are welcome, and the 'Heritage Works' publication should be of use to you in developing policies around this subject: https://historicengland.org.uk/images-books/publications/heritage-works/. The will to develop a Heritage Interpretation Strategy is also very welcome and can be closely tied with this work.</p>
LPIS516	Rugeley Town Council	<p>The town centre of Rugeley is covered by 4 conservation areas. There is concern that planning decisions are undermining these areas leading to an erosion of their integrity as areas with outstanding architectural features and retaining views in and around Rugeley. The conservation area plans are only of use if planning decisions cease to undermine their principals.</p>
LPIS517	Staffs. County Council	<p>We welcome the recognition of the Historic Environment Character Area (HECA) and the two Extensive Urban Surveys to supporting the aims of policy CP15. The incorporation of these documents into the Local Plan (Part 1) was previously strongly supported. It is noted that these documents are now nearly a decade old and it is acknowledge that a degree of review of them is advised to ensure that they continue to be relevant to the aims of the District Council in protecting and enhancing all types of heritage asset.</p> <p>As discussed at our last meeting the Chase through time project may need to be included. (500 new sites found)</p>
LPIS518	Claire Walker	<p>It is a mining area with evidence of mining dating back to medieval times with bell pits etc. These could be added to the his toric points of interest for investigation. Be proud of the history.</p>

LPIS519	Christopher Walker	It is a mining area with evidence of mining dating back to medieval times with bell pits etc. These could be added to the historic points of interest for investigation. Be proud of the history.
Question 51. What might a Heritage Interpretation Strategy for the District cover?		
LPIS520	Historic England	See Question 50
LPIS521	Lichfield and Hatherton Canals Restoration Trust	We would support the provision of Heritage Interpretation Boards at suitable locations on the projected through-route for the Hatherton Canal and mentioning the work being done and the work proposed to restore the Hatherton Canal.
LPIS522	Rugeley Town Council	See Question 50
LPIS523	Staffs. County Council	See Question 50
Question 52. Do you have any further comments on how the historic environment might help the regeneration of the District?		
LPIS524	Historic England	See Question 50
LPIS525	Brereton & Ravenhill Parish Council	<u>Page 54, Existing policy CP15</u> It is important to recognise that protection of historic assets requires a willingness to use statutory powers in respect of deteriorating buildings including the use of section 215 notices and a willingness to acquire land compulsorily
LPIS526	Rugeley Town Council	See Question 50
LPIS527	Staffs. County Council	See Question 50
Question 53. Do you have any other comments on our review of Policy CP15: Historic Environment?		
LPIS528	Brereton & Ravenhill Parish Council	<u>Page 54, paragraph 5.131</u> Any consideration of "Brereton Colliery as regeneration/leisure" opportunity should reflect its location in the Area of Outstanding Beauty and the Green Belt and, as such, should be of limited development only (e.g. a small and strictly controlled number of log cabins for tourism).
LPIS529	Historic England	See Question 50
LPIS530	Jukes, June	Historic sites should be preserved, they are part of our local heritage
LPIS531	Lichfield and Hatherton Canals Restoration Trust	We strongly support steps being taken, working with neighbouring authorities and with the Lichfield & Hatherton Canals Restoration Trust and the Canal & River Trust to ensure a protected through-route for the Hatherton Canal from a junction with the Wyrley and Essington Canal near Fishley in Walsall Council area through to the Staffordshire and Worcestershire Canal near Hatherton.
LPIS532	Rugeley Town Council	See Question 50
LPIS533	Staffs. County Council	See Question 50
Review of CP16: Climate Change & Sustainable Resource Use		
Question 54. Do you have any comments on what issues need to be addressed in terms of climate change and sustainable resource use and what policy options may need to be considered, taking account of key local issues such as air quality and mineral sterilisation?		
LPIS534	Canal & River Trust	The Trust wish to highlight the potential of the canal for heating & cooling for district heat network or individual schemes such as at allocated sites. As a least cost energy source, utilising the heat from the canal could help with building resilience with other low carbon technologies such as CHP (combined heat and power) plants. If an energy centre is proposed, then utilising heat pump technology could supply building such as civic, educational or health care facilities where heat load demands are high. The Policy should be amended to include reference to the potential of the canal network to contribute to low carbon technologies. In addition, the Trust also wish to highlight the potential for surface water drainage to the canal which could also be referenced in revised

		<p>Policies. Any surface water discharge to the canal would require prior consent from the Canal & River Trust. Full details of any proposed discharge would need to be submitted and include appropriate mitigation measures to ensure there was no adverse impact to the biodiversity of the waterway, water quality or structural integrity of the waterway. As the Trust is not a land drainage authority, such discharges are not granted as of right-where they are granted they will usually be subject to completion of a commercial agreement.</p>
LPIS535	Coal Authority	<p>As you are aware Cannock Chase area has significant coal mining legacy including; approximately 201 mine entries, recorded and likely coal workings at shallow depth and surface mining activity. The area is also identified as containing Surface Coal Resource.</p> <p>The Coal Authority is therefore pleased to see that coal mining legacy is identified as a Key Issues within the Scoping Report. We note that Policy CP16, criterion f, of the adopted Cannock Chase Local Plan (Part 1) requires development proposals to have regard to stability issues arising from coal mining legacy and the need for site-specific safeguarding of minerals. As the national policy framework in relation to these issues has not changed we would expect to see the existing criterion (f) included in any revisions to Policy CP16 made for the new Local Plan.</p>
LPIS536	Environment Agency	<p><u>Water Framework Directive</u></p> <p>A large part of the Environment Agency's work now is to implement the Water Framework Directive (WFD), a European Directive which aims to protect and improve the water environment. It applies to surface waters and groundwater. Successful implementation of the Water Framework Directive will help to protect all elements of the water cycle and enhance the quality of our groundwaters, rivers, lakes, estuaries and seas. We would expect therefore for WFD to be integrated into your Local Plan, and reflected in many of the policies your draft which relate to flooding, drainage, rivers, ecology and contaminated land.</p> <p>The Water Framework Directive (WFD) looks at the ecological health of surface water bodies (defined as a slight variation from undisturbed natural conditions), as well as achieving traditional chemical standards. In particular it will help deal with diffuse pollution which remains a big issue after we have improved most point source discharges.</p> <p>The Environment Agency has published River Basin Management Plans (RBMPs) that identify measures that will achieve WFD requirements for all water bodies in England and Wales. Regulation 17 of the Water Environment (WFD)(England & Wales) Regulations 2003 places a duty on each public body including local planning authorities to 'have regard to' RBMPs.</p> <p>When undertaking the development of a site, or the proposed development of a site, an assessment should be made to:</p> <ul style="list-style-type: none"> • identify when there might be impacts on water bodies; • seek options that reduce impacts on water bodies; • assess the risk of deterioration or failing to improve water bodies; • require all practicable mitigation; • prevent deterioration of current water body status; • take listed measures in RBMPs into account; • consider alternative development options that would avoid or reduce impacts on water bodies; • seek opportunities to improve water bodies; and • consider objectives in RBMPs for protected areas. <p>We recommend the following guidance, which provides advice on how Local Authorities can fulfil their duties in implementing this directive. Please pass on to any other colleagues you feel may benefit from this (including those outside planning). A list is included within the document stating which LPA roles may have a role to play with regards to this.</p> <p>http://www.sustainabilitywestmidlands.org.uk//media/resources/Final_Executive_Summary_June_2012.pdf</p>

		<p>The RBMP relevant to your Authority boundary is the Humber River Basin Management Plan which can be found here: https://www.gov.uk/government/collections/river-basin-management-plans-2015</p> <p>The following issues all fall under the banner of WFD-implementation in some way and should therefore be addressed within your policies and growth proposals.</p> <p><u>Foul Drainage</u></p> <p>Evidence supporting your Local Plan Review should demonstrate that the necessary foul drainage infrastructure is in place or viable for your allocated sites. Some areas may drain to the foul main sewer system to be treated by Severn Trent Water, but the transmission infrastructure or treatment facility may not be sufficient to handle the additional load created from growth and may in turn cause a pollution of the water environment. Conversely, where the main sewer is not available it must be ensured that the water environment has the ability to accommodate discharges from packaged treatment plants and other non-mains solutions.</p> <p>Where growth will be putting additional pressure on the Severn Trent Water foul mains, it must be demonstrated there will be no significant deterioration in current spill frequency/volume from storm related discharges (CSOs, storm tanks, pumping stations) as a result of any growth. This will require hydraulic modelling from Severn Trent Water (STWL) to demonstrate no risk of deterioration.</p> <p>The Environment Agency cannot make any statement on whether there is hydraulic capacity within a sewer network to accommodate the additional flow. Only STWL can do this. We can however advise on areas of concern with regards to 'permitted' capacity. In other words, sewage works that currently have headroom in their permits and acceptance of the additional flow would not trigger a permit alteration STWL should therefore be consulted on whether they have a preference for the location of the developments. If there are various parcels of land that could be developed then they may prefer certain areas draining to certain STWs or avoiding known pinch-points within a sewer network.</p> <p>At the point where we know where the growth is projected and which STWs it will drain to we can carry out a quick assessment to produce a RAG assessment of permitted capacity. A initial check of flow figures suggests that Rugeley and Cannock STWs have significant permitted flow headroom. It is our understanding these are the two STWs that serve the district council area, however this should be clarified.</p> <p><u>Water Availability</u></p> <p>Evidence will also need to be provided to demonstrate that adequate water can be made available to support the level and distribution of growth proposed. As part of the Water Resources Management Plan 2019 South Staffs Water are implementing various policies to reduce demand. These should be taken into consideration for any development in the area, especially the Building Regulations &c. (Amendment) Regulations 2015. We therefore recommend that any development considers water resource availability and implements water efficiency measures.</p> <p>Drought and non-drought events can put customer water supply at risk, these challenges combined with increased levels of development in the area should be considered as part of the whole in the assessment of whether a sustainable supply of water is available to support the plan.</p> <p><u>River Channels</u></p> <p>Green/blue corridors provide multiple benefits to residential areas by providing services such as flood management provision, green space and ecological function and some amenity. Consequently they then need to be afforded a high level of protection (8m minimum standoff) from encroaching developments in order to facilitate their function particularly with the need for extra capacity</p>
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		<p>due to climate change. This should be considered when assessing the capacity of sites that have a watercourse within or along the boundary.</p> <p>Deculverting of watercourses should be a standard policy primarily because it reduces flood risk and creates new ecological habitat. This will also allow more space to be freed up by for development because new development over culverts is not allowed and reduce future management implications of the culvert in the long-term. The new watercourse can be diverted to increase total length around the edge of developments which can provide extra flood event capacity and improve development layout.</p> <p>If greenspaces can be designed to be less formal areas with more semi-natural habitats this will reduce maintenance costs and provide better biodiversity and water management potential. These can also be incorporated into the surface water management of the site.</p> <p>The Saredon Brook is classified as a Heavily Modified Waterbody and is failing to reach Good Ecological Status due to water quality issues from a range of urban sources so any opportunities to improve the water quality should be implemented. The de-culverting of watercourses is a major objective under WFD in order to reduce artificial modifications.</p> <p><u>Groundwater Protection</u></p> <p>Please note these comments relate solely to the protection of 'Controlled Waters'.</p> <p>Reference to the 1:50,000 scale geological map indicates that the area is covered partly by the bedrock of the Kidderminster Sandstone Formation, which is designated a 'Principle Aquifer' by the Environment Agency, and partly by the Pennine Middle Coal Measure Formation, designated as a Secondary A Aquifer. Some areas of superficial deposits are also indicated, in the form of River Terrace deposits. These deposits are likely to be associated with the River Trent, which flows through part of the area designated by the Local Plan. Other areas of Glacial Till superficial deposits are also designated for part of the Local Plan. Several Source Protection Zones are identified in the area covered by the Local Plan. These are designated for public water supply boreholes for South Staffordshire Water.</p> <p>Reference to Environment Agency databases indicate that several historic landfills are located within the area identified in the neighbourhood plan. We recommend that you contact the Local Authority, as lead regulator for these sites, for further information. There is potential for contamination to be present which may currently be impacting 'Controlled Waters' receptors of groundwater in the underlying Principal Aquifer and Source Protection Zones. Furthermore there is potential for re-mobilisation of any contaminants during site development.</p> <p>Should any sites identified for future development currently or formerly have been subject to land-use(s) which have the potential to have caused contamination of the underlying soils and groundwater then the plan should be able to demonstrate that risks associated with this can be managed through the planning process. Planning applications must be supported by a Preliminary Risk Assessment to demonstrate that the risks posed to 'Controlled Waters' by any contamination are understood by the applicant and can be safely managed.</p> <p>Government Policy, as detailed in the National Planning Policy Framework (paragraph 120), states that 'where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner'.</p> <p>The plan proposals should be in line with the position statements in our 'Groundwater Protection: Principles and Practice' (GP3) document, available from our website at www.environment-agency.gov.uk. This document sets out our position on a wide range of activities and developments, including:</p> <ul style="list-style-type: none"> • Storage of pollutants and hazardous substances
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- Solid waste management
- Discharge of liquid effluents into the ground (including site drainage)
- Management of groundwater resources
- Land contamination
- Ground source heat pumps

It should be noted that certain high risk activities (e.g. underground and sub-water table storage of fuel) may not be appropriate within high risk areas such as Source Protection Zones.

Flood Risk

Flood risk is a key local issue as well as a cross-boundary issue and as such should be addressed by the inclusion of a specific flood risk policy to cover all sources of flooding, in addition to an up to date Level 1 Strategic Flood Risk Assessment (SFRA) and Level 2 SFRA where sites are allocated within the mapped floodplain to demonstrate that the site proposals can be delivered safely. Site allocations at risk of flooding should be supported by evidence to demonstrate that the Sequential Test and Exception Test have been passed. We recommend that finds are set aside at this early stage to commission consultants to undertake a detailed Level 2 SFRA if necessary.

Your Authority area covers the headwaters of both the Ridings Brook and Rising Brook and as such it is important that any new development does not increase or exacerbate flood risk downstream both within your Authority area or in other council areas. Other main rivers within the area include Wash Brook, Wyrley Brook (southern boundary) and the River Trent (northern boundary). Parts of Cannock and Rugeley are covered by the Environment Agency's flood warning service.

Surface Water

The CCDC area has historically experienced a high number of flooding incidents caused by surface water. In June 2016 areas around Cannock were affected by flash flooding from intense rainfall and thunderstorms which impacted on homes, businesses and roads. Improvements in surface water management is required over much of the area. Staffordshire County Council, as Lead Local Flood Authority, should be consulted regarding surface water issues and suitable measures to deal with surface water arising from development proposals required to minimise the impact to and from new development. Staffordshire County Council has also published a SuDS Handbook which includes their requirements for managing surface water on new developments:

<https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-Planners-and-Developers.aspx>

Flood Defences

There are Environment Agency maintained defences in Cannock which include Mill Green balancing reservoir and dam as well as flood walls and embankments and a flood relief channel and culvert under the A5. These reduce flood risk to around 240 homes and businesses whilst protecting key habitats and providing an enhanced recreational facility in the area.

In Rugeley, the Environment Agency has recently completed a £5.2 million flood alleviation scheme which reduces the risk of flooding to more than 270 properties in the town, and crucially takes the town centre out of the functional floodplain, allowing redevelopment. It includes a flood storage area on Hagley playing fields which will store water from Rising Brook during times of heavy rainfall and then slowly release it back into the brook when levels no longer pose a flood risk. New flood mapping to reflect this should be available in Autumn 2018.

In order to ensure that the appropriate level of protection these defences provide is maintained in future, we need to ensure we can safely access these areas in order to inspect and carry out works. It is therefore important that any proposed development is set

		<p>back at least 8 metres from any flood defence for this purpose. Consideration should be given to using CIL charging to contribute towards the costs of maintaining these defences for any new development that will benefit from the presence of the defences. It should be noted that even in defended areas there will always still be a degree of residual risk if these defences are overtopped or breached by a flood event greater than that for which the defences were designed. For this reason proposed development in areas benefitting from the presence of the defences will be required to incorporate raised floor levels.</p> <p><u>Investment programme</u></p> <p>There is a proposed scheme in our investment programme to carry out a capital maintenance scheme on the culverted section of the Rising Brook through Rugeley town centre. This culvert requires works to improve its condition due to structural defects and siltation. Work is currently planned to commence in 2025/26.</p> <p>There are currently no other schemes in this area identified in our investment programme. However, other flooding problems may arise in future which will require flood alleviation measures subject to technical, economic and environmental viability. Consideration should be given to using CIL charging to secure funding for flood risk schemes that are unlikely to be wholly funded through central or local government.</p> <p><u>Strategic Flood Risk Assessment</u></p> <p>A SFRA (Level 1) was originally produced in 2008 by CCDC and a Level 2 SFRA was produced for Rugeley Town Centre in 2009. The original SFRA was subsequently updated in 2014 to take into account new model data. We have not undertaken any new modelling since then apart from some associated with the design of the now completed Rugeley flood alleviation scheme. However, the current SFRA (2014) does not take account of the revised climate change guidance issued in 2016 as it has used an increase of 20% in peak flows to determine future flood risk. Given the strategic nature of Level 1 SFRAs, we would now expect LPAs to consider as a minimum, the potential impacts from climate change under the central (20%), higher central (30%) and upper end (50%) allowances for the 2080s epoch to be included as part of the evidence base for the revised plan.</p> <p>In addition, other relevant documents published since 2014 such as the Staffordshire Local Flood Risk Management Strategy 2015, Staffordshire SuDS Handbook 2017 and the Humber Flood Risk Management Plan 2016 [Sub Area ‘Staffordshire Trent Valley’] should be taken into consideration as part of any SFRA review.</p> <p>The SFRA (Level 1) should be used to apply the Sequential Test and assess all proposed site allocations to determine whether they are located outside of flood risk areas from all sources of flooding without the application of the Exception Test. It should include the definition of Flood Zone 3b to establish areas where water needs to flood or be stored in times of flood. The area identified as functional floodplain should take into account the effects of defences and other flood risk management infrastructure. If an area is intended to flood, e.g. an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as functional floodplain, even though it might not flood very often. Appropriate policies should be included in the plan to ensure these areas are safeguarded for this purpose.</p> <p>If the Level 1 SFRA shows that land outside flood risk areas cannot accommodate all the required development, a Level 2 SFRA will be required in order to provide the information necessary for application of the Exception Test for those sites. This should include an assessment of the extent, duration, velocity, depth and rate of onset of flooding, as well as identification of affected properties, infrastructure and communities. It should also assess the risk of flood defences failing, for example could defences be breached or overtopped. The likelihood of flood defences failing will change over time, for example because of limitations on maintenance funding and/or degradation. You should also consider what would happen if the flood defences failed. We therefore advise that the</p>
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		<p>SFRA (Level 1) should be updated to incorporate the latest climate change guidance as well as any other relevant issues and be used to apply the Sequential Test for proposed site allocations. It should also identify any cross-boundary flood risk.</p> <p>A SFRA (Level 2) will need to be produced to support application of the Exception Test where required, and demonstrate deliverability of the plan proposals.</p> <p>The conclusions of the SFRA Levels 1 and 2 should be reflected in the revised local plan.</p> <p>The current SFRA (2014) advises that a policy for flood risk management is essential in order to ensure a consistent approach and ensure that the objectives of national policy are embedded within the local plan. It also includes a number of policy recommendations for integration into the Local Plan.</p> <p>We recommended that the revised plan includes a specific policy on flood risk. Appendix 1 provides further details on this issues this should look to address.</p> <p><u>Regulated Sites</u></p> <p>The general issue of safeguarding regulated activity (such as AD plants, landfill, composting and other waste processing facilities) from proposed new sensitive receptors using a buffer zone is becoming an increasing concern. Issues can involve both housing development increasingly close to an operating waste facility, with inevitable complaints over amenity, with pressure on the Environment Agency (as the regulatory body) to act. This can result in pressure to demand that a facility closes and relocates, however a facility may be providing local or even national waste management capacity, identified in adopted waste plans.</p> <p>‘Safeguarding’ can also refer specifically to providing for appropriate future expansion of existing infrastructure, by preventing conflicting developments. We are seeing increasing pressure on waste facilities especially in urban areas, largely due to housing developments which result in an increase in complaints to ourselves as the regulator of those facilities. Changes to planning system now allow commercial properties to be converted to residential use, such as offices on industrial estates.</p> <p>It should be made clear that the Environmental Permitting Regulation does not demand ‘zero impact’, so conflict situations become inevitable.</p> <p>The updated NPPF now makes reference to placing obligations onto the “Agent of Change” (i.e. the developers/applicants,) requiring them to ensure appropriate mitigations are put in place to protect neighbouring users from impacts:</p> <ul style="list-style-type: none"> • 182. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed. <p>As such, the Local Plan should look to identify issues where this may be an issue and consider carefully the allocation of sites which are located within close proximity to permitted waste facilities. Failure to do so can result in unacceptable levels of noise, odour, vibration, dust, smoke, flies, etc. Your local plan policies should identify these high risk facilities, steer development away from such areas and ensure that if development is proposed in close proximity it is such that it is not of a ‘sensitive’ nature to such nuisances.</p>
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		Close liaison with the waste planning authority and the Environment Agency should be maintained to ensure the plan reflects joined-up working.
LPIS537	Lichfield and Hatherton Canals Restoration Trust	We feel that the restoration of the Hatherton Canal could offer useful opportunities for flood risk mitigation. We note that the lead flood risk authority for the area is Staffordshire County Council but we are not aware that they have any work in progress yet to investigate what opportunities exist in this direction. We would be pleased to work with them on this.
LPIS538	National Farmers Union West Midlands Region	<p>Large new developments in urban areas have the potential to cause downstream impacts, even when new SUDs techniques are employed. It is important to recognise that farmers have to deal with these impacts as they are responsible for maintaining many of the area's watercourses and drainage infrastructure. Waterlogging and flooding has the potential to directly impact upon the productivity of agricultural land so it is important to value and maintain our existing drainage infrastructure.</p> <p>The proposals for growth outlined in the document will lead to large new housing and employment developments in the urban area but despite the reference to the importance of flooding, scant information is provided on the downstream impacts.</p> <p>The document does not include details of the SUDS (Sustainable Urban Drainage) requirements that would apply to new development or how surface water runoff could be captured and managed to reduce flood risk. Therefore the document needs to investigate the wider impacts of water management to ensure that drainage capacity is available to cope with the new demands placed on the county's natural infrastructure.</p> <p>The paper does not examine the additional demands that will be placed upon water abstraction or sewerage treatment capacity in the area. Again these are areas that may impact upon adjacent farm businesses and we would welcome more information on how potential impacts will be mitigated.</p>
LPIS539	Natural England	Q54 & Q55 - Green and blue infrastructure are characterised by their multi-functional and cross-cutting nature. We anticipate that our dialogue with the Council on this fundamental theme will allow further discussion and the identification of the interaction between these assets and the role they have in mitigating and promoting adaptation to the effects of climate change. We will seek to identify suitable reference material as part of our dialogue.
LPIS540	Severn Trent Water Ltd	<p>Thank you for the opportunity to comment on your consultation. We currently have no specific comments to make, but please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice. For your information we have set out some general guidelines that may be useful to you.</p> <p><u>Position Statement</u></p> <p>As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.</p> <p><u>Sewage Strategy</u></p> <p>Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the</p>

		<p>capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.</p> <p><u>Surface Water and Sewer Flooding</u> We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewerage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.</p> <p>We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.</p> <p>To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and_guidance/infrastructure-charges/</p> <p><u>Water Quality</u> Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.</p> <p><u>Water Supply</u> When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.</p> <p><u>Water Efficiency</u> Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.</p> <p>We recommend that in all cases you consider:</p> <ul style="list-style-type: none"> • Single flush siphon toilet cistern and those with a flush volume of 4 litres. • Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute. • Hand wash basin taps with low flow rates of 4 litres or less. • Water butts for external use in properties with gardens.
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LPIS541	Staffs. County Council	This is an early stage consultation, and in general, the new Plan seems to be evolving in a way which should not cause any difficulties for the Minerals and Waste Planning Authority. However, as the pressure grows to find more land for development, we can expect an accompanying increase in demand for minerals to build more houses, factories and roads, and more demand for facilities to manage the waste that they will inevitably produce. The potential for conflict between land uses will increase, but it should still be possible to find satisfactory solutions. Cannock Chase Council will need to remember that the Minerals Local Plan for Staffordshire and the Staffordshire and Stoke-on-Trent Joint Waste Local Plan form part of their Development Plan, and it is important that the emerging new Local Plan is in conformity with those plans. Effective safeguarding of both mineral and waste site will be particularly important.
LPIS542	Claire Walker	With the expected influx of 3000 visitors due to Mill Green it is important to keep all green spaces in order to preserve air quality for those residents actually living in this area.
LPIS543	Christopher Walker	With the expected influx of 3000 visitors due to Mill Green it is important to keep all green spaces in order to preserve air quality for those residents actually living in this area.
Question 55. Do you have any comments on the evidence base updates required, including any site specific information that may be required?		
LPIS544	Natural England	See question 54
LPIS545	Severn Trent Water Ltd	See question 54
LPIS546	Staffs. County Council	The Evidence base updates are broadly acceptable. We welcome the reference to Minerals Safeguarding, but safeguarding essential waste infrastructure and sites is also important and should be included.
Question 56. Do you have any comments on what, if any, sustainable construction standards should be considered within future policy options?		
LPIS547	Staffs. County Council	As mentioned previously SuDS could feature here and the LLFA SuDS handbook.
Questions on other issues which need to be covered and the scope of the new plan		
Question 57. Have we missed anything else not covered via our policy review which should be in the new Local Plan? What have we missed, and can you supply further details or evidence to help us with this?		
LPIS548	Canal & River Trust	Consider a separate canal-specific policy (see previous comments)
LPIS549	Lichfield District Council	Lichfield District Council would welcome further engagement on revisions of the Rugeley Power Station SPD (where necessary) and further updates through co-operation.

LPIS550	Natural England	<p><u>Soils</u></p> <p>The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.</p> <p>The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 112 to safeguard 'best and most versatile' agricultural land.</p> <p>See our response to Question 29 for information on evidence.</p>
LPIS551	Norton Canes Parish Council	The Parish Council have noticed in the Green Belt review that there are several plots of land being pushed that lie close to the Cannock Extension Canal SAC. We feel there should be a specific chapter in the local plan dedicated to protecting and enhancing this designated area along the same lines as Cannock Chase SAC.
LPIS552	Staffs. County Council	We have nothing further to add at this stage and we look forward to continuing to work closely with you as the Plan progresses. Should any additional issues arise following the preparation of revised/new evidence we can address them in cooperation.
LPIS553	Staffs. Fire & Rescue	On behalf of Staffordshire Fire and Rescue Service I would like to acknowledge receipt of the Cannock Chase District Local Plan Review and associated documents. The Service supports the documents in principle and would welcome the opportunity to continue to work with the District Council in the planning process across the locality. We would request that the requirement for sprinklers in domestic, commercial and public buildings be considered as part any planning process within the district.
Question 58. Overall, what are the key strategic issues which should be specifically addressed by strategic local plan policies?		
LPIS554	Inglewood Investments (SLR Consulting)	<p>To summarise, the key strategic issues that the new Local Plan needs to address, are as follows:</p> <ul style="list-style-type: none"> • Housing availability, delivery and housing choice; • Safeguarding land for future plan periods; • Releasing suitable, less sensitive Green Belt land through a full Green Belt review consultation exercise; • Identify sites which will help tackle cross-boundary issues; and • Ensuring a range of high quality and visually attractive development is delivered, which promotes sustainable, healthy and safe communities.
LPIS555	Natural England	Natural England advises that the Plan's vision and emerging development strategy should address impacts and opportunities for the natural environment with particular emphasis on designated environmental assets. In accordance with NPPF 170d and 174b, the plan should take a strategic approach to the protection and enhancement of the natural environment and aim for a net gain for biodiversity considering opportunities for enhancement and improving connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Nature Improvement Area, Local Nature Partnership, Area of Outstanding Natural Beauty Management Plan, Rights of Way Improvement Plan and Green Infrastructure Strategies.
LPIS556	Richborough Estates (Land off Brownhills Rd Norton Canes) (Pegasus Group)	As set out within this Representation, a key strategic issue which must be addressed is un-met housing need arising from within the GBHMA. The Local Plan should address this issue in full throughout the plan period, through the Duty-to-Cooperate. It is submitted that the un-met need can only be met through the release of Green Belt land for housing.

LPIS557	Richborough Estates (Land South of Cannock Rd Heath Hayes) (Pegasus Group)	As set out within this Representation, a key strategic issue which must be addressed is un-met housing need arising from within the GBHMA. The Local Plan should address this issue in full throughout the plan period, through the Duty-to-Cooperate. It is submitted that the un-met need can only be met through the release of Green Belt land for housing.
Question 59. Are there any issues which you think could be better dealt with by supporting documents instead? If so, what are these and can you explain why they would be better dealt with outside of the new Local Plan?		
LPIS558	Natural England	No.
Question 60. Finally – do you have any other comments which cannot be addressed elsewhere?		
LPIS559	Brereton & Ravenhill Parish Council	Page 101, 2nd indent BRPC welcomes the aspiration to see progress towards enhancement of the district’s Conservation Areas in Brereton and elsewhere and to safeguard of other heritage assets across the District. This will need a willingness to use appropriate statutory powers including compulsory acquisition and section 215 notices.
LPIS560	Cannock Chase Labour Party (A. Bate)	<u>Bleak House</u> The Integrated Impact assessment used when Bleak House wasn’t allocated as a proposal in the Local Plan (which was only completed in January 2017) is identified as C264 (a,b,c,d, & e) in the document , indicates: -Significant negative effect on the sustainability appraisal for bio-diversity and geodiveristy. -Significant negative effect on the sustainability appraisal for pollution. -Significant negative effect on the sustainability appraisal for previously developed land. -Significant negative effect on the sustainability appraisal for Landscape and Townscape. There have been no changes to the land in the last 16 months, so there would be no different an outcome for the Land to become suddenly suitable for development. Coal Authority reports also indicate areas of land that are “high risk” for development around the areas of land 264 (d and e) near Chetwyn Park estate, and gives locations of closed mining shafts. There are no reasons why this should be allocated as a proposal in the local plan on this occasion, simply for the fact nothing has changed. There is no benefit to taking the area out of the Greenbelt. From election canvassing, it was also clear that most residents are not in favour of any development in this area or to be taken out of the Greenbelt. The Labour party would be vocally opposed to removing this area of land from the Greenbelt and support local resident views that it should not be allocated as a proposal in the local plan.
LPIS561	Inglewood Investments (SLR Consulting)	<u>Previous Representations - Land at Springs Farm, Brereton, Rugeley</u> As you will be aware from our Site Specific Submission on behalf of Inglewood and our subsequent meeting on Thursday 26th April 2018, with Clare Eggington and Sarah Jones, in relation to the Cannock Chase Development Plan Review Part 2 Issues and Options Consultation, Inglewood has an interest in land adjoining the southern edge of Brereton, Rugeley. In this context, Inglewood is promoting this site for residential development, with associated open space and enhancements to public access to those areas of the Green Belt which would be retained and reinforced. The previous submission demonstrates the availability, suitability and deliverability of this site. SLR is currently preparing a concept masterplan to communicate Inglewood’s ‘Vision’ for how the site could be developed recognising Cannock Chase District Council’s (CCDC) desire to see landscape and ecological assets retained and protected as an integral part of any future development.

	<p>The purpose of this representation letter is to summarise our thoughts regarding the Issues and Scope Document, with specific reference to Inglewood’s proposals, where appropriate.</p> <p><u>Scoping and Issues Document</u> It is evident from reviewing the Scoping and Issues Document that a number of changes have occurred and subsequent updates are required since the adoption of the Local Plan (Part 1) in 2014.</p> <p>These updates particularly relate to the District’s profile and objectives, housing numbers and the availability of housing land. This representation addresses the most important themes contained within the Document as they relate to our Client’s interests in the District, particularly in terms of the benefits which the release of this land can secure in meeting the objectives of the emerging new Local Plan.</p> <p>This letter has also addressed relevant key questions which the Issues and Scope Document poses. These questions and responses are contained within the Appendix 1. Thereafter at Appendix 2 we provide a plan of our Client’s land interests for completeness. These representations will be supplemented shortly with the submission of the masterplan work which is currently being prepared following our meeting in April.</p> <p><u>Cannock Chase District Council Local Plan Update</u> It is understood that Cannock Chase District Council (CCDC) are replacing the adopted Local Plan Part 1 and previously commenced Local Plan Part 2 Document with a new Local Plan. This document will set the context for delivering growth, alongside detailing;</p> <ul style="list-style-type: none"> • the spatial strategy; • strategic and detailed planning policies to manage change; • land allocations and safeguard land for development; and • a monitoring framework. <p>The adoption target for the new Local Plan is September 2021, and this Consultation is the first step in Local Plan preparation to establish the Issues and Scope which the Plan will need to cover. We also understand that this consultation is a high-level, general consultation at this point, and that you are not looking at individual sites at this early stage in the process, although questions about sites are included in the document. A new call for sites will follow as part of your Issues and Options Consultation in February 2019.</p> <p><u>Issues and Options Consultation 2017</u> Although you are now essentially starting again with a new Local Plan, we consider it important to highlight that SLR submitted a representation on behalf of Inglewood as part of your Local Plan Part 2 Issues and Options Consultation (as outlined above). This consultation ran for 8 weeks from Monday 30th January to Monday 27th March 2017. We understand that the new Local Plan will replace the previous initial work undertaken as part of the Local Plan (Part 2) consultation; however your website states that ‘this work will be carried forward as part of the Local Plan Review’, therefore we consider it timely to provide a brief update on our progress, highlighting our previous representations.</p> <p>The previous Consultation included consideration of possible Site Allocations and Planning Standards, and we submitted a promotional document which set out the case for the allocation of ‘Land at Springs Farm, Brereton, Rugeley’. Given work undertaken on behalf of our Client to date, as well as reviewing the current Issues and Scope Document, we would like to take this opportunity to continue to promote our Client’s Site, and the benefits it could offer for the District, particularly given the early stage that you are at in the development plan process. Our Client is very keen to contribute positively to CCDC’s plan making process through a pro-active approach, which would help to contribute to the delivery of housing land for the District.</p>
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	<p>To summarise, the Site would offer the following benefits to the District:</p> <ul style="list-style-type: none"> • Delivery of accessibly located land to meet the identified future housing requirements; • Release of Green Belt land which has already been the subject of erosion in terms of function, outside of the AONB; • Opportunity to identify safeguarded land to avoid successive Green Belt reviews, which would run contrary to the NPPF; • Potential to open up land for increased public access; • Opportunity to enhance the wider setting of the adjacent AONB; • Potential to enhance biodiversity and implement a native planting scheme to complement the new development, open space provision and ecological connectivity; • Delivery of a site which can be readily linked into the wider existing cycle network, coupled with good bus connections; • Increase in residents to support existing local services in the location; and • Provide assistance to the GBHMA in delivering their housing requirements. <p>In addition to the promotional document, SLR's landscape and masterplanning team are currently producing a masterplan for the Site. This would support the promotional document and presents the Site and its potential opportunities in further detail, demonstrating the deliverability of the above benefits.</p> <p>This work will be ancillary to this representation and will be submitted to the Council following the close of this Consultation for your consideration, in advance of the Call for Sites.</p> <p><u>Housing Delivery in the context of the West Midlands Metropolitan Green Belt</u></p> <p>As set out within Policy CP1 of the Local Plan Part 1 Document, 60% of land within the District is designated Green Belt land, and it is evident from the Issues and Scope Document, that CCDC may potentially include some Green Belt land in the new Plan to help accommodate the District's housing need. We are concerned however that this is not at this stage an explicit commitment given the level of housing need during this plan period and beyond. In this regard, at an early stage we consider that the CCDC should provide evidence of the level of Green Belt land release required to robustly plan for housing delivering for the next two plan periods at least.</p> <p>In this context, we consider that the release of some Green Belt land will be essential around Rugeley in order to deliver balanced growth, particularly taking into account the fact that the Town is physically constrained and notwithstanding proposal for Rugeley Power Station. The eastern edge of Rugeley is constrained by the River Trent (and its floodplain), additionally proposals to the east of the town beyond the A51 and railway, (which is not Green Belt) would deliver illogical and poorly connected development in terms of settlement pattern.</p> <p>Moreover, much of the available land outside of the Green Belt is already committed or developed, as a result of policies to convert such sites which have been delivering brownfield development in more appropriate proportions since the early 2000's as a result of positive policy to this end. Given this constrained position we consider that a comprehensive review of the Green Belt is required to ensure that the emerging plan is sound and that it allocates sufficient levels of land to deliver for the needs of the District and a proportion of the wider housing market area requirement. CCDC undertook an assessment of Cannock Chase's Green Belt in 2016 to assess the extent to which various land parcels performed against the wider objectives of the Green Belt as set out within the NPPF. The Assessment considered 'Site R28' which is almost identical to our Client's Site (please refer to Appendix 2 for a comparison between Site R28's boundary and Inglewood's ownership boundary). It was concluded that Site R28 did not perform/score particularly well against the five purposes of the Green Belt, and therefore did not necessarily contribute to its wider designation. However, no land was recommended for removal from Green Belt as a result of this review.</p>
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Given that you are now at the start of the preparation of a new Plan, we consider that this is an appropriate time to review Green Belt boundaries, particularly given the new methodology for assessing housing requirements contained in the recent NPPF and the pressing needs of the wider housing market area, which continues to be under delivered. The last review of boundaries was over 20 years ago and therefore a proportionate review at this time would not be premature and would respond appropriately to current housing pressure.

In considering our Client's Site in our previous submission, SLR reviewed your 2016 Green Belt Study, and assessed this land taking account of all technical considerations. We concluded that it represents land that is both suitable and deliverable for new development. The Site is not designated for its landscape value and there were no technical constraints to its delivery for a sustainable urban extension. Furthermore, development would not result in coalescence of settlements.

We consider that there is a real opportunity to deliver development on appropriate land in the right location through the redrawing and release of some current Green Belt. This can be achieved whilst also improving adjacent retained Green Belt land through ecological, landscape and visual enhancements, and providing opportunities for public use. We conclude that further work should be undertaken on the review of the Green Belt to inform the current Plan process and to ensure that the evidence base is robust and housing/safeguarded land provision is commensurate with demand/need. Given the level of housing pressure, we consider that this is particularly important to ensure that the Plan can be responsive to any potential under delivery, for instance where brownfield land does not come forward quickly enough for unforeseen technical reasons. This is now particularly pertinent given the 'Housing Delivery Test' and the potential implications if under-delivery is established.

Housing Delivery

CCDC's current housing requirement figure is 5,300 new homes between 2006 and 2028; an average of 241 per year. As discussed in the Issues and Scope Document, the Government has changed the way housing requirements are calculated. Revisions in the form of the 'Standard Housing Methodology' and the introduction of the 'Housing Delivery Test' will require Local Authorities to ensure they have sufficient land supply throughout their plan period, and should also be encouraging Authorities to secure a sensible amount of land for safeguarding. Consequently CCDC's housing requirement figure will need to be revised in line with this approach; with the likelihood that housing requirement will increase.

In addition, the Greater Birmingham Housing Market Area Strategic Growth Study (GBHMA), which combines fourteen local authority areas, including Cannock Chase District, has identified a significant housing shortfall of 28,150 dwellings to 2031, and 60,900 to 2036. It is recognised that this requirement will need to be distributed around the authority areas and therefore it is likely that some difficult decisions will need to be made in all administrative areas. Taking a proactive approach to this process and releasing the least sensitive parts of Green Belt for development should negate the need for a more 'top down' approach later if this shortfall is not addressed.

In order to increase delivery, the GBHMA has suggested that authorities consider and apply the following minimum density rates:

- Rural areas: 30 dwellings per hectare;
- Suburban locations: 40 dwellings per hectare;
- Town and District Centres: 50 dwellings per hectare.

This will help to increase delivery. However the GBHMA recognises that Green Belt release is unavoidable. Therefore with the majority of the Cannock District being constrained by Green Belt and AONB designations, CCDC will benefit from taking a pro-active approach.

With the introduction of the 'Housing Delivery Test' and 'Standard Methodology' the Government has sent a clear message that under-delivery will not be acceptable. Therefore, identifying a range of suitable sites across the District is a key priority going forward, which we

		<p>consider the Issues and Scope Document recognises in principle. However, the emerging Plan needs to be explicit about the requirement for a comprehensive Green Belt Review; and particularly the need for this in order to avoid ‘unchecked speculative development’ if housing targets are not met later in the Plan period.</p> <p>We consider that our Client’s land interest provides an opportunity to deliver some of this requirement. To illustrate the level of housing which this might sensibly deliver, Site R28, which as described earlier is comparable with our Client’s Site, is approximately 13 hectares, and therefore has the potential to deliver over 520 houses (based on GBHMA recommended density for a suburban location). This potential housing site could also deliver other benefits including, for example, the integration of appropriate open space and green infrastructure corridors, as well as ensuring a scheme for ecological enhancements and a biodiversity net gain.</p> <p>In summary, it is evident that you are at an early stage in the plan making process. Therefore there is an opportunity to address key issues and priorities for the District early in order to ensure that the Plan has the best opportunity to be found ‘sound’.</p> <p>Given the ‘Housing Delivery Test’ and its implications if under-delivery occurs; coupled with the new ‘Standard Methodology’; and the housing pressure from the wider HMA, the evidence base and strategy for housing delivery will be under particular scrutiny as the Plan goes through its various consultation stages and is considered at Examination. This Issues and Scoping stage is therefore welcomed as an opportunity to ensure that these issues can be fully considered and robustly provided for and we trust our comments above and responses to questions are helpful.</p>
LPIS562	National Grid	<p>National Grid has appointed Wood to review and respond to development plan consultations on its behalf.</p> <p>We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p><u>Further Advice</u></p> <p>National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.</p>
LPIS563	Natural England	<p><u>Green Infrastructure (GI)</u></p> <p>The current Local Plan includes green infrastructure under Biodiversity and Geodiversity, the LPA may want to consider creating a separate policy for GI, in which we would encourage the LPA to include policy points that show the council expects GI to be central to the planning process right from the beginning. GI policy points should ideally be reiterated throughout all sections of the planning document, not just isolated in the GI policy. This shows that the LPA wants to see GI considered in all aspects of development.</p> <p>The following points should be considered to be included in such a policy:</p> <ul style="list-style-type: none"> • Requirements on what development proposals must include, while allowing for flexibility and innovation in implementation. Some examples include; a site % of GI and what ecosystem services that GI should provide and a recommended level of tree canopy cover in an urban space. Specifically excluding private gardens is a good strategy, although we recognise that they can provide some GI benefits. • Requiring the on-going management and maintenance of GI assets in perpetuity (or a suitably long time).

		<ul style="list-style-type: none"> • Including a funding mechanism. For example, use of planning obligations (S106), Community Infrastructure Levy or, Infrastructure Delivery Plans or Reference to inclusion of GI in lower tier plans e.g. Area Action Plans / supplementary guidance. • Including a mechanism for securing GI (e.g. planning obligations) and protecting it from future development (e.g. conservation covenant agreement, LNR declaration, Fields in Trust designation, green space designation in neighbourhood plans or Town and Village Green registration . • Including the requirement for monitoring and evaluation of new GI especially in the case of habitat creation. Ensuring GI is a benefit not only to people and nature but also the local economy where possible.
LPIS564	Norton Canes Parish Council	<p>The Parish Council would like to see measures to avoid developers 'landbanking' to prevent delays in building once planning permission has been granted. We would suggest that when outline and full planning permission is granted that there should be a deadline date of 2 /3years before submitting a final application or commencement of the development. This would avoid assessments provided by statutory organisations being out of date at the time of building.</p> <p>Better communication processes regarding planning applications should be addressed. We need to increase the physical threshold to which the District Council uses to notify nearby residents as to planning applications. This should include both signages on lampposts and direct mail to residents.</p> <p>We would encourage a wider communication with residents who will be affected by any development whether it be a large or small development.</p> <p>We question what processes the District Council have to ensure that they receive feedback from statutory organisations about what they are spending their allocation of funding on re infrastructure. We would also ask that these statutory organisations engage at a local level, i.e. Headteachers, GP's, County Council Highways regarding their responses re planning applications. This information needs to be communicated to Parish Councils.</p> <p>It is suggested that a better planning portal is developed as we do not now receive paper copies of any planning applications which does not assist us any decision making. The current planning portal is extremely difficult to navigate. Each document within it is not sufficiently labelled to enable to make informed decisions.</p>
LPIS565	Preece, Cllr. J	<p>I would also like to concur with the points raised by Norton Canes Parish Council, especially regarding how the planning process, council notification and consultation policies should be amended to increase awareness of new application that have gone in.</p> <p>I also believe that this review should also be used in conjunction with an upgrade to the planning portal, which I believe to be a confusing, clumsy and difficult to navigate system.</p>
LPIS566	Claire Walker	<p>We should not use Green belt or AONB green spaces for building of houses or industrial use they should be left as nature intended for the health of current and future generations.</p>
LPIS567	Christopher Walker	<p>We should not use Green belt or AONB green spaces for building of houses or industrial use they should be left as nature intended for the health of current and future generations.</p>

Appendix 3 - Summary of Consultation Response Received during Issues and Options Consultation

Local Plan Review Issues & Options Consultation: Summary of Responses		
Rep ID No.	Respondent	Comment
Overall/General Comments		
LPIO1	Bywater, A&J	<p>Area of Concern: Housing on Greenbelt Land South of A5190, Heath Hayes</p> <p>We would want to see the improvement of the local road infrastructure bearing in mind the current weight of traffic and congestion on the A5190 and five ways island, with the additional impact of the new designer outlet village. I.e. build roads first then build houses. A previously suggested link road from the south of five ways island on the B4154, joining the Kingswood Lakeside Road.</p>
LPIO2	Church Commissioners of England (c/o Barton Willmore)	<p>Bleak House: The Commissioners' have promoted Bleak House through the CCDC Strategic Housing Land Availability Assessment (SHLAA) in 2014, 2016 and 2019. The 2018 SHLAA identified the Commissioner's site as 'Land to the east of John Street/Wimblebury Road' under SHLAA Ref: C264. The SHLAA also redefined C264 into smaller parcels under C264 (a) to (e). The SHLAA notes that the site has an estimated overall capacity of 1,000 dwellings and replaces former SHLAA site 'C114'.</p> <p>The Commissioners also own a large parcel of land further south of Bleak House, which provides a large spatial gap between the site, the Staffordshire Coalfield Heaths SSSI and Burntwood. For avoidance of doubt, the Commissioners are not promoting the land to the south.</p>
LPIO3	Cycle-R	<p>Rugeley Power Station: it must be noted that Engie have, in effect, ignored the feedback from the local communities where three main areas were identified:</p> <ul style="list-style-type: none"> • Good quality, sustainable housing • High quality, well paid jobs • Retention of the historical aspects of the site, in this case, the four towers. <p>...they have taken the route of building houses on it, whilst the housing is needed, this will create an area that will end up as a commuter site for the surrounding towns and cities, draining money and resources out of Cannock and Lichfield, there will be no community development. The current plans will actively destroy the economy for the area. This site is the single most important infrastructure site in the UK and has the potential for creating a huge level of income for the area, as well as strong employment, training opportunities and the facilities to attract major names. A serious review of policy regarding this site needs to be undertaken, taking a longer term view for the benefit and health of the region rather than the short term, immediate benefits that the current proposal will bring.</p>
LPIO4	KGL Estates Ltd (c/o John Heminsley)	<p>Rugeley Power Station: Having recently adopted an SPD jointly with Lichfield District Council on the future development of Rugeley Power Station which proposes a balanced approach to a mix of housing and employment development, the Council is urged to continue with this approach rather than the one proposed in the recent outline planning application which is predominantly housing with very little employment land. In order for Rugeley to continue to be a sustainable</p>

		<p>settlement rather than rely on significant growth of outward community for jobs the Power Station provides the only significant opportunity for employment land growth in the town.</p> <p>Land South of the A5190 Cannock Road, Heath Hayes: Because of the relatively fragmented nature of the GB in the south of the district which continues across boundaries into South Staffordshire, Walsall and Lichfield, the proportionate dispersal approach to release of GB in this area as identified in the GL Hearn Study is considered to be the appropriate approach.</p> <p>Land south of the A5190 is the most sustainable location for GB release to meet some of the required local and regional housing need.</p>
LPIO5	National Grid	<p>We have reviewed the consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p>Please remember to consult National Grid on any Development Plan Document or site-specific proposals that could affect our infrastructure. (Contact details on letter)</p>
LPIO6	Wyrley Estate (c/o Fisher German LLP)	<p>The Local Plan review process is welcomed, and the consultation document is, overall, thorough and transparent about the challenges facing the district but provides a useful range of options for how the new document might take shape. That said, it is essential to ensure that the needs of the district in terms of housing and employment land are kept under review, and that figures are both ambitious and achievable. The resultant plans needs to be sufficiently flexible to take account of any uncertainty ahead. This will inevitably mean Green Belt release. Whilst this is always to be avoided where possible, we believe that it is possible to release some sites without significantly impacting on the wider integrity of the Green Belt.</p>
LPIO7	Armitage, J	<p>Recent Developments in Cannock Chase. There has been a lot of sites built on in the last year or 2 with further sites earmarked. I would expect these numbers to be taken into account.</p> <p>Rugeley Bus Station/Market Hall needs development. Both are underused (although we obviously still need a bus service) and the Market Hall is an eyesore.</p>
LPIO8	Armitage, J	<p>Cannock Wood is also very valuable – keep it green! There has also been a high level of infill with people building houses, sacrificing green space.</p> <p>Rugeley Town Centre – in need of developing, particularly the bus station and market hall, unused and an eyesore. Wharf Road does not need more housing pollution is poor and it is heaving under the weight of traffic.</p> <p>Objectives 7 & 8 are lowest on list of requirements.</p>
LPIO9	Armitage, K	<p>Development (current) in Wharf Road has created chaos. The road is now a death-trap with cars speeding up and down. Consider developing the bus station/market hall, Rugeley an eyesore and under-used.</p> <p>Pollution where I live is high. It is difficult to get doctors appointments.</p> <p>Congestion is adding a significant amount of time on journeys I make. Pavement parking is also becoming increasingly bad seemingly in all areas. More housing equates to more cars.</p> <p>Heritage Trail – is part of our Natural, not just industrial heritage.</p> <p>The new housing at the top of Burnthill Lane has gone far enough. More housing here would exacerbate the problem.</p>

LPIO10	Beau Desert Golf Club (c/o FBC Mandy Bowdler LLP)	Site C375 remains available and suitable for the proposed mixed development described in the SHLAA and Brownfield Land Register submissions pertaining to that site
LPIO11	Birmingham City Council	Birmingham City Council welcomes the contents of the Issues and Options consultation and the strategic options for growth under consideration and appreciates the opportunity for continued engagement and working with Cannock Chase Council through the Duty to Cooperate process. In particular, the City Council welcomes the recognition given within the consultation to the relevant strategic matters to be addressed across the Greater Birmingham and Black Country Housing Market particularly in relation to unmet housing need. We therefore agree with the issues identified and generally support the options explored.
LPIO12	Brereton & Ravenhill Parish Council	BRPC welcomes paragraphs 7.1, 8.1 and 13.1 of the Consultation Document, but these do not go far enough. There should be a clear statement in accordance with the NPPF that land should not be taken out of the Green Belt where the need for housing can be met beyond the outer Green Belt boundary in neighbouring authorities. BRPC welcome paragraphs 11.34 (final indent) and 11.37 (3 rd indent).
LPIO13	Brindley Heath Parish Council	BHPC welcomes paragraphs 7.1, 8.1 and 13.1 of the Consultation Document, but these do not go far enough. There should be a clear statement in accordance with the NPPF that land should not be taken out of the Green Belt where the need for housing can be met beyond the outer Green Belt boundary in neighbouring authorities.
LPIO14	Broadbent, A	Traffic on the A1590: Any development south of this road will surely increase this; the traffic is at most times, ridiculous. Rugeley Power Station: site development should be planned to retain or increase greenery as it makes a more pleasant place to live.
LPIO15	Coal Authority	The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking consideration of prior extraction of the coal. The questions asked in the Issues and Options document are generally for local consideration and are not issues the Coal Authority wishes to specifically comment on.
LPIO16	Armitage, D	Rugeley Power Station: It is inconceivable that Lichfield has such a large allocation of Housing. Rugeley will have to use part of their allocation for employment and not Lichfield. Why? Doctors – how will Rugeley cope with thousands more when it is so difficult to get an appointment. There is also no contraceptive/sexual health clinic anymore. Pollution – cars, congestion, unnecessary idling of engines outside schools and in car parks will undoubtedly get worse. It is difficult now to get around to area as it is. Any further development would exacerbate current problems. Flooding –The new flood defence does not cater for the whole of the area. Climate Change – We should be planting trees rather than concreting out greenbelt. Wildlife – I live in close proximity of Sherbrook Valley and have recently noticed that skylarks have returned to our area, alongside other wildlife such as hedgehogs, toads, badgers etc. the loss of the greenbelt would have a severe impact. The greenbelt areas in Brereton, Rugeley are so small it would be sacrilege to build on including those spaces considered ‘brownfield’. Heritage Trail – Building alongside the trail in the greenbelt would destroy the point. It is accessible to all. It benefits both physical and mental well-being, has historical significance and is beautiful...

LPIO17	Environment Agency	The Environment Agency has limited scope to comment on the various options at present, given that the water evidence base is not yet completed. Once the Strategic Flood Risk Assessment and Water Cycle Study have been published, it will allow us to better advise on sustainable levels and locations for growth in terms of the capacity of the water environment to support development.
LPIO18	Goodwin, M	CCDC have destroyed Norton Canes with the ridiculous levels of new housing.
LPIO19	Historic England	Page 20- references Natural England and Historic England as duty to cooperate specialists on one line. We would recommend, as we are two separate Government agencies with different remits, that we be listed separately to avoid any confusion. Paragraph 4.2 – second bullet point, relates to ‘safeguarding’ heritage and we would recommend changing the term to ‘conserving and enhancing’ We welcome the inclusion of heritage within the vision on page 25.
LPIO20	Jones, T	I welcome paragraphs 7.1, 8.1 and 13.1 of the consultation document, but these do not go far enough. There should be a clear statement in accordance with the NPPF that land should be taken out of the Green Belt where the need for housing can be met beyond the outer Green Belt boundary in neighbouring authorities. I support 12% of the district’s housing need being met in the Rugeley/Brereton area, but only if this includes sites outside both the district beyond the Green Belt. I oppose any larger proportion of the housing need being met in the Rugeley/Brereton area since this would both reduce the Green Belt and be unsustainable I welcome paragraphs 11.34 (final indent) and 11.37 (3 rd indent). I see no need to update the second indent in paragraph 4.2.
LPIO21	Lichfield District Council	Lichfield DC agrees that issues identified such as the Cannock Chase SAC, AONB, employment and housing and Rugeley Power Station will be cross boundary issues and also welcomes the continued recognition of the cross boundary travel relationships between Lichfield District and Cannock Chase District. Rugeley Power Station: It would be useful for Cannock Chase DC to confirm how it is treating the Rugeley Power Station site. It is recognised that Cannock Chase DC will be making its own individual site assessments based on professional judgement of each site’s performance against the comprehensive list of criteria as set out in the draft methodology proposed in the issues & options paper. In undertaking this work, Lichfield would encourage Cannock Chase DC to maximise the use of the assets that are identified as being able to be allocated through the SHLAA process. Lichfield DC note the cross-boundary planning application for the Power Station site received during the consultation period on the Issues & Options document, and that the scheme is housing led for up to 2300 dwellings across the two authorities. At the time of writing, the full implications of the application remain under careful consideration, and it is recognised that there are implications on a range of matters including in respect of the proposed changes in the housing/employment balance of the scheme from that originally envisaged.
LPIO22	National Farmers Union	Wider Environmental Impacts of Development: Large new developments in urban areas have the potential to cause downstream impacts, even when new SuDS techniques are employed. It is important to recognise that farmers have to deal with these impacts as they are responsible for maintaining many of the areas watercourses and drainage

		<p>infrastructure. Waterlogging and flooding has the potential to directly impact upon the productivity of agricultural land so it is important to value and maintain our existing drainage infrastructure.</p> <p>The proposals for growth outlined in the document will lead to large new housing and employment developments in the urban area, but despite reference to the importance of flooding, scant information is provided on the downstream impacts. The paper does not examine the additional demands that will be placed upon water abstraction or sewerage treatment capacity in the area. Again these are areas that may impact upon adjacent farm businesses and we would welcome more information on how potential impacts will be mitigated.</p> <p>Livestock units and residential development: We have not made a detailed examination of all the locations outlined as site allocations for employment or housing development. However, where sites are allocated for development, the proximity of the land to existing livestock units must be examined. Sites should not be allocated for residential development if they are found to be in near proximity to an existing livestock unit. Farms can be sources of noise and odour and therefore neighbouring land could be unsuited to residential development. We are keen to ensure that development in the countryside does not result in conflict between new residents and existing farm businesses.</p>
LPIO23	Network Rail	<p>Rugeley Power Station: Network Rail has met with Engie the developers of Rugeley Power Station. The scheme will place significant pressure on the station facilities at Rugeley Trent Valley. The station has a lack of car parking and access/egress is poor. Network Rail's land ownership around the station is very limited and acquisitions will be required.</p> <p>Developer Contributions: Developer contributions will be required to fully fund potential upgrades at Rugeley Trent Valley Station. Given the increase in patronage that the Rugeley Power Station development of 2300 dwellings would bring. S106 contributions should also be considered for enhancements at Cannock.</p> <p>District Stations: The Council should note that Rugeley TV, Rugeley Town, Hednesford and Cannock are all unstaffed stations, are without buildings and consequently they lack facilities. The redevelopment of Rugeley Power Station (2300 homes), coupled with the Chase Line Electrification and development of Mill Green Outlet Village and projected visitor numbers will place significant pressure on each station. With the exception of Cannock, Network Rails' land ownership is limited so acquisitions may be required to increase car parking provision/deliver better facilities.</p>
LPIO24	Palmer, M	<p>A disappointing consultation process...well presented from a Council point of view but lacking in supplied information and diagrams, whilst lacking in fundamental clear outlines to inform residents clearly and simply. No projections of environmental and residential impact of expansions and very poor infrastructure options.</p> <p>Two options dropped out in surprise...traveller sites...we already have three in my local area...truck parking facility...in residential area?</p>
LPIO25	Parlett, G	<p>Land Adj Cannock Road, Heath Hayes: I realise there is a growing housing problem which comes with a growing population in the future, but farm land is becoming less, due to the building of motorways, railways and housing. I notice that new warehouses and retail parks are becoming more abundant in the area with less thought to infrastructure. The pollution and air quality in our area is disgusting, add to it the sweet smell from the BIFFA tip and you are left with quite a concoction fallout.</p> <p>An extra 1000 cars on this particular road at any time in the future could cause a lot of problems to this area. The cost of updating the present infrastructure to accommodate 700+ houses would be vast indeed.</p>

LPIO26	Road Haulage Association	The RHA is pleased that Cannock Chase Council acknowledge the points we made about the lack of Lorry Parking Facilities and the need for Lay-by's. Cannock Chase businesses need road freight to collect and deliver goods. All domestic homes require home delivery and that market is increasing. The RHA considers that more needs to be done to support road freight to enhance economic growth.
LPIO27	South Staffordshire Council	It is anticipated that there will be an ongoing dialogue with Cannock Chase District Council to consider the implication of any cross-boundary issues which arise once there is a clearer indication of future growth locations. These issues include potential impact of growth on the A5 corridor in relation to air quality and the Cannock Chase Extension Canal SAC.
LPIO28	St Modwen (Watling Street) (c/o RPS Planning & Development)	St Modwen supports the proposed Plan Objective 4: Encourage a vibrant local economy and workforce. In terms of the relationship between the provision of homes and jobs in Cannock, St Modwen broadly supports the commentary under Objective 3: Provide for Housing Choice, para 7.32. St Modwen also supports the housing choice to locate growth at the Norton Canes area whereby employment growth located near to the settlement can help to balance the provision of homes and jobs to local employment opportunities in order to encourage more commuting by non-vehicular travel modes.
LPIO29	Staffordshire County Council	We note now that the local need has been established but the proportion for the GBBCHMA is represented via a range, which complicates infrastructure planning. A precise picture for required infrastructure will therefore not be possible until the housing figure has been refined. Similarly, in relation to the employment land. We note that the Plan already identifies issues in relation to congestion and air quality around the Five Ways Island and that further growth is proposed in the vicinity under Option C2. In addition to the two identified issues there is pressure on primary school places in this area and that will also need to be considered as there may be resultant implications for the scale of growth. <u>Flood Risk & SuDS</u> At this stage we would wish to reiterate our previous comments to ensure the SuDS Handbook is clearly referenced in the Local Plan. As sites are allocated we can begin to consider any site-specific requirements.
LPIO30	Startin, P	I think objective one links in well with the housing plan. It is a well known fact that we are running out of suitable brownfield land on which to build new housing developments in the traditional way. With the lack of brownfield sites available and the fantastic improvements in construction technology, CCDC must start looking to build up. This not only allows more housing units on the same plot of land, but it helps with green credentials and helps provide vast swathes of affordable housing.
LPIO31	Walker, C	I would hope along with this comment, my previous comments on the local plan for last year will also be included in responses. I am disappointed that the local plan consultation was stopped and restarted as I feel that this will have an effect on the responses you will gather as many people think they have already commented.
LPIO32	White, R	There has been a large amount of development in Rugeley and surrounding areas. The Power Station development alone is going to place a large strain on services, roads and town.

		<p>Wildlife in and around Green Belt, particularly Sherbrook Valley. Also green belt in Cannock Wood is outstanding. The chase is too far for me to go and it is a working forest so does not place wildlife at the centre of its operations. The countryside is an important factor in our heritage, keep it that way.</p> <p>Rugeley Market Hall and Bus Station needs to be developed. The market is finished and emotional reasons are not reasons to maintain such a waste of urban space.</p> <p>Objectives 7 and 8 are a long-term essential requirement for future generations.</p> <p>Regarding the Power Station it concerns me that a burgeoning population will pollute the river, particularly litter.</p> <p>Brownfield within the green belt should not be open to exploitation.</p>
District Context		
Question 1 Do you have any comments on the District Profile? Is there anything missing and if so what, and what source of information should we use?		
LPIO33	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	<p>The recognition that the application of the standard method requires the emerging Local Plan to adopt a minimum housing requirement of 284 dwellings per annum is supported. The Council is encouraged to have an ambitious plan for housing growth. The standard method is only a starting point and the Council should consider increasing the housing target upwards to support economic growth and delivery affordable housing.</p> <p>We also support the recognition that Cannock Chase will have a role to play in meeting the 'significant housing shortfall' for the Greater Birmingham and Black Country Housing Market Area.</p> <p>In terms of delivery of the overall housing requirement it is noted that approximately 60% of the district is designated as Green Belt, in addition, there are areas of AONB in the District that act as a further constraint which will require the local authority to consider closely development options at locations which are neither Green Belt or AONB. Given the level of housing growth proposed it is envisaged that the Green Belt will be put under significant pressure through the plan making process to accommodate development. It is, therefore, essential that the best use is made of non-Green Belt and non-AONB opportunities.</p>
LPIO34	Canal & River Trust	<p>We welcome the identification of the canal within the Transport and Infrastructure and Environment sections of the District Profile.</p> <p>Although we welcome reference to the role that our network can play with regards to heritage-led regeneration within the Environment Section, we do believe that reference to the wider benefits of the canal should be included. Notably, the canal network provides an opportunity for leisure, recreation and sporting activities, supporting physical and healthy outdoor activity. Our network provides an easily accessible green infrastructure resource that can help to promote healthy lifestyles.</p> <p>We therefore advise that the reference to canals within the 'Environment Section' should be expanded to refer to their role as strategic Blue and Green Infrastructure Corridors. This would help to make the Local Plan more effective, as it would make the potential benefits of our network more obvious to future Decision Makers in addressing some of the key objectives for the Local Plan Period.</p>
LPIO35	Church Commissioners for England (c/o Barton Willmore)	<p>We are in general agreement with the District Profile outlined within Sections 2 and 3... In particular, we consider that Cannock Chase District has a need for future sustainable market and affordable housing, including a contribution to the shortfall across the wider Greater Birmingham and Black Country Housing Market Area (HMA).</p>

		<p>The 'District Context' section makes reference to the 2012-published Southern Staffordshire Districts Housing Need Study and SHMA Update. This SHMA...was based on the 2008 and 2011 housing projections and informed the Local Plan (Part 1) (adopted June 2014) housing requirements.</p> <p>The Commissioners recommend that Cannock Chase Council produce an updated SHMA, which will take account of the most up-to-date information for housing needs within the Greater Birmingham and Black Country HMA. This should form a key part of the evidence base for the Local Plan Review. The updated SHMA should assess Cannock Chase District's housing needs and work with neighbouring authorities within the Greater Birmingham HMA. This additional information, along with the 2018- published Greater Birmingham HMA Strategic Growth Study, should be used to provide an updated and accurate profile for the District.</p>
LPIO36	KGL Estates Ltd (c/o John Heminsley)	<p>The Council's broad conclusion that in order to meet locally generated housing need plus a proportion of the Greater Birmingham and Black Country Housing Market's unmet need together with future employment land requirements will mean release of Green Belt (GB) land is agreed.</p> <p>The Council's analysis shows that there are limited opportunities for increasing housing densities within existing urban areas because of the extent of existing commitments and the supply of developable brownfield sites within the urban areas is also limited. As potential need for an extension of the Kingswood Lakeside employment park onto adjoining GB has already been identified in the current Local Plan.</p> <p>In relation to national policy on choice of sites for GB release, there are no brownfield sites in suitable locations around the edges of the main urban areas so the key criterion to concentrate on is good accessibility to public transport.</p>
LPIO37	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>Richborough Estates is generally supportive of the identified District Profile. The acknowledgement that the housing evidence base will need updating as part of the Local Plan Review is supported, particularly to reflect the requirements of the revised NPPF and the introduction of the Standard Method to calculate housing need.</p> <p>The acknowledgement that the Council will need to play a role in addressing some of the housing shortfall on the Greater Birmingham and Black Country HMA is also supported: any housing relating to the shortfall is above the minimum required by the Standard Method and this needs to be made clear in the profile. The profile also needs to incorporate the growth ambitions of the Greater Birmingham and Solihull LEP and the Staffordshire and Stoke LEP: the Council is a member of both, and both show clear commitment to supporting housing growth and delivery.</p> <p>It also needs to acknowledge its role as a non-constituent member of the WMCA and the associated commitment of the WMCA.</p> <p>It is therefore felt that greater recognition should be given to the importance and ability of Cannock Chase District in meeting not only the unmet housing need arising from the GBBCHMA but also in supporting its own local economic growth ambitions as well as those of the two LEPs and those of the WMCA.</p> <p>The Profile identifies the importance of the Green Belt in providing a range of benefits, including maintaining the openness of the rural-urban fringe. Richborough Estates acknowledges this; however, Green Belt boundaries should not be maintained to the detriment of sustainable development. It should be recognised that, in certain circumstances, it is appropriate to release sustainable sites from the Green Belt so that they can come forward for development.</p> <p>Green Belt Study produced in 2016 – This study should be updated in order to support the Local Plan Review, particularly in light of the publication of the revised NPPF.</p>

		<p>The profile identifies Cannock, Hednesford and Heath Hayes as a continuous urban area, with the greatest abundance of services and facilities. Richborough Estates continues to submit that this should be strengthened to explicitly identify Cannock, Hednesford and Heath Hayes as the most sustainable settlements within the District. Similarly Norton Canes is identified as a sustainable settlement. It is also felt that the sustainable nature of Norton Canes should be strengthened in the District Profile.</p> <p>It is also considered that the need to support existing and future services and facilities should be identified in the profile, rather than just identifying where those services have been lost as this plays a key part in delivering and maintaining sustainable communities.</p>
LPIO38	Wyrley Estate (c/o Fisher German LLP)	<p>It is considered that the profile is a reasonable assessment of the current position of the authority area. It is of paramount importance that the new Local Plan considers not only the local position, but how the district fits into the wider region.</p> <p>There is clear Duty to Cooperate in the NPPF and the Council must ensure it is fully engaging with its neighbours to ensure that the plan is sound and fit for purpose.</p> <p>As such, the Council must consider opportunities for increasing available employment land, particularly on key transport corridors and allow the continued sustainable growth of sustainable settlements such as Norton Canes. Attention must also be given to maximising the available heritage assets within the district, which can play a key role in regeneration. A point that should be stressed is that delivering suitable levels of development will mean looking at areas where the Green Belt can be amended.</p>
LPIO39	Brereton & Ravenhill Parish Council	<p>BRPC draws attention to the penultimate line on page 15 that Rugeley and Brereton have a <i>“combined population of 24,650 is 25% of the District total (2011 Census).”</i> The level of facilities for a community of this size is poor and well below that of substantially smaller communities elsewhere in Britain. There is a serious real danger that the northern part of the district will be excessively dependant on commuting and trips to facilities elsewhere, most of which would be by private motor vehicle.</p> <p>The statement that <i>“Rail services have seen significant improvements to Birmingham”</i> is sadly far from the case. Very frequent cancellations of the Chase Line service to the Rugeley stations are encouraging people to use private motor vehicles rather than the train.</p>
LPIO40	Brindley Heath Parish Council	<p>The statement that <i>‘Rail services have seen significant improvements to Birmingham’</i> is sadly far from the case. Very frequent cancellations of the Chase Line service to the Rugeley stations are encouraging people to use private motor vehicles rather than the train.</p>
LPIO41	Cannock Chase AONB Partnership	<p><u>The District Context</u></p> <p>Section 2 notes that <i>‘Cannock Chase AONB provides a strategic area of accessible countryside with conservation, recreation, economic and tourism benefits.’</i> This is certainly true, however I also note that later on, under Environment the text highlights that some of the District’s biodiversity assets are potentially at risk of decline due to development and recreational pressures unless appropriate mitigation is put in place. This applies equally to the AONB which is also at risk of erosion of its natural beauty and special qualities due to recreational pressures unless appropriate mitigation measures are put in place. It would be appropriate to refer to this issue in setting the context for the Local Plan.</p>

		<p><u>The Rural Areas (Page 17 – Line 1)</u> The wording of this statement suggests that the statutory designation is for recreation. However, the AONB designation under the Countryside and Rights of Way Act 2000 (CROW) places a duty on all public bodies to “<i>have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.</i>” The AONB Partnership would welcome greater clarity in the Local Plan of the purposes of the designated status of the AONB. That it is entirely appropriate to set sustainable and balanced Local Plan policy approach to tourism and recreation. However, it is necessary to continue to safeguard the AONB within that activity, taking account of all forms of development and their impact on the landscape of the AONB. The two things shouldn’t be mutually exclusive but must be balanced by appropriately worded evidence and policies in the Local Plan.</p>
LPIO42	Environment Agency	<p>It is notable that within page 13 there is no reference to the water environment within the Environment Section. This should be rectified once your evidence base has been published to provide a broad summary of the flood risk, water resources, ground water and water quality characteristics of the area, with particular note to those factors which may be a constraining factor to growth, or have the potential to be enhanced through development. We welcome the reference on page 14 (key issues) to flood risk and climate change, however no evidence has been provided in the previous section to support this. We recommend the SFRA and WCS evidence is used to expand this section. We welcome the acknowledgement of the EA flood alleviation scheme on the Rising Brook at Rugeley (Page 16) as working together in partnership with the district council, the county council and local LEPs provided combined flood risk reduction, community and regeneration benefits to the area.</p>
LPIO43	Historic England	<p>Paragraph 2.3 – Historic England did raise the need for a separate section for the historic environment and we remain supportive of this approach. Page 11- under the section on ‘Town Centres and Shopping’ we would be supportive of a reference to the role of heritage in creating prosperous town centres and heritage tourism. Page 12- Under the paragraph relating to canals we would recommend the inclusion of the term ‘heritage’ within the bracketed list Page 13 - We are supportive of the paragraphs relating to this historic environment, within the district profile Page 14 – We are supportive of the reference to the historic environment We are supportive of the references to heritage within Cannock Town Centre and the need to protect and conserve the relevant heritage assets and enhance their character. What is the strategy to achieve this? Page 16 – We are supportive of a paragraph reflecting the historic environment in this section on Rugeley and welcome the future conversations on how this can be achieved Within the section on rural areas we would be supportive of the inclusion of text referencing the role of heritage within the AONB, referencing heritage assets such as the World War trenches and cemeteries, as well as research such as a ‘Chase Through Time’ to reflect this important asset as a heritage landscape. We are generally supportive of the district profile and the reference to the historic environment throughout.</p>
LPIO44	Inland Waterways Association	<p><u>Page 12</u> Please correct ‘Canal’ to ‘Canals’ in Lichfield & Hatherton Canals Restoration Trust</p>

LPIO45	Jones, T	I draw attention to the penultimate line on page 15 that Rugeley and Brereton have a “ <i>combined population of...</i> ”. The level of facilities for a community of this size is poor and well below that of substantially smaller communities elsewhere in Britain with which I am familiar. There is a serious real danger that the northern part of the district will be excessively dependent on community and trips to facilities elsewhere, most of which would be by private motor vehicle. The statement that “ <i>Rail services have seen significant improvements to Birmingham</i> ” is sadly far from the case, as I (and many others) know only too well. Very frequent cancellations of the Chase Line service to the Rugeley Stations are encouraging people to use private motor vehicles rather than the train.
LPIO46	Natural England	The District Profile provides a good summary of the issues and opportunities for the natural environment. We welcome the references to the Cannock Chase AONB and the area’s SACs.
LPIO47	Cllrs. Preece, J, Stretton, Z and Newbury, J	We feel that on page 16, there should be more explanation of the specific pressures the village is currently facing with regards to Housebuilding. 773 new properties will be built in Norton Canes within a short space of time. Compared to the 2011 census figure of 3090 households, this represents a net growth of 25%; the village will grow by a quarter as a result of planning applications already passed. Nowhere else in the Cannock Chase District is experiencing this intense level of housebuilding in a relatively short timeframe, and the strong pressures on infrastructure that inevitably accompany it. We feel that this fact should be formally acknowledged as it underscores many of the concerns that our residents, and we as district councillors, have both in the context of any future housebuilding and necessary investment in our local infrastructure. With reference to the health centre, we would like it to stress that concerns do not only relate to service capacity, but also physical ‘bricks and mortar’ capacity to accommodate the equivalent of 4 GP surgeries. We think that it should be acknowledged on page 17 that the whole rural area south of the A5 in the District is part of Norton Canes, including the ancient hamlet of Little Wyrley. This part of the District is often forgotten but should be included in the Local Plan, particularly with reference to its outstanding heritage potential.
LPIO48	St Modwen (Watling Street) (c/o Pegasus Group)	St Modwen supports in general terms the recognition of the role the A5 corridor is playing in the diversification and expansion of the local economic and business base in Cannock Chase, despite the District exhibiting net-out community of workers. However, the profile, as written, appears to focus on employment structure without any recognition of the significant growth in the number of jobs discussed in other aspects of the evidence base (EDNA) which has broadly exceeded regional and national growth rates since 1997. In light of this, St Modwen would like to see greater emphasis on recent and longer-term growth in overall total employment witnessed in Cannock Chase as this represents a key strength of the District going forward. It is therefore crucial that the Local Plan Review properly assesses and plans for the future employment needs in terms of job growth and the land required to cater for employment development in the District.
LPIO49	Stafford Borough Council	The adopted plan for Stafford Borough (June 2014) focusses the majority of new housing and employment provision at Stafford Town, without releasing Green Belt areas, and a number of significant sites are now being delivered. As you may be aware the Borough Council is currently progressing with the evidence base for the Issues and Options stage for the New Local Plan leading towards a future development strategy beyond the adopted Plan period of 2031. In particular

		Stafford Borough will continue to work with Cannock Chase District concerning the Cannock Chase SAC Partnership and the Cannock Chase AONB.
LPIO50	Staffordshire County Council	<p><u>Ecology</u> Page 14: The 9th bullet point contains a caveat in the second part of the sentence ‘whilst meeting demands and providing...including heritage-led regeneration’ it is the only key issues to be thus qualified, which considerably devalues its aim, contrary to the principle of three equal pillars of sustainable development, and to NPPF (2018) Paragraph 170. The qualified should be deleted.</p> <p><u>Historic Environment</u> Page 14 – the value attributed to the historic environment in bullet point 9 ‘The highly valuable and ...historic environment and...’ is welcomed. Concerns are raised with regards to the potential devaluing of this aim by including <i>whilst meeting demands and providing opportunities...economic activity including heritage-led regeneration</i>. It is recommended that this qualifier is removed.</p>
LPIO51	Wright, T (c/o Pegasus Group)	<p>The profile identifies the importance of the Green Belt in providing a range of benefits, including maintaining the openness of the rural-urban fringe. This is acknowledged, however, Green Belt boundaries should not be maintained to the detriment of sustainable development.</p> <p>Given that 60% of the District is Green Belt, it should be recognised that, in certain circumstances, it is appropriate to release sustainable sites from the Green Belt so that they can come forward for development to meet identified needs.</p> <p>Green Belt Study 2016 – This Study should be updated in order to support the Local Plan Review, particularly in light of the publication of the revised NPPF.</p> <p>The profile should highlight that some development of sustainably located sites would be acceptable in the AONB to meet identified needs provided that this was sensitively designed and located away from those parts of Cannock Chase containing the SAC.</p> <p>It is considered that the need to support existing and future services and facilities should be identified in the profile, rather than just identifying where those services have been lost as this plays a key part in delivering and maintaining sustainable communities.</p>
Wider Context		
Question 2 We reference strategies and plans with which we think we need to align throughout the document, is there anything you need to be aware of in terms of the context within which we are preparing the new local plan?		
LPIO52	Church Commissioners for England (c/o Barton Willmore)	<p>The Local Plan should be prepared so that the housing needs of Cannock Chase District along with the needs of the Greater Birmingham HMA are met, with a specific focus on cross boundary working. The meeting of unmet housing need (both locally and regionally) is a specific issue which should be addressed.</p> <p>[...]</p> <p>Notwithstanding the above, the Commissioners recommend that the District specifically consider the following paragraphs and documents, when preparing the Local Plan Review:</p> <ul style="list-style-type: none"> • NPPF (February 2019) – Paragraphs 21, 25, 27, 31 • PPG (May 2019) – Paragraph: 029 Reference ID: 61-029-20190315

		<ul style="list-style-type: none"> • Greater Birmingham HMA Strategic Growth Study (Feb 2018) – Paragraph 1.23 • Birmingham Development Plan (Jan 2017)? – Policy PG1 and Policy TP48 • Black Country Core Strategy – Issues and Options Report (July 2017) – Paragraph 2.35 (and figure 6), Paragraph 3.18 • North Warwickshire Local Plan Submission (March 2018) – Policy LP6 • Solihull Local Plan Review: Draft Local Plan Supplementary Consultation (Jan 2019) – Paragraphs 26 and 29 • Bromsgrove District Plan Review: Issues and Options (Sept 2018) – Paragraph 4.18
LPIO53	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>Richborough Estates supports the identification of housing need and economic growth as key issues in the district profile. However, it should be made clear in this section on wider context that the Council has a requirement to not only test to meet housing need arising from within the District, but also from within the wider HMA and should also be accounting for the wider growth ambitions of the WMCA, LEPS and of its own Corporate Plan.</p> <p>The wider context section should therefore specifically reference the Birmingham Development Plan which was adopted in January 2015 and which identified an unmet need of 37,900 dwellings for the plan period 2011-2031 which, to date, the HMA authorities have failed to re-distribute.</p> <p>This section should also be referencing in more detail the growth ambitions of the WMCA and the two LEPs given that the Council is a member of these organisations. It should set out the Council's role in the delivery of their plans.</p> <p>Richborough Estates accordingly supports the involvement of Cannock Chase District with the GBBCHMA and its constituent authorities. The Council will need to ensure that the Local Plan fully engages with the GBBCHMA authorities. This engagement should be on-going, clearly documented and genuine, throughout the period of the plan.</p>
LPIO54	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	<p>Reference will need to be made to the recent Government advice published in the recent updates to the Planning Policy Guidance on 26 June 2019 regarding the need to plan for the housing needs of older people.</p> <p>Note will also need to be paid to the SHOP analysis tool which does not currently appear in the SHMA and evidence from the select Committees on the benefits of building with an ageing population in mind. (SHOP link in document)</p>
LPIO55	Birmingham City Council	<p>Birmingham welcomes the recognition given in the document to how Cannock fits into the wider region and its need to fulfil its Duty to Cooperate requirements by working with neighbouring authorities through the partnerships and groups identified in paragraph 3.5 of the Issues and Options document.</p>
LPIO56	Cannock Chase AONB Partnership	<p>The Cannock Chase AONB Management Plan, prepared in accordance with CROW, sets out how the AONB will be conserved and enhanced. The recently published Cannock Chase AONB Management Plan 2019-2024 succeeds the Management Plan 2014-2019. It describes the challenges that the AONB is likely to face in the next five years. This includes potential impact of new areas of housing built close to the AONB and could impact on the setting of the AONB and the growing recreational activity which could harm the AONBs wildlife and special qualities.</p> <p>Cannock Chase Review of AONB Landscape Character Framework 2017 updates the Landscape Character Assessment for the AONB and includes a vision and Landscape Guidelines for each character type.</p>
LPIO57	Environment Agency	<p>Paragraph 3.9 mentions how water quality and drainage issues are cross-boundary, however we note they are not flagged as KEY cross-boundary issues in paragraph 3.10.</p>

		We look to the SFRA and WCS to inform further on cross-boundary impacts, particularly within the context of the Water Framework Directive (Humber River Basin Management Plan) and waterbodies which flow in and out of the district from neighbouring authorities as these are conduits for impacts to and from neighbouring growth e.g. sewage treatment works and flood risk. As your WCS and SFRA are being undertaken as a joint project with a number of neighbouring authorities we feel this evidence will be particularly pertinent in linking in impacts and opportunities from other districts Local Plans.
LPIO58	Greenlight Developments Ltd (c/o Lichfields)	Greenlight wishes to reiterate its support for CCDCs recognition of how the district fits within the wider West Midlands Context within Chapter 3 of the Issues and Options Consultation document. In particular, Greenlight supports the Council's updated commitment to work with neighbouring authorities on a range of strategic issues.
LPIO59	Natural England	<u>Paragraph 3.5</u> We welcome the references to the Cannock Chase AONB Partnership and the Cannock Chase SAC Partnership in the list of key partners. <u>Paragraph 3.10</u> We suggest a slight amendment to the list of key cross-boundary issues. Under bullet point 11 we would add, 'Conserve and enhance landscape character'. This would better reflect what is meant by the term 'landscape'. <u>Additional Plans and Strategies</u> Natural England and other cross boundary partners in the Cannock Chase to Sutton Park areas share an ambition to: <ul style="list-style-type: none"> • Use a partnership approach to better manage, protect, expand and enhance lowland heathland and associated habitats to improve biodiversity. • Link and buffer these sites and also create a network of further complementary habitats • Facilitate integrated sustainable public access and education to increase the value that people put on local biodiversity and the landscape. This is reflected in your Local Plan's ambition to deliver the Government's 25 Year Environment Plan to work with other Local Authorities and Duty to Cooperate authorities to create ecological links, networks and green corridors for nature and people to enjoy. We also welcome and note the reference to this ambition in the Local Plan Vision and Objectives.
LPIO60	South Staffs Water and Cambridge Water	In response to a request from DEFRA for further information, we have both updated our Water Resources Management Plans (WRMPs). Here are the updated pages: South Staffs Water: https://www.south-staffs-water.co.uk/about-us/our-strategies-and-plans/our-water-resources-plan Cambridge Water: https://www.cambridge-water.co.uk/about-us/our-strategies-and-plans/our-water-resources-plan
LPIO61	Stafford Borough Council	The Borough Council acknowledges the key cross boundary linkages concerning travel to and from Stafford for employment, retail and leisure particularly in relation to Rugeley, continuing the broad approach of the current Local Plan. The Borough Council considers that, in terms of the relationship between Rugeley and Stafford Borough, new development for Rugeley should not impact on the rural areas of the Borough, and therefore no future development through the new Cannock Chase Local Plan should impact on the Green Belt or AONB within Stafford Borough.

		Nevertheless, it is noted that a number of the housing and employment options within the Issues and Options Consultation Document do identify locations in the Cannock Chase AONB and/or the Green Belt.
LPIO62	Wright, T (c/o Pegasus Group)	The identification of housing need and economic growth as key issues in the district profile is supported. However, it should be made clear in this section on wider context that the Council has a requirement to not only test to meet housing need arising from the District, but also from within the wider GBBCHMA and should also be accounting for the wider growth ambitions of the WMCA, the LEPs and of its own Corporate Plan. The wider context section should therefore specifically reference the Birmingham Development Plan which was adopted in January 2017 and which identified an unmet need of 37,900 dwellings for the plan period 2011-2031 which, to date, the GBBCHMA authorities have failed to redistribute. This section should also be referencing in more detail the growth ambitions of the WMCA and the two LEPs given that the Council is a member of these organisations. It should set out the Council's role in the delivery of their plans.
LPIO63	Association of Black Country Authorities (c/o Walsall Council)	The list of plans in paragraph 3.6 should include neighbouring authorities' development plans.
Question 3 What do you think should be the key areas of focus for the preparation of Statements of Common Ground, and who should be involved in these?		
LPIO64	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	It is our view that Statements of Common Ground will be required in respect of the various issues identified in paragraph 3.10 of the Consultation Document, however, the most significant cross boundary issue that needs to be addressed is its housing growth and housing need. As acknowledged by the emerging Plan the District will need to play a role in assisting in meeting the unmet housing requirements of both Birmingham and the Black Country.... The Council should actively engage with Birmingham and the Black Country in order to establish the quantum of additional housing development it will be required to accommodate to meet the housing shortfall. The principal parties involved in the preparation of the Statements of Common Ground will be the Authorities within HMA. However, it is our view that the Statements of Common Ground will need to be informed by representations from interested parties including the development industry. It is anticipated that the quantum and overall distribution of development will be a key issue at the forthcoming Local Plan examination (and indeed the other Local Plan examinations within the HMA area.) Early consultation on the distribution of development will help minimise areas of disagreement in this regard.
LPIO65	Church Commissioners for England (c/o Barton Willmore)	Paragraph: 011 Reference ID: 61-011-20190315 of the PPG outlines what a Statement of Common Ground is expected to contain. In the case of Cannock Chase District and authorities within the Greater Birmingham HMA, it is clear that the following strategic issues should be the key areas of focus for the preparation of Statements of Common Ground(s): <ul style="list-style-type: none"> • Housing • Employment • Green Belt Review • Infrastructure • Transport

		<ul style="list-style-type: none"> • Air Quality
LPIO66	Holford Farm Partnership (c/o Hawksmoor Property Services Ltd)	We support the updated list of cross boundary issues contained within the consultation document at Paragraph 3.10. With regards to potential future Statements of Common Ground, we would consider that housing and economic growth to meet the needs of the District together with adjoining areas should be viewed as priorities. Future joint working with organisations such as the Greater Birmingham & Solihull Local Enterprise Partnership (GBSLEP), the Staffs & Stoke LEP, The West Midlands Combined Authority (WMCA) and all local authorities within the Greater Birmingham & Black Country Housing Market Area should be of paramount importance.
LPIO67	Home Builders Federation	The meeting of unmet needs should be set out in a SoCG signed by all respective authorities (see HBF answer to question 4) in accordance with the 2019 NPPF (paras 24, 26&27). The new Local Plan should be based on effective joint working on cross boundary strategic matters that have dealt with rather than deferred as evidenced by a SoCG. One key outcome from co-operation between authorities should be the meeting of housing needs in full. A key element of Local Plan Examination is ensuring there is certainty through formal agreements that an effective strategy is in place to deal with strategic matters such as unmet housing needs when Local Plans are adopted.
LPIO68	Lichfield & Hatherton Canals Restoration Trust	We feel there is a need for a Statement of Common Ground between Cannock Chase Council and South Staffordshire District and Walsall Councils for a continuous protected route for the restored Hatherton Canal linking from the Wyrley & Essington Canal in the Walsall Council area to the Staffordshire and Worcestershire Canal in the South Staffordshire area. We in the Lichfield & Hatherton Canals Restoration Trust would be the relevant organisation to provide information about the proposed route where it is not already evident and recorded as existing canal channel on the ground.
LPIO69	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	In line with Paragraph 27 of the Framework, Statements of Common Ground should be prepared in line with the NPPG. In terms of the GBBCHMA it is clear that the Strategic Growth study requires a coordinated approach by the fourteen authorities concerned. Given the complexities of the geography, the clear need for Green Belt release and the related need to demonstrate 'exceptional circumstances' local Plans need to be taking this evidence forward collectively, fairly and transparently. Clear evidence of this joint approach is needed to avoid an endless cycle of development being pushed from one local authority area into another as a result of disaggregated discussions on a sub-HMA level. Richborough Estates submits that Statements of Common Ground will be required with the GBSLEP, the SLLEP and the WMCA.
LPIO70	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that one of the key areas of focus in SoCG should be housing growth and the need to make an appropriate and sustainable contribution to the wider housing area shortfall. Taylor Wimpey consider that any additional identified need from the GBBCHMA can be accommodated in part by releasing and allocating suitable Green Belt sites in Cannock Chase District for housing. The site at Wimblebury Road, Cannock is considered to be suitable to help contribute to the future housing need.
LPIO71	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	Given the clear cross boundary issues relating to the overall apportionment of housing within the HMA it is clear that such strategic matters will require policies to be dealt with in SoCG adhering to the Duty to Cooperate.

		Clearly Para 20-23 of the NPPF provide the bass for the matters on which cooperation is required. Such matters, whilst including housing, including affordable housing, should also extend to meeting the needs for an ageing population and how these needs can be best met at a strategic level.
LPIO72	Birmingham City Council	Key areas of focus for any SoCGs will be housing and employment particularly in terms of agreeing to test fully whether any unmet need arising from within the Greater Birmingham and Black Country HMA of which Cannock Chase forms a part of, can be accommodated within Cannock Chase.
LPIO73	Greenlight Developments Ltd (c/o Lichfields)	A core part of demonstrating the statutorily required Duty to Cooperate is the preparation of one –or more- SoCG. Whilst Greenlight concurs with the Council's updated list of key cross-boundary issues, there is a clear and cogent need to prioritise housing growth, and establish an appropriate and sustainable contribution to the wider HMA shortfall. The GBBCHMA authorities, of which the Council is a constituent authority, should play a critical role in Duty to Cooperate discussions. Due to the Greater Birmingham HMA Strategic Growth Study establishing that there is a significant housing shortfall across the GBBCHMA. This has implications for the ability of individual local authorities across the wider West Midlands to meet their own needs as well as that of neighbouring authorities, with potential 'cascade' effects of displaced need across a wider area, including along transport corridors.
LPIO74	(Watling Street) (c/o RPS Planning & Development)	St Modwen consider that key focus for any SoCG will be the need to address the acknowledged shortfall in employment (and housing) land emanating for the Black Country Authorities. Addressing these unmet needs is a clear 'cross-boundary matter' falling under the remit of the Duty to Cooperate obligations for the District.
LPIO75	Wright, T (c/o Pegasus Group)	SoCG should be prepared in line with NPPG. In terms of the GBBCHMA, it is clear that the Strategic Growth Study requires a coordinated approach by the fourteen authorities concerned. Clear evidence of this joint approach is needed to avoid an endless cycle of development being pushed from one local authority area into another as a result of disaggregated discussions on a sub-HMA level, which would potentially result in fragmentation of the HMA partnership and consequential failure to deliver the housing required. Therefore, it is especially important that discussions are documented accordingly through SoCG. This is of particular significance given the housing delivery remits of the LEPs and of the WMCA so it is proposed that SoCG will be required with the GBSLEP, the SSLEP and the WMCA.
LPIO76	Association of Black Country Authorities (c/o Walsall Council)	The list in paragraph 3.10 would provide a good starting point. Neighbouring authorities should certainly be involved.
Question 4 We think that the appropriate geography for housing issues is the area covered by the Greater Birmingham and Black Country Housing Market Area. Do you agree? If not what evidence is there for any alternative approach?		
LPIO77	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	It is agreed that the Greater Birmingham and Black Country HMA area should be the geographical focus for addressing overarching housing issues including the distribution of the Black Country and Birmingham housing shortfall.

LPIO78	Church Commissioners for England (c/o Barton Willmore)	The Commissioners agree that the appropriate geography for housing issues is the area covered by the Greater Birmingham and Black Country HMA. Cannock Chase District is one of fourteen local authorities which comprise the Greater Birmingham HMA, as such the combined administrative geography for said fourteen authorities is a sensible and logical approach. Cannock Chase District, along with other authorities within the Greater Birmingham HMA commissioned the Greater Birmingham HMA Strategic Growth Study. This study examined the entire administrative area and outlines recommendations that could potentially deliver sustainable development, which meets the housing needs across the HMA. As such, this geography should be maintained when it relates to addressing housing issues.
LPIO79	Home Builders Federation	The GB&BC HMA is an appropriate geographical area for housing.
LPIO80	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Richborough Estates agrees that the evidence has demonstrated that the appropriate geography for housing issues in the area covered by the GBBCHMA. Cannock Chase Council needs to play a significant role on helping the GBBCHMA to deliver the shortfall within the defined geographical boundaries of the HMA, in line with the recommendations of the Strategic Growth Study.
LPIO81	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that the appropriate geography for housing issues is the area covered by the GBBCHMA.
LPIO82	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	Cannock Chase forms part of the wider GBBCHMA. This is considered an important geography for housing issues to be addressed and for the district to be able to follow a strategic approach to the review of the green belt and AONB where exceptional circumstances will need to be demonstrated. This will need to be integrated into overall housing needs of the other authorities through the Duty to cooperate.
LPIO83	Birmingham City Council	Birmingham City Council agrees that the appropriate geography for housing issues is the Greater Birmingham and Black Country HMA. This is backed up by a history of joint working across the HMA and evidence such as the Strategic Growth Study carried out by GL Hearn.
LPIO84	Gladman	Gladman considers the GBBCHMA represents the most appropriate geography upon which to set the Council's housing requirement and to consider the justification for the release of Green Belt land for unmet needs. Gladman considers that it would not be appropriate or sustainable for some of the unmet needs of the Greater Birmingham HMA to effectively "leapfrog" Cannock Chase and be provided in authorities outside the HMA such as Stafford.
LPIO85	Greenlight Developments Ltd (c/o Lichfields)	Greenlight concurs with the Council's assertion that the appropriate geography for housing issues is the area covered by the GBBCHMA.
LPIO86	St Modwen (Watling Street) (c/o RPS Planning and Development)	In terms of the appropriate economic geography for Cannock Chase, the Council's own evidence moots that the District Falls within a '...much wider strategic travel to work area, including Wolverhampton, Walsall, <i>South Staffordshire, Lichfield and Stafford...</i> ' (Paragraph 3.124 of the EDNA refers). This is further evident based on the District's generally central position geographically within the wider proximity to the major conurbation.
LPIO87	Wright, T (c/o Pegasus Group)	It is agreed that the evidence has demonstrated that the appropriate geography for housing issues is the area covered by the GBBCHMA.

		It is therefore essential that the GBBCHMA addresses its own needs within that defined appropriate geography and does not seek to export growth to other areas as this would extend delivery beyond where the need has been demonstrated to arise.
LPIO88	Association of Black Country Authorities (c/o Walsall Council)	We agree.
Question 5 What do you think is an appropriate geography for the consideration of economic issues? What evidence is there to support this?		
LPIO89	Church Commissioners for England(c/o Barton Willmore)	We suggest that an appropriate geography for the consideration of economic issues is the Greater Birmingham Local Enterprise Partnership (LEP) area.
LPIO90	Holford Farm Partnership (c/o Hawksmoor Property Services)	Given the existence of the Strategic Economic Plans (SEPs) at the GBSLEP, the Staffs & Stoke LEP and also the WMCA, we consider focussing on the sub-regional geographics covered by the organisations would make sense. The Economic Development Needs Assessment (EDNA) produced by Lichfields in April 2019 as part of the Council's evidence base for the new Local Plan Review notes that Cannock Chase is not a self-contained Functioning Economic Market Area (FEMA), and notes "strong linkages with other areas" including Southern Staffordshire and also the nearby Black Country. Focusing on the area covered by the two LEPs and also the WMCA would allow for the distribution of unmet employment land need to be redistributed from areas such as the Black Country. The shortfall could be then accommodated, in addition to supporting the economic objectives of delivering inward investment into Cannock Chase for the future.
LPIO91	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The updated Economic Development Needs Assessment provides the evidence for the Functional Economic Market Area which is noted. There are clear links with Stafford Borough as part of this which would lend credence to the need for Rugeley Power Station to be an employment-led development, providing local job opportunities in that part of the district and reducing the need to travel as part of a sustainably balanced strategy.
LPIO92	Birmingham City Council	The appropriate geography will be the Functional Economic Market Area for Cannock Chase established in the employment land/economic needs assessment. However, given that there is a shortage of larger employment sites within the conurbation, we would encourage Cannock Chase Council to investigate and test options for the release of larger sites for employment purposes.
LPIO93	Wright, T (c/o Pegasus Group)	The updated Economic Development Needs Assessment provides the evidence for the Functional Economic Market Area which is noted. There are clear links with Stafford Borough as part of this which would lend credence to the need for Rugeley Power Station to be an employment-led development, providing local job opportunities in that part of the district and reducing the need to travel as part of a sustainably balanced strategy.
LPIO94	Association of Black Country Authorities (c/o Walsall Council)	As referred to in Economic Development Needs Assessment (EDNA) for the District Council, Cannock Chase is considered to fall within an area of 'moderate economic transactions' with the Black Country. The functional economic relationship can be seen in terms of commuting patterns. [...]. The strongest relationship is with Walsall, where some 2,243 residents travelled to work in Cannock Chase and 3,855 residents from Cannock Chase travelled to work in Walsall. [...].

		Of Course, Cannock Chase will have relationships with other nearby districts in southern Staffordshire as well as with Birmingham. In the case of the latter many of the commuters from Cannock Chase to Birmingham are likely to be office-based rather than employed in B1(b)/(c)/B2/B8 uses that are normally within the scope of economic studies [...]. We would suggest that the Cannock Chase takes a similar approach to that of the Black Country and South Staffordshire by identifying a core area (including Walsall and appropriate parts of neighbouring districts in southern Staffordshire) and a secondary zone.
Question 6 Do you have any other comments on the issues in this chapter?		
LPIO95	Beau Desert Golf Club (c/o FBC Manby Bowdler LLP)	The updated list of cross-boundary issues includes Housing Growth, Housing Need, Economic growth, Health, Recreation, Green Belt, and Landscape. We agree that these are important factors but it should be clearly emphasised in the Plan that these factors must be considered holistically rather than in isolation.
LPIO96	Greenlight Developments Ltd (c/o Lichfields)	Greenlight supports the Council's acknowledgement of the District's role within the wider context, the Council's commitment to work with neighbouring authorities on a range of strategic issues, and that the GBBCHMA represents the most appropriate geographical area for the consideration of housing issues. However, given the scale of the housing issue present within the GBBCHMA, Greenlight considers that one of the principal areas of consideration for the SoCG should be housing growth and the provision of a sustainable and appropriate contribution to addressing the wider shortfall across the GBBCHMA.
Vision & Objectives		
Question 7 Do you have any comments on the updated Vision and Objectives?		
LPIO97	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	We generally support the vision and objectives identified by the consultation document. It correctly acknowledges that it will be necessary to release a sufficient quantum of land for housing to meet the District's own housing need and the appropriate contribution towards the wider housing market area shortfall is supported. It is however, our view that an additional objective should be added. It should be specified that the emerging Local Plan will seek to maximise non-Green Belt development opportunities for development before Green Belt land release takes place.
LPIO98	Canal & River Trust	We welcome the updated objectives, which encompasses additional comments regarding the importance of the canal network. We support the proposed vision to strengthen and positively manage the network of open green space within the District, with specific mention of canals. We do request, however, that the vision should seek to include wording that states that new developments will seek to connect and positively engage with strategic green infrastructure and open space. To make the Local Plan more effective and precise, we advise that an additional statement should be included that states that development will positively engage with and link in with existing walking and cycling routes. We believe this would directly help to promote active travel in the District. With regards to the proposed Objectives, we wish to make the following comments: <ul style="list-style-type: none"> Objective 2 – We welcome the reference to the use of canals and other watercourses in providing sport and leisure opportunities, including walking and cycling.

		<ul style="list-style-type: none"> Objective 5 – We welcome the reference to the aim to achieve improvements to walking and cycling. We do, however, believe that there may be an opportunity to include an objective for development to engage positively and interlink with existing walking and cycling routes, as this would identify a key measure as to how walking and cycling can be promoted, and would make the Plan more effective in meeting its aims. Objective 8 – We welcome reference to the promotion of renewable energy and green technologies. We also welcome the aim to reduce pollution, which could help to promote improved water quality within our canals, and would be compliant with the aims of paragraph 170 (part e) of the Framework.
LPIO99	Church Commissioners of England (c/o Barton Willmore)	<p>The objectives and vision in the Local Plan Review should be consistent with national policy and enable the delivery of sustainable developments. In relation to Objective 3: Provide for housing choice, we consider there should be recognition in relation to meeting housing need in appropriate locations this is likely to include greenfield and Green Belt Land. The Commissioners welcome the proposed vision for the Local Plan, which has been refined and updated when compared to the vision in the Cannock Chase Local Plan Part 1.</p> <p>Our client supports the revised end date of the plan period (2036), on the basis this will provide a 15year period from adoption. This vision and objectives of the Local Plan Review should also align with the end date of the Greater Birmingham HMA Strategic Growth Study and cover the entire plan period.</p>
LPIO100	Lichfield & Hatherton Canals Restoration Trust	<p>We welcome the words in paragraphs 4.1, 4.4, 4.6 and 4.7 which apply to our proposals for the restoration of the Hatherton Canal.</p> <p>We are particularly supportive of the objective of safeguarding land – as referred under paragraph 4.7 – for sustainable transport routes. We wish to see formal policy protection by the relevant local authorities safeguarding the projected route of the Hatherton Canal, end-to-end. Some of that route lies within the Cannock Chase District.</p>
LPIO101	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>Richborough Estates is generally supportive of the vision although it is considered too long and should be distilled to highlight key issues as this will serve to provide greater pertinence and clearer links with the identified objectives. Richborough Estates is supportive of the objectives set out within the Local Plan Review Document, insofar as they collectively promote sustainable development. In particular objective 3 is endorsed. Richborough Estates also supports the recognition of the economic benefits that providing for increased housing choice can bring, as well as the need to release land for housing development in appropriate locations.</p> <p>Further to Richborough Estate’s representations to the previous Issues and Scope consultation, it is noted that Objective 3 has been strengthened to include reference to contribution to the wider housing market area shortfall and this addition is fully supported. It is also considered that the title of the objective should be renamed ‘Provide for Housing Need and Choice’ which would more accurately reflect the Council’s duties.</p> <p>It is considered that an additional strategic objective should be added, which underlines the requirement to support the needs of neighbouring authorities through the Duty to Cooperate. This will strengthen the requirement and ensure that the Duty to Cooperate is fully engaged with throughout the plan period.</p>
LPIO102	Severn Trent	<p><u>Objective 7</u></p> <p>We suggest the use and designation of open green spaces to deliver the objective. We welcome proactive engagement around designation of open green spaces and believe they can be used to house green blue infrastructure.</p>

		<p>We recognise your increased efforts to push sustainable development. To maximise natural capital and environmental benefits SuDS should focus on more than simply flood alleviation purposes.</p> <p><u>Objective 8</u></p> <p>We acknowledge the County Councils SuDS handbook and support its use as a tool to help deliver effective SuDS. We're open to consultation and discussion around such policies and helping build the appropriate evidence base to support such case.</p>
LPIO103	Sport England	<p>Sport England welcome the acknowledgement of 'active design' in Objective 1 but consider that the 10 design principles should be acknowledged. To assist with the understanding of active design it is viewed that the Local Plan should contain a link to the document. It is also viewed that the principles of active design assists are relevant to Objective 2.</p>
LPIO104	Taylor Wimpey (c/o Lichfields)	<p>Taylor Wimpey suggests that the Vision acknowledges that some Green Belt release would need to be considered as part of this process.</p> <p>Taylor Wimpey recognises the need for sustainable development. However, the wording of part of the vision is considered to be overly prescriptive and onerous as there is no requirement in national planning policy for development to meet the highest possible sustainability standards. Taylor Wimpey suggests that alternative wording could be used here to indicate that the highest possible sustainable standards will be <u>encouraged</u>.</p> <p>Taylor Wimpey also suggests that the vision is amended to indicate that housing will be flexible to be able to adapt to the changing needs of residents, where evidence is provided to demonstrate a need for such dwellings.</p>
LPIO105	Beau Desert Golf Club (c/o FBC Manby Bowdler LLP)	<p>It will be important to ensure that the objectives in relation to preserving and enhancing the AONB and building sustainable and healthy communities are considered holistically alongside the housing and other policies so as to ensure that suitable sites (such as C375) where provision is made for appropriate AONB and landscape enhancements alongside a sustainable housing proposal, are considered favourably.</p>
LPIO106	Brereton & Ravenhill Parish Council	<p>BRPC sees no need to update the second intent in paragraph 4.2</p>
LPIO107	Briggs, T	<p><u>Page 25</u></p> <p>There is a key phrase here 'no inappropriate development within or on the edge of the AONB'. The green belt will be protected from inappropriate development...'</p> <p>CCDC needs to be very clear about this; there have been 'greenbelt reviews' in other areas that have led to precious greenbelt being lost. The policies you state mean nothing unless they are backed up by a commitment to retain the greenbelt designation for all areas currently within the greenbelt for the period of the Plan. As it stands a number of 'reviews' could be carried out, leading to 'death by a thousand cuts' as various parcels of land are removed from greenbelt either by virtue of a formal greenbelt review or through revised permitted development. The Council's stance appears at first glance to be a noble one, but it is easily circumvented.</p> <p><u>Objective 4 (Page 27)</u></p> <p>There needs to be an additional point here to confirm that the AONB/Greenfield will be prioritised over business need. In short, the business owner should be answerable to the demands of the AONB, not the AONB being answerable to the demands of the business owner.</p>

LPIO108	Cannock Chase AONB Partnership	<p>The AONB Partnership warmly welcome the commitment that ‘<i>There will be no inappropriate development within or on the edge of the Cannock Chase Area of Outstanding Natural Beauty. The Green Belt will be protected from inappropriate development, will be well managed and will be linked to the Area of Outstanding Natural Beauty.</i>’</p> <p><u>Objective 7</u></p> <p>The first bullet point refers to protecting conserving and enhancing Cannock Chase AONB. This should be further clarified to acknowledge that maximising opportunities for access and enjoyment must be balanced with the statutory requirement to minimise impacts on the AONB and would only be appropriate where there is no conflict with statutory designation, bearing in mind the primary purpose of the AONB.</p> <p>Potentially there will be instances where mitigation is not possible and therefore a proposal will not be acceptable, and the AONB would welcome reference to this potential scenario.</p> <p>Emphasis on the provision of easily accessible high-quality recreational areas outside the AONB would be welcomed to relieve recreational pressure in the AONB, and thereby assist in delivering a more sustainable future for the AONB.</p>
LPIO109	Gladman	<p>Gladman considers that the Vision and Objective should give a much greater emphasis upon meeting affordable housing need rather than the vague aspiration to “help meet local need for both affordable and aspirational housing” as currently proposed.</p> <p>There has been a significant failure of the Local Plan to deliver affordable homes since its adoption in 2014. This should be addressed through the Local Plan Review by having an ambitious target for new housing in the District. There is a need for the allocation of greenfield sites as well as previously developed land as the former are more likely to produce policy compliant levels of affordable homes.</p>
LPIO110	Greenlight Developments Ltd (c/o Lichfields)	<p>In particular, Greenlight is advocative of the Council’s broadening of its Vision to deliver housing to meet the local needs, and make an “appropriate and sustainable contribution to the wider housing market area shortfall”. Similarly, Greenlight welcomes the premise of the Council’s update to Objective 3 and its intent “to manage the release of sufficient land...”</p> <p>It is critical that the Council define and include a housing-related objective within the Local Plan Review, which sets out the objectives of the Plan over the new Plan period and provides a barometer against which the Plan can be assessed.</p> <p>Greenlight considered that the Council’s current plan, as updated in the IOC to now include the housing needs of the GBBCHMA, is consistent with the objectives of the NPPF, and is supported.</p>
LPIO111	Historic England	<p>We would request a separate objective for the historic environment. Coupling it with the natural environment can cause difficulties where there are competing issues for these two themes and it also proves difficult to monitor the success of the objective if it has been positive or negative for one theme and not the other.</p>
LPIO112	Lyons, O	<p>The grounding of the Local Plan should be to ensure that, as the district evolves, it is an attractive place for residents to call home.... The area and any future developments must be in keeping with local heritage and developments must be of a high quality and well suited to the surroundings.</p> <p>In order to ensure than links to traditional heritage and architectural design are maintained, any distinctive characteristics of an area should be protected, preserved and, where possible, replicated. [...]</p> <p>I firmly believe the best way to protect this is to ensure that the community themselves and the residents are at the heart of the process, such as through the creation of local Neighbourhood Plans.</p>

LPIO113	National Farmers Union	<p><u>Objective 4</u> We are pleased that this objective offers support for the land based economy of the District. The planning needs of rural businesses are evolving and policy should ensure it keeps pace with developments in the industry. This is particularly important for those businesses located within the green belt who may need to invest in new infrastructure in order to meet environmental and animal welfare standards.</p>
LPIO114	Natural England	<p><u>Vision</u> We are pleased to note that our previous comments about soils and water have been taken into account. The only additional tweak we would suggest is in bullet point 2 under the section of the vision that talks about people leading greener, more environmentally friendly lifestyles...we would suggest the following wording 'There will be no inappropriate development within or in the <i>setting</i> of Cannock Chase AONB'. This wording is more in line with the Cannock Chase AONB Management Plan and developing AONB Design Guidance.</p> <p><u>Objectives</u> Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para 170 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure. We suggest that an additional bullet point under Objective 7 would address this issue, 'To ensure net gain for biodiversity is considered for all aspects of the plan and development types...'</p>
LPIO115	Cllrs. Preece, J, Stretton, Z and Newbury, J	<p>On page 23 it states that part of the District Council's vision will be "safeguarding of heritage assets...". We need to be sure that this stated aim is able to become a reality. If the District Council is serious about safeguarding heritage assets, then it must start with ones that it owns, of which the Grove Colliery site is one. This site has tremendous heritage and leisure potential, something which the owner of adjacent land recognises and is keen to promote alongside the District Council. There are other assets in Norton Canes which should also be safeguarded as part of a strategy which is inclusive of the whole District, not just the three towns. On Page 24, it states that "the district centre at Hawks Green...will have improved facilities." We are keen to establish how this will manifest itself on reality. In recent years, there has been much emphasis placed on the town centres of Cannock, Hednesford and Rugeley but little strategic attention has been paid to village centres such as ours. We welcome this statement as improvements can be made to our village centre but it needs to be backed up with the strategic oversight that has been afforded to successful regenerations of town centres in the District. On page 25 it states that "The Cycle network will have been expanded...together more effectively." To achieve this, we believe that it is essential that the historic mineral routes that line the District are preserved, documented and given protected status even before any commitment to use them in an integrated way for a cycle network is made. In future housing developments, any suitable route should be identified as a core part of the conditions of acceptance of application. [...] On Page 25 it states that "There will be a 'green corridor' ...linking the Cannock Chase AONB to Sutton Park." Norton Canes is home to No Man's Bank which is part of the Chasewater and the Southern Staffordshire Coalfield Heathlands SSSI. At the present time, it is listed as of low quality and Natural England have come up with a list of recommendations for work that needs to be undertaken in the area to raise its ecological quality. We believe that there should be a priority</p>

		given in the Local Plan to the enhancement of these areas as they could make a valuable contribution to the vision of creating a corridor of much needed lowland heathland from the AONB to Sutton Park.
LPIO116	St Modwen (Watling Street) (c/o RPS Planning and Development)	St Modwen broadly supports the commentary in the IOD Vision and Objectives, at page 24 which states <i>“The potential of the District’s accessible location along major transport routes... There will be new investment in areas of growth, and the levels of commuting will be reduced.”</i>
LPIO117	Stafford Borough Council	The Borough Council are generally supportive of the Vision and Objectives within the new Cannock Chase Local Plan to cover the period to 2036. It is important to ensure that a balanced approach takes place between the development requirements of neighbouring areas and the focus for new infrastructure, housing and employment growth within the Cannock Chase District area. In particular the Council supports the approach to maintaining the Green Belt areas confirmed through the Green Belt Study 2016 for Cannock Chase District whilst maximising the use of brownfield land and potentially discussing with neighbouring authorities the potential to accommodate development needs in nearby urban areas. However, Stafford Borough Council can confirm it is not in a position for any unmet gypsy, traveller and travelling showpeople needs within Stafford Borough.
LPIO118	Staffordshire County Council	<u>Historic Environment</u> The reference to the historic environment, cultural heritage, and heritage assets in the updated vision are welcomed. Likewise, objective 7 is supported.
LPIO119	Strathclyde Pension Fund (c/o Savills)	Paragraph 4.2 focuses solely on the designated retail centres, but remains silent on the fact that Cannock chase does have out of centre retail parks which provide vital large format accommodation not found within the designated centres. We would request that further consideration of the contributions which the existing retail parks make to the wider economy of the district is recognised.
LPIO120	Wright, T (c/o Pegasus Group)	The vision is broadly supported although it is considered too long and should be distilled to highlight key issues as this will serve to provide greater pertinence and clearer links with the identified objectives. The objectives set out within the Local Plan Review Document are generally supported, insofar as they collectively promote sustainable development. In particular, objective 3, Providing for Housing Choice is endorsed. It is noted that Objective 3 has been strengthened to include reference to contribution to the wider housing market area shortfall and this addition is fully supported. It is also considered that the title of the objective should be renamed ‘Provide for Housing Need and Choice’ which would more accurately reflect the Council’s duties to deliver a requirement which addresses not only the minimum figure set by the standard but also a contribution towards the shortfall. It is considered that an additional strategic objective should be added, which underlines the requirement to support the needs of neighbouring authorities through the Duty-to-Cooperate. This will strengthen the requirement and ensure that the Duty-to-Cooperate is fully engaged throughout the plan period.
LPIO121	Association of Black Country Authorities (c/o Walsall Council)	We broadly support the Vision and Objectives for the district, in particular the 2 nd bullet of Objective 3 [...]. [...], the Local Plan should play its part in meeting the needs of nearby urban areas, so that regard should be had to the scale and location of development in Cannock Chase, to ensure that it complements and does not undermine investment in existing urban areas and can be accessible to all those who might need and/or wish to benefit from it [...].

Design Policy Options

Question 8 Is there any local evidence to support the need for the Council to adopt minimum internal space standards for new dwellings (the nationally described space standard)? If so, what?

LPIO122	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	It is in our view that the emerging Local Plan should not seek to adopt minimum internal space standards for new dwellings as set out in the Nationally Described Space Standards. There is no such requirement within the Framework. Setting such standards removes flexibility. The size of properties should be controlled on a site by site basis through the development control process. Smaller properties cost less to construct and buy. There may, therefore, be occasions when the Local Authority wishes to encourage the provision of smaller housing as it will assist in the provision of affordable market housing. The imposition of space standards will increase construction costs have an impact on the price point of new homes.
LPIO123	Home Builders Federation	<p>The adoption of the NDSS should be in accordance with national policy (2019 NPPF para 127f&Footnote 46), the Written Ministerial Statement (WMS dated 25th March 2015 and the NPPG. [...])</p> <p>It is incumbent on the Council to provide a local assessment evidencing the specific case for Cannock Chase which justifies the adoption of the NDSS which should only be introduced on a “need to have” rather than a “nice to have” basis. The identification of the need for the NDSS must be more than simply stating that in the past some dwellings have not met the standard. The Council should identify the harm caused or may be caused in the future and identify if there is a systemic problem to resolve. The HBF is not aware of any evidence that market dwellings not meeting the NDSS have not sold or that those living in these dwellings consider that their housing needs are not met. There is not evidence that the size of houses built are considered inappropriate by purchasers or dwellings that do not meet the NDSS are selling less well in comparison with other dwellings.</p> <p>[...]The Council should robustly test the impacts of adopting the NDSS on the viability of development. There is a direct relationship between unit size, cost per sqm, selling price per meter and affordability.</p> <p>Where the NDSS is to be adopted the impact on affordability should be assessed including the potential impact on meeting first time buyer demand for starter homes often the NDSS most significantly impacts on smaller 1, 2 and 3 bedroomed dwellings.</p> <p>An inflexible policy requirement for adoption of the NDSS may impact on affordability and reduce housing choice. Any adverse impact on affordability of starter home/ first time buyer products may translate into reduced or slower delivery rates which should be reflected in the Council’s housing trajectory.</p> <p>It is possible that additional families who can no longer to afford to buy a NDSS compliant home are pushed into affordable housing need at the same time as the Council undermines delivery of affordable housing.</p> <p>If the NDSS are adopted then the Council should put forward appropriate proposals for transitional arrangements.</p>
LPIO124	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>Richborough Estates submits that the introduction of the NDSS would have a significant detrimental effect on the efficiency of land use within Cannock Chase District. The introduction of such restrictive policy requirements would be unduly onerous in terms of the consequences for the range of affordable products which could be offered.</p> <p>There appears to be no evidence to justify the requirement for all residential development to meet the NDSS. Therefore, it should not be included in policy. A wide range of house sizes provides for better uptake by potential purchasers.</p>

LPIO125	Rugeley Power Ltd (c/o Savills)	<p>Owners of Rugeley Power Station.</p> <p>Although the Local Plan will not be adopted by the time the outline planning application is determined, this plan may be adopted when future Reserved Matters applications are submitted on site. Therefore, it is considered important that the Local Plan does not contain policies that could negatively impact on the innovative development proposals that Rugeley Power Ltd intend to deliver at Rugeley Power Station.</p> <p>We consider that CCDC should maintain an approach that allows flexibility in delivering good design at an appropriate internal space and density within the District. A blanket approach to space and density standards will lead to inflexibility in the housing market. By setting space and density standards, it could limit the potential to deliver homes that meet the needs of the population in the District.</p>
LPIO126	Taylor Wimpey (c/o Lichfields)	Should the Council wish to include policy requirements for such standards in the Local Plan it will need to ensure that the appropriate evidence is provided to justify this requirement and that the application of the standards is fully tested through viability evidence produced to inform the Local Plan.
LPIO127	Bloor Homes Ltd (c/o Define Planning and Design)	<p>Written Ministerial Statement dated 25th March 2015. If the Council wish to adopt the NDSS within a Local Plan policy, then clear and up to date evidence of a local need to do so is required. In this case there is no known evidence of dissatisfaction with the size and standard of housing that is being delivered in the District to meet the identified need or of the dwellings being provided actually being too small.</p> <p>Moreover, the potential imposition of the NDSS on development viability, housing affordability, and the potential impact on development delivery rates in the District, would also need to be carefully examined.</p>
LPIO128	Gladman	If the Council wishes to adopt the NDSS as a policy requirement then this should only be done in accordance with the NPPF footnote 46. The WMS dated 25 th March 2015 and the NPPG (ID:56-020). The Council should consider the impacts on need, viability and timing before introducing the NDSS.
LPIO129	Thornton, H	Rugeley and Brereton lack job opportunities, particularly jobs of high quality and jobs for women, resulting in a high level of out-commuting, rectifying this should be a priority.
LPIO130	West Midlands HARP (c/o Pegasus Group)	<p>To facilitate an increase in the delivery of affordable housing across Cannock Chase the Council needs to establish policies in the new Local Plan which are ambitious, but pragmatic and flexible.</p> <p>Should the Council decide, on the basis of clear evidence, that new density standards and the NDSS should be introduced locally, we ask that such policies be applied across all housing tenures to ensure Housing Associations can continue to deliver homes on an equal footing with other developers.</p>
LPIO131	Wright, T (c/o Pegasus Group)	<p>It is submitted that the introduction of the NDSS would have a significant detrimental effect on the efficiency of land use within Cannock Chase District. The introduction of such restrictive policy requirements would be unduly onerous in terms of the consequences for the range of affordable products which could be offered. Through the insistence on the provision of oversized smaller properties as 'standard' this has the potential to impact on the delivery of a range of affordable stock available to the consumer as required by the Framework, as well as having implications for viability which could undermine plan delivery.</p> <p>There appears to be no evidence to justify the requirement for all residential development to meet the NDSS. Therefore, it should not be included in policy.</p>

Question 9 Are there other standards we should be including, and of so what evidence can you provide which would provide the local justification for this?		
LPIO132	Home Builders Federation	There are no other standards considered necessary for inclusion in the new Local Plan.
LPIO133	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	[...]Standards should be applied in suitable locations such as town centres and those benefitting from good public transport links. Richborough Estates would endorse this approach, any standard should also retain a degree of flexibility to allow for development to reflect local character and context and specific, identified needs at settlement level. Regarding the application of such standards, Richborough Estates considers that any standards should be set within a Local Plan Policy rather than in a SPD. The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.
LPIO134	Rugeley Power Ltd (c/o Savills)	[...]For large sites, it is considered that densities should be varied across the site to reflect varying character areas and ensure that an appropriate and diverse mix of dwelling types are provided to meet housing needs. Subsequently, it is considered that applications should be considered on a site by site basis. Any design policy within the Local Plan should provide flexibility to ensure that innovative design is not restricted. For the design policy we support Option A . However, in relation to updating the Design SPD, CCDC should produce a flexible document that promotes innovative design and supports the efficient use of land, especially brownfield sites, taking account of existing site constraints and allowing opportunities for innovation where appropriate.
LPIO135	Sport England	It is viewed that current Local Plan Policy CP3 and the Design SPD does not provide sufficient clarity as how to optimise the promotion of physical activity within developments. Therefore either of the Design Policy Options (a and b) should ensure that active design principles are explained in greater detail and embedded further.
LPIO136	Bloor Homes Ltd (c/o Define Planning and Design)	NPPG (ref 56-001-20150327) highlights that the Government has created a new approach to the setting of technical standards for housing. It is, therefore, entirely inappropriate to seek to set any local technical standards or requirements relating to the construction, internal layout or performance of new dwellings in Local Plan policy beyond the very few clearly specified exceptions, and only then, where there is robust evidence of a need to do so.
LPIO137	Historic England	Historic England is supportive of clear and strong policies on design, within the local plan and associated guidance within an SPD. We are keen to ensure that the historic environment is fully considered in any design guidance.
LPIO138	Hughes, R	Option B - The greatest consideration should be given to design to maintain a community's character.
LPIO139	Lyons, O	Although I would favour Option A in terms of amending, updating and expanding the existing policy, I believe that the Council should begin looking at more modern developments which include shared spaces, such as high quality, well designed modern apartments. It is, however, crucial that these options are well explored and consulted on widely. In addition to this, and as a Council, we must adopt the greenest methods of development and pursue green, environmental policies in all that we do.
LPIO140	Startin, P	I think Option B for Objective One is the correct choice as the Council must start looking up to solve the challenges it faces in housing.
LPIO141	Wright, T (c/o Pegasus Group)	The setting of any density standards in the new local Plan should only be undertaken in accordance with Paragraph 123 of the NPPF.

		<p>Any standard should also retain a degree of flexibility to allow for development to reflect local character and context and specific, identified needs at a settlement level.</p> <p>Regarding the application of such standards, it is considered that any standards should be set within a Local Plan Policy rather than in a SPD. The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.</p>
<p>Question 10 Is the Local Plan still the right place to include a Local List, or would this be more appropriate to be developed by local communities (for example Hednesford Neighbourhood Plan has identified buildings of local significance which it wishes to protect).</p>		
LPIO142	Historic England	We are very keen for a district wide list and would be supportive of the Council bringing this forwards, when their resources allow.
LPIO143	Cllrs. Preece, J, Stretton, Z and Newbury, J	We feel that it is essential that the District Council maintains a Local List as some communities may not have the capacity to develop one themselves; we also think it would be more efficient for a District-wide local list to be maintained.
LPIO144	Staffordshire County Council	It is suggested that the Local Plan is still the place for a local list. Inclusion of locally significant buildings in neighbourhood plans is to be supported and encouraged especially when there isn't a district-wide local list. A local list included in the Local Plan would provide consistency and perhaps more traction.
LPIO145	Thornton, H	Better if Local Lists are in the Local Plan but compiled with input from Parish Councils, Heritage and Local History Groups.
<p>Question 11 The NPPF (paragraph 70) states that 'planning policies and decision should avoid the development of isolated homes in the countryside' but sets out exceptions to this. Should we be elaborating further to define local policy in this context and if so what should be focus on and what local evidence is there to support this?</p>		
LPIO146	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	This should refer to Paragraph 79 of the Framework (Feb 2019). Richborough Estates considers that national policy is sufficient unless local evidence can justify further elaboration.
LPIO147	Wright, T (c/o Pegasus Group)	This should refer to Paragraph 79 of the Framework (Feb 2019). National Policy is considered sufficient unless local evidence can justify further elaboration.
LPIO148	Association of Black Country Authorities (c/o Walsall Council)	Given that nearly all the open countryside in the District, including that adjacent to the boundary with Walsall, lies in the Green Belt, there would appear to be little scope for the development of isolated homes in the authority's area.
<p>Social Inclusion and Healthy Living Policy Options</p>		
<p>Question 12 Which options or combinations of options do you support and why?</p>		
LPIO149	Canal & River Trust	<p>We welcome the aims of Option A, which we believe could help to increase the focus of the Local Plan upon opportunities for improving health and wellbeing in the District. Reference to an increased emphasis upon a network of green and blue infrastructure and the role it can play, as suggested, would be an especially powerful route towards meeting the overall policy aims.</p> <p>The existing Plan includes details of the indicative route in support of the Hatherton restoration. We welcome the proposals under Option D, as the inclusion of a policy specific to the restoration, including a requirement to ensure that</p>

		<p>the route is safeguarded and not severed by new development, would help to ensure that developments are required to consider it in their proposals and help to manage development which may otherwise sever the line or prevent its restoration.</p> <p>We note that the present Core Strategy currently indicates a requirement that the restoration proposal should demonstrate that additional boat movements along the Cannock Extension Canal SAC can be prevented. We believe this should not be included in the new document. The Cannock Extension Canal, and navigation along it, is the responsibility of the Canal & River Trust and it is not considered appropriate for a planning policy to specifically restrict boat movements. [...]</p>
LPIO150	Cycle-R	<p>Objective 2 is an excellent objective that needs working on, through the Charity I work for (Cycle-R), we have noticed high levels of poor health, bad diets, obesity and lack of exercise. A lot of this is focussed on those areas of high deprivation in the area, low income leads to poor diets and levels of indolence. Looking at the options, I would favour option D, this creates a broader range of available activities.</p> <p>However, I would note at this stage that the facilities for cycling in the District are very poor. Whilst the trails on the Chase are superb, it is not easy to get there if you don't drive and road based cycle routes in and around Cannock are very poor. These do need to be looked at, I understand that roads are the purview of the County, but they are desperately needed.</p>
LPIO151	Lichfield & Hatherton Canals Restoration Trust	<p>We are supportive of any of the options identified provided that the projected route for the Hatherton Canal, where that route lies within the Cannock Chase District, is protected from development which would compromise the future restoration of the canal for navigation and other appropriate (leisure etc.) uses. We are particularly supportive of Option D whereby a specific policy statement is produced and adopted. [...]</p> <p>Hatherton Canal: it is necessary for the policies and route alignments on the Policy Maps of Cannock Chase Council, South Staffordshire District Council and Walsall Council to cross-refer and mesh so that there is protection over a feasible and continuous end-to-end route including space for land alongside to be battered down to canal water level.</p>
LPIO152	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>Richborough Estates supports a combination of Options A, C and D. There would be concern with Option B as it is important that as much information as possible is set out in the Local Plan.</p> <p>Richborough Estates considers that any open space standards should be set within Local Plan Policy rather than in an SPD. [...]Standards should be clear and not onerous to allow for clear guidance in formulating any scheme.</p>
LPIO153	Rugeley Power Ltd (c/o Savills)	<p>We support Option A that open space, sport and playing requirements should be based on updated evidence not within the Policy itself. The policy should link up to date evidence as suggested by Sport England to ensure that development sites are providing sufficient open space to meet local needs.</p> <p>It is considered the development at Rugeley Power Station can assist in achieving the aims of the social inclusion and healthy living policy.</p>
LPIO154	Sport England	<p><u>Objective 2 – Para 6.12 – Footnote 32</u></p> <p>Clarity is sought as to the Council's future approach CIL in relation to playing pitches and indoor facilities to understand how this would shape objective 2 policy options.</p>

		Sport England would support the allocation of Option A and that headline findings within the Playing Pitch Strategy and Indoor Strategy should be recognised within a policy and subsequent projects contained within a site allocation policy (where relevant) and within the infrastructure delivery plan.
LPIO155	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that a combination of Options A and C would be appropriate. It is essential that details of open space standards are set out in a transparent manner within local plan policy. The policy would need to make clear that requirements for open space will be assessed against the most up to date evidence on need and shortfall, so that existing provision in the local area is properly taken into account. The policy should cross refer to the most up to date open space assessment and playing pitch and indoor sports strategies. Taylor Wimpey considers that green spaces of strategic significance on a district scale are appropriate for inclusion in the Local Plan and that smaller areas of green space which are of particular importance at the community level could be identified through the Neighbourhood Plan process.
LPIO156	Bloor Homes Ltd (c/o Define Planning and Design)	It is essential that the Local Plan ensures that all future developments make a fair contribution to the provision of community infrastructure in the District. In relation to open space provision the Local Plan must clearly set out <u>all</u> of the requirements, and in respect of off-site provision, the mechanism(s) for securing the required contributions. It is not helpful to seek to apply blanket requirements for a variety of very specific types of open space to each and every site. Instead guidance is required that encourages proposals to respond to both the strategic context and existing (or proposed) provision, and the specific nature of the site. The provision of multi-functional spaces that respond to a variety of needs should be encouraged. The provision should be established on local standards based on a robust and up to date assessment of the local need for open space and sports and recreation facilities, taking account of deficits and surpluses in existing provision.
LPIO157	Briggs, T	I strongly support Option D to enable the canal route to be safeguarded. This project is working well in Lichfield and will be an excellent visitor draw once completed.
LPIO158	Cannock Chase AONB Partnership	Option A or C: Allocating green spaces of strategic significance on a district scale would be supported, to focus enhancement of strategic areas of open space outside the AONB, connected by a network of robust green links accommodating cycle routes, which could potentially relieve recreational pressure on the AONB.
LPIO159	Hughes, R	Option C – Support local communities develop their own local-scale planning policies; local people know best for their community
LPIO160	Inland Waterways Association	IWA supports Option D ; to create a separate policy for the Hatherton Branch Canal restoration and seek to safeguard the canal route. However, the word “Branch” should be removed, as the proposal extends beyond the historic Hatherton Branch to include a new section of route replacing a lost part of the original Cannock Extension Canal to form a new through route, with the whole project call the “Hatherton Canal” The Hatherton Canal route cross the boundary between Cannock Chase DC and South Staffordshire DC in several places, and now also has a short section in Walsall MBC, requiring cooperation between the Councils to ensure continuity and consistence of policies and maps.

		<p>The route as identified by the Lichfield & Hatherton Restoration Trust is safeguarded in Policy SAD8 of the adopted South Staffordshire Site Allocations document. The adopted Walsall Site Allocation Document, Policy SAD4 also safeguards the Hatherton Canal.</p> <p>Cannock Chase Local Plan (Part 1) undertakes in Policy CP9 to identify and safeguard a firm route on the Policies Map via the Local Plan Part 2, subject to certain conditions. However, that will not now happen, leaving important parts of the route unprotected and with no detailed mapping to guide applicants in avoiding any prejudicial impacts from their development proposals. It is vital therefore the necessary safeguarding of the route is implemented through the reviewed Local Plan.</p> <p>IWA suggested wording for a Hatherton Canal Restoration Policy is provided in the response.</p>
LPIO161	Lyons, O	I would adopt Option C in supporting local communities to develop their own policies via Neighbourhood Plans. Again, a green agenda must be implemented within this process and focus placed on the importance of tackling air pollution issues and encouraging and enabling community groups to adopt, protect and promote local green spaces.
LPIO162	National Farmers Union	All options include reference to networks of green and blue infrastructure. Farmers and landowners must be fully engaged with discussions on Green Space and green and blue infrastructure as they own and manage many of the areas key assets. Option C states that greenspace would be allocated at a local level via local policy including neighbourhood plans. These initiatives must ensure they fully consult the owners of land that could be allocated as greenspace or green and blue infrastructure and fully understand how they are currently managed and how they contribute to the local economy.
LPIO163	Cllrs. Preece, J, Stretton, Z and Newbury, J	We would support Option C for policy objective 2 but we would also like to see a separate policy for the Hatherton Branch Canal within the Local Plan because we believe a concerted effort should be made to safeguard it.
LPIO164	Norton Canes Parish Council	The Parish would support Option C . Existing Local Plan policy CP5 needs to be updated to reflect new evidence on need for indoor and outdoor sport recreation provision and overall open space provision.
LPIO165	Startin, P	I am in support of Option C for objective 2. Neighbourhood Plans are a great way for the community to take ownership of their area.
LPIO166	West Midlands HARP (c/o Tetlow King Planning)	If identified needs are to be met the Council needs to decide which infrastructure to prioritise, and set policy accordingly. Robust viability testing is required to justify any increase in development requirements, particularly those that may cause the delivery of affordable housing to be reduced.
LPIO167	Wright, T (c/o Pegasus Group)	A combination of Options A, C and D is supported. There would be concern with Option B as it important that as much information as possible is set out in the Local Plan. Open space standards should be set within a Local Plan Policy rather than in an SPD. [...]Standards should be clear and not onerous to allow for clear guidance in formulating any scheme.
LPIO168	Association of Black Country Authorities (c/o Walsall Council)	We have no comment to make about these options, except to advise that (as referred to in 'Option D') we support the provision of a specific policy to safeguard the route for the potential restoration of the Hatherton Canal [...]. [...].
Question 13 Are there any other options we should be considering? What are these?		

LPIO169	National Farmers Union	Health Authorities increasingly recognise the role of public rights of way in improving public health and wellbeing. Therefore it is very important to increase user's awareness of their responsibilities as rights of way users and for those promoting the outdoors to consider how adequate resources can be delivered to support the maintenance of the network. Farmers and Landowners are largely responsible for the maintenance of footpaths across their land. Therefore the impacts of new residential development on adjacent agricultural land need to be carefully thought through. Many field parcels adjacent to housing developments are unfortunately then subject to repeated trespass, fly tipping (particularly garden waste), dog worrying, and concerns about disease carried in dog faeces. Therefore where new housing is proposed adequate green space must be incorporated into the development in order to relieve pressure on adjacent farmland and investment must be made (with prior consultation of local farmers) in the surrounding areas access infrastructure. This is to mitigate the impact of new urban development on the surrounding farmland. [...]
LPIO170	Staffordshire County Council	<u>Public Rights of Way (PRoW)</u> We welcome the overall intention of the Plan to seek the enhancement of the opportunities to walk/cycle and ride within the area. We also welcome the recognition that public rights of way can from a key part on promoting health and wellbeing and the future sustainability of a community. Where appropriate the plan should seek to encourage/require development to enhance the existing path network where possible in line with Staffordshire County Council's Rights of Way Improvement Plan.
Question 14 How should we be seeking to develop local policy concerning air quality, and what evidence can we use to support this?		
LPIO171	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	It is vital that any local standards are based on robust and proportionate evidence. These should be set through Local Plan policy rather than in a SPD. The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.
LPIO172	Taylor Wimpey (c/o Lichfields)	Any policy on air quality should be worded so that it would allow for development in sustainable locations, where it can be demonstrated that there would be no air quality constraints with the appropriate mitigation measures as required. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.
LPIO173	St Modwen (Watling Street) (c/o RPS Planning & Development)	Care should be taken when using AQMAs to provide the bases for local planning policies that seek to take air quality issues apparently evident in particular parts of the District. [...] In addition, nitrogen dioxide concentrations are anticipated to reduce during the Local Plan period, and thus will be much lower than at present by the end of the period. Based on this, it is unreasonable to determine the impact of development of a particular site (including CE20) upon air quality should be based purely on proximity to an AQMA. This illustrates that a simplistic evidence-based approach may not be necessarily appropriate in the case of the A5 corridor. This should be recognised and incorporated into any emerging policy to be proposed at later stages of the Local Plan Review.
LPIO174	West Midlands HARP (c/o Tetlow King Planning)	Improvements to Air quality through planning policy should only be sought where fully supported by evidence that there is a significant existing issue.

		The Council needs to understand baseline conditions across the district before drafting policies, and should policies be required, make these very clear as to expectations, aspirations and requirements.
LPIO175	Wright, T (c/o Pegasus Group)	Local Policy should be formulated in line with national policy. It is vital that any local standards are based on robust and proportionate evidence. These should be set through Local Plan policy rather than in a SPD. The including of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.
Overall Housing Growth Policy Options		
Question 15 Which option do you support and why?		
LPIO176	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	It is our view that housing growth Options A and Options B are unrealistic. The level of housing growth proposed is insufficient to meet the growth requirements of Cannock Chase and a suitable and sustainable proportion of the Greater Birmingham and Black Country HMA housing shortfall. Indeed, it is our view that the quantum of development to meet the unmet needs identified by Option C is also likely to be too low.
LPIO177	Church Commissioners of England (c/o Barton Willmore)	In order for the Local Plan Review to align with and deliver Objective 3: Provide for Housing Choice, the Commissioners consider that Overall Housing Growth Policy Option D is most suitable. The Commissioners also support Overall Housing Growth Policy Option C . Although this approach could be considered acceptable, we recommend that Overall Housing Growth Policy Option D is most suitable, given the local circumstances and acute needs within the wider HMA. We do not support the Overall Housing Growth Policy Options A and B, as they fail to adequately deliver the quantum of housing required to address the needs within Cannock Chase District and the Greater Birmingham HMA. Therefore, a more proactive and strategically streamlined approach is recommended, as part of the Local Plan Review. This approach should be based on Paragraph 60 of the NPPF [...]The District should note that the Standard Method is the minimum starting point. [...] The Greater Birmingham HMA Strategic Growth Study identified a significant housing need, including the unmet need from Black Country Authorities and an outstanding minimum shortfall of dwellings to 2031 and 2036 across the Birmingham HMA. Considering this, we assume the District will engage constructively and actively with the 13 other authorities which comprise the Greater Birmingham HMA, in order to maximise the effectiveness of the Local Plan in the context of strategic cross boundary matters, such as an identified acute housing shortage. It is within this context that we support Option D, which is based on the maximum capacity identified for the 'proportionate dispersal' option identified in the Greater Birmingham HMA Strategic Growth Study. [...] The inclusion of Bleak House for future residential development in the Local Plan Review will contribute to delivery at this rate.
LPIO178	Home Builders Federation	Currently the Council has calculated the LHN figure for Cannock Chase as 284 dwellings per annum. It is agreed that this figure should be kept under review until the date of submission for examination. This LHN figure is only the minimum starting point. The Council is encouraged to have an ambitious plan for housing growth.

		<p>The new Local Plan's housing requirement figure should comprise the LHN figure for Cannock Chase plus an additional unmet housing need figure for the GB&BC HMA.</p> <p>In this context the Council should consider as a minimum the capacity of 500 dwellings (Option B) up to the maximum of 2,500 dwellings (Option D) as identified in the proportionate dispersal option of the Strategic Growth Study for the period 2018-2036. The housing requirement figure should be set out in an agreed and signed SoCG (see HBF answer to Q3)</p>
LPIO179	KGL Estates Ltd (c/o John Heminsley)	<p>Option A would clearly not meet the required need and Option B is a minimum response. Option C is the most appropriate in allowing for a reasonable degree of flexibility. Option D appears to be difficult to achieve bearing in mind environmental constraints in the District.</p>
LPIO180	Lichfield & Hatherton Canals Restoration Trust	<p>We have no preference between the various alternatives outlined but in the event of residential development alongside or close to the projected through-route we would want there to be easy pedestrian access connections to the canal towpath from those developments so that the canal brings benefits to that local community.</p> <p>We welcome the CIL funds that Cannock Chase Council has already provided to us in support of the Hatherton Canal Restoration and would be pleased to receive further funding under s.106 or CIL in support of our continuing programme of work for this Canal.</p>
LPIO181	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p><u>Quantum</u></p> <p>Firstly, it is clear that the standard method generates a figure which should be treated as a <u>minimum</u>.</p> <p>The constructive approach to addressing the shortfall is welcomed in principle, and this aligns to the approach being suggested by South Staffordshire Council (Issues & Options Oct 2018) as one which should be rolled out across the GBBCHMA as a consistent way of addressing the housing shortfall under the statutory Duty to Cooperate.</p> <p>Richborough Estates wishes to highlight concerns that this option would only provide a comprehensive solution to meeting the identified housing shortfall if all other constituent LPAs within the HMA adopt a complementary approach to meeting the minimum capacity of all recommended areas of search within the Strategic Growth Study. This approach is also heavily dependent upon the delivery of significant strategic growth across the GBBCHMA to 2036 including new settlements.</p> <p>Therefore, Councils should be seeking to deliver more than the 'lower' end of the range suggested. It is submitted that Cannock Chase Council should be aiming for the upper end of this range. Even then, this should be treated as a minimum requirement (when added to the OAN).</p> <p>The Council's requirement should be calculated using the standard method figure, plus a contribution to the GBBCHMA shortfall, plus an additional allowance to allow for economic uplift.</p>
LPIO182	Severn Trent	<p>With reference to the three scenarios described in 7.9, we would be more favourable of an approach towards larger development allocations. This approach means we can assess and plan infrastructure needs and upgrades in fewer locations which is more efficient and less disruptive to deliver. Utilising a large array of windfall sites and increasing development dispersion can result in wide spread pressures on infrastructure which then require more interventions to resolve.</p>
LPIO183	Taylor Wimpey (c/o Lichfields)	<p>Taylor Wimpey wishes to make a number of comments in relation to the overall housing growth options identified in the LPIO and these comments are set out below.</p>

Local Housing Need

TW welcomes the use of the 2014 Sub-National Household Projections (SNHP) in the LNHA. However, TW notes that the LNHA has applied the 2018 projections as 'current year' projections and considers that the projections for 2019 need to be applied instead.

TW also considers that the most recently available affordability ratio for 2018 (6.13) should be applied.

Figure 14 of the LHNA suggest that projected institutional population growth needing communal accommodation has been identified within the Standard Method calculation. However, this C2 provision is not included in the household projections and should not form part of the adjustment in the LHN which is to take account of affordability. The need for C2 accommodation should be separate to the LHN calculation, and the Council should be making separate provision to meet C2 need.

Different figure to the LHN generated by the standard method

The reference to uplifting the housing figures in the Plan to help deliver affordable housing need suggests that this is a component part of the calculation of the housing requirement, rather than the LHN. It is against this policy context that the housing need for the Cannock Chase Local Plan must be considered.

TW is concerned that matters have not been properly considered and assessed in the document. In particular:

- There is no consideration as to whether increases in housing need are required to support growth strategies such as the GBSLEP and the WMCA.
- There is no consideration as to whether increases in housing need are required to support strategic infrastructure improvements.
- The LHNA identified an affordable housing need excluding a vacancy/2nd home allowance. The provision of this level of affordable housing on sites is considered to be completely unrealistic (and is unlikely to be unviable).

TW also has concerns with inputs used to derive the affordable housing need identified including:

- Much of the data used is historic or nationally specific
- The number of homeless households is identified as zero which seems unlikely
- The household dissolution figure in the LNHA is likely to be too low because the net household growth has been factored into the calculation as opposed to the gross household growth as required in the Practice Guidance.

TW considers that the LNHA should be updated to fully consider all of the relevant factors identified in this Practice Guidance, including above matters, and that the updated report used to inform the next iteration of the Local Plan.

The Local Plan should ensure that sufficient sites are allocated to ensure that identified housing need can be delivered

Unmet need for the GBBCHMA

There is a clear requirement to go for a higher housing need figure where needs cannot be met within neighbouring areas. There is an important need for the Council to consider how it can make provision for a sustainable and appropriate contribution to addressing the wider shortfall across the GBBCHMA. Taylor Wimpey considers the 'proportionate dispersal area options' derived in the SGS is an appropriate evidence base upon which the Council should derive and test individual options through its own Local Plan.

		<p>Whilst the Council legitimately point to recent delivery rates in Cannock Chase (Para 7.15) and resultant uplift that each Option would represent above this, TW considers that this is a relatively artificial barometer – a point partially acknowledged by the Council (para 7.15). It would not be unrealistic, or undeliverable, to boost the supply of housing by c.34% (as a minimum) within the District, were it supported by planning policy. The consequence of this, also, would be that the Council would make a significant contribution to addressing the GBBCHMA unmet housing needs.</p> <p>TW considers that the additional dwellings to be provided to meet this shortfall should be no less than 1,500 (Option C). It is considered that there is scope to provide up to 2,500 dwellings (Option D). There is no basis to conclude that the highest rate of growth (Option D) is not deliverable.</p> <p>Given the growth ambitions of the wider area and significant shortfall in the HMA, it is clear that the district will need to plan to deliver an increased number of homes to what is currently required, in the future. The Council must therefore ensure its evidence base sufficiently assesses all reasonable alternative options to supply this land for housing, including the release of Green Belt.</p> <p><u>Meeting Longer Term Needs</u></p> <p>TW supports the allocation of safeguarded land in general as it will provide greater certainty over the Green Belt boundaries beyond the plan period.</p>
LPIO184	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	<p>It is clear of the options identified, Option A would fail to meet the wider housing needs.</p> <p>Option B suggests an additional 500 dwellings over the plan period but it is predicated on a number of assumptions.</p> <p>Option C is therefore considered likely to provide the minimum level that Cannock Chase should provide.</p>
LPIO185	Wyrley Estate (c/o Fisher German LLP)	<p>The Council is encouraged to be ambitious in its housing targets.</p> <p>The LHN figure needs to stay under review through the process. In times of economic uncertainty evidence can change rapidly and become out of date. The final plan needs to be both ambitious and realistic and consider how the council will meet its obligations in terms of the housing need in the wider region.</p> <p>The Council would be encouraged to aim for option D, as this represents the most ambitious model, although it significantly outstrips current delivery, it would be achievable if the council considers a large potential release of Green Belt land.</p>
LPIO186	Beau Desert Golf Club (c/o FBC Manby Bowdler LLP)	<p>Option D is supported in that the opportunity to provide additional housing growth will not only support the housing need arising from the Birmingham and Black Country Areas, but will also maximise the opportunity for economic growth within the District; this option has the greater potential to ensure the sustainability of local communities with the District, provided that a sustainable approach is taken to the distribution of the housing growth.</p>
LPIO187	Birmingham City Council	<p>BCC supports investigating all options which can offer additional housing growth over and above Cannock Chase's projected housing need at this stage in line with the requirements of the NPPF and the Duty to Cooperate.</p> <p>Option A should therefore not be considered as it does not fulfil the requirement to meet some of the unmet need elsewhere within the HMA.</p>
LPIO188	Bloor Homes Ltd (c/o Define Planning & Design)	<p>Option A is clearly an inappropriate option given that in order to comply with the NPPF policies, the Local Plan must also effectively address the established unmet housing needs that are already arising elsewhere in the GBBCHMA.</p>

		<p>Options B-D set out different scenarios that, to varying degrees, would also address some of the unmet need arising from elsewhere in the HMA.</p> <p>Critically, the Local Plan must commit to a robustly justified level of provision that will make a substantive contribution to addressing the unmet housing needs arising in the GBBCHMA otherwise it will be fundamentally unsound.</p> <p>Option B would only represent a “token gesture” in this respect reflecting the minimum capacity identified in the Strategic Growth Study, and therefore, ignoring the capacity that would be identified through a local assessment of growth opportunities.</p> <p>It is considered, therefore, that the level of provision should be <u>at least</u> that set out in Option C, but appropriately uplifted to reflect the capacity of all of the growth opportunities identified and demonstrated to be suitable, available and deliverable through the Local Plan process. The Local Plan must then allocate these sites to facilitate their timely development and significantly boost the supply of housing above past delivery rates.</p>
LPIO189	Boot, A (c/o CT Planning)	<p>Support Option D.</p> <p>The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development.</p> <p>The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.</p>
LPIO190	Boss, P	<p>Option A – the required housing identified should be delivered. Additional housing should be identified when it is required to ensure it is built where it is required.</p>
LPIO191	Brigden, J (East of Long Lane) (c/o CT Planning)	<p>Support Option D.</p> <p>The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development.</p> <p>The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.</p>
LPIO192	Brigden, J (Land to the North of Norton Hall Lane) (c/o CT Planning)	<p>Support Option D.</p> <p>The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development.</p> <p>The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the</p>

		urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.
LPIO193	Brigden, J (Land west of Hednesford Road) (c/o CT Planning)	Support Option D . The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.
LPIO194	Brigden, J (West of Long Lane) (c/o CT Planning)	Support Option D . The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.
LPIO195	Briggs, T	Much is made of the need to preserve greenbelt in earlier pages but here we seem to have the suggestion that greenbelt can be 'carved up' in order to make up for others shortfall. CCDC should build the minimum number of houses that is required to comply with its statutory commitments, not sell off precious, irreplaceable land in order to be seen to be helping other authorities that are struggling. A long term view also needs to be taken, if CCDC allows these extra homes to be built, will it be given a 'free pass' to build less when the next Local Plan period begins? I very much doubt it, so where will the additional land come from then? More greenbelt and AONB land lost I assume. Option A is the most prudent way forward.
LPIO196	Messrs Conway, Lyons, Emery, Horsford (c/o CT Planning)	Support Option D . The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.
LPIO197	Friel Homes (c/o CT Planning)	Support Option D .

		<p>The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.</p>
LPIO198	Gladman	<p>Paragraphs 4.3 and 4.4 of the Consultation Document refer to the Standardised Methodology for assessing housing need as set out in the NPPF as the basis for the housing requirement in the Local Plan review. Whilst the role of the Standardised Methodology in defining housing needs in plan making is acknowledged, Gladman advises caution in the use of implied figures at face value for establishing the housing requirement.</p> <p>The Standardised Methodology must be considered to represent a tentative and minimum starting point, with the actual level of objectively assessed need for the District somewhat higher.</p> <p>Gladman considers that Option D would be the most appropriate and proportionate approach, subject to the caveat regarding the housing requirement for the District's own housing needs as expressed above.</p> <p>Whilst it is accepted that this level of growth would be in considerably in excess of the annual average number of housing completions in the District over the past 20years, it should be borne in mind that the planning policy context for the District over that period has been one of severe constraint in terms of housing development; it should not be assumed that this reflects the appetite for the delivery of new housing in the District by the housebuilding industry.</p>
LPIO199	Greenlight Development Ltd (c/o Lichfields)	<p><u>LHN Calculation</u></p> <p>Broadly, Greenlight consider the Council's calculation of the minimum LHN figure aligns with the standardised methodology and the LHNA appropriately utilises the 2014-based households projections in accordance with the Governments updated PPG. However, the Council's calculation utilises the 2017 median work-place based affordability ration. The PPG is clear that the most up-to-date affordability ratios should be utilised for the standard method. Notably, the LHNA, at paragraph 3.2, states that the most up-to-date affordability data was the 2017-based affordability ratio. However, the LHNA was published in April 2019 after the workplace based affordability rations were published. There is a need for the Council to review and update their LHN calculation and figure to ensure a robust evidence base underpins the Local Plan.</p> <p><u>Uplifts to LHN</u></p> <p>The NPPF and PPG are clear that the LHN figure generated by the standard method is a minimum starting point. Indeed, the IOC, at paragraph 7.2 acknowledges this. Whilst the Council has taken consideration of the unmet need arising from the GBBCHMA the Council has not given due consideration to whether other uplifts to the LHN figure are required:</p> <ul style="list-style-type: none"> • Economic Growth – The Council does not appear to have considered whether the planned economic and employment growth would require additional housing growth above that of the minimum starting point. • Infrastructure – similarly, the LHNA has not considered whether an increase in the LHN figure for the District would be required to support strategic infrastructure

		<ul style="list-style-type: none"> Affordable Housing - Coupled with the aforementioned uplifts, Greenlight considers that an uplift in the housing figure to help deliver affordable housing need would, on the face of it, appear justified. <p>Greenlight welcome the Council's testing of a number of options to address the cumulative housing supply shortfall across the HMA up to 2036, in accordance with paragraph 60 of the NPPF.</p> <p>Greenlight considers the '<i>proportionate dispersal area options</i>' (500-2,500) derived in the SGS is an appropriate evidence base upon which the Council should derive and test individual options through its own Local Plan.</p> <p>Whilst the Council legitimately point to recent delivery rates in Cannock Chase (Para 7.15) and resultant uplift that each Option would represent above this, Greenlight consider that this is a relatively artificial barometer – a point partially acknowledged by the Council (Para 7.15)</p> <p>Accordingly, there is no basis at all for the Council to consider making provision for less than c.1500 (Option C), based on the median capacity identified for the 'proportionate dispersal' option, albeit, it is also clear – as highlighted by the SA – that Option D (2,500) has been assessed as having the same impacts against the SA Objectives as Option C (1,500), and both options did not score markedly worse than Option B (500). There is also no basis to conclude that the highest rate of growth (Option D) is not deliverable.</p> <p>Therefore, Greenlight considers that such levels of provision are not considered to be unreasonable, or undeliverable – subject to testing matters such as deliverability, infrastructure considerations and overall sustainable development matters. Given the above, the Council must ensure that its Local Plan is underpinned by an evidence base which sufficiently, and lawfully, assesses all reasonable alternative options to address the GBBCHMA unmet need, including the release of Green Belt land.</p>
LPIO200	Hughes, R	Option B – Provide the minimum figure of 284 plus the lower end of the “proportionate dispersal” range
LPIO201	Lichfield District Council	<p>Lichfield welcomes Cannock Chase's continued commitment to making a contribution towards meeting the unmet need identified in the GBBCHMA study.</p> <p>It is acknowledged that delivery of this need through the proportionate dispersal approach is also consistent with the area of search approach in the Strategic Growth Study.</p> <p>Cannock Chase DC is correct in assuming as referenced in paragraph 7.13 that Lichfield DC will be making its own contribution to the unmet need identified in the Strategic Growth Study. Lichfield has already consulted on its potential options in meeting the unmet need identified in the SGS and it is considered that this will be challenging to deliver in its own right given the constraints that exist.</p> <p>Lichfield DC supports Cannock's approach of considering the area of proportionate dispersal on its own as a basis for identifying the quantum to be provided in addition to the local need identified through the NPPF standard methodology. The SGS recognises that the proportionate dispersal approach will rely on need being met through individual local plan reviews and that the SHLAA process will play a key role in this form of delivery. In this regard, given the mutual constraints across Cannock Chase DC and Lichfield DC, it is reaffirmed that the SHLAA update which will be needed as part of the evidence base should continue to use a methodology consistent with Lichfield DC as has been the approach previously.</p>

LPIO202	Lyons, O	I agree that the focus should centre around urban supply, primarily regenerating existing brownfield sites. I agree with the suggestion of proportionate dispersal and believe that we should begin with meeting targets, and then building upon that to meet additional need. In this instance I would favour Option B to being with ensuring the minimum figure provided by Government and then working towards an additional 500. If this can be met, then the needs/demand can be reassessed at that point and the situation reanalysed.
LPIO203	Newton, A (c/o CT Planning)	Support Option D . The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development. The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.
LPIO204	Cllrs. Preece, J, Stretton, Z and Newbury, J	We would support option B which includes the proposal for a contribution of 500 additional houses for the shortfall in the GBBCHMA. The housing target could potentially put substantial pressure on Norton Canes' greenbelt, but as a District we must also recognise the pressure that is being brought to bear from regional housing need we feel that 500 additional houses is the absolute maximum that the Cannock Chase District should be expected to contribute. Compared to other authorities in the GBBCHMA such as Lichfield, North Warwickshire and Stratford-on-Avon, Cannock Chase has very little land left which is not part of the designated West Midlands Green Belt. Additionally, we are constrained by our small geography compared to those authorities and also by the AONB which takes up a substantial proportion of our District's land. Based on these considerations, we do not believe that it would be feasible or reasonable to expect the Cannock Chase District, and potentially by extension Norton Canes, to contribute the figures outlined in options C or D.
LPIO205	Norton Canes Parish Council	The Parish would support Option C in relation to dealing with both locally generated housing need and a proportion of the Birmingham and Black Country requirements this is on the basis that the sites chosen should not involve further expansion to either the north or south of the village.
LPIO206	South Staffordshire Council	We welcome the publication of the Issues and Options document and support the approach towards examining a range of potential development scenarios which would contribute towards meeting both locally generated and wider HMA needs. [...] South Staffordshire Council would support the District Council using the same methodology as South Staffordshire has for calculating your contribution towards the GBHMA shortfall. This would reflect the lower range of the 'proportional dispersal' recommendation in the 2018 GL Hearn Growth Study and would equate to a 500 dwelling contribution.
LPIO207	South Staffs Water	Support Option D . The plan is being reviewed in the context of a considerable unmet housing need across the GBBCHMA. If Cannock Chase Council, as appears in the Issues and Options Consultation Document, is supportive of the Duty to Cooperate, then it should look at the potential for the District to maximise the provision of new residential development.

		The importance of the Green Belt is recognised. However, Green Belt boundaries should not be maintained to the detriment of procuring sustainable development. The Green Belt review should be revisited to assess all sites within the urban-rural fringe of settlements in order to seek the release of appropriate and sustainable sites within the Green Belt for residential development.
LPIO208	St Modwen (West of Pye Green Rd) (c/o RPS Planning and Development)	<p>We note that the LP is appropriately intending to address the GBSLEP issues (para 5.52) and potential 60,900 dwelling shortfall to 2036. In this regard, we urge the Council to reconsider the findings of the GL Hearn GBSLEP report and the 60,900 is to be regarded as a minimum figure and there are significant uncertainties about the basis on which that figure was reached. The Local Plan Review should therefore treat this as a minimum baseline figure in terms of assessments of its future housing requirement.</p> <p>It is noted at paragraph 5.41, the standardised OAN methodology indicates an increased housing requirement for Cannock from 241dpa to 284dpa. However, as the document has acknowledged, even though NPPF2 has recently been published, the Government's advice on the standardised OAN is that the approach to the assessment may well change. This is likely to increase the housing requirement above the standardised approach and is likely to result in a change to the methodology that could see an increase for Cannock. This will require addressing in relation to the future Preferred Options Consultation.</p> <p>Given the above and in advance of the housing requirement being established through the revised standard OAN there is a lack of evidence on which to establish the housing requirement at the present time. However, as a minimum the above indicates a need to establish a housing requirement above Option B in the I & O Consultation.</p>
LPIO209	Startin, P	Building up, I believe is the solution to the housing challenge. I would broadly be in support of Option D for the housing objective as this would represent huge job opportunities in the District as long as the deals were constructed correctly.
LPIO210	Thornton, H	<p>Support option B as it appears to be reasonable, given the limited amount of housing land available.</p> <p>Para 7.40: Apartment blocks would not be appropriate as they are more for students in town-cities with colleges/universities, and for similar 'mobile' residents, whereas the norm in the Rugeley area is for established families who prefer their own private gardens.</p> <p>Para 7.41: When the approx. 1125 dwellings on the 'A' Power Stations land, entirely in Lichfield District, were allocated in 2010-12 500 of them were credited towards meeting "the growth requirements of Rugeley & Brereton" which made the overall allocation more equitable. Therefore a similar arrangement should apply to the 'B' Power Station – if not, why?</p>
LPIO211	West Midlands HARP (C/O Tetlow King Planning)	We suggest that Option C would be the most suitable approach to maximising the delivery of affordable housing through a higher overall housing growth across the District.
LPIO212	Wright, T (c/o Pegasus Group)	<p><u>Quantum</u></p> <p>Firstly, it is clear that the standard method generates a figure which should be treated as a <u>minimum</u>.</p> <p>The constructive approach to addressing the shortfall is welcomed in principle, and this aligns to the approach being suggested by South Staffordshire Council as one which should be rolled out across the GBBCHMA as a consistent way of addressing the housing shortfall under the statutory Duty-to-Cooperate.</p>

		<p>However, there is a concern that this option would only provide a comprehensive solution to meeting the identified housing shortfall if all other constituent LPAs within the HMA adopt a complementary approach to meeting the minimum capacity of all recommended areas of search within the Strategic Growth Study.</p> <p>The approach is also heavily dependent upon the delivery of significant strategic growth across the GBBCHMA to 2036 including new settlements.</p>
LPIO213	Association of Black Country Authorities (c/o Walsall Council)	<p>Note: Using the 2014-based household projections for the period 2019-29 and the 2018 affordability ratios, we think the local housing need for Cannock Chase is 277 dwellings per annum rather than 284.</p> <p>We are pleased the consultation recognises the relationship between Cannock Chase District and the Black Country. We see the consultation acknowledges work done at the Housing Market level and we would welcome opportunities to hold Duty to Co-operate discussion with Cannock Chase to determine the approaches to meeting needs arising the Black Country. [...].</p> <p>[...]</p> <p>Previously, in 2017 we commented in response to consultation on the proposed Part 2 plan for Cannock Chase that a figure of 1,000 dwellings in excess of local need might be appropriate (i.e. a figure between Options B and C). More recently, work for the review of the Black Country Core Strategy (now 'The Black Country Plan') is revealing the scale of projected housing growth to 2038 and the likely shortfall in supply within existing urban areas. This is now estimated to be in the region of 26,000 homes, whilst there will also be a need for additional employment land. The scale of such a gap in supply is unlikely to be met by the review of the Black Country's Green Belt that is currently taking place. [...]. In the circumstances, we welcome efforts by nearby authorities to help accommodate development needs and, given the scale of the shortfall in our capacity, we would encourage the testing of as high a figure as possible. Option D is therefore now preferred.</p> <p>We recognise that the option still needs to be tested to determine where there are or can be sufficient sites in the district to accommodate the amounts of development that can be pursued. In this regard, we recognise that Cannock Chase District is constrained by the Green Belt, AONB and SAC. The ability of the local housing market to deliver new homes is also a potentially limiting factor [...]. On the other hand, we agree with the comment in paragraph 7.15 that delivery rates can be reflective of the planning policies that apply at the time.</p>
Question 16 Are there any further options to be considered? Please provide supporting evidence for any alternative options suggested.		
LPIO214	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	<p>We have significant concern about the reliance which is placed upon the findings of the Greater Birmingham and Black Country Housing Market Area Study by the Issues and Options consultation draft Local Plan. The overall housing requirement referred to in the Housing Market Area Study is not robust. The study itself confirms that the overall housing requirement should be treated with caution as it is simply a demographic figure. Furthermore, this study was produced prior to the publication of the revised Framework. The housing requirement for the various authorities within the HMA in emerging replacement plans should be calculated using the standard method. This is not reflected by the Housing Market Area Study.</p> <p>In addition, a number of the assumptions in the study regarding urban capacity and the ability to increase densities are not tested. The study effectively relies upon the existing allocations and SHLAA sites (that are yet to be tested for</p>

		<p>suitability for an allocation) and an assumption that new development will come forward for development at an increased density. This is not a realistic assumption. That being the case, any general conclusions drawn regarding the quantum and distribution of the unmet housing need based upon the Housing Market Area Study will ultimately be flawed. In addition, the study concentrates upon large sites and leaves the assessment of smaller development opportunities to the local level. Whilst the study does consider the opportunities for smaller urban extensions (500 – 2,500 dwellings) within the plan area, it does not consider opportunities below that scale. It would be entirely appropriate for Cannock Chase to consider identifying urban extensions of less than 2,500 units in size as part of its assessment of options. For reasons referred to above, the suggestion in paragraph 7.12 of the consultation Local Plan that the HMA authorities simply need to accommodate the minimum amount of housing development identified by the Housing Growth Study to address the conurbations housing shortfall is incorrect. The housing requirement, urban capacity assessments, assumptions regarding density and the tested distribution options are not reliable enough to inform the emerging Plan. We would suggest that Cannock Chase will need to accommodate a similar quantum of development to North Warwickshire, which will be in the region of 4,000 additional units over and above the local level housing requirement.</p>
LPIO215	KGL Estates Ltd (c/o John Heminsley)	It would be useful to test a further option of locally generated need + 1000 as this would be within the range of supply requirements of 1900 to 4400 dwellings over and above existing identified supply.
LPIO216	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	No further options to be considered although the right is reserved to reconsider this view at a later stage depending on progression of matters relating to the housing shortfall and how this is progressed through the Duty to Cooperate.
LPIO217	Brereton & Ravenhill Parish Council	BRPC supports 12% of the district's housing need being met in the Rugeley/Brereton area, but only if this includes sites outside both the district beyond the Green Belt. BRPC opposes any larger proportion of the housing need being met in the Rugeley/Brereton area since this would both reduce the Green Belt and be unsustainable.
LPIO218	Historic England	<p>We consider that in identifying sites for housing then this would need to be accompanied by appropriate heritage assessment.</p> <p>If Cannock Chase Council will be taking on additional housing growth to meet the needs of the Greater Birmingham HMA, we would want to ensure that there was appropriate heritage assessment to ensure that appropriate sites only were put forward for allocation.</p>
LPIO219	St Modwen (West of Pye Green Rd) (c/o RPS Planning & Development)	<p><u>Para 7.21 – Exceptional Circumstances</u></p> <p>Paragraph 7.21 is correct that non-Green Belt land for housing should be identified and allocated in advance of Green Belt land: <i>“Before concluding that Green Belt boundary changes are justified...with neighbouring authorities on whether or not they could accommodate additional development” (NPPF, Para 137)</i></p> <p>The Local Plan Review therefore must establish suitable locations for housing growth in Non-Green Belt locations and ensure those sites are allocated for housing in advance of undertaking a Green Belt Review. The Green Belt sites should only then be allocated, based on the residual housing requirement of the plan. It must not allocate Green Belt sites based on the whole housing requirement. This means non-Green Belt housing sites should be identified under para 137, PRIOR TO moving to finding suitable Green Belt under para 138 of the NPPF.</p>

Strategy for Meeting Overall Housing Growth Policy Options		
Question 17 Which combination of options do you support and why? Should any further options be considered?		
LPIO220	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	It is difficult to comment on the most appropriate option to deliver the housing requirement whilst there is so much uncertainty about the quantum of housing that needs to be delivered through the plan making process. To put this into context, there is approximately a 2,500-unit figure difference between Options A and D identified by the consultation documents Housing Growth Policy Options. It is, however, our view that the best possible use should be made on non-Green Belt land before allocating options to remove the land from the Green Belt. In terms of wider distribution options, the principal urban areas of Cannock and its adjoining area, Rugeley and Norton Canes should be the priority locations for delivering additional residential development. These are the most sustainable locations for development within the District and should be the preferred locations for housing allocations.
LPIO221	Bywater, A&J	Area of Concern: Housing on Greenbelt, Land South of A5190, Heath Hayes Assuming that no other brownfield sites can be found then we would reluctantly accept housing development south of the A5190.
LPIO222	Church Commissioners of England (c/o Barton Willmore)	The Commissioners support both Option C2: Green Belt Extensions ('in combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extensions at Cannock/Hednesford/Heath Hayes and Norton Canes urban edges'" and Option C3: Green Belt Urban Extensions ('in combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extension distributed across the district.')
LPIO223	Cycle-R	The Cannock Chase Green Belt Review (March 2016) identifies Bleak House under reference 'C13' and concludes that it is 'mid-performing' against the purposes of the Green Belt, which are set out in national policy. Bleak House has the ability to accommodate new residential development without contributing to an increase in the extent of unrestricted sprawl of a large built-up area. Bleak House: Residential-led development on the site would result in a limited loss of countryside and a limited reduction in 'technical openness' compared with the existing character of Bleak House. Therefore, a sensitively design residential-led proposal within a robust landscape framework at the site would comply with the purposes of the Green Belt in the NPPF. The Commissioners request that Bleak House is allocated in the Local Plan Review, as it constitutes sustainable development, is free from designations once the Green Belt boundary is amended and could assist the District in meeting its housing need, including affordable.
LPIO224	Home Builders Federation	Objective 3: This is a tricky area to review. There is a need for housing in and around Cannock, especially with a focus on Social Housing and provisions for self-build. Personally, I would look at Option C , this would provide the minimum necessary with a decent overflow. This is partially where the redevelopment of the Rugeley Power Station site would play a role later; I am attaching an outline brief regarding this site and will look at more detail a little later. The options are a tricky choice, the current plans for Rugeley Power Station show that it will be a housing led development (going specifically against the community feedback), this limits the option to Option C, whilst there would be objection to using some greenbelt land, I would look at a broader distribution (Option C3).
LPIO224	Home Builders Federation	The HBF's preference is Option C3 which combines Option A and Option B.

		<p>The widest possible range of housing sites by both size and market locations should be sought to provide suitable land or small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allow places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p>
LPIO225	KGL Estates Ltd (c/o John Heminsley)	<p>Option A would not meet the requirements for minimum additional housing growth.</p> <p>Of the two Rugeley Power Station options B1 and B2 a balanced approach with mixed housing and employment development is considered most appropriate for the reasons already given.</p> <p>Option C1 with GB release as urban extensions to Rugeley and Brereton is not considered to be the most appropriate. The land at Etchinghill and on either side of Hednesford Road is both GB and AONB and is prominent in the landscape, therefore also environmentally sensitive. There is very limited scope for infill development within Slitting Mill.</p> <p>Option C2 includes land south of the A5190 at Heath Hayes and Norton Canes which is considered to be the most appropriate land for release from GB having no major environmental or landscape constraints. It is also close to Cannock railway station and has good bus service access. Norton Canes as a village already has commitments which amount to 21% growth, well exceeding its proportion of District population and therefore major sites immediately around the village boundaries, particularly to the north would continue to unbalance the strategy of housing growth being related to the size of existing settlements.</p> <p>Sites east of Heath Hayes/Wimblebury also have significant environmental and landscape constraints. So in conclusion part of option C2 is supported so far as it releases land south of the A5190 Cannock Road.</p> <p>Option C3 includes all potential urban extension in GB around three main settlements in the District plus extending village boundaries, which in combination would provide much more housing land than would be needed. However, it would have been helpful for this part of the document to provide estimate for the additional housing capacity which would be provided over and above the quotes urban capacity and the RPS options.</p>
LPIO226	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>In terms of the spatial distribution of the housing growth Richborough Estates has the following comments:</p> <ul style="list-style-type: none"> • Option A provides only the minimum figure which is fixed by the Government's Standard Methodology. Whilst this provides a starting point for setting a requirement this is an absolute minimum and therefore Option A alone will not suffice and the Council's acceptance of this matter is welcomed. • Option B1 combines Option A with housing-led redevelopment of Rugeley Power Station, whilst B2 supports employment-led/mixed use redevelopment at this site. Again, the Council acknowledges that either option will be unlikely to meet housing needs in full and this realistic approach is welcomed. The Council also need to be factoring in the deliverability of Rugeley Power Station and will need to be realistic as to how much of this site will actually come forward over the plan period. Richborough Estates submits that Option B2 is the most appropriate as this will contribute to a sustainable and balanced strategy for Rugeley otherwise the town will expand considerably in residential terms without complementary employment balance. The Rugeley Power Station SPD (2018) clearly states mixed use for the site and this should be adhered to. The importance of the employment element must not be underestimated. It should be borne in mind that the Power Station Site as a whole (also

		<p>taking into account the Lichfield part) needs to be considered when determining whether the Cannock section is either housing-led or employment-led.</p> <ul style="list-style-type: none"> Option C1 focuses upon Green Belt around Rugeley, C2 around Cannock/Hednesford/Heath Hayes/Norton Canes, and Option C3 which is a more even distribution of Green Belt options across the district. Richborough Estates supports Option C2 as this would help to address the GBBCHMA housing shortfall closer to where the need arises (i.e. the majority stems from Birmingham and the Black Country) and would achieve a balanced sustainable strategy, given the potential levels of housing growth at Rugeley Power Station which would, in reality, reduce the potential for release of Green Belt sites. If however, the Council is minded to allocate Rugeley Power Station as an employment-led development then C3 would also be potentially suitable depending on the more detailed evidence which will be needed to support the plan as it advances, as this would still enable significant provision to be made by the most deliverable, suitable and sustainable options including Norton Canes. <p>In summary, Richborough Estates' strong preference is to support option A in combination with Option B2 and Option C2.</p>
LPIO227	Rugeley Power Ltd (c/o Savills)	<p>We support Options B and C which include the redevelopment of Rugeley Power Station. Options B1 and B2 set out different redevelopment options for Rugeley Power Station relating to whether it will be housing-led or employment-led/mixed use. The outline application which has been submitted is for a residential-led mixed use scheme with up to 5ha of employment proposed. Therefore, the housing growth policy should be updated to reflect this.</p> <p>In light of figures discussed, the tables set out under Paragraphs 7.29 and 7.30 on the number of dwellings that are expected to be delivered within the next 15years should be updated to incorporate the dwellings that are expected to be delivered at Rugeley Power Station.</p>
LPIO228	Severn Trent	<p>Our preference would be Option A. We also support additional proposals around the Rugeley Power Station sites. The various version of Option C and green-belt utilisation, are less favourable for us for two reasons</p> <ul style="list-style-type: none"> Less existing infrastructure Overall environmental and biodiversity impact is higher <p>This being said, developing a green belt site can pose a great opportunity to install innovative and exemplar sustainable features. This should be defined and pushed through planning policy to ensure it materialises.</p>
LPIO229	Taylor Wimpey (c/o Lichfields)	<p>Taylor Wimpey considers that Option C2 which proposes Green Belt urban extensions at Cannock/Hednesford/Heath Hayes and Norton Canes urban edges in combination with the options for the Urban Areas and former Rugeley Power Station is the most appropriate of the options identified.</p> <p>Taylor Wimpey considers that Cannock (including Heath Hayes) should continue to be the main focus for development, and should be identified as the priority for development in a settlement hierarchy and the majority of new residential development should be focussed within and around the settlement.</p> <p>Taylor Wimpey considers that any distribution of development which does not prioritise the settlement of Cannock (including Heath Hayes) as the focus for development would be unreasonable given its role as a strategic sub-regional centre and its role in providing the majority of employment opportunities for the District.</p>

		Taylor Wimpey considers that sufficient allocations should be provided in the Local Plan to ensure that identified housing requirement can still be met if sites such as Rugeley Power Station do not deliver as anticipated.
LPIO230	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	<p>A strategy focused on Urban Areas only (Option A) or Options B1 and B2 will certainly fail to provide for this minimum level of housing growth,</p> <p>Both Options C1 and C3 identify land around Etchinghill as possible areas for Green Belt urban extensions within the district and we would express support for these as potential options to meet housing needs.</p> <p><u>Green Belt</u></p> <p>Green Belt boundaries will clearly need to be reviewed to facilitate the housing need for the district and safeguard land for development beyond the plan period. We are also in agreement that the smaller parcels of land identified, adjacent to larger built up areas of the District are most likely to be the most sustainably located sites for possible development. The March 2016 Cannock Chase Green Belt Study assessed parcels of land in terms of how they function against each of the Green Belt purposes by using a scoring system. We believe the scoring system is not robust and offers a very subjective assessment of the sites.</p> <p><u>AONB</u></p> <p>It is anticipated that an updated Landscape Character Assessment will be required to assist in reviewing Green Belt boundaries. However, at this stage, it is apparent that none of the land the subject of these representations performs particularly strongly against these key AONB criteria.</p> <p>The land at Etchinghill being promoted is very much at the fringe of the AONB and is characterised by farmed landscape with some regular field patterns and hedgerows.</p>
LPIO231	Wyrley Estate (c/o Fisher German LLP)	It is considered that option C2 represents the most suitable compromise between protecting the AONB and allowing for sustainable urban extensions of settlements in accessible locations. This should enable ambitious housing targets to be met in the most sustainable way without unacceptable detriment to the environment.
LPIO232	Astbury, J	<p>Would not want to see any areas removed from Green Belt, in particular land at the east of Heath Hayes known as Bleak House and adjoining site of Wimblebury Road. This road is already heavily congested and Five Ways island is subject to a poor air quality order, due to pollution from more vehicles.</p> <p>Capacity in Heath Hayes is at a maximum now. I have seen plans published by large housing developers suggesting the area before mentioned is suitable for up to 1,000 homes, schools, doctor's surgeries. It could not accommodate such a development, wildlife would disappear and the individual identity of the village would be lost as Heath Hayes would be joined up on all four compass points to Wimblebury, Hednesford, Norton Canes and Burntwood.</p>
LPIO233	Astbury, L	<p>Can see from plan that one of the options could be to remove the former Bleak House site at Heath Hayes (Wimblebury Road) from Green Belt. Would like to say that Heath Hayes is already heavily congested with traffic. More housing developments have been permitted in the last 20years that have allowed the road network to become overloaded. Five Ways island and area surrounding is already subject to a poor air quality report. Any housing allowed on this site would further worsen this problem. This site is also a buffer between the villages of Heath Hayes, Wimblebury, Norton Canes and Burntwood. The green corridor is required to both preserve wildlife on the site and retain the villages own identity.</p>

LPIO234	Armitage, J	<p>I have strong objections to any large-scale development in Rugeley, particularly within AONB and the green belt. Option C3, although impossible to ascertain the numbers on areas suggested is encroachment of our precious green belt. Additionally, it appears as though Slitting Mill will merge with Rugeley.</p> <p>The Green belt and AONB in Rugeley is rich in wildlife, particularly across Sherbrook Valley. [...] Please do not consider ANY development of the AONB or green belt. I am concerned about any development alongside Sant's Brook.</p> <p>I am very concerned that massive development will add to the amount of traffic congestion. 2000 houses on the Power Station site, I wonder how many children will need to be driven to the Hart School?</p> <p>Green Belt spaces and the benefit to physical and mental well-being. Rugeley is a small area with limited access to the green belt.</p> <p>HS2. If this goes ahead it will undoubtedly cause problems for Rugeley and surrounding villages. Full-scale development, particularly of the Power Station site will exacerbate the problems. Additionally, we will also be losing trees, woods and wildlife to HS2.</p> <p>Rugeley' Power Station. I have read that Lichfield will gain a greater share for their housing burden. Will all of the Lichfield residents in Rugeley travel to Lichfield for schools, doctors, services, leisure, shopping? NO, they will go Rugeley, causing more damage to our roads, congestion, littering, noise etc. This seems highly unfair to Rugeley particularly given to the fact that some of the housing capacity will be given to employment. Therefore, creating a potential burden on the green belt. It is outrageous, Rugeley suffers again.</p>
LPIO235	Armitage, J	<p>Firstly, the 2,000 homes for Rugeley Power Station - a larger proportion will be allocated to Lichfield, people living there will no doubt be placing further stress (already strained) on our roads, doctors, schools and services not Lichfield! No doubt Rugeley will be allocated the less desirable housing and small units. Also, I hope that established 'green' areas will remain.</p> <p>Developments in previous 2-3years have supplied quite a lot of housing. Traffic, availability of doctors etc. are bearing the brunt already.</p> <p>Green Belt – Should not be considered. It is what makes Rugeley a lovely place to be. Option C1 will just result in expansion of development on green belt. We are also due to experience major losses with HS2.</p> <p>Option C is not in the interest of local people. Green space is becoming more valuable and should be given respect. It is necessary for both physical and mental health. Option C1 would be outrageous!</p>
LPIO236	Armitage, K	<p>Rugeley makes quite a small area of Cannock Chase, its inconceivable you would use the Green Belt and even AONB.</p> <p>Option C1 seems to be merging Slitting Mill with the town</p> <p>From C1 it appears that half of Brereton's Green belt would be considered. More houses = more pollution, less access to services, busier roads, I would not wish my children to grow up in area without green space. Think of the health factor – more people walking, cycling and not along roads but green spaces. The Chase is too far for many but we have our lovely green belt for all.</p>
LPIO237	Beau Desert Golf Club (c/o FBC Manby Bowdler LLP)	<p>Options C2 and C3 are supported as they allow the opportunity for a more dispersed and therefore more sustainable pattern of development across the District's urban fringes.</p>

		<p>The identification of the area in the vicinity of the site C375 as a possible Green Belt urban extension at Hednesford is welcomed and supported. It is considered that the area identified should more clearly extend to include that part of site C375 and has been submitted in the SHLAA for housing development.</p> <p>This location is a suitable and sustainable place for such an extension, being well-connected with road and public transport links. As set out in detail in the SHLAA submission, the proposal for a small area of housing in the north-western part of the site would facilitate the improvements to the remainder of the site, to include sensitive landscaping and improved public access, giving rise to significant environmental and ecological benefits, this enhancing the AONB and the public enjoyment of it, as well as improvements to local leisure facilities through the modest extension to the Golf Club.</p>
LPIO238	Birmingham City Council	<p>The Issues and Options Document recognises the need for Cannock Chase Council to look towards meeting unmet need from elsewhere within the HMA. All combinations of options should therefore be tested at this stage to determine the most realistic and viable capacity within the District in line with the sequential approach to any possible green belt release outlined in the NPPF. Exploring options which are in line with the suggested 'proportionate dispersal' approach within the West Midlands Strategic Growth Study is welcomed.</p>
LPIO239	Bloor Homes Ltd (c/o Define Planning & Design)	<p>It is clear, that to accord with the NPPFs policy requirements, the Local Plan Review must facilitate a continual supply of housing from a "portfolio" of deliverable development sites, based on a robust and broad sustainable spatial development strategy and with sufficient flexibility in the planned housing land supply.</p> <p>The portfolio approach will ensure that the identified LHN is met in full within the plan period, that unmet needs are addressed and that a rolling 5year housing land supply is maintained.</p> <p>Option A is clearly not an appropriate option by itself as it completely fails to address the requirements of the NPPF. The Consultation Document also refers to the potential for substantive housing delivery at Rugeley Power Station and that forms the basis of Option B. That growth opportunity may or may not have a significant role to play in addressing the identified housing needs in the District. It will, by its very nature, be an extremely complicated scheme to realise and the difficulties in that respect should not be under estimated. Therefore, any reliance on it in the Local Plan must reflect the NPPFs very clear focus on demonstrating deliverability and evidence the required timescale for delivery.</p> <p>Option C: is supported as the only option that reflects the requirements of the NPPF and most likely to result in the scale of delivery required to ensure that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is effectively addressed.</p> <p>The Local Plan should, therefore, seek to release sites from the Green Belt and allocate them for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of new and enhanced infrastructure, notably highways, public transport and the community.</p> <p>Extensions to the existing urban areas in the District that are already well served by services and facilities and offer employment opportunities, such as Norton Canes, should therefore, form a key part of any spatial strategy within the Local Plan.</p> <p>In identifying Areas of Search the SGS highlighted the importance of the existing public transport network and the associated journey time to the Main Urban Areas. Close proximity to Birmingham and the Black Country and accessibility to public transport links to it is, therefore, a key consideration for locating strategic development. That clearly triggers the</p>

		<p>need for Green Belt release in the southern part of the District, including Norton Canes. The approach also has the clear advantage of avoiding the AONB that covers the northern part of the district. Option C2 is, therefore, supported. Bloor Homes Ltd have an interest in land to the north west of Norton Canes (SHLAA REF: N24, N33, and N64) that is available and suitable for residential development. Whilst the site currently provides an otherwise sustainable and deliverable residential development opportunity.</p>
LPIO240	<p>Boot, A (c/o CT Planning)</p>	<p>Support Options C2 and C3 which would seek to accommodate a proportion of the required new housing growth for the District for the period up to 2036 at Norton Canes. This strategy would seek urban extensions to the west and south of Norton Canes and the release of land from the Green Belt.</p> <p>Additional housing growth at Norton Canes would provide the land and opportunity to enhance the range of services offered and strengthen the sustainable nature of Norton Canes.</p> <p>Land at 89 Commonsides (part of SHLAA site N63): [...] lies to the South of Norton Canes within the urban-rural fringe area located between the M6 Toll and the A5. The land is urban in character and comprises largely of existing dwellings and their extensive curtilages. Following the construction of the M6 Toll, the land no longer serves any of the five purposes for including land in a Green Belt set out in Paragraph 135 of the Framework.</p> <p>The site could come forward as part of a larger residential allocation. Incorporating adjoining land which has been identified in the SHLAA.</p>
LPIO241	<p>Boss, P</p>	<p>Option C3 – The former Rugeley Power Station site should provide the majority of housing but all options throughout the district should be included to deliver as response to Q15</p>
LPIO242	<p>Brereton & Ravenhill Parish Council</p>	<p>Given the way in which Rugeley and Brereton are surrounded by other districts and by land that is AONB, Green Belt or both, it is most important that some of the housing need in the northern part of the district is met in non-Green Belt areas of neighbouring authorities.</p> <p>Appropriate brownfield land should be redeveloped for housing. In this context it is important to note that some employment land along Redbrook Lane and on the Levels could be made available for housing if the businesses there at present want to expand are able to do so on the Power Station site. This would prevent those businesses leaving the Rugeley/Brereton area and would reduce HGV traffic on Brereton's residential roads.</p> <p>Higher densities will be needed in appropriate locations. However, this must not be at the expense of amenity of existing residents. Appropriate locations are the Power Station site, which with its lower altitude and distance from existing dwellings could take development higher than two storeys, and the former school site off Hardie Avenue. The latter depends on substantial improvements in the form of either a roundabout or traffic lights being made to the junction of Queensway with Hednesford Road. Wharf Road is too narrow and too impeded by necessary parking for residents who have no other parking and the nursery school.</p> <p>To the extent (if any) that the existing urban area cannot accommodate needed housing, this should not be in the Green Belt. Rather the statutory duty to cooperate and NPPF guidance applies. Sites should be sought outside the district. These should include sites well served by existing rail services and by frequent bus services.</p> <p>Paragraph 7.23 should mention the housing development off Wolseley Road in Stafford Borough. This is in reality part of Rugeley and should be counted as meeting part of Rugeley and Brereton's need. To count it as meeting part of Stafford's need is wholly unrealistic.</p>

		<p>BRPC is firmly opposed to paragraph 7.44. This is totally contrary to NPPF policy that favours development beyond the Green Belt rather than inside it. Given the lack of facilities in Rugeley/Brereton it is highly unsustainable. Similarly “consider Green Belt urban extensions at Rugeley/Brereton urban edges” in Option C1 is contrary to government policy and unsustainable.</p> <p>Rugeley Power Station: BRPC is concerned that new GP and school facilities are provided. This must not involve a delay after new houses are occupied.</p>
LIPO243	Bricka, L	<p>As a former resident of the Cannock Chase area and still a frequent visitor of family and friends, I agree that there is a growing need for housing, including affordable housing in the area. However, I am dismayed that areas within the AONB are being considered for development when ample Green Belt fields of less environmental importance are available next to existing infrastructure.</p> <p>I would therefore support option C2 (with the exception of AONB land north of Cannock).</p>
LPIO244	Brigden, J (East of Long Lane) (c/o CT Planning)	<p>Supports Options C2 and C3 which would look to accommodate a proportion of the required new housing growth for the District at Norton Canes. This strategy would seek urban extensions to the west and south of Norton Canes and the release of land from the Green Belt.</p> <p>Additional housing growth at Norton Canes would provide the land and opportunity to enhance the range of services offered, and strengthen the sustainable nature of Norton Canes.</p> <p>Land at East of Long Lane, Norton Canes (SHLAA Ref N64): [...] lies to the west of Norton Canes immediately adjacent to the urban area. The site is well located in size and scale to the existing built form and is in a predominantly residential area.</p> <p>In association with adjacent land a comprehensive scheme could be brought forward which would deliver further green and built infrastructure that would enhance the service provision of Norton Canes. Furthermore, in line with NPPF (Paragraph 138) there is sufficient land within Mr Brigden’s land holding to provide compensatory improvements to the environmental quality of, and accessibility to, the remaining Green Belt land.</p>
LPIO245	Brigden, J (Land to the North of Norton Hall Lane) (c/o CT Planning)	<p>Supports Options C2 and C3 which would look to accommodate a proportion of the required new housing growth for the District at Norton Canes. This strategy would seek urban extensions to the west and south of Norton Canes and the release of land from the Green Belt.</p> <p>Additional housing growth at Norton Canes would provide the land and opportunity to enhance the range of services offered, and strengthen the sustainable nature of Norton Canes.</p> <p>Land to the north of Norton Hall Lane (SHLAA Ref N66): [...] lies to the south of the urban area of Norton Canes. Its north-east boundary abuts the frontage properties along Norton Hall Lane. The site lies between the urban area of Norton Canes and the M6 Toll. It is situated in a sustainable location close to services and facilities</p> <p>Release of land in this location, particularly given the presence of the M6 Toll would not undermine the purposes of including land in the Green Belt. A residential development of Land North of Norton Hall Lane would not materially reduce the gap between Heath Hayes and Norton Canes.</p>

LPIO246	Brigden, J (West of Hednesford Road) (c/o CT Planning)	<p>Supports Options C2 and C3 which would look to accommodate a proportion of the required new housing growth for the District at Norton Canes. This strategy would seek urban extensions to the west and south of Norton Canes and the release of land from the Green Belt.</p> <p>Additional housing growth at Norton Canes would provide the land and opportunity to enhance the range of services offered, and strengthen the sustainable nature of Norton Canes.</p> <p>Land west of Hednesford road (SHLAA Ref N33): [...] lies immediately adjacent to the urban area of Norton Canes. Well located in size and scale to the existing built form of the settlement, and to the south and west lies residential development. The site is entirely suitable for an urban extension to Norton Canes. The land can be released for housing development without impacting on the five purposes of including land in the Green Belt.</p>
LPIO247	Brigden, J (West of Long Lane) (c/o CT Planning)	<p>Supports Options C2 and C3 which would look to accommodate a proportion of the required new housing growth for the District at Norton Canes. This strategy would seek urban extensions to the west and south of Norton Canes and the release of land from the Green Belt.</p> <p>Additional housing growth at Norton Canes would provide the land and opportunity to enhance the range of services offered, and strengthen the sustainable nature of Norton Canes.</p> <p>Land to the west of Long Lane (SHLAA Ref N65): [...] lies to the west of Norton Canes. The southern boundary of the site abuts the built up area of Norton Canes. The release of land west of Long Lane is associated with Land to the East of Long Lane comprises a site sufficiently large size to deliver comprehensively planned, sustainable urban extension to Norton Canes. Residential development on this site would contribute to meeting the identified housing needs, including affordable homes and would deliver physical, green, social and community infrastructure necessary to support a sustainable community.</p> <p>Land to the West of Long Lane has boundaries that are readily recognisable and defensible, such that the release of land from the Green Belt, in association with adjacent land could be undertaken without undermining the purposes of the Green Belt in this location and without undermining the gap between Norton Canes and Heath Hayes. Furthermore, in line with NPPF (Paragraph 138) there is sufficient land within the land holding to provide compensatory improvements to the environmental quality of, and accessibility to, the remaining Green Belt land.</p>
LPIO248	Briggs, T	<p>The options as presented seem to form a good 'sequential test', beginning with urban extension, taking in to account the Rugeley Power Station and then look to greenbelt as a last resort.</p> <p>A commitment needs to be made to keep the greenbelt 'as is' once lost it will never be reclaimed and the precedent will be set. Releasing greenbelt land would lead to that land being built on first due to the potential profits and the lack of costs in site preparation when compared to brownfield land.</p>
LPIO249	Brindley Heath Parish Council	<p>Given the way in which Rugeley, Brindley Heath and Brereton are surrounded by other districts and by land that is AONB, Green Belt, or both, it is most important that some of the housing need in the northern part of the district is met in non-Green Belt areas of neighbouring authorities.</p> <p>Appropriate brownfield land should be redeveloped for housing.</p> <p>To the extent (if any) that existing urban area cannot accommodate much needed housing, this should not then be introduced into the Green Belt. [...] Sites should be sought outside the district. These should include sites well served by existing rail services and by frequent bus services.</p>

		<p>Paragraph 7.23 of the review should mention the housing development off Wolseley Road in Stafford Borough, this is in reality a part of Rugeley and should be counted as meeting part of Rugeley, Brindley Heath and Brereton's need. To count it as meeting part of Stafford's need is wholly unrealistic.</p> <p>Opposition to Paragraph 7.4 of the review has been expressed. This is contrary to NPPF policy which favours development beyond the Green Belt rather than inside it. Given the lack of facilities in Rugeley/Brereton it is highly unsustainable. Similarly, 'consider Green Belt urban extensions at Rugeley/Brereton urban edges' in Option C1 is contrary to Government policy and unsustainable.</p> <p>Adequate Primary Medical Care (GP Practices) and school facilities should be provided to serve development. This must not involve a delay after new houses are occupied.</p>
LPIO250	Broadbent, A	<p>Option A.</p> <p>I respectfully submit that the Government minimum should be adhered to in compliance with the law, presumably. But Brownfield sites should be used first, as in the Old Rugeley Power Station Site.</p> <p>The Green Belt should, like the AONB of the Chase and the area east of and south of Heath Hayes be sacrosanct, we need these areas to be kept for posterity.</p>
LPIO251	Cannock Chase AONB Partnership	<p>Option A or B are supported: Urban extensions south of Rugeley and Brereton (Option C1) lie either in the AONB, or in the case of Brereton in the setting of the AONB, and development would be contrary to the NPPF, the AONB designation and the policy in the AONB Management Plan.</p> <p>Options C2 and C3 include release of areas within the Green Belt, in the AONB and in the immediate setting of the AONB. Release of areas either within the AONB or in its setting should as a principle be resisted to avoid eroding the special qualities of the AONB or detrimental impacts on the setting.</p>
LPIO252	Messrs Conway, Lyons, Emery, Horsford (c/o CT Planning)	<p>Support Options C2 and C3 which would seek to accommodate a proportion of the required new housing growth for the District at Norton Canes. This strategy would seek urban extensions to the west and south of Norton Canes and the release of land from the Green Belt.</p> <p>Additional housing growth at Norton Canes would provide the land and opportunity to enhance the range of services offered, and strengthen the sustainable nature of Norton Canes.</p> <p>Land at Commonsides: lies to the south of Norton Canes within the urban-rural fringe area located between the M6 Toll and the A5. The land is urban in character and comprises largely of existing dwellings and their extensive curtilage. The land is well related in size and scale to the pattern of development adjoining the site to the east at Brownhills West. The release at Land at Commonsides, along with land at 89 Commonsides comprises a site of sufficiently large size to deliver an attractive, comprehensively planned, sustainable urban extension. The land is well related to both Norton Canes and Brownhills West. Residential development on this site could contribute to meeting the identified housing needs of Cannock Chase Council and the GBBCHMA.</p> <p>Land at Commonsides has boundaries that are readily recognisable and defensible, such that the release of the land from the Green Belt, in association with adjacent land could be undertaken without undermining the purposes of the Green Belt in this location and without undermining the gap between Norton Canes and Heath Hayes.</p>

LPIO253	Dunkley, B	In my opinion the locations shown in the Cannock/Hednesford/Heath Hayes and Norton Canes urban edges should all be discounted. These areas are already over populated areas and removal of the green belt in these areas would not be acceptable. I am in support of the urban areas and the Rugeley Power Station as these do not impact our green spaces only those already impacted by urbanisation and population. I understand that the Council is being pushed to meet targets but resistance should be the first defence but if all this fails then we should consider no more of the green belt than that proposed in the urban extensions at Rugeley/Brereton urban edges.
LPIO254	Dunkley, N	In my opinion the locations shown in the Cannock/Hednesford/Heath Hayes and Norton Canes urban edges should all be discounted. These areas are already over populated areas and removal of the green belt in these areas would not be acceptable. I am in support of the urban areas and the Rugeley Power Station as these do not impact our green spaces only those already impacted by urbanisation and population. I understand that the Council is being pushed to meet targets but resistance should be the first defence but if all this fails then we should consider no more of the green belt than that proposed in the urban extensions at Rugeley/Brereton urban edges.
LPIO255	Elliott, L	I disagree with options of housing development that include green belt use. Use of the greenbelt is devastating to wildlife and we should now be utilising our brownbelt and industrial sites instead of these areas. The designer outlet has used up space that could have been used for housing. The Cannock, Heath Hayes and Wimblebury areas have been extensively developed over the years and the local facilities and roads are not suitable for further heavy development. With this in mind, I agree that A and B options are needed, however would be against options C onwards. If greenbelt was needed to meet housing demands (not exceed it), then any surrounding areas in Cannock, Heath Hayes and Wimblebury and Hednesford should be avoided due to the excessive burden on facilities brought about by the designer outlet.
LPIO256	Elphick, R	This is in particular reference to Green Belt Land South of Cannock Road, Heath Hayes, Cannock. Richborough Estates have produced a proposal for the development of approximately 700 dwellings and a possible Primary School. On the proposed plan, there is provision for two new islands, one mini and a larger one. These will be the only access for entry and exit to the site. The new McArthur Glen Designer Outlet will inevitably also attract a good share of traffic along A5190. We have seen a very considerable increase in road use, more so recently with HGVs. This is obviously resulting in increased noise and more importantly, a rise in air pollution. Whilst I appreciate that you have to adhere to Government Legislation for housing quotas, I think that any future development, on this particular mentioned area, would result in an enormous impact on the A5190. Therefore, I strongly believe, that serious thought be applied to any suggestion of allowing such a proposal to being accepted.
LPIO257	Cllr Fitzgerald, A	In my opinion I think it is crucial that green belt land is preserved. Whilst there is clearly a need for new housing provision for local residents, it is important to ensure sufficient land is allocated for employment hubs to develop and energise employment within Cannock. Therefore, my preference is for B2 , which provides expansion of both housing and employment, this enabling all round growth and local employment for local people. This option also potentially reduces

		issues with transport links, which has proven a major factor for many people struggling to get to their places of employment, which also impacts on employment levels.
LPIO258	Friel Homes (c/o CT Planning)	<p>Supports Options C1 and C3.</p> <p>If the Council is seeking to provide land for some 1900-4400 new dwellings as part of their Duty to Cooperate it will be necessary to release Green Belt Land to meet this requirement. A comprehensive review of the Green Belt should be undertaken which considers the potential of all land at the urban-rural fringe.</p> <p>Land at the edge of Rugeley/Brereton represents a highly sustainable location for new housing growth. Concentrating new housing development at Rugeley would assist in the regeneration of the town and provide the land and opportunities to further enhance the sustainability of the settlement.</p> <p>Land at Armitage Lane, Rugeley (SHLAA Ref: R32): [...] lies adjacent to the built-up area of Rugeley. The site can be released from the Green Belt without adversely impacting on the five purposes of the Green Belt. Land at Armitage Lane represents a medium sized housing site. Paragraph 68 of the NPPF recognises the important contribution such sites make to meeting the housing requirement of an area, particularly as they can be built out relatively quickly. Furthermore, the site is owned by a housebuilder with an interest to deliver the site early in the Plan period.</p>
LPIO259	Gladman	<p>Overall a development strategy that provides a number of opportunities in a range of locations of varied scales is likely to be the most effective in terms of delivery. Gladman believes that the overall development strategy should combine a number of the options presented within the consultation document rather than focusing solely on one type of site or location.</p> <p>This will ensure delivery across the course of the plan period, due to differing timescales and lead in times with different types of site and also that if delivery in one area is delayed for whatever reason there are alternative options which can come forward.</p> <p>The Council needs to avoid a development strategy which is too heavily reliant on just one type of site location, as if these fail to come forward it could put the delivery of the plan as a whole at risk.</p>
LPIO260	Greaves, M	<p>C116a Richborough Estates, Land Off Cannock Road, Heath Hayes: A proposal was drawn up in 2014 for development on arable land in the greenbelt area for circa 700 dwellings. There is the potential for an extra 800+ vehicles within the immediate area all using the A5190 with potentially further vehicles requiring access to the proposed school. Add to that the expected increase in vehicles gaining access to the new McArthur Glen Retail Park.</p> <p>I am concerned about the impact this vehicular increase will have on the noise and air pollution in the area. There has been a significant increase in traffic over the past 20+years, including the amount of HGVs which will also have the added inconvenience of traversing 3 roundabouts within 50-100 yards causing hold ups and pollution.</p> <p>The land in question has been farmed regularly during the last 20+years and I believe that arable land is at a premium and should be maintained for that sole purpose.</p> <p>I sincerely hope these factors are taken into account when this proposal is discussed and that a great deal of thought is given to the impact this development may create.</p>
LPIO261	Greenlight Development Ltd (c/o Lichfields)	The NPPF is clear on the weight attached to Green Belt by Government (Paragraph 137 and 138 referenced).

		<p>Greenlight supports the Council's recognition of the need to have regard to this approach in its forthcoming derivation of a spatial strategy, set out at paragraph 7.33 and 7.34 of the IOC, and considers that it accords with the NPPF in principle. In this regard, Greenlight considers that the acuteness of the unmet housing need arising from the GBBCHMA can, and in this instance should, constitute exceptional circumstances, as established in the case of Calverton Parish Council V Nottingham City Council.</p> <p>Cannock remains the largest settlement and main strategic centre within the District, with access to a range of services and facilities. As such, it should remain the primary focus for development, to ensure its role within the settlement hierarchy – and the wider West Midlands region – is strengthened.</p> <p>On this basis, Greenlight considers that Option C2 is the most appropriate of the options identified; albeit, it would also support Option C3. Greenlight supports the principal of the approach and considers that Cannock should continue to be the main focus for development with an emphasis on sustainable sites on the edge of the existing urban areas.</p> <p>With regards to Cannock, in particular, Greenlight considers that their site should be included as a reasonable option for housing delivery within the settlement.</p> <p>Land off Wellington Drive in Cannock Chase (SHLAA Ref: C121): the site represents a brownfield site which is currently underused and comprises a disused car auction site on the western edge of Cannock Chase settlement, abutting the edge of Cannock built-up area, and is also a cross-boundary site with SSDC. The site should be considered, in its own right, a reasonable option for future housing land supply delivery of c. 55-70 homes through allocation in Cannock Chase District. The wider site provides the opportunity for a large allocation of a total of c.250 homes. Notwithstanding, Greenlight consider there is nothing preventing the allocation of the smaller, predominantly brownfield parcel in Cannock Chase on its own merits.</p> <p>Greenlight supports the Council's commitment to consider the option to release Green Belt land as part of a revised spatial strategy; albeit, in accordance with the sequential approach of the NPPF.</p> <p>In particular, Greenlight supports Option C2 for meeting the housing needs of the District and GBBCHMA.</p>
LPIO262	Griffiths, P	<p>I see one of the Council's objectives is to create healthy living opportunities across the district. Building on the greenbelt in Slitting Mill would definitely be the opposite.</p> <p>Many local people enjoy the walking & running & cycling down Jones Lane and onto the Heritage Trail. They enjoy the peace and fields around this area, houses built here would ruin that opportunity.</p> <p>The road junction onto Penkrige Bank Rd is already dangerous without more traffic.</p> <p>Environmental sensitivity should be considered important.</p> <p>The Council should choose Option A to focus on urban areas first or Option B to use the power station land.</p> <p>But I strongly object to Option C – Building on Green Belt. This is unnecessary as the other options are perfectly adequate.</p>
LPIO263	Grigg, S	<p>I believe the options for additional housing highlighted in Options A, B1 and B2 would be useful to utilise the brownfield and urban sites already highlighted within the district. Additionally, the option of potential development highlighted in C1 would positively meet additional housing needs whilst keeping the change to the landscape and green spaces minimal. These options would deliver greatly to need for additional housing, and not create such a great impact on the wider environment.</p>

		<p>With regards to the options of C2 and C3, I am deeply, utterly concerned if such plans were to be approved and go ahead in the district. I appreciate development has to take place, but I urge you not to consider options C2 and C3 to meet the housing needs of the district. This would cause greater further destruction within the region to green sites the region is well known for and has to offer. Additionally, the sites highlighted under options A, B1 and C1 would provide alternative housing options, and the council must consider alternatives to the green belt.</p> <p>The site highlighted between Wimblebury, Hazel Slade and Rawnsley and Prospect Village, I believe fundamentally is not suitable to be released from the Green Belt for development of housing. [...] Release of the land in Wimblebury would cause over urbanisation, and would not be a viable option for development due to the already struggling local facilities including schools and transport.</p> <p>Additionally, with regards to over urbanisation the local villages surrounding this site would lose their identity completely. Wimblebury, Hazel Slade and Rawnsley and Prospect Village would become one large area which does not really have any identity apart from being a housing development and would cause all three areas to be combined and lose their own local identities, something the green belt is designed to prevent from happening.</p>
LPIO264	Guest, C	<p>I was opposed to the use of any greenbelt land for housing development and continue to be of this mind. We have many industrial sites that are empty and not used. We also have many spaces in Cannock town centre that are not used to the lack of development there and the building instead of the designer outlet. With this in mind, I would be opposed to any of the housing options you have put forward except options A and B where existing urban and industrial sites are used.</p> <p>I feel that you could meet the housing quotas using this and to exceed housing quotas by using greenbelt land would be a travesty for our area and completely against the wishes of government, the environmental secretary and more important local people.</p>
LPIO265	Guest, J	<p>I was opposed to the use of any greenbelt land for housing development and continue to be of this mind. We have many industrial sites that are empty and not used. We also have many spaces in Cannock town centre that are not used to the lack of development there and the building instead of the designer outlet. With this in mind, I would be opposed to any of the housing options you have put forward except options A and B where existing urban and industrial sites are used.</p> <p>I feel that you could meet the housing quotas using this and to exceed housing quotas by using greenbelt land would be a travesty for our area and completely against the wishes of government, the environmental secretary and more important local people.</p>
LPIO266	Hewitt, P	<p>The Rugeley Power Station site is a big part of the decisions that will need to be taken. I believe that high quality employment with a range of suitable housing is vital to the future of Cannock Chase.</p> <p>[...]Therefore, I totally oppose building on Green Belt Land, to do this goes against what Cannock Chase is and why people live and visit here.</p> <p>I support Options B1 and B2.</p>
LPIO267	Highways England	<p>Highways England have undertaken a high-level review of the potential impacts of the development options presented as part of the Cannock Local Plan, and have determined the potential trip generations and distributions/assigned of development traffic onto the strategic road network (SRN).</p>

		<p>Our principle concern is the A5 corridor [...] but we have also considered the potential impact of local plan development traffic on M6 Junctions 11 and 12.</p> <p>Following our high-level review of potential trip generations routed onto the SRN we have noted that residential options B2, C1, C2 and C3 are likely to present the largest levels of trips onto the A5 and M6.</p> <p>The initial analysis undertaken considers the housing and employment development proposals in isolation from each other. The analysis carried out identifies the relative scale of impacts associated with each option, which will be helpful to Cannock Chase District Council moving forward. At this stage, the analysis does not take into account trips associated with the proposed residential sites travelling to/from the proposed employment sites. At such a time a preferred overall housing and employment option emerges, then it may be possible to refine the analysis.</p>
LPIO268	Hughes, R	<p>Option B2 – Focus development on urban areas first plus a lower level of housing on the Rugeley Power Station site, Green Belt and AONB land should be protected from development.</p>
LPIO269	Jackson, D	<p>I think that Option A is the only option based on my experience of living in the area. Plus, develop the Market Hall in Rugeley.</p> <p>Wharf Road: has already been inundated with development. All that is left is a small patch of green belt, this should remain. Further development will make the road even busier and polluted.</p> <p>Hart School: [...] There appears to be an area suggested on the AONB quite close to the school (option C1). This would be totally unacceptable, more pollution, more congestion, threat to health and safety and in close proximity to the school. Our Green Belt will disappear if Option C3 is considered.</p> <p>Pear Tree Estate/Hednesford Road: Another bottleneck area. More houses means more cars, which means more congestion and higher levels of pollution. Not ideal for a town which lies in a valley.</p> <p>Sandy Lane Surgery: Busy times of day result in long waiting times entering and exiting the car park. More houses will result in more people placing more strain on our GP surgeries which already struggle with demand.</p> <p>Rugeley Power Station: If Lichfield are having a bigger percentage of the housing I would be interested to know where they will go for schools, doctors, services, shopping and leisure. Even though the intended housing is supposed to be using renewable energy that hardly applies to the vehicles. Also, the Power Station site has some beautiful natural areas encouraging wildlife and screening potential development. More people inevitably bring disruption to wildlife, litter, and anti-social behaviour.</p> <p>Sherbrook Valley has had enough development with the building of the estate at the top of Burnthill Lane and off the Hednesford Road. [...]</p>
LPIO270	Jones, T	<p>Given the way in which Rugeley & Brereton are surrounded by other districts and by land that is AONB, Green Belt or both, it is most important that some of the housing need in the northern part of the district is met in non-Green Belt areas of neighbouring authorities. [...]</p> <p>Appropriate brownfield land should be redeveloped for housing. In this context it is important to note that some employment land along Redbrook Lane and on the Levels could be made available for housing if the businesses there at present that want to expand are able to do so on the Power Station site. This would prevent those businesses leaving the Rugeley/Brereton area and would reduce HGV traffic on Brereton's residential roads.</p>

		<p>Higher densities will be needed in appropriate locations. However this must not be at the expense of the amenity of existing residents appropriate locations are the Power Station site, which with its lower altitude and distance from existing dwellings could take development higher than two storey, and the former school site off Hardie Avenue. The latter depends of substantial improvements in the form of either a roundabout or traffic lights being made to the junction of Queensway with Hednesford Road. Wharf Road is too narrow and too impeded by necessary parking for residents who have no other parking and the nursery school.</p> <p>To the extent (if any) that the existing urban area cannot accommodate needed housing, this should not be in the Green Belt. Rather the statutory duty to cooperate and NPPF guidance “<i>towards locations beyond the outer Green Belt boundary</i>” applies. Sites should be sought outside the district. These should include sites well served by existing rail services and by frequent bus services.</p> <p>Land close to Rugeley Trent Valley Station outside flood zones 2 and 3 should be considered.</p> <p>Paragraph 7.23 should mention the housing development off Wolseley Road in Stafford Borough. This is in reality a part of Rugeley and should be counted as meeting part of Rugeley and Brereton’s need. To count it as meeting part of Stafford’s need is wholly unrealistic.</p> <p>I am firmly opposed to paragraph 7.44 “<i>The strategy for future development...</i>” this is totally contrary to NPPF policy that favours development beyond the Green Belt rather than inside it. Given the lack of facilities in Rugeley/Brereton it is highly unsustainable. Similarly, “<i>consider Green Belt urban extension at Rugeley/Brereton urban edges</i>” in Option C1 is contrary to government policy and unsustainable.</p> <p>I am concerned that new GP and school facilities are provided. This must not involve a delay after new houses are occupied.</p>
LPIO271	Lichfield District Council	<p>The comments in paragraph 7.35 recognising the wider context for neighbouring districts are welcome and Cannock Chase DC should look to meet the housing needs within their district boundary rather than in neighbouring authorities. Lichfield would advise Cannock Chase DC to meet as much need as is possible whilst still being deliverable within its authority boundary. [...] It is important to emphasise that we support Cannock Chase in looking at their own potential supply and we encourage careful and ongoing scrutiny where there is under supply to ensure the assets are maximised. [...] This may involve, for example, a review of the level of employment land allocated and considering the suitability of some of it being used instead to deliver some of the housing need requirements. [...]</p>
LPIO272	Lyons, O	<p>In terms of the location of this housing within the District, it should be with the former Rugeley Power Station site given that this is one of the largest brownfield sites in the region and the plans detail that the site can cater for up to 2300 houses, approximately half of which fall within Cannock Chase. However, I do not believe that housing on that site should take precedence over employment. As such, I would favour Option B with regards to the location of housing, beginning with the redevelopment of urban areas prior to focusing on the former Power Station site as part of an employment-led regeneration scheme (Option B2). Additional areas, such as smaller brownfield sites could then be explored to meet any additional needs.</p>
LPIO273	Morgan, A	<p>The options that should be considered are A and B only as they do not include green belt areas. Green belt should be preserved as far as possible and those highlighted in option C2 would take too much of the green belt area away and</p>

		cause too much of the landscape to be impacted. Heath Hayes, Wimblebury and Hednesford have already seen too much housing development in recent years and further expansion would have a further negative impact. Please discount these areas from consideration for housing growth.
LPIO274	Morgan, P	The options that should be considered are A and B only as they do not include green belt areas. Green belt should be preserved as far as possible and those highlighted in option C2 would take too much of the green belt area away and cause too much of the landscape to be impacted. Heath Hayes, Wimblebury and Hednesford have already seen too much housing development in recent years and further expansion would have a further negative impact. Please discount these areas from consideration for housing growth.
LPIO275	Newton, A (c/o CT Planning)	Supports Option C3 . If the council is seeking to provide land for some 1900-4400 new dwellings as part of their Duty to Cooperate it will be necessary to release Green Belt Land to meet this requirement. A comprehensive review of the Green Belt should be undertaken which considers the potential of all rural-urban fringe land, not just land adjacent to the main urban areas, and should therefore include land adjacent to the District's villages. Land at UK Architectural Antiques, Hayfield Hill, Cannock Wood: the site is located close to the existing settlement boundary and is located in a sustainable location. It is submitted that the site could come forward for residential development for some 25 dwellings.[...] Furthermore, there is sufficient land within the wider landholding to provide additional woodland planting and public access to offset the loss of Green Belt land. In seeking to accommodate some of the housing shortfall for the GBBCHMA, the opportunity arises for Cannock Chase Council to undertake a comprehensive review of its Green Belt and consider releasing land from the edge of the sustainable settlements. This should include the District's Villages. A proportionate amount of new housing growth should be allocated in the villages to maintain and improve the vitality and viability of the community. The emerging Housing Growth Policy should identify opportunities for villages such as Cannock Wood to grow and thrive, especially where this will support local services.
LPIO276	Cllrs. Preece, J, Stretton, Z and Newbury, J	We would prefer option C1 in terms of the strategy for meeting overall housing growth. As outlined on page 47 of the consultation document, Norton Canes has provided nearly a quarter of the 3,200 houses identified for the current Local Plan period to 2028. As we indicated in our response to q1, Norton Canes is experiencing a high level of housebuilding in a short space of time. We therefore strongly feel that when it comes to the District's housing target for this local plan period, new housing needs to be spread more evenly around the District. Point 7.23 on page 45 describes the overall strategy for meeting housing growth requirements within the District. It is clear that both Hednesford and Norton Canes have seen large housing growth within the current Local Plan period whilst other areas, such as Heath Hayes, Rugeley and Brereton have not seen housebuilding on this scale for many years. We believe that in the south-east of the district, the land east of Wimblebury Road should now be considered as land suitable for development given the extensive building taking place in Norton Canes. With the Horseshoe Drive development and the Sycamore Road/Hawthorn Road estate, a precedent has already been set for development east of Wimblebury Road. Consideration should be given to sites which would not impact on the area of separation between Heath Hayes, Rawnsley and Prospect Village; this could include the fields which lie within the Heath Hayes and Wimblebury Parish between Hawthorn Road and Heath Hayes Park.

LPIO277	Norton Canes Parish Council	Our small geography and the Cannock Chase AONB means we should not be expected to make a contribution as large as other authorities which have plenty of non-green belt land. Option C3 is supported which potentially provides the widest choice of sites across the whole of the District with the caveat that major new sites on the edge of the village should not be included.
LPIO278	Mr & Mrs Priest, C	Richborough Estates Ref. C116ab Land South of the A5190 We have seen a considerable increase in volume of traffic and HGVs on Cannock Road; with traffic delays quite common outside our property. The New McArthur Glen Designer outlet opening in 2020 the volume of traffic will almost certainly double, which will cause more pollution and traffic chaos.
LPIO279	Pugh, J & M	Richborough Estates Ref. C116ab Land South of the A5190 We would like to oppose the proposed plans [...]. We have noticed a large increase in the volume of traffic, particularly HGVs. Our house, along with others on Cannock Road, has suffered from subsidence in the past and we have restraint bars fitted. We are very concerned that the extra traffic created by the new housing estate will negatively impact on this, especially during the construction stage when heavy machinery will be used. The new McArthur Glen Designer Outlet, will also inevitably generate an increase in traffic. The road is already incredibly busy at peak times with queues of traffic. All this combined will add to the growing congestion, noise and air pollution. We are also concerned of the negative effect the new estate will have to the local wildlife and their habitats.
LPIO280	Quinn, M	Options A and B , are acceptable, option C1 could be considered if it is a last resort but C2 locations should at all costs be discounted as they would have a negative impact to the Cannock Chase area. Green Belt spaces are important to our local area now and for future generations. Wimblebury, Heath Hayes and Hednesford has lost a lot of its green spaces over recent years, increased housing and residents have put strain on the infrastructure including the road networks, causing air quality problems in Wimblebury areas and traffic problems.
LPIO281	Quinn, S	Options A and B , are acceptable, option C1 could be considered if it is a last resort but C2 locations should at all costs be discounted as they would have a negative impact to the Cannock Chase area. Green Belt spaces are important to our local area now and for future generations. Wimblebury, Heath Hayes and Hednesford has lost a lot of its green spaces over recent years, increased housing and residents have put strain on the infrastructure including the road networks, causing air quality problems in Wimblebury areas and traffic problems.
LPIO282	Ricketts, R & B	Land at Hagley Park Farm and Jones Lane (R38)? We are completely against the proposal that housing will be built on Green Belt land and AONB. This proposal for building on Green Belt Land; cannot be allowed to happen. Prevent urban sprawl – Green Belt’s primary purpose is to prevent urban sprawl.[...] Prevent neighbouring towns merging into one another – the separate nature of the Village of Slitting Mill will be completely be lost by this development. The village will be merged into Rugeley Town with no boundary between. This is unacceptable.

		<p>Assist in safeguarding the countryside from encroachment – the land is next to Cannock Chase AONB. If building were allowed, this would encroach on the countryside attached to the AONB and cause damage to the outlook and wildlife therein.</p> <p>Cannock Chase AONB MUST be protected at all cost.</p> <p>Preserve the setting and special character of historic towns – the village of Slitting Mill got its name from the Rolling and Slitting Mill which was working in the 17th centuries.[...]. This is quite separate and has its own unique character; this will be lost forever if the building were allowed. We cannot allow this to happen.</p> <p>Assist in urban regeneration, by encouraging the recycling of derelict and other urban land. There are plenty of other areas of land available in the area that has been identified as requiring urban regeneration and recycling of derelict land. Building on this green belt land would reduce the urban regeneration that needs to take place elsewhere in the wider Rugeley area.</p>
LPIO283	Scarle, D	<p>Richborough Estates Ref. C116ab Land South of the A5190</p> <p>Wildlife – if the land is used for building where will all the wildlife go? Where will local residents exercise their dogs?</p> <p>Traffic – There is already an increase in the traffic coming along Cannock Road due to the new shopping development. I do not what the increase in traffic that this development would bring. There will be extra pollution from the increased traffic which I do not wish my family to live in. The increase in traffic would bring more safety concerns for the local residents – mainly for the children.[...]</p> <p>Horses – I currently rent just under 19acres of land along the Cannock Road. This land is now home to my 10horses, most of them rescued or retired. By taking the land away means that they will lose there home.[...]</p>
LPIO284	Shepherd, J	<p>Richborough Estates Ref. C116ab Land South of the A5190</p> <p>I find that the proposal to build approximately 700 dwellings on land to the south of Cannock Road, Heath Hayes with only two access points represents planning at its worst – with no consideration for traffic issues. At peak times this road is far too busy with traffic ‘hold-ups’ caused by Five Ways Island.</p> <p>I suggest that further access should be made at the south of the site using Hickling Road, which should be widened and the junction at the far end improved.</p> <p>It would also be useful to construct a road running east from my proposed southern access, along its path of the old Bleak House mineral route, connecting the B4154 (Hednesford Rd to Norton Canes) and the A5190 (Cannock Road) towards Chasetown. This would largely alleviate the congestion problems at Five Ways Island.</p>
LPIO285	South Staffs Water	<p>SSW support Option C3.</p> <p>If the council is seeking to provide land for some 1900-4400 new dwellings as part of their Duty to Cooperate it will be necessary to release Green Belt Land to meet this requirement. A comprehensive review of the Green Belt should be undertaken which considers the potential of all rural-urban fringe land, not just land adjacent to the main urban areas, and should therefore include land adjacent to the District’s villages.</p> <p>Land at Jones Lane, Slitting Mill: the site is located adjacent to the existing settlement boundary. It is located in a sustainable location. It is submitted that part of the site, close to the Slitting Mill Road frontage could come forward for residential development, providing housing for the village.[...] Furthermore, there is sufficient remaining land within South</p>

		<p>Staffordshire Water's land holding to offset the loss of Green Belt Land through compensatory improvements to local environmental quality and accessibility.</p> <p>In seeking to accommodate some of the housing shortfall for the GBBCHMA, the opportunity arises for Cannock Chase Council to undertake a comprehensive review of its Green Belt and to consider releasing land from the edge of the Districts sustainable villages, with a view to allocating a proportionate amount of new housing growth to maintain and improve the vitality and viability of the community. The emerging Housing Growth policy should identify opportunities for villages such as Slitting Mill to grow and thrive, especially where this will support local services.</p>
LPIO286	St Modwen (West of Pye Green Road) (c/o RPS Planning & Development)	<p>Concentrating and exploring all housing growth as a priority at the urban area is supported. This means Option A (urban edges) is supported in advance of exploring other policy options. In relation to the capacity at Pye Green Road, there exists a greater housing capacity on non-Green Belt sites above the 3,200 dwellings already identified.</p> <p>The land west of Pye Green Road clearly represents a 'reasonable alternative' for housing (as opposed to a mixed use site references as site c113).</p>
LPIO287	Staffordshire County Council	<p><u>Education</u></p> <p>From a school place planning perspective, the identification of larger development sites or sites that are adjacent to each other assist with the school place planning process as opposed to a scattered approach of smaller housing development sites where there is pressure on places.</p> <p>Option A: We note that the Council is undertaking an 'urban capacity study' to bring together the various pieces of evidence on urban capacity to provide a more comprehensive picture. This evidence needs to be considered within the context of existing school capacity in the local area, and the potential to provide additional school places at existing schools if required.</p> <p>Option B1/B2: A new primary school is proposed as part of the RPS development as part of the current planning application, which will mitigate the need for additional school places to accommodate children generated by development. Additional high school places may need to be factored into the plan at a later stage.</p> <p>Option C1: These proposed sites are all within the Rugeley Town primary school place planning area and the Rugeley High School place planning area. There is pressure for primary school places within this school place planning area, particularly around the Power Station and Brereton area, so additional housing in this area is likely to require the provision of additional primary school places. There is existing pressure in the Rugeley high school place planning area.</p> <p>Option C2: Norton Canes: There is pressure for primary school places in this area, with an existing identified need to provide [...] primary school places to mitigate housing developments that have recently been built or are due to commence. Further housing will therefore require the provision of additional primary school places.[...]</p> <p>Cannock Town: The two sites to the north of Cannock Town are located in the catchments of Hazel Slade Primary Academy and West Hill Primary School. There is pressure for places and these schools, and in this part of Cannock Town. New housing development in this area is therefore likely to require the need for additional primary school places. Given the pressure for primary school places in the Heath Hayes/Wimblebury area any housing will require additional primary school places.</p> <p>Option C3: Our preference would be for the identification of larger development sites rather than this scatter approach of small housing allocations to assist with school place planning process.</p>

		<p><u>Ecology</u> All Norton Canes area options will need to consider possible effects on the Cannock Extension Canal SAC. Housing options C2 and C3 give two serious concerns for ecology: The potential for direct impacts on the Cannock Chase SAC, and the potential for direct impact on Ancient Woodlands.</p> <p><u>Historic Environment</u> Option C3 in Cannock Wood area has the potential to impact upon the setting of two scheduled monuments. Additional development in urban areas has the potential to impact upon designated heritage assets.</p>
LPIO288	Startin, P	With regards to the location of housing, I believe that if the Council does look to go up, Option A is all that is required.
LPIO289	Trine Developments Ltd (c/o First City Ltd)	<p>Support Option C2</p> <p>We agree that there is insufficient land within the urban area to meet wider housing need in the sub region. In these circumstances there is an urgent need to release Green Belt sites, not as a last resort but to take account of the need to promote a pattern of development in the District.</p> <p>Land off Spring Close on the northern edge of Norton Canes (N20): In our view the site should be allocated for residential development to assist in meeting the District's objectively assessed housing needs combined with the need to be the shortfall from the GBHMA.</p> <p>We consider that Norton Canes should be supported for modest expansion on the northern edge of the settlement on a well contained site with strong and defensible boundaries that will have permanence, close to facilities and services, and with ease of access visa the A5 to employment. This would be consistent with the Plan's urban and key centre sustainable development strategy and the exceptional circumstances that justify the release of Green Belt land.</p>
LPIO290	Walker, C	<p>The options that should be considered are those that have little to no impact on the green belt areas. The areas highlighted in options A and B, I would be in support of as they utilise the brownfield and housing sites within the urban areas and the redevelopment of the Rugeley Power Station for the housing requirements.</p> <p>I cannot support the use of green belt but if it is mandatory to utilise some green belt then C1 is as far as this should be considered as this will have the least impact to the area.</p> <p>The area highlighted in C2 should not be considered it covers too large an area and the impact in areas of Hednesford and Heath Hayes would be too great.</p>
LPIO291	Walker, C	I continue to be opposed to the use of greenbelt sites to meet housing quotas when they can be met using urban and industrial sites we have already developed. Our green spaces are important and should be preserved. We have many industrial units that are unused and some that can be relocated to areas like Kingswood Lakeside to enable houses to be built on already developed land. With this in mind, I offer my support to housing Options A and B but not to any other options. I feel that using the greenbelt should be avoided at all costs.
LPIO292	Walker, C	I am against building on greenbelt land when we have developed so much in the area already and do not have any infrastructure to support it. I understand that there is a housing need to be met and feel that this should and could be met by using already developed sites. With this in mind, I would be in support of options A and B using existing industrial (and brownbelt) and urban sites but against any use of greenbelt (C onwards). Should greenbelt need to be used, then I

		think the Cannock area has already been overdeveloped especially when the new designer village which will impact on our roads and therefore feel that option C1- Developing the Rugeley area would have the least social impact.
LPIO293	Walker, P	I disagree with options of housing development that include green belt use. [...] use of greenbelt is devastating to wildlife and we should now be utilising our brownbelt and industrial sites instead of these areas. The designer outlet has used up space that could have been used for housing. The Cannock, Heath Hayes and Wimblebury areas have been extensively developed over the years and local facilities and roads are not suitable for further heavy development. With this in mind, I agree that A and B options are needed , however would be against options C onwards. If greenbelt were needed to meet housing demands (not exceed it) then any surrounding areas in Cannock, Heath Hays and Wimblebury and Hednesford should be avoided due to the excessive burden on facilities brought about by the designer outlet.
LPIO294	Walker, S	I am against building on greenbelt land when we have developed so much in the area already and do not have any infrastructure to support it. I understand that there is a housing need to be met and feel that this should and could be met by using already developed sites. With this in mind, I would be in support of options A and B using existing industrial (and brownbelt) and urban sites but against any use of greenbelt (C onwards). Should greenbelt need to be used, then I think the Cannock area has already been overdeveloped especially when the new designer village which will impact on our roads and therefore feel that option C1- Developing the Rugeley area would have the least social impact.
LPIO295	Wright, T (c/o Pegasus Group)	In terms of the spatial distribution of the housing growth the following comments are offered: <u>Option A</u> : provides only the minimum figure which is fixed by the Government's Standard methodology. While this provides the starting point for setting a requirement this is an absolute minimum and therefore Option A alone will not suffice and the Council's acceptance of this matter is welcomed. <u>Option B1</u> : combines Option A with housing-led redevelopment of Rugeley Power Station, whilst B2 supports employment-led/mixed use redevelopment at this site. Again, the Council acknowledges that either option will be unlikely to meet housing needs in full and this realistic approach is welcomed. It is submitted that Option B2 is the most appropriate as this will contribute to a sustainable and balanced strategy for Rugeley, otherwise the town will expand considerably in residential terms without complementary employment balance. It is acknowledgement of the fact that, even taking the aforementioned scenarios into account, there will still need to be consideration of Green Belt sites. Of these options, those which support the release of Green Belt sites around Rugeley are supported (Option C1).
LPIO296	Paterson, L	Richborough Estates Ref. C116ab Land South of the A5190 My objection to the location of this planned housing estate is based primarily on traffic problems. Recently all the residents along this road have been subjected to a major increase in road traffic and heavy duty vehicles. The site location would add more cars onto a road that I consider to be very overused. These houses are built on mining area's and the movement and cracks that have appeared on the many houses along this street, along with some that have subsided, show its instability. Adding more cars along this road, which would not only come from residents but from people doing the school run, would make the situation far worse.[...]

		My other objection is that I find it illogical to put more housing surrounding the SSSI site located at Fairlady Coppice off Newlands Lane to this area, which I believe would be negatively impacted by the housing estate.[...]
LPIO297	Association of Black Country Authorities (c/o Walsall Council)	Given that any housing supply above that required to meet local need would be to serve need arising from the Black Country and/or Birmingham, it would be reasonable for it to be location where residents could continue to enjoy existing links for employment and family close to these areas. This would appear to favour Option C2. However, all the options are likely to require further assessment in terms of their sustainability and impact on landscape sensitivity. The limited length of the boundary between Walsall and Cannock Chase means that there would appear to be little scope for any cross-boundary development. [...].
Question 18 Are the current settlement boundaries for the District's villages appropriate? If not, how should they be amended and why?		
LPIO298	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	In order for Green Belt boundaries to be amended to accommodate growth requirements it is necessary for Local Authorities to demonstrate 'exceptional circumstances' to justify the revisions in accordance with the requirements of the Framework. We would suggest that exceptional circumstances will not exist if suitable and sustainable sites outside of the Green Belt are not allocated for development in the first instance. Green Belt land release should only be considered where there is no alternative sustainable option for meeting the overall housing requirement.
LPIO299	Church Commissioners of England (c/o Barton Willmore)	We endorse the principle of updating of the extant settlement boundaries as this will assist in accurately reflecting the development on the ground since they were last drawn up. The revised settlement boundaries will also play a pivotal role in directing future development to the most sustainable locations in Cannock Chase District and show where new development would be appropriate in principle. We recommend that the District utilise the most up-to-date evidence to update the settlement boundaries. It is considered that in drawing up or revising settlement boundaries, the Local Plan Review should recognise that settlement boundaries are only to be drawn around settlements, which are assessed to be the most sustainable in the District. The future development needs of an area should also be a material consideration. The Commissioners consider that a settlement boundary should be drawn up along the southern extent of Bleak House.
LPIO300	Home Builders Federation	The current settlement boundaries of the District's villages should be reviewed under Option C3 (see HBF answer to Question 17)
LPIO301	KGL Estates Ltd (c/o John Heminsley)	Extending the current settlement boundaries of Cannock Wood, Hazelslade, Prospect Village and Slitting Mill would not be likely to deliver a significant contribution to meeting housing need. There are AONB constraints affecting 3 of the villages. Minor changes to boundaries may be appropriate to respond to local housing requirements but is not considered to be a strategic issue.
LPIO302	Richborough Estates (Brownhills Rd) (c/o Pegasus Group)	Settlement boundaries, including those to the urban areas, will need to be amended to accommodate some Green Belt release as confirmed by the evidence base.
LPIO303	Wyrley Estate (c/o Fisher German LLP)	It is noted in the district profile that Norton Canes has accommodated significant growth in recent years, most around the southern edge. Whilst there are potential sites to the west, there are opportunities also to the north on Wyrley Estate land to create a more balanced approach to urban extension, providing also opportunities for improved services and infrastructure to accommodate new development.

		<p>Site 1 – Land of Hednesford Road/Norton: located off the main Hednesford Road and is a large greenfield site to the north of Norton Canes on the edge of the settlement boundary. The site would create a natural extension to the settlement of Norton Canes.[...]</p> <p>Site 2 – Land off Burntwood Road: Close to site 1, the land is near Norton Canes High School. The site is within an identified residential area and just outside the settlement boundary. Located to the rear of existing residential properties and near to the school, this makes it a sustainable and logical place for new residential development to help meet the LHN. [...]</p> <p>Site 5 – Land off Lime Lane: the land is partially divided by two administrative boundaries; Cannock Chase Council and Walsall Council. The site is not allocated in the Walsall Local Plan and is designated as Green Belt Land. It is recognised that this land is not well connected to Brownhills and is located as an island within the Green Belt areas of CCDC and Walsall Council. However, although the wider land at present has limited development potential, it adjoins an existing Gypsy and Traveller Site at Lime Lane and could be utilised to provide additional facilities adjoin that site and also as potential safeguarded land for future development.</p>
LPIO304	Beau Desert Golf Club (c/o FBC Manby Bowdler LLP)	The settlement boundary for Hednesford should be reviewed and amended to accommodate Housing Growth Policy Options C2 and/or C3.
LPIO305	Briggs, T	<p>Yes, current boundaries are appropriate.</p> <p>There is the possibility of setting a dangerous precedent by extending village boundaries, eroding the character of the district, the potential loss of greenfield/AONB, siting developments in areas with little or no facilities and that would be unable to cope with the influx.</p> <p>Extending boundaries (and also considering building on AONB sites) is counter intuitive to other stated policies where the aim is to maximise the AONB as a tourist attraction and (for example) town centres such as Hednesford maximising tourism as a gateway to the AONB. Again, the Council should set a definite policy here.</p>
LPIO306	Gladman	<p>Gladman recommends that the settlement boundaries should be reviewed as part of the plan preparation process to ensure that the necessary scale of growth can be delivered.</p> <p>The Policy should be flexible enough to be able to accommodate new development outside of settlement boundaries, to allow the Councils to quickly address any issues of shortfall in housing supply against the plan requirement.</p> <p>The Council could incorporate a criteria based policy to achieve this, such an approach would allow the plan to protect itself against unsustainable development at the same time as being flexible to additional development opportunities to come forward to meet identified needs. (Reference to submission version of the Harborough Local Plan Policy GD2).</p>
LPIO307	Lyons, O	In terms of the geographical boundaries within the District, I believe the distinct areas are Cannock, Hednesford, Rugeley, Norton Canes and Rawsley. These areas all have very individual identities with differing priorities, characteristics and heritage.
LPIO308	Newton, A (c/o CT Planning)	Amendments to the Settlement Boundaries should be sought to allow limited housing growth in the villages and in doing so would contribute to the viability and vitality of local services, businesses' and the general community.

		Consideration should be given to extending the settlement boundary to the south of Cannock Wood to include the Land at UK Architectural Antiques, Hayfield Hill, Cannock Wood . The site is located adjacent to a public transport service along Hayfield Hill which provides access to services and facilities in neighbouring settlements.
LPIO309	South Staffs Water	Amendments to the Settlement Boundaries should be sought to allow limited housing growth in the villages and in doing so would contribute to the viability and vitality of local services, businesses' and the general community. Consideration should be given to extending the settlement boundary at Slitting Mill to accommodate new housing growth.
LPIO310	Thornton, H	The present settlement boundaries around villages in the District are still appropriate.
LPIO311	Wright, T (c/o Pegasus Groups)	Settlement boundaries, including those to the urban areas, will need to be amended to accommodate some Green Belt release as confirmed by the evidence base.
Affordable Housing Percentage Requirements Policy Options		
Question 19 Which Option, or combination of options do you support and why? Should any further options be considered?		
LPIO312	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	Questions 19-24 raise a series of issues in relation to the delivery of affordable housing including the threshold for delivery and the potential for increasing the percentage requirements and off-site affordable housing provision. It is not, however, clear if the various options have been tested through a viability assessment.
LPIO313	Cycle-R	There does need to be more affordable housing in the District, however the issues are quite complex, as reflected in the Local Plan. I feel that the maximum flexibility needs to be applied to a situation, as noted I would favour Option B , but perhaps extending this to all sites, whether 5 houses or 500.
LPIO314	Home Builders Federation	The Affordable Housing Policy should be updated to reflect the 2019 NPPF (paras 62-64) and the definition of affordable housing set out in Annex 2 – Glossary.
LPIO315	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Option A is broadly supported as this provides certainty as to how affordable housing requirements would be assessed in compliance with national policy but without being overly prescriptive which would compromise other aspects of project delivery. The review of viability on large sites is an important inclusion as it enables flexibility as the details of a scheme are prepared. In terms of Option B , the recognition that large sites may not fit specific 'typologies' and should be considered in the light of site-specific viability assessments is welcomed. Approaches to viability should not be over simplistic as there may well be a range of factors on such sites which would impact upon delivery of affordable housing and these matters would need to be considered in the round.
LPIO316	Rugeley Power Ltd (c/o Savills)	In relation to option A we consider that affordable housing policy should not just be amended to reflect the Housing Need Assessment. Local Plan viability work should first and foremost be taken into account in determining affordable housing percentage and tenure mix. The Housing Needs Assessment should include Universal Credit to provide a true picture of affordability and the full range of tenures in the NPPF should be included in the assessment. Registered providers should also be consulted on local affordability of different tenures. Local plan viability works should include realistic and evidenced costs, and should not just be used to determine adorable thresholds.

		<p>In terms of reviewing viability, unless significant market changes occur, the need to review for sites over a 2-year period seems excessive.</p> <p>Option B's proposed site specific affordable requirements is encouraged in particular for large sites. There will still be a need for flexibility in affordable housing policy as on or off site costs are not fully known at the Local Plan making stage. The LPA will need to be better prepared in terms of S106 costs and off site highways requirements at the local plan stage in accordance with updated Planning Practice Guidance.</p> <p>The other factor is the cost of undertaking site specific viability work, which should be borne out of the local plan costs.</p>
LPIO317	Taylor Wimpey (c/o Lichfields)	<p>Taylor Wimpey considers that Option B is likely to be the most appropriate option. The proposed flexibility for off-site provision in lieu of on-site provision in exceptional circumstances is supported. The implementation of specific affordable housing requirements on large site allocations may also be appropriate where sites have significant infrastructure requirements or are critical to the overall housing supply.</p> <p>The LPIO is clear that further viability work will be undertaken in advance of the Preferred Options. This viability work will need to consider the likely delivery of affordable housing. To provide certainty on viability, affordable housing requirements should be expressed as a single figure rather than a range, as recommended in the Practice Guidance. It will be important to ensure that local market housing needs are met in full as well as the need for other housing tenures including affordable.</p>
LPIO318	Bloor Homes Ltd (c/o Define Planning & Design)	<p>In light of the acute affordable housing need that has been identified in the District, the provision of affordable housing as an integral part of housing development is supported. However, the target level of provision within the policy needs to be carefully considered in order to ensure that the viability of housing development schemes coming forward is not compromised. Indeed, rather than establishing an unduly onerous requirement for individual schemes, the Local Plan should seek to increase the overall level of housing provision, and therefore, increase the actual number of affordable homes that would be delivered.</p> <p>It is also important that affordable housing provision reflects the changing needs of the District over the plan period, both in terms of quantum and tenure. The actual provision within individual schemes should, therefore, be based upon the most up to date evidence of need and delivery in differing locations within the District, and the Local Plan policy should facilitate that.</p>
LPIO319	Gladman	<p>Paragraphs 62 to 64 of the NPPF provide clear guidance in respect of the approach that Local Plans should take in respect of affordable housing and Gladman would expect that the CCLP will update its affordable housing policy accordingly. The CCLP should also adhere to the definition of housing set out in Annex 2 of the NPPF.</p>
LPIO320	Greenlight Developments Ltd (c/o Lichfields)	<p>In general, Greenlight supports the Council's proposal in Option A to update the strategic affordable housing to reflect the new NPPF, which although not explicit, is assumed to encompass the definitions of affordable housing contained within Annex 2, such as starter homes.</p> <p>Similarly, Greenlight supports the inclusion of off-site contributions in exceptional circumstances. However, Greenlight considers that Option B is likely to be the most appropriate option.</p>
LPIO321	Hughes, R	<p>Option B - To enable separate consideration for large sites to factor in their own individual needs; not a one size fits all approach.</p>

LPIO322	Lyons, O	I would believe Option A to be the best option as this enables the current policy to be updated in order to reflect the needs identified in the Housing Needs Assessment and by ensuring affordable housing is available in most developments exceeding more than 10 dwellings.
LPIO323	West Midlands HARP (c/o Tetlow King Planning)	Our members support the delivery of an uplifted housing target figure for this new Local Plan which will best support the delivery of affordable housing. While we do not provide detailed comments on the options set out in this consultation, we strongly recommend to the Council to take the most ambitious approach which will best meet needs, while balancing local constraints. This should mean ensuring that policies do not rigidly preclude the delivery of affordable housing led-schemes across the district with the delivery of rural and entry-level exception sites considered separately. It is appropriate to thoroughly consider the benefits of setting different affordable housing thresholds and the ability to increase the delivery of affordable housing through the new Local Plan. The use of site-specific thresholds and percentage expectations for affordable housing can be a very useful tool to properly target such delivery on site allocations; this can also help separate out the site specific constraints on such sites from wider housing delivery, reducing the potential to skew the viability assessment on policy. The Council should seek to maximise on-site delivery of affordable housing where this will meet needs, and consider off-site financial contributions as an exception.
LPIO324	Wright, T (c/o Pegasus Group)	Option A is broadly supported as this provides certainty as to how affordable housing requirements would be assessed in compliance with national policy but without being overly prescriptive which could compromise other aspects of project delivery. The review of viability of large sites is an important inclusion as it enables flexibility as the details of a scheme are prepared: this level of detail only emerges at the planning application stage as many matters cannot be pre-empted through the local plan process. In terms of Option B, the recognition that large sites may not fit specific 'typologies' and should be considered in the light of site-specific viability assessments is welcomed. Approaches to viability should not be over simplistic as there may well be a range of factors on such sites which would impact upon deliverability of affordable housing and these matters would need to be considered in the round. Notwithstanding this, however, large sites provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure.
Question 20 Do you have any comments on the Housing Needs Assessment for the District?		
LPIO325	Rugeley Power Ltd (c/o Savills)	The Housing Needs Assessment does not consider Universal Credit in calculating affordability and assumptions made to assess affordability are not shown. Mortgage availability does not appear to have been researched and consultation with Registered Providers would have been useful to understand affordability options. Figure 4 does not take account of the potential for those in over-crowded homes to be addressed by those in under-occupied homes, if those in under-occupied homes moved to more suitable accommodation. Figure 5 does not take account of the existing affordable stock in terms of relets. Or new build affordable that is in the pipeline, not just via S106 agreements but additionally planned by Registered Providers.
LPIO326	Taylor Wimpey (c/o Lichfields)	Please see our detailed response to Q15 in relation to the Housing Needs Assessment.

		The Local Plan should ensure that sufficient sites are allocated to ensure that the identified affordable housing need can be delivered.
LPIO327	Norton Canes Parish Council	The latest Housing Needs Assessment identifies major growth in demand for a variety of housing types for the elderly. This should be capable of being reflected locally in Norton Canes and there is a role for the Neighbourhood Plan in seeking to deliver on this issue.
LPIO328	Thornton, H	NPPG require housing to be safe and accessible to avoid crime and disorder, therefore houses on the Power Station site, which will become a semi-rural area, should be limited to 3storeys as higher buildings are often apartments with internal public areas which encourage crime and bad behaviour, especially if situated next to public areas. Any higher domestic building would set a precedent for future buildings over the wider area and could create future 'sink' estates.
Question 21A Are there any other options for securing affordable housing supply that we should be considering?		
LPIO329	Home Builders Federation	The Council should consider rural exception and/or entry level exception sites.
LPIO330	Taylor Wimpey (c/o Lichfields)	In order to ensure that affordable housing need is met, the council should consider providing a buffer on top of the chosen housing growth option and allocating additional sites to help deliver this need.
LPIO331	West Midlands HARP c/o Tetlow King Planning)	We support the Council; in considering the setting of a lower threshold of five dwellings for seeking affordable housing <u>delivery on-site</u> where this is achievable, and viable. The Council should also seek to maximise supply of affordable housing by exploring a policy of supporting exception sites and the delivery of affordable housing-led schemes where these target identified needs.
Question 21B Should the Council consider a lower threshold of 5 dwellings for seeking affordable housing contributions from schemes within the AONB, taking into account the local context?		
LPIO332	Home Builders Federation	If the Council considers that the lower threshold of 5 dwellings within the AONB in Cannock Chase is appropriate then the lower threshold should be applied in accordance with the WMS dated 28 th November 2014. The lower threshold should also be robustly viability tested.
LPIO333	Cannock Chase AONB Partnership	It would be appropriate for the Council to consider a lower threshold of 5 dwellings for seeking affordable housing contributions from schemes within the AONB, taking into account local context.
Question 22 Should affordable housing requirements for schemes be set higher than the needs identified in the Housing Needs Assessment to off set no contributions from schemes under 10 dwellings?		
LPIO334	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	The percentage of affordable housing required in the District will be linked to the total quantum of development proposed. The greater the housing requirement the greater the quantum of affordable housing that will be delivered if the percentage level of provision remains the same. It is, therefore, difficult to comment upon what the preferred quantum and percentage of affordable housing should be until there is greater certainty on the overall housing requirement. It will be important to make sure that the future affordable housing requirements can be viably delivered through the overall housing requirement and the development sites which are allocated.
LPIO335	Home Builders Federation	Affordable housing provision should not be set higher than identified needs to offset no contributions from residential developments of less than 10 dwellings.

LPIO336	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that the off-setting of contributions in this manner would be inappropriate and could threaten the delivery of sites for viability reasons. Taylor Wimpey considers that a more appropriate way to ensure that affordable housing requirements are met would be to allocate sufficient land to meet any need identified.
LPIO337	West Midlands HARP (c/o Tetlow King Planning)	The Council should set the affordable housing requirement at a level which viably maximises delivery on all sites, enabling delivery in a wide range of circumstances.
Question 23 Is there a minimum level of feasible on site affordable housing provision that the Council should take into account as part of its evidence base work e.g. currently assumed to be 3 affordable dwellings on site?		
LPIO338	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	The Council should consult with Registered Social Landlords (RSLs), such as Bromford, who are active in the Cannock Chase plan area to establish the feasibility of a minimum level of on-site affordable housing provision.
LPIO339	Home Builders Federation	The Council should consult with the Registered Social Landlords (RSLs) active in the Cannock Chase plan area to establish the feasibility of a minimum level of on-site affordable housing provision.
LPIO340	West Midlands HARP (c/o Tetlow King Planning)	The minimum feasible level of on-site affordable housing provision will vary on a case-by-case basis. According to existing stock levels, proximity to existing stock, the types and tenures of affordable housing being delivered, availability of grant funding and general viability considerations.
LPIO341	Association of Black Country Authorities (c/o Walsall Council)	Given that some of the additional housing to be provided in the district is expected to meet the needs of the Black Country, it is important that this includes our requirement for affordable housing. However, provided the overall numbers are sufficient and affordable housing is developed in locations that are accessible to people from the Black Country, we have no comments to make about the way these numbers are provided on individual sites.
Question 24 Previous consultation responses suggest that affordable housing should not be retained 'in perpetuity'. In what other ways could the Council secure the affordable housing supply within the District if an 'in perpetuity' requirement is not included within the policy i.e. so that any recycled funding from the sale of affordable housing is spent on replacement/new affordable housing supply within the District?		
LPIO342	Home Builders Federation	Affordable housing should be provided as set out in the 2019 NPPF (paras 62-64) and the definition in the ANNEX2 – Glossary. On residential developments of 10 or more dwellings at least 10% of dwellings should be available as affordable home ownership (para 64) which are not necessarily an "in perpetuity" affordable housing tenure. An updated affordable housing policy must comply with national policy.
LPIO343	West Midlands HARP (c/o Tetlow King Planning)	It is not appropriate for the Council to seek to secure affordable housing <i>in perpetuity</i> where affordable housing is not being delivered on rural exception sites. It would be more appropriate for the Council to establish a rural exception site policy for those areas where this will enable more affordable housing to come forward, and set out model conditions based on existing national examples in supplementary guidance.
LPIO344	Association of Black Country Authorities (c/o Walsall Council)	The Black Country authorities have received similar representations on behalf of housing associations raising concerns that section 106 agreements that require housing to remain affordable in perpetuity create difficulties in securing funding from lenders. However, such a requirement is a matter of national policy. In fact the NPPF defines affordable housing fro

		rent as housing which meets all the listed conditions including provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled. [...]. Whilst there may be some cases where it is not be necessary for individual units to be retained as affordable indefinitely, as a matter of principle we would support a general policy to secure the retention of the required level of affordable housing in perpetuity, including through recycling where existing affordable homes are sold or otherwise cease to meet the definition of affordable.
Housing Mix Policy Options		
Question 25 Which option, or combination of options do you support and why? Should any further options be considered?		
LPIO345	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	Bromford supports Option A which continues with the current policy approach of encouraging an appropriate mix of housing sites, types and tenures for different groups in the community on a District wide basis as informed by an up to date Housing Needs Assessment combined with Option D of allocating specific sites for different housing needs such as 100% affordable housing sites, sites for care homes, self build sites etc.
LPIO346	Church Commissioners of England (c/o Barton Willmore)	We support housing mix policy option A , which proposes to continue with the current policy approach of encouraging an appropriate mix of housing sizes. Types and tenures for different groups in the community on a District wide basis, informed by the Housing Needs Assessment. This approach allows flexibility to varied needs and supports absorption of homes once developed. The other options are overly prescriptive and onerous and do not allow for flexibility and changes over time.
LPIO347	Cycle-R	Whilst probably the most difficult to manage, I strongly favour option D in this case.
LPIO348	Home Builders Federation	The HBF's preference is Option A which continues with the current policy approach of encouraging an appropriate mix of housing sizes, types and tenures for different groups in the community on a District wide basis as informed by an up to date Housing Needs Assessment combined within Option D of allocating specific sites for different housing needs such as 100% affordable housing sites, sites for care homes, self build sites etc. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households without seeking overly prescriptive housing mixes on individual sites. [...]
LPIO349	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Option A is supported. The new Local Plan should deliver housing to meet the full range of needs, including affordable and specialist housing, in addition to unmet affordable need within the HMA. [...] larger sites provide the greatest level of opportunity to provide for a mix of housing in terms of size, type, and tenure. Option B and C are not supported as this approach would be too prescriptive. Housing mix should not be specified in any local plan policy which only presents a specific snapshot in time. Instead policy should direct the reader to the latest evidence base which should be routinely updated across the 15-year plan. Option D could be supported to help deliver on specific needs.
LPIO350	Rugeley Power Ltd (c/o Savills)	Options B and C seek to implement a specific housing mix percentage for sites. We do not support this approach as we consider that it is inflexible, especially considering the length of time the Local Plan will remain in place. Housing mix should be determined on a site by site basis and determined by the SHMA. Large sites should be expected to provide a mix of housing sizes, types and tenures but this does not mean that a specific percentage requirement should be set. [...]

		Option D proposes to allocate specific sites for different housing needs. It is considered that whether a site is suitable for a specific use should be undertaken on a site by site basis.
LPIO351	Taylor Wimpey (c/o Lichfields)	<p>Taylor Wimpey considers that a policy approach of encouraging an appropriate mix of housing sizes, types and tenures for different groups in the community on a District wide basis, informed by the Housing Needs Assessment is the most appropriate approach (Option A). However, any policy wording should provide the appropriate flexibility to allow for an alternative housing mix to be provided where this is justified by exceptional circumstances, such as viability concerns. Whilst on the face of it Taylor Wimpey supports this flexible approach, [...] Taylor Wimpey has some concerns in this regard.</p> <p>The advocated approach may be incorrect when having regard to the High Court judgement in William Davis Ltd & Ors v Charnwood Borough Council [2017] EWHC 3006. Whilst relating to an SPD, the principle – i.e. seeking to adopt a specific mix which has not been tested at examination or forms part of the development plan applies to an even greater extent to a piece of untested evidence (such as that within any updates the LHNA).</p> <p>Therefore, whilst having regard to paragraph 61 of the Framework, Taylor Wimpey considers that any Policy should reference the current LHNA derived housing mixes as a guide and exclude reference to future evidence updates. To account for the need to reflect changing circumstances, Taylor Wimpey would recommend that the Policy itself remains suitably flexible, and not overly prescriptive, through the inclusion of specifically worded caveats in the policy that allows for alternative housing mixes to be provided where this is justified by exceptional circumstances.</p> <p>It is unclear how the figures in Figure 45 have been derived. As such, Taylor Wimpey considers that the LNHA does not currently sufficiently or robustly evidence and justify the proposed housing mixes contained within Figure 45. The Council should, therefore, provide further detail in this regard.</p> <p>Taylor Wimpey also considers that the allocation of specific sites for different housing needs such as 100% affordable housing sites, sites for care homes and self-build sites (option D) should be considered. This will allow these sites to be provided in the most appropriate locations.</p> <p>[...]</p>
LPIO352	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	We believe that there is a very real and clear case now for specific allocation of specialist housing including areas capable and suitable for a full range of housing for older people and that this option (Option D) could be adapted to include such a mechanism.
LPIO353	Bloor Homes Ltd (c/o Define Planning & Design)	<p>A flexible approach to the determination of the housing mix in future developments, informed by up to date evidence and agreed at the application stage, is required in order to widen the opportunities for home ownership and create sustainable, inclusive and mixed communities.</p> <p>A continuation of the current policy approach that encourages the provision of an appropriate mix of housing is supported (Option A), rather than the alternative options that seek to prescribe a specific mix within Local Plan Policy.</p>
LPIO354	Gladman	Gladman considers that the mix of housing on a site should be negotiated on a site by site basis so that it can be reflective of the specific area's needs at the time of the application. Housing mix also has a huge impact upon the overall viability of a scheme and small changes in the housing market over time, can severely impact scheme deliverability.

		Therefore to allow sufficient flexibility for the plan to adapt to these situations, the policy on housing should ensure that it is based on the most up-to-date evidence at the time of the application.
LPIO355	Greenlight Developments Ltd (c/o Lichfields)	<p>The Current policy position (Policy CP7) aims to achieve a balanced housing market by requiring new housing developments to provide for a mix of housing sizes, types and tenure which meet the needs and aspirations of the current and future population, informed by the SHMA. However, as noted in the IOC, it allows for flexibility through site-by-site negotiations and recognises the developments will individually provide different mixes according to their context. (Para 7.69).</p> <p>Greenlight supports the Council's existing position in this regard and considers that any market/affordable housing mix requirements should not be overly prescriptive and inflexible. As such, Greenlight considers that a policy approach that encourages an appropriate mix of housing sizes, types and tenures for different groups in the community on a District-wide basis, informed by the LHNA (Option A), is the most appropriate approach.</p> <p>Whilst on the face of it Greenlight supports this flexible approach, which includes a caveat to take account of future updated evidence to provide flexibility over the lifetime of the Local Plan to potentially reflect changing circumstances and needs, Greenlight has some concerns in this regard. The advocated approach may be incorrect when having regard to the High Court Judgement in William Davis Ltd & ORS v Charnwood Borough Council [2017] EWHC 3006.</p> <p>Therefore, whilst having regard to Paragraph 61 of the NPPF, Greenlight considers that any policy should reference the current LNHA derived housing mixes as a guide, and exclude reference to future evidence updates. Alongside this, to account for the need to reflect changing circumstances, Greenlight would recommend that the policy itself remains suitably flexible, and not overly prescriptive, through the inclusion of specifically worded caveats in the policy that allows for alternative housing mixed to be provided where this is justified by exceptional circumstances.</p> <p>In addition to Option A, Greenlight would welcome the inclusion of Option D, which would enable specific sites to deliver and meet the needs of specific household groups, such as 100% affordable housing or older person housing schemes.[...]</p>
LPIO356	Hughes, R	Option A (plus Option D) – Determine housing mix provision on a site by site basis and consider sites for specific needs.
LPIO357	Lyons, O	<p>I believe that the evidence gathered via the needs assessment should form the basis upon which the housing policy is developed, allowing the creation of differing sizes, types and tenures to meet demand. I would favour Option C given that I do not believe it appropriate to set requirements through policy but rather a flexible approach catering for the needs of different areas, different communities and making informed decisions on a case by case basis through an assessment of the evidence available at that time.</p> <p>However, I believe that it may be advantageous, in some instances, to specify percentages on larger sites to ensure all needs are met. [...]</p>
LPIO358	Norton Canes Parish Council	Option D should include housing for the elderly more generally not just care homes.
LPIO359	Thornton, H	Support combination of Options A, B2 and C2 because they cover areas with most employment opportunities and have good transport links with Birmingham and the Black Country.

		Para 8.27 – The Rugeley ‘B’ Power Station SPD of 2018 identifies the part in Cannock Chase District as employment-led development. This is absolutely necessary to make-up for the deficiency of job opportunities referred to above but its also need to provide local employment for occupants of the dwellings now almost completed on the ‘A’ Power Station site, where no nearby employment land has been provided whatsoever.
LPIO360	West Midlands HARP (c/o Tetlow King Planning)	It remains appropriate for the Council to set a district-wide policy of encouraging development to deliver a sufficient mix of house types, tenures, and restrictions to meet specific needs where these occur, and as viable. We support Option A , as Options B and C would unreasonably limit the ability to deliver housing mixes as needed, across the Plan Period. With regards to affordable housing mix, it may be most useful for the Council to set policy aspirations for affordable rent and sale tenures, rather than specifying for each of the four categories as set out in Annex 2 of the NPPF as this would retain an element of flexibility while responding to priority needs. We do support the identification of sites to meet specific needs as set out in Option D , however, this must be supported by sufficient site appraisal work to ensure allocations are deliverable, and responsive to the differing needs of housing providers.
LPIO361	Wright, T (c/o Pegasus Group)	Option A is supported. The new Local Plan should deliver housing to meet the full range of needs, including affordable and specialist housing, in addition to unmet affordable need from within the GBBCHMA. It is submitted that, whilst it is important to identify a wide range of sites for housing, larger sites provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure. Options B, C and D are not supported as this approach would be too prescriptive. Housing mix should not be specified in any local plan policy which only presents a specific snapshot in time.
LPIO362	Association of Black Country Authorities (c/o Walsall Council)	The housing market area comprises the entire district so there would seem to be little evidence to support a specific mix of housing types on individual sites (Option B). Option A would therefore seem to be the appropriate approach. However, it is important to continue to monitor the housing mix achieved on new developments to ensure it remains in line with the assessed need.
Question 26 Do you have any comments on the Housing Needs Assessment for the District?		
LPIO363	Home Builders Federation	The Council’s Housing Needs Assessment is useful but it is inadequate as an evidence support to justify the adoption of any higher optional housing standards. If the Council wishes to adopt such standards then further supporting evidence as set out in the NPPG should be collated.
LPIO364	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The Housing Needs Assessment represents a snapshot in time and will need updating throughout the plan period to ensure that it remains up to date and relevant in order to be able to inform policy which can continue to deliver viable sites in a time manner to meet Local Plan requirements. Also see the response to Q25.
LPIO365	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	Cannock Chase Housing Needs Assessment provides an analysis of the need for specialist older persons housing and identifies a backlog of dwellings at the start of the plan period in 2018. As stated in Q25, we believe that there is a very real and clear case now for specific allocation of specialist housing including areas capable and suitable for a full range of housing for older people.

LPIO366	Greenlight Developments Ltd (c/o Lichfields)	In respect of the Council's evidence of housing mix requirements over the Plan period, the LHNA does not explicitly set out details of the proposed housing mix. The LHNA provides some context on the size of the existing dwellings within the District, at Figure 18, with some further analysis in the affordable housing chapter. However, it is unclear how the figures in Figure 45 have been derived. As such, Greenlight considers that the LHNA does not currently sufficiently or robustly evidence and justify the proposed housing mixes contained within Figure 45. The Council should, therefore, provide further detail in this regard.
LPIO367	Inland Waterways Association	<u>Houseboats (Page 75)</u> While the number of permanent residential boat dwellers in the District may be small (10) they form a distinctive local community at the northern end of the Cannock Extension Canal. Boat dwellings have particular characteristics and needs different from bricks and mortar housing, which should be referred to in the Local Plan. For example, boats have a greater susceptibility to external noise which should be taken into account in the planning system when any developments nearby are being considered.
LPIO368	Wright, T (c/o Pegasus Group)	The HNA represents a snapshot in time and will need updating throughout the plan period to ensure that it remains up to date and relevant in order to be able to inform policy which can continue to deliver viable sites in a timely manner to meet Local Plan requirements.
LPIO369	Association of Black Country Authorities (c/o Walsall Council)	No. It appears to comply with national guidance.
Question 27 Should there be different approaches to the affordable housing tenure mix/bedroom mix and the market housing bedroom size mix i.e. affordable housing tenure percentage requirements specified in policy only? Should this be strategic or non-strategic policy?		
LPIO370	Home Builders Federation	[...] Any housing mix requirements for market and/or affordable housing should not be overly prescriptive or unduly inflexible. The HMF preference is Option B (see HMF answer to Q25). The level of specified detail in the policy should determine if this is a strategic or non-strategic policy (see HBF answer to Q66).
LPIO371	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	This approach would be too –prescriptive. Housing mix should not be specified in any local plan policy which only presents a specific snapshot in time. Instead policy should direct the reader to the latest evidence base which should be routinely updated across the 15-year plan. This ensures that the housing mix is reflective of current need and can be delivered in the market conditions which prevail at this time.
LPIO372	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that a policy approach of encouraging appropriate mix of housing sizes, types and tenures for different groups in the community on a District wide basis, informed by the Housing Needs Assessment is the most appropriate approach. Policy wording should provide the appropriate flexibility to allow for an alternative housing mix to be provided where this is justified by exceptional circumstances, such as viability concern. This approach should apply to both market and affordable housing.

LPIO373	West Midlands HARP (c/o Tetlow King Planning)	We do not consider it appropriate to set specific housing mix policy as this unnecessarily fetters the delivery of housing to meet needs across the district, and over the lifetime of the Plan. Policies should also not differentiate between affordable and market housing mix as this creates difficulties for Housing Associations in purchasing land and sites with permission.
LPIO374	Wright. T (c/o Pegasus Group)	This approach would be too prescriptive. Housing mix should not be specified in any local plan policy which only presents a specific snapshot in time. Instead policy should direct the reader to the latest evidence base which should be routinely updated across the 15year plan period. Adopting a more rigid, prescriptive approach which is 'set in stone' through the Local Plan itself would have long term consequences for viability and delivery of individual sites, and of the plan as a whole.
Question 28 Should there be a separate policy for meeting the needs of an ageing population?		
LPIO375	Home Builders Federation	The Council should consider a separate policy for meeting the needs of an aging population as set out in the recently published NPPG (ID63-001 to 019) dated 26 th June 2019.
LPIO376	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	It would be appropriate to include policy which recognises the issue and provides a broad strategic steer. In line with response to questions 25, 26 and 27 any policy should not be prescriptive but instead be capable of responding to current evidence and provide a link to evidence.
LPIO377	Rugeley Power Ltd (c/o Savills)	We consider that a separate policy should identify how the needs of an ageing population are to be met, including O55s, assisted living and other specialist care facilities (Use Class C2). This will ensure that there is flexibility in the market and that C2 uses will be provided on appropriate sites across the District.
LPIO378	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that a separate policy for meeting the needs of an ageing population could be worthwhile to address this issue. [...] Should the Council consider adopting optional standards related to specific elements of building design, including standards set out in Part M4 of the Building Regulations relating to accessibility, adaptability and wheelchair users, the appropriate evidence will need to be provided as detailed in the Practice Guidance including evidence of need, viability and a consideration of site specific factors. These standards will need to be tested through the Local Plan viability assessment work.
LPIO379	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	There is clearly a need for a step-change in policy and a far more "pro-active" and "positive" approach on the need for local authorities to plan for housing for older people.
LPIO380	Bloor Homes Ltd (c/o Define Planning & Design)	There is no objection to the principle of sheltered and extra care accommodation to meet the needs of an ageing population being provided in appropriate locations, but a blanket policy requirement would not be appropriate as it would not take account of the site and location specific constraints to delivery of specialist housing of this type.[...]
LPIO381	Gladman	The provision of specialist housing to meet the needs of older people is of increasing importance and the Council need to ensure that this is reflected through a positive policy approach within the Local Plan. The Council needs a robust understanding of the scale of this type of need across the District. Gladman recommend that the CCLP should include a specific policy in relation to the provision of specialist accommodation for older people (Example text provided).

		In relation to the options presented in the consultation document, Gladman reiterates the need for a positive policy approach which both allocates specific sites and also provides flexibility for additional sites to be brought forward.
LPIO382	Greenlight Developments Ltd (c/o Lichfields)	In relation to meeting the needs of older persons within the District, paragraph 61 of the NPPF is clear that local authorities should assess the size, type and tenure of housing needed for different groups in the community and then reflect these needs in planning policies. Indeed, in this context, the LHNA provides some background on the projected increase of older person households within the District over the Plan period and identifies that there is already a significant backlog in the supply of accommodation for such households (Para 22). [...] Greenlight considers that the council should set out specific policies for meeting the needs of older person households within the new Local Plan.
LPIO383	Norton Canes Parish Council	Yes there should be a specific policy for meeting the housing needs of an ageing population.
LPIO384	Staffordshire County Council	Our 'Next Generation Care' project provides insight and intelligence around the need for and supply of specialist housing for older people across Staffordshire. The evidence base and assessment siting behind the project is relevant to plan making. We are mindful the Government has recently updated the PPG around Housing for older and disabled people, our reports, coupled with officer input, could be useful in helping determine the housing requirements/mix for older persons and the proportion of specialist accommodation potentially needed for the District. This is particularly relevant for the Design Policy and Housing Mix Sections of the Plan.
LPIO385	West Midlands HARP (c/o Tetlow King Planning)	We encourage the Council to set a separate policy aimed at meeting the diverse needs of the district's ageing population. This should encompass the wide variety of housing types and tenures which are being delivered across the country by our members [...] The policy within the adopted Bromsgrove District Plan is a useful exemplar. We would encourage the Council to consider sites not only within, but 'adjacent' and 'close proximity' to defined settlements, as this will allow a greater range of sites to be considered when searching for suitable locations for specialist housing and care for the elderly.
LPIO386	Wright, T (c/o Pegasus Group)	It would be appropriate to include policy which recognises the use and provides a broader steer. In line with the response to questions 25, 26 and 27, any policy should not be prescriptive but it instead be capable of responding to current evidence and provide a link to evidence.
Question 29 Are there any sites that should be considered for specific housing needs allocations? Are there any site specific criteria that should be considered in allocating sites for meeting specific housing needs?		
LPIO387	Bromford Housing Group Ltd c/o PlanIt Planning and Development)	Housing needs will vary across the District and what may be a suitable housing mix in Cannock may be inappropriate within a more rural area.

LPIO388	Home Builders Federation	The Council should consider specific housing need allocations. There are site specific criteria which should be considered, for example, the proximity of sites for specialist housing for older people to public transport, local amenities, health services and town centres.
LPIO389	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	The land identified within this representation provides a site suitable and available for a range of housing needs especially suited to accommodate older persons housing. On the one hand it forms a logical extension to the settlement whilst having ease of access to all necessary services and in addition, representing a viable and deliverable site.
Question 30 Do you have any other comments on the suggested housing mix policies, taking account of recent Letwin Review and NPPF requirement for 10% affordable homeownership?		
LPIO390	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	It is our view that the Local Plan should maintain a flexible position in relation to the housing mix of new developments. The housing mix requirements are likely to change during the course of the plan period as the demographic profile of the District changes and new housing developments come forward.
LPIO391	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	[...] policy should not be too prescriptive and should not be set in the Local Plan but instead should link to the most up to date evidence which would establish the most appropriate local mix. Development sites will need to be mindful of the NPPF requirement for 10% affordable home ownership.
LPIO392	Taylor Wimpey (c/o Lichfields)	In formulating policy, the Council, will need to consider these factors and appropriate wording may be required to ensure that they can be considered throughout the life of the plan. If this option is to be pursued, the provision of this level of affordable home ownership on sites will also need to be tested through the Council's viability assessment work.
LPIO393	West Midlands HARP (c/o Tetlow King Planning)	As the NPPF seeks a minimum of 10% affordable home ownership tenures as part of the affordable housing mix on major development sites, we support such an expectation in any housing mix policy adopted by the Council. These should be flexible to enable a variety of sites to be delivered to meet needs in individual site circumstances across the plan period.
Question 31 Do you agree that the local context does not justify the need for further local policies on rural exception or entry level exception sites over and above existing national policy?		
LPIO394	Richborough Estates Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Yes, this is agreed.
LPIO395	West Midlands HARP (c/o Tetlow King Planning)	We expect the Council to set local policy, which is consistent with the NPPF particularly on the delivery of rural and entry-level exception sites.
Question 32 Do you agree that the local context does not justify the need for further local policies on rural or agricultural workers dwellings, over and above national policy?		
LPIO396	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Yes, this is agreed

LPIO397	National Farmers Union	We still feel that the document would benefit from the inclusion of some support for rural or agricultural workers dwellings in order to facilitate the growth and development of agricultural businesses. The paper states that 60% of the District is designated as Green Belt, much of which will be managed by agricultural businesses. People living and working in these areas will present a very small proportion of the Districts population but they would benefit from some policy support given that their activities contribute to the delivery of environmental management across the district.
Gypsy, Traveller and Travelling Showpeople Housing Needs Policy Options		
Question 33 Do you have any comments on the Gypsy, Traveller and Travelling Showpeople Assessment for the District?		
LPIO398	Cycle-R	I am reminded of what Leeds are doing at the moment with the provision of sites and providing utilities and waste collection on those sites. This would mitigate many of the issues that the general public see. I would favour Option C in this case.
LPIO399	Hughes, R	Option A - Do not allocate a specific site however, develop criteria to help determine planning applications.
LPIO400	Lyons, O	I believe that Option A should be looked at. This would enable the Council to adopt a flexible approach by determining considerations to be taken into account by the Planning Committee when deciding upon proposals. I believe that allocating such sites through the local plan limits possibilities in terms of land usage and becomes too restrictive.
LPIO401	Cllrs. Preece, J, Stretton, Z and Newbury, J	We are minded to support option C . Given the difficulties encountered in identifying suitable sites this far, we feel that a District-wide area of search and cooperation with neighbouring local authorities would be the best approach. A current concern we have is that the lack of clarity around identified sites is leading to speculative planning applications being submitted in Norton Canes. We appreciate that the A5 corridor is a key route in the context of this policy but any evaluation of potential sites needs to take into consideration possible impacts on the settled community in the village.
LPIO402	Norton Canes Parish Council	The Parish would wish the area of search for sites to be broadened across the district (Option C) using a criteria based approach (Option A).
LPIO403	St Modwen (Watling Street) (c/o RPS Planning and Development)	St Modwen consider that in terms of the latest evidence of need for additional gypsy and traveller, this represents a significant reduction on previous measures in earlier GTTSPs (2012 iteration) down from 50 to 29 on the Council's own evidence. However, based on the analysis presented in section 4 of this submission, (and Appendix 6 thereon), St Modwen suggests that the reduced figure of 29 additional pitches between 2018 and 2036 should be further reduced to 25 additional pitches and, if turnover in the existing stock is properly accounted for, this could be even lower still. Consequently, the Council should rethink the previous strategy that sought to address local need for new sites based on a very widely drawn 'Area of Search'. St Modwen controls an existing GTTSP located at Watling Street that fell within the area of search. St Modwen will look to work with the Council as its evidence base on GTTSP progresses.
Question 34 Do you have any comments on how sites could be secured for gypsy, traveller and travelling showpeople accommodation given the difficulties faced to date e.g. is there a need to consider the provision of public sites?		
LPIO404	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Richborough Estates considers that options A and C should be considered further. Option D is not supported: housing mix such prescriptive requirements should not be set in policy as this would impact upon the viability and deliverability and upon individual strategic sites.

LPIO405	Wyrley Estate (c/o Fisher German LLP)	<p>The identification and allocation of sites for Gypsies, Travellers and Travelling Showpersons is generally a complex matter, and it is noted that the council currently struggles in this regard.</p> <p>It is however, essential for the council to resist unplanned sites coming forward in an ad-hoc manner, or by allowing the needs to be met through appeal. The Council should consider providing sites on its own land for development, if available, but needs to consider Green Belt Allocations, in line with the conclusions of the 2016 Green Belt Assessment, if the identified needs are to be met.</p> <p>In addition to the general risk from allowing an ad-hoc approach to site provision, it could also mean sites being established in areas where it may place other strategies at risk. Taking a short-term approach would not represent good planning and could jeopardise the future economic well-being of the borough if important strategies and aspirations are curtailed as a result of harmful unplanned development.</p> <p>Wyrley Estate are willing to offer land within site 5 as an extension to the well-populated and popular site at Lime Lane. As an isolated site in the Green Belt, there would be obvious encroachment into the countryside and impact on openness. However, it would act as an extension to an existing site and would not lead to any significant encroachment between settlements.</p>
LPIO406	Historic England	Any sites identified for allocation to meet the needs of Gypsy, Traveller and Travelling Showpeople needs would also need to be accompanied by appropriate site assessment.
LPIO407	Wright, T (c/o Pegasus Group)	<p>It is considered that options A and C should be considered further.</p> <p>Option D is not supported: such prescriptive requirements should not be set in policy as this would impact upon the viability and deliverability of the plan and upon individual strategic sites.</p>
LPIO408	Association of Black Country Authorities (c/o Walsall Council)	<p>The report acknowledges the difficulties in securing the provision of sites where landowners have expectations of higher land values. This highlights the need to allocate and safeguard existing sites as well as to allocate land for new ones. Option A [...] is unlikely to achieve the provision of an adequate number of sites to meet needs [...]. Option B would therefore seem the most appropriate. This option (looking at the A5 corridor) is also the one most likely to provide sites that could contribute, if necessary, to meeting needs arising from the Black Country. We recognise that all existing pitches in Cannock Chase are in the Green Belt, and that new ones are likely to need to be similarly located.</p>
Strategy for Meeting Overall Employment Needs Policy Options		
Question 35 Which combination of options do you support and why? Should any further options be considered?		
LPIO409	Canal & River Trust	<p><u>Option C – Green Belt Sites</u></p> <p>We note that Option C for the delivery of sites via Green Belt release would potentially encompass land to the south of Bridgtown, upon the route of the proposed Hatherton Canal Restoration, and also includes land next to the Cannock Extension Canal, south of Norton Canes.</p> <p>Whilst we would not object to the allocations in these areas, consideration would need to be given towards the impact of development upon the potential restoration of the canal, and the impact upon setting and biodiversity of the Cannock Extension Canal.</p> <p>Hatherton Canal: Development upon this route could introduce additional obstacles to its future restoration, including from new road crossings and buildings upon the route. We therefore request that any policy for new allocations upon the</p>

		<p>canal route should include requirement for development to accommodate for the future restoration – including the provision of bridge crossings where necessary, and the avoidance of development that would sever the route.</p> <p>Cannock Canal Extension: Development in proximity to this route could impact adversely upon the setting of the canal, and could introduce additional air pollution, which could harm the SSSI. We therefore advise that consideration is given towards the direct impact to the canal as part of any future allocation in this area.</p>
LPIO410	Holford Farm Partnership (c/o Hawksmoor Property Services Ltd)	<p>We support Option C2</p> <p>[...] it can be seen that the relatively limited supply of brownfield land in the District will not be enough to adequately meet the future needs of Cannock Chase, nor any additional unmet need arising from adjoining local authorities that have insufficient employment land supply.</p> <p>The EDNA recommends a flexible portfolio of sites, and we agree with this recommendation on the basis that it will provide the key to choice within the employment land market, to allow the District's supply of land to be flexible to accommodate future market needs.</p> <p>We particularly support the area shown along the A5 in the south eastern part of the District on the plan at page 83 of the Consultation documents which shows, under Option C2, the area suggested for possible Green Belt sites to come forward for development.</p> <p>Our clients have two landholdings in the area, both of which are immediately available for future employment land supply:</p> <p>Jubilee Fields: extends to approximately 5.08ha and adjoins the existing Watling Street Business Park to the east, with direct frontage to the A5 trunk road to the north, and the Wyrley and Essington canal to the west.</p> <p>Turf Field: extends to approximately 2.12ha and is contained by the A5 to the south, the M6 Toll to the north and the B4154 Walsall Road and Turf Tavern Public House to the east. We consider that the site does not contribute effectively to the functions of the Green Belt and would be well utilised for the development of a future employment/mixed use site. We consider that rebalancing the proposed supply of employment land away from Kingswood Lakeside towards other parts of the District will assist in distributing economic activity across the District, and providing a wider variety and choice of sites for the future to meet the needs of the market.</p>
LPIO411	KGL Estates Ltd (c/o John Heminsley)	<p>In relation to the employment land, as already stated RPS should deliver a significant contribution in the interests of maintaining Rugeley as a sustainable settlement. The option of extending Kingswood Lakes is the most sustainable to provide for the needs of the south of the District with much of the necessary infrastructure already in place. There is also the potential synergy with housing proposals south of the A5190 with the potential to relieve congestion at Five Ways Island. So a combination of options B1 and C1 is supported.</p>
LPIO412	Richborough Estates (Brownhills Rd) (c/o Pegasus Group)	<p>Option A is supported. It is important that employment is retained and encouraged in urban areas to deliver a balanced and sustainable strategy.</p> <p>Option B1 is also supported: the Rugeley Power Station should be employment-led to provide a sustainable balance for Rugeley. This would also be consistent with the joint Rugeley Power Station SPD.</p>
LPIO413	Richborough Estates (S of Cannock Rd) (c/o Pegasus Group)	<p>Option A is supported. It is important that employment is retained and encouraged in urban areas to deliver a balanced and sustainable strategy.</p>

		<p>Option B1 is also supported: the Rugeley Power Station should be employment-led to provide a sustainable balance for Rugeley. This would also be consistent with the joint Rugeley Power Station SPD.</p> <p>Option C1 is supported, in particular the extension of Kingswood Lakeside, as this would provide further employment opportunities to future residents of a development at land south of Cannock Road, Heath Hayes [...]. Such an approach would also enable a balanced strategy for the district, as Rugeley's economic growth needs would be able to be delivered by an employment-led development at Rugeley Power Station.</p>
LPIO414	Rugeley Power Ltd (c/o Savills)	<p>Option B1 seeks to deliver an employment-led redevelopment at Rugeley Power Station. We do not support this option as we have identified as part of our application that the site is not suitable for large scale employment use.</p> <p>Option B2 sets out a housing-led redevelopment solution which does not include any employment provision. We suggest that another option of a housing-led redevelopment with supporting uses should be added.</p>
LPIO415	Severn Trent	<p>We would support efforts in line with Option C.</p> <p>This effort could help mitigate geo-spatial pressures that a single site ma have due to its surrounding context.</p>
LPIO416	Wyrley Estate (c/o Fisher German LLP)	<p>It is imperative that a suitable range of employment land across the borough needs to be provided, to exploit opportunities for sustainable extensions to existing business parks in accessible locations. In this regards the C options appear to be the most reasonable. The council must ensure a suitable supply of economic land to complement the ambitious housing growth targets, if a situation is to be avoided where unsustainable patterns of commuting are encouraged.</p>
LPIO417	Birmingham City Council	<p>Any option which seeks to meet employment needs should be explored as well as options which enable large industrial sites (>25ha) to be tested and considered. This is due to the fact that there is a shortage of large sites of this kind within the conurbation so any such sites will help towards meeting wider regional needs particularly where they have good access to the rail and highway network.</p>
LPIO418	Briggs, T	<p>The options provide a good sequential test as presented.</p> <p>I am concerned that businesses within the AONB will organically expand and the impacts become considerable for local residents.</p> <p>Setting aside areas for business use allows the correct infrastructure to be incorporated and the impact on neighbouring residential areas minimised, especially if it is a joint residential/commercial scheme; shoehorning a business into an AONB and allowing it to expand unfettered is not a good policy, especially as such sites often give very low yield in terms of employment versus the detrimental impact on the character of the AONB and of the district. If any business use is granted within the AONB it should be heavily restricted with permitted development rights removed in perpetuity.</p>
LPIO419	Cannock Chase AONB Partnership	<p>Options A, B and C1 are supported. Allocations within the AONB should be resisted (as for Q17).</p>
LPIO420	Highways England	<p>Highways England have undertaken a high-level review of the potential impacts of the development options presented as part of the Cannock Local Plan, and have determined the potential trip generations and distributions/assigned of development traffic onto the strategic road network (SRN).</p> <p>Our principle concern is the A5 corridor [...], but we have also considered the potential impact of local plan development traffic on M6 Junctions 11 and 12.</p>

		Following our high-level review of potential trip generations routed onto the SRN we have noted that employment options C1 and C2 are likely to present the largest levels of development trips onto the A5 and M6.
LPIO421	Hughes, R	Option B1 – Development should focus on urban areas first plus employment as well as on the redeveloped Rugeley Power Station site. Green belt land should be protected from development.
LPIO422	Lyons, O	It is important to ensure that adequate land is earmarked as employment space and can therefore be promoted as such. In terms of the location of this employment space I would favour Option B (B1) which would focus on identifying urban sites and brownfield sites for employment based development, such as Rugeley Power Station under a employment/mixed use regeneration scheme. I strongly believe that more focus should be placed on encouraging start-up businesses and entrepreneurs, particularly given that Cannock Chase is currently lacking. I do also believe that existing employment sites are in need of protecting and would therefore opt for Option B.
LPIO423	Cllrs. Preece, J, Stretton, Z and Newbury, J	We would be open to supporting option C1 for the strategy for meeting overall employment needs policy. We believe that Rugeley Power Station site should be leveraged for employment land as far as possible but given its redevelopment is likely to be housing-led, some development at Kingswood Lakeside may be needed to deliver growth in employment land. We feel that priority should initially be given to filling currently vacant space at Kingswood Lakeside. [...] additional development of greenbelt land for employment would put further pressure on greenbelt sites which could adversely impact Norton Canes; therefore, maximising capacity at Kingswood Lakeside makes strategic sense [...] However, any growth in employment land within the Norton Canes Parish should be taken into account when potential strategic sites for housing are considered; Norton Canes should not be expected to deliver a disproportionate contribution to both employment and housing growth as this will have a very negative impact on our local infrastructure, particularly from a highways perspective. We support option A for other employment land policy options. A flexible approach will be needed to employment sites, both within Norton Canes and the wider Cannock Chase District, so we would prefer for the District Council to continue to provide a local context to national planning policy for employment sites.
LPIO424	Norton Canes Parish Council	Norton Canes already has a large number of business units both within the village and at Kingswood Lakeside. Additional business sites located in the village pose increased problems in terms of volumes of traffic through the village. Option B1 having an employment led redevelopment of Rugeley Power Station which would reduce pressure to find additional employment land elsewhere including in Norton Canes is supported. Option C1 including an extension of Kingswood Lakes is not supported as a priority because if the potential for further traffic problems in the village. The other part of this option involving an expansion to Watling Street Business Park is preferred.
LPIO425	St Modwen (Watling Street) (c/o RPS Planning and Development)	All the options have been identified against the assumption that 25ha of employment land is already 'available' within existing urban areas to meet future employment needs. These options, therefore, deal with the 'residual' amount of employment land yet to be identified through the Local Plan Review process. In meeting this (as yet undetermined) residual land supply, the IOD appears to argue for a sequential approach by first looking to existing urban areas, then to the Rugeley Power Station Site and then, if insufficient sources of supply exist under options A and B1/B2, then consideration will be given to potential release of green belt sites in accordance with the national policy.

		<p>It is clear from the approach being taken in the IOD that the choice of/or combination of options to meet the overall employment needs is influenced to a great extent by two factors; firstly, the overall employment development needs of the District; and secondly, the confirmed supply of employment land. In terms of the overall need for employment growth, the IOD does not identify an overall employment need, but figures are discussed and presented in the updated EDNA report. St Modwen does not accept the growth figures being suggested in the EDNA, and we make separate representations on the EDNA under Q36. Furthermore, in terms of employment land supply, RPS does not accept that 25ha of employment land exists, as suggested by the Council in the updated Employment Land Availability Assessment, which we address in more detail in our response to Q38.</p> <p>St Modwen consider that there is a need to identify further land to deliver sustainable employment growth within the District, based on consideration of sites within the existing Green Belt, including land contiguous to Watling Street Business Park. On this basis, St Modwen support options C1 and C2 (with an overall preference for option C2) in combination with other options where justified.</p> <p>In addition, the emerging Employment Strategy needs to fully recognise the contribution that existing employment estates and areas can make to the future economic prosperity of the District, including creating a positive policy framework to support well-planned extensions in appropriate locations to help meet future employment needs of the District and the unmet needs of its neighbours.</p>
LPIO426	Staffordshire County Council	<p><u>Ecology</u> All Norton Canes area employment options will need to consider possible effects on the Cannock Extension Canal SAC.</p> <p><u>Historic Environment</u> Options C1 and C2 in the Cannock Wood area have the potential to impact upon the setting of two Scheduled Monuments. Additional development in urban areas has the potential to impact upon designated heritage assets.</p> <p><u>Employment</u> The County Council strongly supports Option C1. Whilst the opportunities for employment development within the urban context is limited, the physical limitations would ensure an appropriate moderate size of development. This has the potential to bring low-level employment back within the remit of sustainable parameters. [...] Kingswood Lakeside has many reasons for being chosen as the focus of development in Cannock Chase District: history, concentration of development, minimisation of visual impact, and quantum range and quality of development.</p>
LIPO427	Startin, P	<p><u>Objective 4</u> I am in support of Option B1. I have visited a facility that has around 20 different companies using a very bohemian space, all built in a warehouse. These kinds of spaces that offer cheap solutions to encourage start-up businesses and provides them with space and opportunity to grow. This coupled with a more vibrant approach to housing communities and options could encourage younger people to stay in the area to set up their businesses, in all instances, I am generally against building on green belt unless it is totally unavoidable.</p>

		I think I have addressed, in part, my views on “other employment land”; I would support Option A but with the caveat that consideration should be given to trying to convert employment land into more relevant working space for the people and businesses of the district.
LPIO428	Thornton, H	Prefer Options A, B1, C1 because they appear to be a reasonable mix although the employment site shown at Brereton should only be developed if absolutely necessary and only used for Type B1 employment as it is next to the AONB and would be mainly accessed via Coalpit Lane which is wholly residential and on a 1 in 14 gradient.
LPIO429	Wright, T (c/o Pegasus Group)	Option A is supported. It is important that employment is retained and encouraged in urban areas to deliver a balanced and sustainable strategy. Option B1 is also supported: the Rugeley Power Station Site should be employment-led to provide a sustainable balance for Rugeley and for the power station site as a whole given that Lichfield District Council is proposing housing on the section of the site which lies within their area. This would also be consistent with the joint Rugeley Power Station SPD which was adopted by both councils in 2018.
LPIO430	Association of Black Country Authorities (c/o Walsall Council)	We welcome the acknowledgement of the shortfall in supply of employment land in the Black Country. The current supply of land in Cannock Chase is relatively small relative to our needs, even with the potential for some land at Rugeley Power Station to be used for this purpose. [...]. Additional employment land provision beyond that required to meet local needs should be located where it can best contribute to the needs of the Black Country. For this reason, Option C1 would be preferred, given that Kingswood Lakeside lies at the southern edge of the district closest to the Black Country.
Question 36 Do you have any comments on the levels and types of employment land needs identified in the Economic Development Needs Assessment for the District?		
LPIO431	Holford Farm Partnership (c/o Hawksmoor Property Services)	We consider that the level of employment land requirement should be at the higher end of the figures suggested, to take account of the potential for higher amounts of future economic growth. In addition, through its obligation under the Duty to cooperate, the District, through a Statement of Common Ground, should accommodate an appropriate proportion of the unmet employment land need arising from the Black Country which is quoted in the EDNA to be between 300-500ha. With regards to the type of employment land, given the fluid nature of demand, we would argue that any allocations should be made for broad ‘B-Class Uses’ rather than being overly prescriptive.
LPIO432	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The range of 30 to 67ha (to 2036) is significant. The Council should be ambitious in what it aims to deliver in the district, not confining itself to the lower end of the range and this should include urban sites and employment-led redevelopment at Rugeley Power Station. This should be part of a balanced sustainable strategy for the district whereby housing requirement should also be treated as a minimum with further growth supported as part of a wider economic development strategy.
LPIO433	Brereton & Ravenhill Parish Council	Employment land must be provided both for new businesses and for existing businesses that wish to expand and may otherwise leave the area. Current proposals for the Power Station site fail to provide sufficient employment land and what is proposed is inadequate, of the wrong nature and designed in a way that would facilitate conversion to further housing. Without sufficient employment land the Rugeley/Brereton area would become increasingly dependent on commuting, much of which would be by private vehicle motors.

		The reference to “ <i>a focus upon the high quality employment sites</i> ” in paragraph 8.9 could be interpreted as impeding existing B2, B8 and sui generis businesses from relocating to the Power Station site. It should be made clear that existing good local businesses with these uses are recognised as being high quality.
LPIO434	Brindley Heath Parish Council	Employment land must be provided both for new businesses and for existing businesses that wish to expand and may otherwise leave the area. Current proposals for the Power Station site fail; to provide sufficient employment land and what is proposed is inadequate, of the wrong nature and designed in a way that would facilitate conversion to further housing. Without sufficient employment land the Rugeley, Brindley Heath and Brereton areas would become increasingly dependent on commuting [...]
LPIO435	Cllr Fitzgerald, A	It is important to ensure that applications submitted to Planning for new places of employment are scrutinised careful to ensure that the businesses provide the high skills type of work. (See also Q17)
LPIO436	Jones, T	Employment land must be provided both for new businesses and for existing businesses that wish to expand and may otherwise leave the area. Current proposals for the Power Station site fail to provide sufficient employment land and what is proposed is inadequate, of the wrong nature and designed in a way that would facilitate conversion to further housing. Without sufficient employment land the Rugeley/Brereton area would become increasingly dependent on commuting [...] The reference to “ <i>a focus upon the high quality employment sites</i> ” in paragraph 8.9 could be interpreted as impeding existing B2, B8 and sui generis businesses from relocating to the Power Station site. It should be made clear that existing good local businesses with these uses are recognised as being high quality.
LPIO437	South Staffordshire Council	Our latest economic evidence suggests that South Staffordshire shares a common Functional Economic Market Area with Cannock, Wolverhampton, Walsall and Dudley. The level of future employment requirements has not yet been determined however we look forward to continuing our close working relationship with the constituent FEMA authorities to explore how any identified shortfall in employment land supply can be addressed.
LPIO438	St Modwen (Watling Street) (c/o RPS Planning and Development)	An immediate observation St Modwen would like to make is that there appears to be very little consideration or discussion on the specific need figures, or the evidence that underpins them, in the IDO itself. [...] St Modwen considers that the employment land requirement recommended in the EDNA 2019 Report should be set at a significantly higher level. Our analysis on the EDNA is set out in a separate submission attached to these representations. [...]In summary, St Modwen does not support the approach to deriving the employment land requirement ‘range’ of 33-60ha between 2018-2036 suggested in the updated EDNA Report.
LPIO439	Wright, T (c/o Pegasus Group)	The range of 30 to 67ha (to 2036) is significant. The Council has clearly stated its economic ambitions through its own Corporate Plan and through its membership of two LEPs and via its role as a non-constituent member of the WMCA. It should therefore be ambitious in what it aims to deliver in the district, not confining itself to the lower end of the range and this should include urban sites and employment-led redevelopment at Rugeley Power Station. This should be part of a balanced sustainable strategy for the district whereby the housing requirement should also be treated as a minimum with further growth supported as part of a wider economic development strategy.
LPIO440	Association of Black Country Authorities (c/o Walsall Council)	We would note that the assessment of future need does not distinguish B1a from B1b uses. Since B1a offices are a main town centre use, they are not appropriate for general employment land (offices to serve factories, warehouses, etc. would, of course, be ancillary to the primary use).

		<p>The annual need for land is low so projecting past trends may not provide an accurate indication of future needs. The 25%/75% split recommended in paragraph 6.94 of the EDNA would appear to exaggerate the future need for land for offices. A more realistic figure should be used with objective justification.</p> <p>The assessment does not appear to take into account changes in the employment density of modern industrial premises. Newer buildings tend to employ fewer workers in a given floorspace because of increased automation. It is recognised that, unlike the Black Country, much of the existing industrial stock in Cannock Chase is relatively modern. [...]. However, modern warehouses tend to have a significantly lower density than older units so this should be taken into account in assessing the land supply required to provide the desired number of jobs.</p>
<p>Question 37 Should employment sites be allocated for specific B classes uses, or just a broad B class uses? If the former, which sites should be allocated for specific uses?</p>		
LPIO441	Holford Farm Partnership (c/o Hawksmoor Property Services)	Employment sites should be allocated for broad B Class uses. This is to ensure that there is flexibility in future employment land supplied to meet the market's needs.
LPIO442	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	As with housing policies the approach should avoid being too prescriptive, to enable flexible responses to be made to changing market conditions.
LPIO443	Rugeley Power Ltd (c/o Savills)	It is considered that employment sites or mixed use sites should be allocated for broad B Class uses to ensure flexibility. Recognition should also be given to other employment generating uses that do not fall within the B class uses e.g. health sector.
LPIO444	Birmingham City Council	It is suggested that a flexible approach is taken to employment site allocations so that a broad range of B class uses is covered rather than rigid allocations which limit development to specific B uses.
LPIO445	St Modwen (Watling Street) (c/o RPS Planning and Development)	<p>It is clearly beneficial to identify employment sites that can potentially deliver a range of employment uses (across the B-use class), thus ensuring that local policies are responsive to changing economic circumstances over the lifetime of the Plan in accordance with national policy. [...]</p> <p>However, certain sites are more suited to particular elements of B class employment uses and this should be factored when establishing the employment locations to be allocated. Local evidence would suggest that a range of sites, in terms of size and location, will still be required to support the employment growth need and aspirations of the District during the plan period. Part of the District's employment need can be met through appropriate allocation of land adjacent to existing employment uses, including land at Watling Street Business Park, which is generally (although not exclusively) aimed at the B2/B8 sectors.</p>
LPIO446	Staffordshire County Council	In general, impositions of restrictions on commercial development through specification of use class restriction will hinder the potential rate of attracting developments to the Cannock District. However, there may be sites whereby due to localised issues a restriction may be appropriate. Therefore, it may be appropriate to consider this matter on a site by site basis based on the context and setting of the site in question.
LPIO447	Wright, T (c/o Pegasus Group)	As with housing policies the approach should avoid being too prescriptive, to enable flexible responses to be made to changing market conditions.

LPIO448	Association of Black Country Authorities (c/o Walsall Council)	As noted under question 36, B1a office uses should be distinguished from other uses.
Question 38 Are there any further employment land development sites that should be considered for assessment?		
LPIO449	Holford Farm Partnership (c/o Hawksmoor Property Services)	Landholdings at Jubilee Field and Turf Field within the potential area of new employment land allocation at Norton Canes, adjacent to the A5, should be considered for assessment as part of an agglomeration of employment land within this corridor. We attach details of the recent SHELAA submissions in support of both of these sites.
LPIO450	Nurton Developments Ltd (c/o JLL)	<p>The Issues and Options does not express an objectively need for employment land. Instead it states that in Section 2, under the heading of Employment (on page 11), that this Issues and Options was produced prior to the employment evidence being updated. However, the Issues and Options does refer (in paragraph 8.21) to a recent assessment of employment land supply (i.e. the ELAA). This identified a supply of 25ha. However, in paragraph 8.22 it cautions that this figure should be treated as a maximum as some of this land is being considered also for alternative use. It is noted further in paragraph 8.23 that the vast majority of site options for additional new employment land lie within the Green Belt. [...] [...] Given that there are few development options available within Cannock that do not include release of the Green Belt, the Council should be aware of other potential strategic employment sites in the same FEMA, which takes in neighbouring South Staffordshire and parts of the Black Country.</p> <p>Land at Hilton Park, Jn 11, of the M6 Motorway: The site has a gross area up to 99ha (and with a developable area of 52ha) and could sustain a development of around 200,000sqm of B1, B2 and B8 floorspace and associated uses. The latest masterplan, showing the scheme as it relates to the route chosen by Highways Englands for the M54, M6, M6 Toll Link Road, is attached. [...]</p> <p>The site is not situated within Cannock, but neighbouring South Staffordshire, and is within the Green Belt. As the site falls outside your jurisdiction, we recognise your Council has no control over its identification for development. However, we do consider it does hold relevance to your Council in considering how you cater for your employment land needs, in conjunction with your neighbouring LPAs, through Duty to Cooperate. The site is located close to your boundaries and only a few minutes drive from Cannock town centre and its local road and rail communications. As such, we would ask you to take this into consideration in reviewing your strategy in terms of employment land.</p>
LPIO451	Wyrley Estate (c/o Fisher German LLP)	<p>Our client owns land adjoining the Watling Street Business Park, which would enable a sustainable extension whilst protecting the overall integrity of the Green Belt.</p> <p>In consideration of Current Local Plan Policy CP8, it is considered a logical extension to remove the business park and extension land from the Green Belt, to provide businesses with the ability to settle and grow on the business park without the restrictions imposed by Green Belt policy.</p> <p>The land adjacent is brownfield, and this greenfield site will provide an extension to an important and well-connected employment site in the Green Belt. The site is currently devoid of extension land and it is required for the district to meet its employment land aspirations. There is insufficient urban brownfield land available and the allocation would meet the exception test.</p>

LPIO452	Cllrs. Preece, J, Stretton, Z and Newbury, J	We believe that before any development at Kingswood Lakeside is determined; consideration should be given to the Watling Street Business Park which has proposed expanding its capacity. The feeling locally is that development here would be less disruptive than at Kingswood Lakeside or elsewhere as it feeds directly onto the A5.
LPIO453	St Modwen (Watling Street) (c/o RPS Planning and Development)	The Council's selected employment growth options set out in the IOD are predicated on the claimed existing supply of 25ha of employment land. However, St Modwen, can show, based on analysis of the existing land supply relied upon by the Council, that further sites will be required to address the likely scale of need and to address delivery issues within the existing supply. This is particularly the case given the very limited amount of employment land delivered in the Norton Canes/Watling Street area since 2006, according to the latest ELAA. Consequently, this should therefore include giving proper consideration to those sites in appropriate locations that are deliverable in the southern parts of the District, including the land at Watling Street Business Park.
Economy and Skills Policy Options		
Question 39 Do you have any comments on what the policy focus should be in terms of sectors that need to be supported to deliver the overall economic vision and growth for the District?		
LPIO454	Cycle-R	Well Paid Permanent Jobs with Prospects – a worker needs to know they can get full time work at a decent wage and the company they are working for will strive to keep them – companies need to move away from viewing staff as assets to support the business and into being people, with lives and needs. A Strong Retail Community – the nature of retail is changing and shifting back to specialist stores, but Cannock will never retain a vibrant retail community if people can't afford to rent shops. The situation is ridiculous when it is cheaper for someone to rent a shop in Hednesford than have a stall in the indoor market. We are facing a situation where the market is empty, shops are standing vacant for long periods of time and the in-stores are so expensive, virtually no-one can afford it. Please, look at the cost profiles for these areas, people want to open their own shops and become self-employed, but simply can't afford it.
LPIO455	Lichfield & Hatherton Canals Restoration Trust	We would favour option A under the Economy and Skills policy options (Page 89) with the specific mention of the opportunities for relevant economic activity on land alongside the restored Hatherton Canal so that restoration of the canal brings employments benefits in addition to the expected leisure opportunities.
LPIO456	Hughes, R	Option A – Update the existing policy
LPIO457	Lyons, O	I believe that the Council needs to work to attract a variety of businesses and investors to the area and create a balanced economy, primarily with the aim of encouraging local businesses to recruit locally and therefore ensuring that skills match. I favour Option A which focusses on the existing policy and allows this to be updated to reflect the more recent findings.
LPIO458	Staffordshire County Council	We would favour Option B that incorporates option A and also puts a focus on implementing Employment and Skills Plans for new development sites. The policy needs to focus on encouraging employers to invest in workforce training and development and take up available assistance such as Apprenticeships and ESF funded programmes. In addition the Plan could encourage developers of major housing and business/industrial sites to contribute to the development of the construction sector and skills locally.

LPIO459	Startin, P	Option B gets my support here. Consideration should be given to trying to convert employment land into more relevant working space for the people and businesses of the district
Question 40 If the policy was to set out specific requirements from new developments should these be required from all developments, or only those above a certain threshold e.g. major developments only (10 dwellings or 1,000m ² floorspace)?		
LPIO460	Home Builders Federation	The HBF's preference is Option A which does not set out specific requirements for new developments.
LPIO461	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	This depends upon the context relating to the particular issue. Local Plan policy should avoid being overly prescriptive as issues will need to be considered 'in the round'. Instead of setting firm requirements, it is recommended that the Council instead provide 'good practice' guidance supported by evidence which could then be referenced in policy, and the approach could then be tailored on a case by case basis. The guidance must not be placing unnecessary burdens upon the development process and will need to be considered in the balance with other plan policies.
LPIO462	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that Option A where the Local Plan policy would continue to encourage developments to demonstrate how they are helping to address key issues identified but with no specific requirements is the most appropriate option. This part of the policy should apply to major developments only (10 dwellings or 1,000m ² floorspace)
LPIO463	Staffordshire County Council	To ease the burden on smaller developments the Government's definition of a major development should be used as a general guideline but with a more appropriate threshold for residential developments. For smaller developments the Council could promote a more informal 'light' touch approach to ESP creation or a plan on a page approach. Flexibility should be applied when considering each application of ESPs to development proposals as it is recognised that not all development proposals will suit the application of ESPs nor should the Council seek to overburden a development, however, all proposals should be considered on an individual basis as to their suitability to undertake an ESP.
LPIO464	Wright, T (c/o Pegasus Group)	This depends upon the context relating to the particular issue, however Local Plan policy should avoid being overly prescriptive as issues will need to be considered 'in the round'. Instead of setting firm requirements which could then impact on the viability and deliverability of sites it is recommended that the Council instead provide 'good practice' guidance supported by evidence which could then be referenced in policy, and the approach could then be tailored on a case by case basis. It is stressed, however, that the guidance must not be placing unnecessary burdens upon the development process and will need to be considered in the balance with other plan policies.
Question 41 What other requirements would help assist deliver the economic growth and vision for the district?		
LPIO465	Lichfield & Hatherton Canals Restoration Trust	We feel that there are opportunities for relevant economic activity on land alongside the restored Hatherton Canal so that the restoration of the canal brings employment benefits in addition to the expected leisure opportunities. This aspect should be reflected by specifically identifying areas of land alongside the projected through route for the Canal for development for canal-related businesses.

LPIO466	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	To recognise the importance that residential development plays in economic growth, especially in supporting a working age population, in supporting existing and new services and facilities which provide local employment and opportunity, in supporting town and local centres and in providing employment during the construction phase.
LPIO467	Staffordshire County Council	Consideration could be given to having focussed support on community-based employability projects providing assistance to those seeking to enter or return to the labour market. Improve jobseekers, parent's and young people's knowledge of the local economy and local employers. [...] Promote the development of transport links and services between residential areas and employment sites, service centres, and visitor attractions for residents, commuters and visitors.
LPIO468	Wright, T (c/o Pegasus Group)	To recognise the importance that residential development plays in economic growth, especially in supporting a working age population, in supporting existing and new services and facilities which provide local employment during the construction phase.
Sustainable Transport Policy Options		
Question 42 Which combination of options do you prefer and why?		
LPIO469	Canal & River Trust	We believe that the requirements of Option A , as summarised, would help to ensure that the opportunity from promoting the use of towpaths, as well as other walking and cycling routes, can be achieved. Opportunities for utilising, enhancing, and linking in to this existing infrastructure should be fully considered. Future developments should be encouraged to consider this at an early stage in the development process and to aid the potential of the canal network should be clearly referenced within the revised Policies. We do not wish to raise any comment about whether Options B or C should be implemented.
LPIO470	Cycle-R	Option B , of course, however there needs to be a review of the bus services, the dropping of bus routes, lessening the frequency of service and stopping entirely on a Sunday is creating one thing, people are either relying on personal transport or not travelling.
LPIO471	Home Builders Federation	If the use of electric and hybrid vehicles is to be encouraged, the HBF support a national standardised approach which should be implemented through the Building Regulations. Any option for the inclusion of a policy requirement for electric vehicle charging should be clearly written and unambiguous (2019 para 16) specifying the quantum and type of provision sought. The requirement should be supported by evidence demonstrating technical feasibility and financial viability. Any requirement should be fully justified by the Council including confirmation of engagement with the main energy suppliers to determine network capacity to accommodate any adverse impacts if all or a proportion of dwellings have EVCPs.
LPIO472	Lichfield & Hatherton Canals Restoration Trust	We would welcome any of the three policy options, noting that the projected restored Hatherton Canal would form part of the network for sustainable transport in the Cannock Chase District – with connections through to the adjacent districts of Walsall and South Staffordshire, and beyond.
LPIO473	Richborough Estates (Brownhills Rd & S of Cannock Rd)	The setting of any minimum or maximum car parking standards for residential development should be undertaken in accordance with Paragraphs 105 and 106 of the NPPF.

	(c/o Pegasus Group)	Richborough Estates acknowledges that the existing Parking Standards, Travel Plans and Developer Contributions for Sustainable Transport SPD is out of date and is in need of updating. It is considered that any transport standards should be set within a Local Plan Policy rather than via SPD, but only where the NPPF allows such standards to be considered, and they would need to be robustly evidenced and justified before this could happen. Standards should be clear and not onerous to allow for clear guidance in formulating any scheme.
LPIO474	Rugeley Power Ltd (c/o Savills)	We consider that Option C is the most appropriate option as it will ensure flexibility in terms of addressing evolving technology. Any SPD that is produced should include enough flexibility and/or a review mechanism to ensure that required parking standards on sites are based on up to date information. The SPD should also include flexible parking requirements on sites that are in close proximity to sustainable transport modes.
LPIO475	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey generally supports Option B for viability to be assessed; it is considered that any such policies should be dealt with through the application of policy within the Local Plan rather than through the use of a SPD. Requirements for electric vehicle charging infrastructure also needs to be set out in order that the costs of providing this infrastructure can be fully considered in the viability assessment work which will form the evidence base to the Local Plan. This requirement also needs to be future proofed with flexibility to allow for the rapidly changing needs for electric vehicles. In considering whether to apply parking standards and formulating policy the Council will need to ensure that any standards applied are appropriately evidenced in accordance with these requirements.
LPIO476	Hughes, R	Option C – Set standards for parking, access and service, lorry parking and electric vehicle charging in a supplementary document.
LPIO477	Inland Waterways Association	IWA supports Option A - adding in strategic references to opportunities from canals/the canal network (including towpaths)
LPIO478	Lyons, O	I believe that green, environmental policies should weave into all aspects of planning. This is a continually developing landscape and, for the purposes of development and continuity, the existing policy should be updated to include the canal network, HGV parking facilities, and importantly, electric vehicle charging points. In addition to this and to align policies, I also believe that there is scope for minimum standards to be identified. This then forces a transition to greener policies, I therefore believe that Option B should be adopted.
LPIO479	Road Haulage Association	We consider Option C the preferred option. Option B makes an assumption that there will be no fossil fuel vehicles after 2040. Whilst this may be the case, it is aspirational and may not happen. Option C allows greater flexibility to adapt to the best available solution at any given time.
LPIO480	Startin, P	I support Option B . Standards should be implemented. If you have no standards, the standard of the offering will always be low, this isn't a viable option for a progressive Council. Very keen to see support of electric car charging. The thing that seems to be missing here is support for cyclists. The cycle network through the whole district is shambolic.
LPIO481	Wright, T (c/o Pegasus Group)	The setting of any minimum or maximum car parking standards for residential development should be undertaken in accordance with Paragraphs 105 and 106 of the NPPF.

		<p>It is nevertheless acknowledged that the existing Parking Standards, Travel Plans and Developer Contributions for Sustainable Transport SPD dated from 2055 is out of date and is in need of updating.</p> <p>It is considered that any transport standards should be set within a Local Plan Policy rather than via SPD, but only where the NPPF allows such standards to be considered, and they would need to be robustly evidenced and justified before this could happen.</p> <p>Standards should be clear and not onerous to allow for clear guidance in formulating any scheme.</p>
Question 43 Are there any other options we should be considering and if so, what should these be?		
LPIO482	Canal & River Trust	<p>We believe that the Local Plan should consider the potential impact of development on existing walking and cycling infrastructure that would be used by the new occupants of development. Modelling or an assessment of pedestrian, cycling and recreational use of the walking and cycling routes should be required; which would allow for an assessment of the impact of proposed developments beyond the development site upon such infrastructure.</p> <p>Applications should also be required to detail any necessary mitigation measures to accommodate additional use.</p> <p>[...] Where new development has the likelihood to increase usage, this could result in additional liabilities for the Trust, from erosion and litter for example. We consider that it is reasonable to request a financial contribution from developers to mitigate this impact of additional use, which could include resurfacing works to make routes more robust or safety improvements necessary to ensure that the network can accommodate additional users safely.</p> <p>Should this not be included, there is a risk that new developments could result in the degradation of existing walking and cycling routes, which could hamper efforts by the Plan to promote sustainable means of transport.</p>
LPIO483	Cycle-R	<p>Cycling – A there is a desire to encourage sustainable transport, there is one obvious area that needs to be looked at – Cycling, creating safe and comfortable cycling routes, many people won't ride on the roads as they consider them to be unsafe.</p>
LPIO484	Brindley Heath Parish Council	<p>The Government has targeted the replacement of diesel and petrol driven vehicles with electric, being the sustainable replacement for the future. We need to prioritise within the plan that on street charging points in town centres and parking areas 'need to be planned in sooner rather than later'.</p>
LPIO485	Road Haulage Association	<p>Given that Road Freight, whatever the means of propulsion, will need roads to travel on. The RHA is extremely disappointed that there are no plans for new roads to service local communities.</p>
LPIO486	Staffordshire County Council	<p>The County supports the update of the existing sustainable transport policy and the Scoping and Issues Consultation and the recommendations in paragraphs 9.13 – 9.23. A new Cannock Chase Integrated Transport Strategy will be produced by the County Council to support the emerging new Local Plan. It is recommended that the following should also be considered in the revised policy:</p> <ul style="list-style-type: none"> • The importance of enhanced telecommunications in terms of reducing the need to travel, particularly in AM and PM peak commuter periods, should be acknowledged. Developers of residential sites need to be strongly encouraged to make the necessary arrangements for the provision of superfast broadband services. • As well as the locations described in para 9.17, developers should be encouraged to install infrastructure to facilitate electric vehicle charging at designated parking spaces within residential developments. <p>The Consideration of lorry parking within the Local Plan is supported (Para 9.9)</p>

		It is also recommended that new development which will increase road-based freight should consider where vehicles will park overnight and provide suitable facilities to accommodate deliveries and distribution vehicles.
Town Centres Hierarchy Options		
Question 44 Which option or combination of options do you prefer and why?		
LPIO487	Cycle-R	Option D – there needs to be an input from the local community. Cannock town centre is typical of those in deprived areas, charity shops and betting shops prevail, the costs are too high for most people to consider taking premises to open their own business (Hednesford is cheaper and is gaining an excellent reputation, similar to Moseley in Birmingham.)
LPIO488	Boss, P	Option D – Rugeley town centre has a shortage of quality day and evening licensed premises, including entertainment that will attract people from all the new and existing houses in and around the town to spend social time in the town. This leads to the town being continually run down and inevitably people then travel to nearby Stafford and Lichfield that causes unnecessary damage to the environment and continues the circle of no investment so no one comes in, so no investment etc. Contributions and ‘planning encouragement’ should be used to attract funding into re-using existing premises in the town centre to provide quality licensed premises that local residents, particularly those new to the area or who will be coming to live in the area, can and will, want to enjoy locally.
LPIO489	Hughes, R	Option C – Produce/update separate Area Action Plans for the large towns in keeping with their individual needs
LPIO490	Lyons, O	Option B should be adopted and an ‘Impact Test’ implemented in the Planning Process. However, in addition to this, I also feel that Option D is also relevant on this occasion to develop prospectuses and therefore outline the ambitious local investment opportunities on offer, so long as they compliment rather than compete against existing provision.
LPIO491	Startin, P	I would support an amalgamation of Options C and D . Having the hierarchical system means those at the bottom get served last. We have some wonderfully active parish/town councils who would love to create vibrancy in their areas.
LPIO492	Strathclyde Pension Fund (c/o Savills)	The options have been recommended despite the LPA recognising that they will have to update their time expired Retail and Leisure Study. Until this update has been undertaken, we believe it is premature to consider options on retail matters, not least because the local retail context has changed significantly since November 2015 with the approval and construction of the retail designer outlet village at Mill Green. [...]We recommend that Option B is the least appropriate route, with no evidential basis and for the reasons provided, Option A is preferred. In addition, Option B is not sufficiently precise. The thresholds vary from centre to centre. Therefore, if an out of centre retail proposal had an anticipated catchment area which includes two centres with differing thresholds it is difficult to determine which threshold applies.
LPIO493	Association of Black Country Authorities (c/o Walsall Council)	We note that the evidence base relating to town centres is to be updated. We would wish to reserve comments pending the outcome of this.
Question 45 Are there other options we should be considering and if so what are they and what evidence is there to support this?		
LPIO494	Armitage, D	Rugeley Town Centre. Develop the bus station and market hall. It is under-used and is an eyesore.

		Expand the Elmore Park; it's extremely small given the numbers of people who live here. Rugeley has experienced constant building. I can't imagine more development especially coupled with the disruption that HS2 would bring.
LPIO495	Hewitt, P	Town and Village centres are vital in our community, we need to look at them as places of leisure and not just shopping, this may include an option to change some buildings to residential use to add vibrancy to the areas. This would include looking at parking restrictions and may lead to residents parking. People go to town centres to relax and we need to create a structure that encourages restaurants, hotels, and cinemas to come to Cannock Chase. Visiting will increase dramatically when the outlet centre is open, we need to create town centres that people want to visit and stay. We also need to look at Rugeley Town Centre in line with the development at the Power Station and not develop the Power Station in isolation.
LPIO496	Historic England	<u>Paragraph 10.10</u> We would be supportive of either a policy led Area Action Plan or additional guidance in as Supplementary Planning Document, as the Council see fit. We would support consideration of the historic environment and using historic characterisation to create attractive town centres that respond to their historic setting and assess and respond to any heritage at risk or enhancement to the historic environment, as well as heritage led regeneration and heritage tourism.
Question 46 The National Planning Guidance states that; local authorities should be seeking to improve the quality of parking in town centres.....and, where it is necessary to ensure the vitality of town centres, the quantity too. Local planning authorities should set appropriate parking charges that do not undermine the vitality of town centres and parking enforcement should be proportionate, avoiding unfairly penalising drivers'. How might this be achieved in practice, through the planning system? Should we be setting any other standards for town centre development? If so, what, and what evidence could be used to support this?		
Question 47 What further work needs to be undertaken in relation to tourism in order to ensure compliance with the NPPF? Is there evidence available already which could assist with this?		
Biodiversity & Geodiversity Policy Options		
Question 48 Which biodiversity and geodiversity option do you support?		
LPIO497	Canal & River Trust	We welcome the content of paragraph 11.23, which clarifies that more emphasis on the canal network, including a strategy for the water environment, could be included in the updated document. We also welcome consideration of an individual policy in relation to the Cannock Extension Canal SSSI. Developments in proximity to our network can result in harm to our network through dust exposure, or from accidental/unmanaged runoff from construction sites. Additional wording in the Local Plan regarding the water quality of our network would help to make the Local Plan more effective at safeguarding (and enhancing) the waterway environment. Developments can have an adverse impact on the ecology of the waterways. The Cannock Extension Canal is a designated SSSI and SAC for its Floating water-plantain. It is important to ensure that any increased recreational use of

		<p>the canal and towpath and any development proposals in the vicinity of the canal take full account of its status as a SAC and SSSI and ensure adequate protection of the biodiversity importance of the canal.</p> <p>Despite the above, we do believe there is a need to ensure that any policy relating to our canal network does not restrict vital development that can be required to allow for safe navigation or water management along our network; giving suitable flexibility to allow for works to be designed that mitigate against any risk to biodiversity of water quality.[...]</p>
LPIO498	Cycle-R	There is little to comment on here, so option B
LPIO499	Lichfield & Hatherton Canals Restoration Trust	We favour option A – provided that the policy recognises the need for a balanced approach between protecting areas for wildlife habitat and enabling work to proceed to achieve corridors of Green Infrastructure where safe access is facilitated both for people and for wildlife. The restoration of the Hatherton Canal is a programme where that balance must be achieved for the work to proceed to secure the full range of benefits.
LPIO500	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	This will depend upon the evidence as to whether a separate SAC policy is needed for the extension canal. It is important that, as policies are formulated, any quantified measures are clearly evidenced, robust and justifiable and do not impose unreasonable burdens when considered in the round with other planning requirements.
LPIO501	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey supports policy which protects and enhances the biodiversity and geodiversity of sites. Clarity surrounding biodiversity offsetting should be clearly set out through the Local Plan policies.
LPIO502	Wyrley Estate (c/o Fisher German LLP)	It is considered that option B is the most justified, as it is imperative that the importance of heritage asset is protected, and harmful forms of development prevented to enable a heritage-led regeneration scheme to come forward as identified as a key priority.
LPIO503	Hughes, R	Option B – Update current policy and include new policy for Cannock Extension Canal SAC.
LPIO504	Inland Waterways Association	IWA supports Option B ; introducing a new policy for Cannock Extension Canal SAC. However, if this is pursued, it should be a comprehensive policy balancing the statutory requirements to protect this SAC with the status of the canal as a navigation and its use for recreational activity and residential boats. It should also address the wider context of adjacent land uses including the existing commercial boatyards, the various current and potential future uses of the Grove Colliery site, and the impact of proposed traveller sites and the go-kart track. As concerns about air quality demonstrate, the SAC does not exist in isolation, and a dedicated plan policy should address all such relevant matters to provide a sustainable plan for both the protection of the SAC and the legitimate interests of local people, visitors, residents and businesses on and adjacent to the site. (note also para 11.37).
LPIO505	Lyons, O	I believe that it is important to protect SACs such as the existing Cannock Chase SAC, I would also extend this to include the Cannock Extension Canal SAC as outlined in Option B .
LPIO506	Natural England	Natural England supports Option B as set out in order to update existing Policy CP12 and to introduce a new policy for Cannock Chase Extension Canal SAC. As you are aware there is progression, through the Cannock Chase SAC Partnership and the Ecological Joint Approach Group, to develop a Strategic Nitrogen Action Plan for the South Staffordshire SACs. This work is in development but will aim to collate an evidence base and a robust strategic approach to avoid and mitigate for the effects of traffic pollution.

LPIO507	Cllrs. Preece, J, Stretton, Z and Newbury, J	We would support option B . The Cannock Extension Canal is an environmental asset of particular concern in Norton Canes, especially with respect to recent developments with the Grove Colliery site. We would prefer to see sympathetic developments along and around the Canal, particularly better cycle routes access and a pedestrian crossing on the A5 following the line of the Canal.
LPIO508	Norton Canes Parish Council	Option B which proposes a specific policy regarding the Cannock Extension Canal is supported.
LPIO509	Staffordshire County Council	Recent work on Nature Recovery Network mapping by Stafford BC and Staffordshire Wildlife Trust offers a cost-effective way to meet the strategic approach promoted in NPPF, and if expanded within the county will also offer cross-boundary insights. Option B is favoured because the Cannock Extension Canal SAC needs specific consideration.
LPIO510	Wright, T (c/o Pegasus Group)	This will depend upon the evidence as to whether a speared SAC policy is needed for the extension canal. However, it is important that, as policies are formulated, any quantified measures are clearly evidenced, robust and justifiable and do not impose unreasonable burdens when considered in the round with other planning requirements.
Question 49 Have you any other issues you wish to raise in respect of biodiversity and geodiversity?		
LPIO511	Richborough Estates (S of Cannock Rd) (c/o Pegasus Group)	The inclusion of a country park as part of the proposals for land south of Cannock Road, Heath Hayes will be able to ensure significant net gains in terms of biodiversity. This will include protection of the existing Site of Biological Interest adjacent to the south east of the proposal country park area, and the creation of wet woodland in association with Newlands Brook. The proposal also creates opportunities to enable links from the site to the wider proposed heathland enhancement corridor between Cannock Chase and Sutton Park as referenced in Policy CP12 of the current adopted Local Plan so the site will be able to offer significant additional benefits beyond its boundaries.
LPIO512	National Farmers Union	Farmers and landowners must be fully engaged with discussions on biodiversity and geodiversity as they own and manage many of the districts key natural capital assets. For the majority of farmers environmental management is a core business activity. Previous studies have shown that agricultural businesses routinely invest in landscape management and enhancement works for example hedging, tree planting, cutting and grazing.
LPIO513	Cllrs. Preece, J, Stretton, Z and Newbury, J	Additionally, as referred to in our response to question 7, we would like to see more focus on the Chasewater and Southern Staffordshire Coalfield Heaths SSSI. It should be a fundamental focus of the Local Plan specifically to formalise and firm up to efforts to bring the SSSIs sites that lie within the District up to higher standard.
LPIO514	Staffordshire County Council	The District contains very little ancient woodland; an additional policy to protect this, including creation of buffering habitat would be helpful. Suitable policy support for this habitat should include mature trees and near veterans because they are the veterans of the future.
LPIO515	Association of Black Country Authorities (c/o Walsall Council)	See our response to Questions 12, 13, 14 above with reference to the Hatherton Canal and its potential restoration. (See Question 12)
Cannock Chase SAC Policy Options		

Question 50 Do you have any comments on this option?		
LPIO516	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	It is accepted that mitigation is required in line with up to date evidence, the site of Brownhills Rd, Norton Canes lies within a designated 15km radius of Cannock Chase SAC. The site has the potential to provide on-site green infrastructure and is conveniently situated close to Chasewater Country Park.
LPIO517	Bloor Homes Ltd (c/o Define Planning & Design)	An update of the evidence base and mitigation strategy for addressing the recreational pressures at Cannock Chase that would arise from further growth is welcomed in order to facilitate the scale of development required in the District to meet the identified housing need and address the nation's housing crisis.
LPIO518	Cannock Chase AONB Partnership	The SAC forms a key part of the AONBs special qualities, therefore policy to ensure its conservation incorporating measures to avoid or mitigate for increasing pressures is warmly welcomed.
LPIO519	Natural England	We support Policy A . The visitor survey work is now complete and can feed into the Local Plan. We will continue to provide support on this matter via the Cannock Chase SAC Partnership and at further stages of the Plan.
LPIO520	Staffordshire County Council	It is agreed that the policy may need to change as the local evidence base changes. Legal interpretation of the Habitats Regulations also continues to expand and may affect how this policy is implemented.
LPIO521	Wright, T (c/o Pegasus Group)	It is accepted that mitigation is required in line with up to date evidence. The site at Birches Farm (Land at Upper Birches Farm, Rugeley) lies within a designated 15km radius of Cannock Chase SAC. The site has potential to provide on-site green infrastructure to provide an alternative, local and attractive alternative destination for walkers and, in particular dog walkers, as the evidence shows that the latter then to use Cannock Chase regularly and cause the most damage.
LPIO522	Association of Black Country Authorities (c/o Walsall Council)	We reserve the right to comment (including through the SAC Partnership) once the evidence review is complete and we have had the opportunity to consider it.
Landscape Character and Cannock Chase AONB Policy Options		
Question 51 Which option or combination of options do you support?		
LPIO523	Cycle-R	There is little to comment on here, so Option C
LPIO524	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Option A is the most appropriate option. Option B is not appropriate as it would be too prescriptive and could be treated as a 'tick-box' exercise by decision makers without having regard to the wider context/ 'planning balance'.
LPIO525	Briggs, T	Option A is supported. There should be no exceptions to the policy other than those that are a requirement due to national planning law; to develop parts of the AONB sets a dangerous precedent [...]
LPIO526	Cannock Chase AONB Partnership	Option C is supported. An updated design SPD would provide appropriate support to this policy. Policy and Actions in the AONB Management Plan support production of guidance on design and on setting and views, which could potentially become reference documents to the Local Plan. The AONB Joint Committee would welcome specific reference in Local Plan Policy CP14 – Landscape Character and Cannock Chase AONB to protection. Conservation and enhancement of the landscape and scenic beauty of the AONB for its own sake, in line with para. 172 of the NPPF. [...]

		In order to add this clarity and therefore ensure that the Local Plan is fully in accordance with the provisions of the NPPF, it is suggested that a sub-paragraph is added to CP14. This could be worded so as to complement the clear protection that is afforded to biodiversity interests and the SAC in the preceding policies (CP12 and CP13).
LPIO527	Hughes, R	Option C – Update current policy, including a supplementary policy document on design
LPIO528	Lyons, O	I would opt for Option B in this instance on the basis that applications may be submitted within the area that actually enhance Cannock Chase and allow the area to be better promoted and utilised. I do, however, think that any criteria developed to judge applications against must be detailed, robust and centre around the protection of our natural environment.
LPIO529	Natural England	The Cannock Chase AONB Management Plan 2019-2024 has now been adopted by Local Authorities. It sets out clear action to prepare guidance on ‘Building and Infrastructure Design in Cannock Chase AONB’ which Local Planning Authorities will be invited to adopt. Option C would give capacity to enhance the current policy wording and accommodate the adoption of Design Guidance produced by the AONB Partnership.
LPIO530	Wright, T (c/o Pegasus Group)	It is submitted that Option A is the most appropriate option. Option B is not appropriate as it would be too prescriptive and could be treated as a ‘tick box’ exercise by decision makers without having regard to the wider context/‘planning balance’.
Question 52 Have you any other issues you wish to raise in respect of Landscape Character and Cannock Chase AONB?		
LPIO531	Richborough Estates (Brownhills Rd) (c/o Pegasus Group)	Both the adopted and the emerging local plan, linked to the AONB Management Plan, highlight the significance of this key asset and the need for its protection including its setting. The site being promoted south of Brownhills Rd, Norton Canes, is well located in terms of its distance away from the AONB.
LPIO532	Richborough Estates (S of Cannock Rd) (c/o Pegasus Group)	Both the adopted and the emerging local plan, linked to the AONB Management Plan, highlight the significance of this key asset and the need for its protection including its setting. The site being promoted south of Cannock Road, Heath Hayes, is well located in terms of its distance away from the AONB, and offers the opportunity for landscape enhancement through the proposed country park.
LPIO533	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	It will be necessary through the Local Plan process to allocate land to meet housing needs and as identified within the Issues and Options, one option may be the allocation of land within the AONB. It will be for the Local Plan to ensure that AONB boundaries are adjusted as part of this process to ensure that strategic allocations are not frustrated by an additional layer of complexity at the planning application stage.
LPIO534	Beau Desert Golf Club c/o FBC Manby Bowdler LLP)	Within the AONB policy provision should be made, exceptionally, for new development, particularly on brownfield land, which enables, supports, and enhances local distinctiveness and landscape quality and public accessibility to and enjoyment of the AONB (e.g. to include the proposal for site C375).
LPIO535	Briggs, T	The Council should stand firm on a policy of no AONB development; if this results in not being able to meet full allocations for new development then so be it; it appears that others areas can simply report that they cannot meet demand and other authorities are expected to take up the slack – I do not see why CCDC cannot take the same approach given the national importance of protecting much threatened areas such as the AONB.

LPIO536	Cannock Chase AONB Partnership	The AONB Management Plan defines one of the AONBs special qualities as ' <i>Relative Wildness and tranquillity</i> ', describing the AONB as ' <i>A haven in tranquillity and wildness.</i> ' Some policy wording around protecting that quality and avoiding impacts on tranquillity, such as that potentially arising from increased user pressure, would be welcomed.
LPIO537	National Farmers Union	Given that large areas of the District are either designated as AONB or Green Belt it is important that some provision is made to support rural businesses when they need to invest in new infrastructure and modern agricultural buildings. Environmental compliance and animal welfare standards are changing and it is important that these businesses are able to evolve in order to meet them. These businesses play a vital role in maintaining the landscape and their activities provide a wide range of public goods.
LPIO538	Wright, T (c/o Pegasus Group)	Both the adopted and the emerging Local Plan, linked to the AONB Management Plan, highlight the significance of this key asset however it is possible to achieve high quality schemes in AONB areas to meet identified needs and this site presents such an opportunity in helping to achieve a balanced strategy for Rugeley which provides for both economic and residential growth.
LPIO539	Association of Black Country Authorities (c/o Walsall Council)	We have no comments to make about these questions. However, in respect of option B, we would point out that the Green Belt is not a landscape designation, so policies used to assess planning applications in terms of the impact on the Green Belt should distinguish between the impact on Green Belt and the impact on landscape.
Historical Environment Policy Options		
Question 53 Which option or combination of options for the historic environment do you support?		
LPIO540	Canal & River Trust	We would support the aspirations of Option B , as it would give additional reference and importance to those historic elements that contribute positively to the setting of the District as a whole. In Rugeley, the canal can offer a significant opportunity to help provide a setting for heritage led regeneration, and can provide an asset to promote visits to the town. A policy that makes specific reference to heritage opportunities here would make the Local Plan more effective in fostering and promoting regeneration initiatives here.
LPIO541	Lichfield & Hatherton Canals Restoration Trust	We favour Option B – with the specific interest that the Hatherton Canal be identified as an element of local heritage to be made more accessible and to be given a higher public profile by the deployment of interpretation boards at appropriate locations.
LPIO542	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The positive and flexible wording of Options A and B is supported as this accords with the spirit of the NPPF for planning positively. There is concern that Option C could be too prescriptive unless it was formulated as guidance rather than a requirement to enable consideration of the local context.
LPIO543	Wyrley Estate (c/o Fisher German LLP)	It is considered that option C is the most justified, as it is essential to have a robust policy that sits within a broader strategy, which is advocated by national policy.
LPIO544	Hughes, R	Option A – Update and expand the current policy
LPIO545	Lyons, O	In recent years many memorials have been erected and there is symbolic recognition across the District of our heritage and historic environment. I believe a sole focus on this would place too many limitations on future developments, however, I do believe heritage to be important. The Council must strike a reasonable balance and I believe Option A –

		updating and expanding the existing policy whilst also including more references to opportunities for regeneration related to heritage – would be best suited.
LPIO546	Cllrs. Preece, J, Stretton, Z and Newbury, J	We support option C . We believe it is an opportunity lost for the Council to allow the Grove Colliery site to be sold for the development of a gypsy and traveller site which was not identified in the 2014 incarnation of the Local Plan; in fact, it was identified as a site which potentially could be development with a key focus on its outstanding heritage value, something which has been tentatively planned by the District Council and the owner of adjacent land for decades as was confirmed in a briefing produced by a Senior Planner at the District Council as recently as last year.
LPIO547	Norton Canes Parish Council	Option B which makes specific reference to local heritage opportunities including canals, collieries and former railway lines is strongly supported.
LPIO548	Staffordshire County Council	A combination of Options B and C referring to the forthcoming Heritage Impact Assessment evidence and including the development of a district-wide interpretation strategy would be the preference.
LPIO549	Thornton, H	Support for Option B seems the best, particularly with respect to Rugeley's deteriorating 13 th Century Old Chancel which hopefully can become a visitor attraction.
LPIO550	Wright, T (c/o Pegasus Group)	The positive and flexible wording of Options A and B is supported as this accords with the spirit of the NPPF for planning positively. There is a concern that Option C could be too prescriptive unless it was formulated as guidance rather than a requirement to enable consideration of the local context.
Question 54 Have you had any other issues you wish to raise in respect of this historic environment?		
LPIO551	Cycle-R	There is little to comment on here, so option C
LPIO552	Richborough Estates (S of Cannock Rd) (c/o Pegasus Group)	Whilst the site south of Cannock Rd, Heath Hayes is of little obvious significance in terms of the District's historic past, it sits within the wider context of a varied and dynamic heritage and there are opportunities to celebrate this through local interpretation which could be incorporated into the public spaces of the site.
LPIO553	Wyrley Estate (c/o Fisher German LLP)	The main heritage matter of interest to Wyrley Estate is the future of the Grove Colliery site. The future of the canal SAC particularly around the former Grove Colliery site, is at a critical crossroads. It has been a long-standing policy aspiration to see the areas developed as a leisure and recreational centre, but this has never come to fruition. At present the site comprises low-grade commercial and storage uses and is massively under-utilised. The site has enormous potential to deliver a high-quality heritage-led regeneration scheme that will significantly boost the economy of not only the area but the wider district. [...] Wyrley Estate owns a part of the Grove Colliery site, with other lands being owned by the Council. Discussions about how there might be a joint approach to considering the future of the site, perhaps as apart of a mixed-use scheme that might use some residential and employment development to enable a heritage-led development. To boost the opportunities for development, it is suggested that the Grove site should be taken out of the Green Belt and a robust policy framework put in place that provides flexibility around a heritage-led regeneration. A policy could refer to the need for a masterplan to be created for the site to show how it will deliver heritage and leisure aspirations in a comprehensive and deliverable manner.

LPIO554	Historic England	We are supportive of a section on the historic environment and note the existence of the current historic environment policy in the local plan. We would welcome an updated approach that seeks to continue NPPF conformity as well as develop elements of local distinctiveness and protection of local assets. We would welcome a local list being prepared for the district, and consider that the Local Plan poses a useful opportunity for dealing with this. [...]
LPIO555	Staffordshire County Council	As previously advised in the Issues and Scope consultation, it is noted that important pieces of the baseline heritage evidence, namely the Historic Environment Character Area and the Extensive Urban Surveys, are now nearly a decade old and it is recommended that a degree of review of these will be required to ensure that they continue to be relevant to the aims of the District Council in protecting and enhancing all types of heritage asset. It is welcomed that there is recognition that the results of the Chase Through Time project will be included as part of the updated evidence base, whilst it is also recommended that Historic England's guidance 'The Historic Environment and Site Allocations in Local Plans' is considered in this process.
Greener Future Policy Options		
Question 55 Does the updated NPPF and other recent Government policy (e.g. Clean Growth Strategy 2017) allow the Council to set higher energy efficiency standard requirements, where justified by local evidence?		
LPIO556	Home Builders Federation	The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Council from stipulating energy performance standards that exceed the Building Regulations but consider that the Council should comply with the spirit of the Government's intention of setting standards for energy efficiency through the Building Regulations [...] It is the HBF'S opinion that the Council should not be setting different targets or policies outside of Building Regulations. The key to success is standardisation and avoidance of every LPA in the country specifying its own approach to energy efficiency which would mitigate against economies of scale for both product manufacturers, suppliers and developers.
LPIO557	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	It should be noted that the Code for Sustainable Homes has now been surpassed by Building Regulations which exceeds the energy efficiency standards defined by Code for Sustainable Homes Level 4, 2015. Paragraph 150 (b) of the NPPF states: " <i>any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.</i> " The expectation of Government is therefore clearly that local planning authorities should seek to enforce those standards required by Building Regulations.
LPIO558	Rugeley Power Ltd (c/o Savills)	It is considered that the Greener Future Policy within the Local Plan should remain flexible and the viability of sites when providing energy efficient schemes should be considered. Therefore, it is considered that Option B is the most appropriate option, that sustainable construction standards should be encouraged not required.
LPIO559	Taylor Wimpey (c/o Lichfields)	The Practice Guidance makes clear that local requirements should form part of a Local Plan following engagement with appropriate partners and will need to be based on robust and credible evidence and pay careful attention to viability. The Practice Guidance advises that the WMS on Plan Making dated 25 March 2015 clarified the use of plan policies and conditions on energy performance standards for new housing developments. The standard sets out the government's expectation that such policies should not be used to set conditions on planning permission with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes.

LPIO560	Bloor Homes Ltd (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	As Stated in response to Question 9, it is entirely inappropriate to seek to set any local technical standards or requirements relating to the construction, internal layout or performance of new dwellings in Local Plan policy beyond the clearly specified exceptions, and only when there is robust evidence of a need to do so. Notably, any improvement to energy efficiency standards will be realised through the revision of Building Regulations, not local planning policy.
LPIO561	Inland Waterways Association	IWA supports Option A ; include reference to potential role of canal network in contributing to low carbon technologies and surface water drainage.
LPIO562	Staffordshire County Council	We would agree that this is the case and that further local evidence may be necessary. <u>Minerals and Waste</u> This should include consideration of the existing requirements of policies 2.4 and 2.5 of the Waste Local Plan relating to safeguarding waste management facilities as well as policy 3 of the Minerals Local Plan relating to safeguarding important mineral resources and mineral infrastructure sites. Note that within the District, there will be other mineral infrastructure sites which are subject to the regulation of the District Planning Authority and should be safeguarded e.g. brickworks, concrete batching plants.
LPIO563	Wright, T (c/o Pegasus Group)	Paragraph 012 of the Planning Practice Guidance reference ID: 6-012-20190315 (updated March 2015) states: <i>'Different rules apply to residential and non-residential premises. [...] local planning authorities: Can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes [...] in sitting performance standards above the building regulations for non-housing developments.'</i> The guidance goes on to state: 'The Planning and Energy Act 2008 allows local planning authorities to set energy efficient standards in their development plan policies that exceed the energy efficiency requirements of the building regulations. [...] The Written Ministerial Statement on Plan Making dated 25 March 2015 clarified the use of plan policies and conditions on energy performance standards for new housing developments.[...] provisions in the Planning and Energy Act 2008 also allow development plan policies to impose reasonable requirements for a proportion of energy used in development in their area to be energy from renewable sources and/or to be low carbon energy from sources in the locality of the development.' The guidance cited above is dated March 2015 and had not been further amended at the point of writing these representations.
Question 56 Apart from a viability assessment of the costs of such measures, what local evidence would be needed to justify the need for higher sustainable constructions standards over and above building regulation requirements?		
LPIO564	Home Builders Federation	Higher sustainable construction standards over and above Building Regulations should not be sought. The HBF's preference is Option B to continue with the current policy approach of encouraging sustainable construction standards.
LPIO565	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	If higher standards are to be required over and above those set by Building Regulations, these would need to be justified through local evidence. However, it is considered that this would be contrary to Paragraph 150 (b) of the NPPF.
LPIO566	Severn Trent	A water cycle study and supporting evidence from both the EA and water and waste water service providers could be used to set site specific policies on high sustainability or construction targets.

LPIO567	Taylor Wimpey (c/o Lichfields)	The Practice Guidance states that if a local planning authority applies a higher water efficiency standard they should establish a need through information gained from consultation with the local water company, the Environment Agency and catchment partnerships. No guidance is provided on the evidence to inform energy efficient standards, so standards over the building requirement would need to be justified by overarching, conclusive and up-to-date evidence establishing their need.
LPIO568	Staffordshire County Council	Evidence could include: <ul style="list-style-type: none"> • Local Climate Change Scenarios. UKCP18 publishes regional scenario-based data • Whilst not strictly a local issue, construction standards should also be considered to required over and above regulations in terms of 'future proofing' • Local evidence such as health and wellbeing statistics could be considered to justify the need for construction which promoted healthier living and working. • Standards may include which relate to the heating, cooling and fuelling of a site. • Material availability (taking into account suitability for the application) • Evidence around the life cycle impacts of the construction including how the construction could be disposed of at the end of its life span • Lifetime building operational costs compared to the 'norm' in the area may also be beneficial
LPIO569	Wright, T (c/o Pegasus Group)	If higher standards are to be required over and above those set by Building Regulations, these would need to be justified through local evidence e.g. the Council's climate change strategy or similar which provides local detail (for example relating to the domestic, commercial, transport sectors.)
Question 57 If specific standards are considered appropriate, should these be required on a certain threshold of site e.g. large sites only?		
LPIO570	Home Builders Federation	The HBF consider that specific standards are inappropriate (see HBF answers to Questions 55 & 56)
LPIO571	Richborough Estates Brownhills Rd & S of Cannock Rd (c/o Pegasus Group)	It is not considered that this should be the case as the need for any such standards would be likely to be the result of cumulative impacts as shown by any evidence produced. However, this would need to be carefully considered in the round as part of the work which will be needed in terms of viability.
LPIO572	Severn Trent	Both the size and consequential impact of the development alongside the context of its surrounding infrastructure and environmental constrains should be considered when defining specific standards in planning policy.
LPIO573	Taylor Wimpey (c/o Lichfields)	Any need established for efficiency standards should be applied to all sites regardless of size. Any requirements for efficiency standards must be tested through the Local Plan viability assessment work across a range of site sizes/typologies being tested.
LPIO574	Staffordshire County Council	No, whilst threshold of site may naturally limit the viability of some options this may not be the case for all. If standards are considered appropriate it may therefore be more prudent to apply them to all site unless it can be demonstrated, they cannot be achieved rather than an arbitrary cut off based on scale. Also factors such as location can more greatly affect the viability of specific standards than the size of the site. A location-based methodology may support greater application of sustainable construction.

		However, sustainable construction could look different for each application, by not restricting where this is applied, more opportunities and innovations would be achievable; rather than limiting the application.
LPIO575	Wright, T (c/o Pegasus Group)	It is not considered that this should be the case as the need for any such standards would be likely to be the result of cumulative impacts as shown by any evidence produced. However, this would need to be carefully considered in the round as part of the work which will be needed in terms of viability.
Question 58 Are there any new or emerging technologies that should specifically be taken into account in gathering the evidence?		
LPIO576	Canal & River Trust	The Trust wish to highlight the potential of the canal for heating & cooling for district heat network or individual schemes such as at allocated sites. We consider that heating and cooling schemes can be delivered without any adverse impact on biodiversity. We believe that the Local Plan should include reference to the potential of the canal network and other waterbodies to contribute to low carbon technologies. (In addition, the Trust also wish to highlight the potential for surface water drainage to the canal which could also be referenced in revised Policies.)
LPIO577	Cycle-R	Option C – however, looking at house building, Cannock would do well to institute requirements to match the German ‘Passiv-Hause’ policy. Creating energy neutral housing and an increase in zero carbon impact transport infrastructure – canals, cycle paths, electric vehicles (including public transport) and a strong rail infrastructure.
LPIO578	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Technology is constantly changing so the plan should be flexible in order to be able to adapt and respond accordingly.
LPIO579	Hughes, R	Option C – Require developments to adhere to sustainable and low carbon building standards
LPIO580	Lyons, O	I would give preference to Option C which involves updating the existing policy so as to reflect new evidence, but also requiring any new developments to meet specific building standards, including sustainable construction standards in terms of water efficiency, energy efficiency, low carbon and renewal technologies. Inclusion in the Local Plan now would force a transition and help pave a greener, sustainable future.
LPIO581	Staffordshire County Council	There are existing technologies which are rapidly reaching a stage where they will be more widely applicable such as smart technology, the internet of thin mgs, and battery storage. Construction should not limit the ability to integrate these technologies in the future. Modular designs allow for more adaptation. Consideration of the ability to integrate, for example, EV charging could mean building in the capacity at point of construction, even if not immediately viable.
LPIO582	Startin, P	Option C is the correct choice here. We are living in a time when construction advances are so fantastic, and greener ways of construction are becoming more obtainable, the Council has an obligation to push these standards through.
LPIO583	Wright, T (c/o Pegasus Group)	Technology is constantly changing so the plan should be flexible in order to be able to adapt and respond accordingly.
Policy Development Contributions and Infrastructure		
Question 59 Is there a need for continued overarching policy which sets out Council overall approach to developer contributions i.e. continuation or Policy CP2 (with updates to reflect changed national and local context)? If so, what updates should be made to the policy?		

LPIO584	Canal & River Trust	<p>Where new development has the likelihood to increase usage we consider that it is reasonable to request a financial contribution from developers to mitigate this impact.</p> <p>The Review offers the opportunity to reassess the mechanisms through which improvements to canal corridors are provided and ensure the impacts of developments on the canal network are mitigated. [...]</p> <p>Whilst CIL would allow for the funding of key infrastructure investments, as set out in a regulation 123 list, we believe there is a need for policy to identify that s.106 payments may be necessary to fund for improvements to accommodate the expected increased usage brought by specific developments onto our network [...].</p>
LPIO585	Home Builders Federation	<p>The new Local Plan should set out the contributions expected from development including the level and types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication etc.</p> <p>It is important that the Council understands and tests the influence of all inputs on viability as this determines if land is released for development. An updated viability assessment should be undertaken.</p> <p>The Council should continue to have an updated version of Policy CP2.</p>
LPIO586	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>It is considered that adopted Policy CP2 needs significant updating to bring it into line with current Government policy and guidance, especially paragraph 34.</p> <p>Policy CP2 as adopted is very light-touch, as the detail is contained in SPD. It is not considered that this approach will be sufficiently robust in future especially given that there is an increased emphasis upon viability at the plan making stage. Where standards are to be set (e.g. open space) these should be articulated in policy rather than SPD so as to be able to inform local plan viability.</p> <p>It is also essential that where elements of the plan are dependent upon market conditions that in these cases the plan demonstrates the ability to be flexible linking to the most up to date evidence to ensure that it continues to remain viable and deliverable over its lifespan.</p> <p>The intention to produce a Viability Assessment to inform the plan is welcomed and indeed will be an essential element of the evidence base as greater clarity is required in respect of all potential developer contributions. [...]</p>
LPIO587	Taylor Wimpey (c/o Lichfields)	<p>In accordance with the Practice Guidance, the Local Plan will need to clearly set out the contributions expected from development. This should include setting out the levels any types of affordable housing provision required, along with other infrastructure.</p> <p>Any policy requirements will need to be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of CIL and S106.</p> <p>Importantly for developers, policy requirements should be clear so that they can be accurately accounted for in the price paid for land. Policies will need to be realistic and ensure that the total cumulative cost of all relevant policies will not undermine deliverability of the Local Plan.</p> <p>The Local Plan will also need to take into account any national reviews of the developer contributions system, such as updates to CIL.</p>

LPIO588	Gladman	Paragraph 34 of the NPPF makes it clear that Local Plan should set out the contributions expected from development including the levels and types of affordable housing required, as well as other infrastructure such as education, health, transport, flood and water management, green and digital infrastructure. An updated viability assessment should be undertaken to ensure that the cumulative development requirements do not render sites undeliverable.
LPIO589	Wright, T (c/o Pegasus Group)	It is considered that adopted Policy CP2 needs significant updating to bring it into line with current Government policy and guidance, especially paragraph 34. Policy CP2 as adopted is very light-touch, as the detail is contained in SPD. It is not considered that this approach will be sufficiently robust in future especially given that there is an increased emphasis upon viability at the plan making stage. As set out in these representations it is important that where standards are to be set these should be articulated in policy rather than SPD so as to be able to inform local plan viability. It is also essential that where the elements of the plan are dependent upon market conditions that in these cases the plan demonstrates the ability to be flexible linking to the most up to date evidence and to ensure that it contributes to remain viable and deliverable over its lifespan. The intention to produce a Viability Assessment to inform the plan is welcomed and indeed will be an essential element of the evidence base as greater clarity is required in respect of all potential developer contributions including affordable housing, CIL charges and potential site specific requirements.
Question 60 Do you have any comments on specific development contributions and infrastructure requirements that should be contained within strategic or non-strategic policies?		
LPIO590	Canal & River Trust	As per Question 59 re financial contribution. Improvements to the surfacing and signposting on these routes would be vital in order to increase their capacity and capability to accommodate additional users. We strongly believe that this should be referred to within Local Policy, as there is a significant risk that otherwise key walking and cycling routes in the District could become degraded at cost to both existing and future communities. We note that improvements to towpaths, mooring facilities and access points to our network in Rugeley Town Centre could significantly encourage and promote public access to our network; allowing the community to better access the wider Green Infrastructure Network, which we believe would provide benefits for health and wellbeing (see Question 12). The Trust is actively working with the Local Authority towards public realm improvements at Leathermill Lane and towpath improvements at Brereton, which could greatly assist in achieving these aims. We believe that the Local Plan should refer to these specific improvements, and measures to further promote links between the canal and the town. Delivery of the Hatherton Canal restoration would be desirable in order to meet the objectives of promoting tourism, leisure, economic regeneration, health wellbeing and green infrastructure. We therefore request that reference to the restoration aspirations, actively promoted by the Lichfield and Hatherton Canals Restoration Trust, are included in the Plan.
LPIO591	Lichfield & Hatherton Canals Restoration Trust	We are please to note that the restoration of the Hatherton Canal has been mentioned as an appropriate programme to be supported.

LPIO592	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Any requirements deemed to be essential should be included in strategic policy as they inform plan making which then sets the context for the decision-making process. The NPPF needs to be the starting point for determining strategic and non-strategic matters, however it should be borne in mind that disproportionate 'non-strategic' matters considered on a site by site basis could still potentially impact upon viability, and cumulatively could impact upon plan delivery therefore a pragmatic and reasonable approach needs to be taken, especially in terms of funding and delivery. The CFIL regulation 123 List along with the proportion of CIL allocated to neighbourhoods should be used to deliver non-strategic infrastructure, including leveraging in match funding from other sources.
LPIO593	Taylor Wimpey (c/o Lichfields)	The Local Plan should clearly identify infrastructure requirements on the basis set out by the Framework. As required by the Framework, infrastructure requirements should not undermine the deliverability of the plan. Any infrastructure sought, both district wide and site specific, therefore needs to be thoroughly tested through the Local Plan Viability Assessment work.
LPIO594	Brindley Heath Parish Council	Roads – The Power Station development could see c.2300 new homes being built which would add c.4500 additional vehicles to this area so it is vital that the surrounding road system can cope. [...]
LPIO595	Historic England	We welcome consultation on developer contributions on page 113 and would request that heritage is added to the list of acceptable areas to fund, specifically issues such a heritage at risk, public realm improvements, conservation areas at risk such a shopfronts, signage, historic landscapes etc.
LPIO596	Inland Waterways Association	IWA supports the suggestion at para 13.13 of funds for the restoration of the Hatherton Canal.
LPIO597	Wright, T (c/o Pegasus Group)	Any requirements deemed to be essential should be included in strategic policy as they inform plan making which then sets the context for the decision-making process. The NPPF needs to be the starting point for determining strategic and non-strategic matters, however it should be borne in mind that disproportionate 'non-strategic' matters considered on a site by site basis could still potentially impact upon viability, and cumulatively could impact upon plan delivery therefore a pragmatic and reasonable approach needs to be taken, especially in terms of funding and delivery.
Question 61 Are there any developments which should be exempt from developer contributions (e.g. currently housing for the elderly is exempt from CIL)?		
LPIO598	Home Builders Federation	The Council should undertake an updated whole plan viability assessment. If any unviable sites and/or typologies are identified then these should be considered for exemption from developer contributions.
LPIO599	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	As the NPPG sets out criteria for exemptions from Developer Contributions, any local policy will need to establish where further exemptions could apply for example of the grounds of viability.
LPIO600	Upton Trust & Carney Brothers (c/o Wardell Armstrong)	Clearly the adoption of CIL has an impact on development viability if applicable to specialist housing developments. In many ways the difficulties lie with the lack of flexibility and understanding of the range of housing types within the current Use Classes Order.

		House of Commons report published in 2018: CIL was also noted as being particularly onerous for developers of specialist housing, being a flat-rate sqm tax applying also the extensive shared areas such as restaurants, leisure facilities, communal lounges and larger wheelchair accessible corridors typical of extra care housing schemes. It may well be sensible to set out specific typologies where circumstances do exist that uses that do not fall to be assessed against general housing policies and triggering requirements such as affordable housing providing that may affect viability.
LPIO601	Wright, T (c/o Pegasus Group)	As stated in PPG, ' <i>provision of affordable housing should only be sought for residential developments that are major developments. For housing development, major development is defined in the National Planning Policy Framework [...] or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.</i> ' (Paragraph: 023 Reference ID: 23b-023-20190315, March 2019).
Question 62 Do you have any comments on the most recent updated Infrastructure Delivery Plan?		
LPIO602	Canal & River Trust	<p><u>Page 15: Canals</u></p> <p>Trent & Mersey Canal: The Trust welcome the inclusion of works to the Trent & Mersey Canal towpath and the restoration of the Hatherton Canal; and believe that the content provided is an accurate reflection of the planned works. [...] We wish to highlight that the Trust has active plans to improve the canal towpath to the north of Rugeley, north of Leathermill Lane. Development in and around the Towers Business Park employment area, and new housing in Rugeley will likely increase demands upon this section of the towpath. In addition, the Trust has aspirations to improve mooring facilities along this stretch of towpath (including essential repairs to the canal wash wall) to improve visitor facilities to the town.</p> <p>We request that improvements to the towpath north of Leathermill Lane (to Etchinghill) should be included in the Infrastructure Delivery Plan so that these improvements can be actively planned for during the Plan Period.</p> <p>Hatherton Canal: We welcome the inclusion of this project in the Infrastructure Delivery Plan.</p> <p>The Lichfield and Hatherton Canals Restoration Trust (LHCRT) is actively working towards the restoration of the former Lichfield Canal to navigable status. We are supportive of the work of the LHCRT in restoring the canal, which is likely to progress during the Local Plan Period.</p>
LPIO603	Lichfield & Hatherton Canals Restoration Trust	<p>It is not clear that our comments against an earlier issue of the Infrastructure Delivery Plan have been recorded in this most recent update. Our comments under the August 2018 consultation were submitted using the on-line form. Regarding the Infrastructure Delivery Plan, we commented as follows:</p> <p>The IDP needs updating in respect of the Hatherton Canal restoration project. There is a need to engage with the two adjacent local authorities and with the Lichfield & Hatherton Canals Restoration Trust to ensure proper and adequate through-route protection. It is also necessary to gain a better understanding of the funds which could be made available from or via the local authorities to enable the project to progress during the life of the present Local Plan. The IDP currently mentions boat movements as an issue likely to impact the Cannock Extension Canal SAC, this can now be deleted. There has been progress with land acquisition since May 2014.</p> <p><u>Page 12</u></p> <p>As a minor point of correction on page 12, the Delivery Agency 'British Waterways' should now read 'Canal & River Trust'</p>

		<p><u>Page 15</u> We welcome the inclusion of the restoration of the Hatherton Canal</p> <p><u>Page 22</u> We welcome the reference to the Hatherton Canal for possible flood risk alleviation benefits</p>
LPIO604	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The IDP has been updated but still contains information on infrastructure which has now been delivered. It needs refining to be shorter, sharper and focussed upon further requirements which are needed for plan delivery.
LPIO605	Severn Trent	<p><u>Surface Water and Sewer Flooding</u> We expect surface water to be managed in line with the Government's Water Strategy. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer. We believe that greater emphasis needs to be paid to consequences of extreme rainfall. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of sewers.</p> <p><u>Water Efficiency</u> We recommend that you consider taking an approach of installing specifically design water efficient fittings in all areas of the property rather than focus on the consumption of the property. This should help to achieve a lower consumption than the maximum volume specified in the Building Regulations. We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110litres of water per person per day.</p>
LPIO606	Sport England	Welcome the acknowledgement that the IDP will be updated to reflect the latest playing pitch and indoor facilities strategy.
LPIO607	Taylor Wimpey (c/o Lichfields)	The use of S106 obligations will need to be considered in the context of what is to be delivered via CIL and the Regulation 123 list. These should be no 'double counting' i.e. items of infrastructure should not benefit from both. Where possible, the IDP should identify the proposed allocations in the Local Plan to which individual infrastructure contributions will apply, and how this will be split proportionately where infrastructure serves a number of sites. This will ensure that the IDP is transparent and ensure that developers are aware of any obligations on them in bringing sites forward for viability reasons.
LPIO608	Cannock Chase AONB Partnership	Support for sustainable tourism and recreational management in the AONB within the Infrastructure Delivery Plan is welcomed to ensure that the AONBs qualities are protected and enhanced. In addition to identifying opportunities within the AONB, support for enhancements close to, but outside the AONB would be welcomed.
LPIO609	Environment Agency	Having reviewed the IDP it appears the detail of a number of water-based infrastructure needs have been drawn from the 2010 WCS, based on the figures within the Local Plan Part 1. We look for this to be updated in due course once more up to date information becomes available.
LPIO610	Highways England	We have reviewed the revised draft version of the IDP. The Council intend to work with partners and stakeholders to gain an understanding of what infrastructure projects are already planned in the district and where there are existing deficiencies. This is welcomed.

		<p>The updates to the IDP include reference to the following Highways England based studies/initiatives:</p> <ul style="list-style-type: none"> • Churchbridge A5/M6T/A460/A34 junction study; • A5 Partnership <p>This is noted, however, the referenced Churchbridge study is a past study as opposed to a current study. It is requested that all references to the 'Highways Agency' within the document are updated to state 'Highways England'. We also recommend that reference is made to the M54/M6 link road project; this scheme is now subject to a "Preferred Route Announcement". A Development Consent Order (DCO) application is expected to be forthcoming in due course, with completion estimated in 2024.</p> <p>It is of note that Midlands Connect are currently carrying out a study of the A5 corridor between M6 J12 and M1 J18. The purpose of this study is to focus on a series of transport improvements to accelerate growth in the corridor and the region. This study is expected to report imminently, and could play a role in the identification of any SRN mitigation required, hence will need to be incorporated into the IDP.</p> <p>Based on the results of our high-level analysis, traffic impacts arise throughout the SRN in the vicinity of the Cannock Chase District. As detailed elsewhere within this letter, further technical analysis will need to be carried out to identify the need for, location of, and form of any mitigation for the SRN.</p> <p>Accordingly, as the transport evidence base for the local plan evolves, it will be necessary to further update the IDP. This is likely to include the need to reference additional highway schemes on the SRN in order to mitigate the traffic impacts of the proposed developments.</p>
LPIO611	Historic England	We welcome the inclusion of public realm works, canal improvements and historic landscape works within the schedule.
LPIO612	Inland Waterways Association	<p><u>Canals (Page 15- Hatherton Canal)</u> S106. This column should be ticked to include contributions from any future development sites adjacent or close to the route.</p> <p>Please delete "and boat turning movements". Inclusion of the word "turning" makes no sense. Also, the issue of boat movements on the Cannock Extension Canal was considered at the Walsall Sites Allocation Plan examination, at which CCDC were represented.</p> <p>Natural England agreed that reference to boat movement restrictions were not justified and should be removed, which was subsequently done and the Plan adopted.</p>
LPIO613	Norton Canes Parish Council	The document suggests that health provision is satisfactory. However, the evidence is that GP practices are already struggling to cope with the number of people now residing in the village and any further increase arising from the committed housing schemes will only add to the pressure. The Health Centre on Brownhills Road is now a Community Hub for health provision such as community nurses and other health staff. The Parish Council would like to see the full building capacity used for primary care provision. Car parking at the building is also a major concern as patients are unable to park. We are not aware of any plans for GP surgeries to expand to cope with demand.
LPIO614	St Modwen (Watling Street)	St Modwen note that the IDP is a 'live document' and, as such, should be kept up to date as an ongoing requirement of the Local Plan Review process. Consequently, the details within it are likely to change as the policies and proposals evolve as the Local Plan Review progresses.

	(c/o RPS Planning and Development)	That being said, as detailed in Appendix 3 of this submission, there is considerable amount of work the Council needs to do in order to flesh out the detail regarding the critical and non-critical infrastructure necessary to support the delivery of the Plan.
LPIO615	Wright, T (c/o Pegasus Group)	The IDP has been updated but still contains information on infrastructure which has now been delivered. It needs refining to be shorter, sharper and focused upon future requirements which are needed for plan delivery.
Question 63 Do you have any comments on the evidence required to ensure it reflect the infrastructure requirements of the new Local Plan? Are there any existing evidence base documents, strategies or action plans from relevant organisations that could help inform the Infrastructure Delivery Plan updates?		
LPIO616	Canal & River Trust	Should the Local Authority have any questions with regards to the projects mentioned in other questions please feel free to contact simon.tucker@canalrivertrust.org.uk
LPIO617	Lichfield & Hatherton Canals Restoration Trust	We would welcome the opportunity to engage directly in discussion with Cannock Chase Council to ensure appropriate policy protection for those sections of the proposed through route for the Hatherton Canal that lies within the Cannock Chase District. We are also willing to work with the Council and with other relevant organisations such as the Inland Waterways Association and Canal & River Trust to ensure that the programme to restore the Hatherton Canals moves forward and the full range of benefits from that programme are identified, planned for, and supported. We would also mention the funding made available by Cannock Chase Council for the Water Supply Study for the restored Hatherton Canal. Once this study has produced the expected report, that document should form part of the evidence base referred to in this question.
LPIO618	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Infrastructure providers need to recognise the importance of their role and duty to engage early in the plan making process. Infrastructure requirements should be proportionate and directly relevant to the plan. They should not be used to retrospectively address previous deficiencies or underinvestment in provision. The IDP should be clear as to where funding for delivery will come from, how it will be accessed and whether it is dependent upon other sources including areas of risk.
LPIO619	Severn Trent	Within Severn Trent there are several sources of information you may find useful to appreciate our future plans; <ul style="list-style-type: none"> • Water Resource Management Plan (2019) <ul style="list-style-type: none"> ▪ https://www.severntrent.com/about-us/future-plans/water-resource-management/wrmp-19-documents/ • Drainage & Waste Water Management Plans <ul style="list-style-type: none"> ▪ Currently only a “lite” version exists as this is a new industry initiative and the first full version will become available in early 2022. You will be consulted on this as it develops. ▪ https://www.stwater.co.uk/content/dam/stw/about_us/pr19-documents/sve_appendix_a9_drainage_and_wastewater_management_plan.pdf • AMP7 (2020-2025) Business Plan <ul style="list-style-type: none"> ▪ https://www.stwater.co.uk/about-us/future-plan-2020-2025/your-opinions-matter/

LPIO620	Taylor Wimpey (c/o Lichfields)	Robust and up to date evidence will need to be provided to justify the infrastructure requirements within the Local Plan and any contributions sought. Where the Council is considering the use of existing documents to inform or form part of the evidence base, Taylor Wimpey considers that the Council should review these documents to ensure that they reflect the most up to date position on requirements and costs. As part of this process, the costs of such infrastructure will need to be clearly identified so that they can be properly tested through the Local Plan viability assessment work.
LPIO621	Historic England	We would welcome the preparation of a historic environment background topic paper, or some similar document setting out the approach taken for the historic environment and the assessment undertaken.[...]
LPIO622	Wright, T (c/o Pegasus Group)	NPPF Paragraph 16 (c) emphasises the importance of engaging with infrastructure providers (amongst others) in the plan making process. NPPF paragraph 25 sets out the need for clear engagement through the Duty-to-Cooperate. Infrastructure providers need to recognise the importance of their role and duty to engage early in the plan making process, being clear and transparent as to what is required and when and the justification for this. Infrastructure requirements should be proportionate and directly relevant to the plan. They should not be used to retrospectively address previous deficiencies or underinvestment in provision. The IDP should be clear as to where funding for delivery will come from, how it will be accessed and whether it is dependent upon other sources including areas of risk (e.g. funding bids).
Question 64 As an infrastructure provider, in what ways would you be able to best engage with the updates of the Infrastructure Delivery Plan on a regular basis?		
LPIO623	Canal & River Trust	We would welcome the potential; to discuss any issues with the Local Authority, and the ability to comment on any updates to the Infrastructure Delivery Plan. We believe that one-to-one meetings offer the most appropriate route of engagement, as it would allow both parties to talk about specific matters related to our infrastructure.
LPOI624	Lichfield & Hatherton Canals Restoration Trust	We feel it would be helpful, at this stage, to have a small number of nominated contacts within Cannock Chase Council and the Lichfield & Hatherton Canals Restoration Trust to ensure appropriate dialogue as felt necessary by either organisation. [...] In order to enable appropriate focus on 'our' item of Green Infrastructure we would want specific meetings with other relevant organisations represented as relevant which could include: Canal & River Trust, Inland Waterways Association, South Staffordshire District Council, Walsall Council
LPIO625	National Grid	Specific development proposals within the Cannock Chase area are unlikely to have a significant direct effect upon National Grid's electricity transmission infrastructure. Generally, network developments to provide supplies to the local distribution network are as a result of overall regional demand growth rather than site specific development. The local distribution network operator (Western Power Distribution) is responsible for operating the local electricity distribution network which supplies electricity from the national electricity transmission system direct to households and business. If new infrastructure is required in response to an increase in demand across the local electricity distribution network the operation (Western Power Distribution) may request improvements to an existing National Grid substation or a new grid supply point. I would advise that you contact Western Power Distribution in the first instance for your information. The gas distributor for your area is Cadent Gas. I would therefore advise you to contact Cadent Gas.

LPIO626	Severn Trent	We welcome ongoing consultation and discussion around your infrastructure delivery plan and are open to how you wish to format this. Where appropriate we can provide a high level of insight into strategic elements of our capital programme which may address queries or concerns with water and waste water infrastructure across the district. Please use growth.development@severntrent.co.uk to contact us for correspondence of this nature.
LPIO627	Arriva Midlands	As a service provider in the local community, we endorse development initiatives which bring value to the Cannock Chase district. Our local bus network is predominantly commercial i.e. provided without subsidy, and we actively scope out future opportunities to adapt our network to meet changing demand – particularly where largescale development is taking place – in order that the Cannock Chase public network map is inclusive and our network sustainable. The biggest challenge we face in this respect is suitability of access to new sites for local buses and ensuring that suitable infrastructure is provided to match introduction of services to newly-developed areas. We would appreciate a clear communication at an early stage to ensure that due consideration is given to the vital facility of public transport at the development planning stage.
LPIO628	Staffordshire County Council	It is recommended that there is regular engagement with the County Council on the identification of the preferred package of highway and transport schemes to be included in an updated IDP. It is essential that there is consistency between the County Council's Integrated Transport Strategy for Cannock Chase and IDP as both documents should be used as supporting evidence.

Neighbourhood Planning

Question 65 Do you agree with the Council's suggested approach to reflecting the importance of neighbourhood planning throughout the Local Plan policies, rather than retaining a separate and generic neighbourhood planning policy as at present?

LPIO629	Home Builders Federation	The importance of neighbourhood planning should be reflected in the new Local Plan however, Neighbourhood Plans must be in general conformity with the Council's Strategic policies (2019 NPPF para 29 & Footnote 16). These strategic policies should be identified in the new Local Plan (see HBF answer to Q66).
LPIO630	Richborough Estates (Brownhills Rd & S of Cannock Rd) c/o Pegasus Group)	Yes, this approach is supported as Neighbourhood Planning is sufficiently addressed via national policy.
LPIO631	Taylor Wimpey (c/o Lichfields)	Should the Council take the suggested approach of reflecting the role and importance of neighbourhood planning by making reference to the opportunities for neighbourhood plans to support Local Plan policies across the whole plan, Taylor Wimpey considers that a specific Local Plan policy on Neighbourhood Plans is not required, as long as the policies in question align with the Framework and the Practice Guidance.
LPIO632	Wright, T (c/o Pegasus Group)	Yes, this approach is supported as Neighbourhood Planning is sufficiently addressed via national policy.

Approach to strategic and non-strategic policies and site allocations

Question 66 Do you have any comments on the approach of separating the updated Local Plan policies into clear strategic and non-strategic elements, where necessary?

LPIO633	Bromford Housing Group Ltd (c/o PlanIT Planning and Development)	It is our view that the emerging Local Plan should make both strategic and non-strategic housing allocations.
LPIO634	Home Builders Federation	As set out in the 2019 NPPF the new Local Plan should make explicit which policies are strategic with a clear distinction between strategic and non strategic policies (para 21 & Footnote 13). The strategic policies of the new Local Plan should address the Council's identified strategic priorities for the development and use of land in the plan area (para 17). These strategic policies should set out an overall strategy for the pattern, scale and quality of development (para 20). The strategic policies should not included detailed matters (para 21) which should be set out in non-strategic policies (para 28).
LPIO635	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The NPPF sets out the context for determining strategic policies in particular paragraph's 20 to 23, and no strategic policies (paragraphs 28 to 30). Also see the response to Q60.
LPIO636	Taylor Wimpey (c/o Lichfields)	As a single Local Plan is being prepared, the Plan should explicitly state which policies are strategic policies. As required by the Framework, the strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. If the anticipated target adoption of the plan is delayed beyond September 2021, then the proposed 15year plan period should stretch beyond 2036 accordingly and sufficient land should be allocated to meet any need over this period.
LPIO637	St Modwen (Watling Street) (c/o RPS Planning & Development)	St Modwen would point out that the commentary presented under this heading in the IOD (paragraphs 13.23-13.33) relates almost exclusively to housing proposals. The IOD does make reference to ' <i>any...employment site of 5ha or greater</i> ' as a potential definition of a strategic site in the Plan, which St Modwen broadly concurs with.
LPIO638	Wright, T (c/o Pegasus Group)	The NPPF sets out the context for determining strategic policies in particular paragraphs 20 to 23, and non strategic policies (paragraphs 28 to 30). Please also see the response to question 60.
Question 67 Do you have any comments on the approach to considering the allocation of strategic sites and non-strategic sites in the Local Plan?		
LPIO639	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	The identification of non-strategic sites should not be left to the Neighbourhood Plan process. It cannot be guaranteed that the Neighbourhood Plan process will identify a sufficient number of non-strategic sites to meet the overall housing requirement. Neighbourhood Plans will need to be prepared in general conformity with the emerging Local Plan. There will be a delay following the adoption of the Local Plan whilst Neighbourhood Plans are worked up. This will delay the delivery of housing within the District. It could also result in the potential for the Local Authority to have a 5 year housing land supply shortfall if Neighbourhood Plans are not progressed with the necessary allocations in place.
LPIO640	Home Builders Federation	The allocation of strategic and non-strategic sites in the new Local Plan should bring forward sufficient land at a sufficient rate to address housing requirement in full over the plan period. The delegation to Neighbourhood Plans of the allocation of any non-strategic sites should not undermine the sufficiency of the Council's overall Housing Land Supply (HLS).

LPIO641	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The Council Recognise Paragraph 68 (a) of the NPPF. The NPPF is therefore clear that Cannock Chase Council should take forward sites of all sizes through the Local Plan review process or demonstrate through the Plan why this cannot be achieved.
LPIO642	Taylor Wimpey (c/o Lichfields)	To ensure transparency and ensure that the delivery of sites can be properly tested, Taylor Wimpey considers that the Local Plan should clearly identify both strategic and non-strategic allocations. Please also see Question 69 It is considered that the land at Wimblebury Road, Cannock should be allocated for residential development in the Local Plan.
LPIO643	St Modwen (West of Pye Green Road) (c/o RPS Planning and Development)	<u>Policy Position – Pye Green Road</u> As the council is aware, the site measures over @60ha and is allocated as a Strategic Housing Site under Policy CP6 within the Current Local Plan (Part 1). [...] St Modwen consider the site should continue to be recognised as a strategic site in the Local Plan Review, the level of housing suitable at the site is considerably in excess of 900 dwellings. In St Modwen’s opinion, the increased housing can be provided whilst maintaining the level of open space (SANGS) over the site area. <u>Increased Capacity – Pye Green Road</u> The increased capacity has come about as a direct result of the approved reserved matters applications delivering housing development at a density significantly higher than was anticipated in the original outline consent, [...]. We are in the process of preparing an updated site wide masterplan and an associated land use table, which will demonstrate the whole site, is capable of delivering in excess of 900 dwellings allocated for the site.
LPIO644	St Modwen (Watling Street) (c/o RPS Planning and Development)	St Modwen consider that the identification of sufficient land to meet local needs, and unmet needs of adjacent areas, are very much ‘strategic matters’ and hence should be considered as ‘strategic’ policy issues for the Local Plan.
LPIO645	Wright, T (c/o Pegasus Group)	As the Council recognise, Paragraph 68 (a) of the NPPF states that “ <i>Local Planning Authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.</i> ” [emphasis added]. The NPPF is therefore clear that Cannock Chase Council should take forward sites of all sizes through the Local Plan Review process or demonstrate through the Plan why this cannot be achieved.
Question 68 Do you have any comments on the site threshold for strategic and non-strategic site allocations within the Local Plan?		
LPIO646	Home Builders Federation	Whatever site threshold is used by the Council to determine strategic and non-strategic sites 10% of the HLS should be provided on small sites.
LPIO647	Taylor Wimpey (c/o Lichfields)	Based on their experience of promoting sites through local plans across the country, Taylor Wimpey notes that a housing site providing a minimum of 150 dwellings is typically regarded as the threshold for a strategic site.
LPIO648	St Modwen (Watling Street)	The definition and application of thresholds (Q68) should not be the driver of the appropriateness or otherwise of allocating particular sites to address identified needs of the area. Rather, the critical issue is to ensure that sufficient land

	(c/o RPS Planning and Development)	is identified (whether allocated or not) to enable the growth needs of the District to be adequately catered for. In this regard, the Council should not apply any threshold or criteria that would otherwise undermine the allocation of sufficient sites to address those needs through the Plan or relegate or delay the identification of sites unnecessarily to a lower order plan to be brought forward at some point in the future.
Question 69 Should sites with planning permissions and/or those that are already under construction be considered for allocation in the Local Plan?		
LPIO649	Bromford Housing Group Ltd (c/o PlanIt Planning and Development)	We have no particular concern with that approach. It must, however, be ensured that double counting does not occur. Sites which are granted planning permission prior to the base date of the Plan should not be counted as contributing to the emerging Local Plan's housing requirement. A more cautious approach must also be taken for sites that have been granted planning permission and the permissions have subsequently expired. An approved and lapsed planning permission should not be relied on unless there is clear evidence to indicate otherwise.
LPIO650	Home Builders Federation	Sites with planning permission, under construction and completed (since 2018) should be accounted for in the overall HLS of the new Local Plan. It is not necessary to allocate completed sites or sites under construction but these sites should be incorporated within settlement boundaries where these are reviewed (see HBF answer to Q18). Sites with planning permission but not yet started should be considered for allocation.
LPIO651	KGL Estates Ltd (c/o John Heminsley)	It is considered reasonable in principle to allocate sites which have planning permission but only if evidence indicates that the development will commence before the expiry of the permission. There's not considered to be a benefit in allocating sites where development is under construction and this should continue to be a role for the SHLAA.
LPIO652	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	No. there should be a 'monitor and manage' approach so if sites stall for any reason then others should be brought forward to ensure a consistent and reliable supply throughout the plan period.
LPIO653	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that sites with planning permission or under construction should not be allocated in the Local Plan. If this approach were to be taken, there is a risk that this may cause discrepancies in the housing supply calculations and could lead to the assumption that housing supply is greater than it actually is. Where sites with permission/under construction form part of a wider site which is proposed for allocation, the area with permission should be identified separately from the remainder of the allocation in the housing trajectory. The Local Plan Proposals Map should also clearly identify the part of the allocation which benefits from planning permission.
LPIO654	Historic England	[...]. Historic England require all sites being proposed for allocation to assess the impacts that development could have on the significance of heritage assets, including their setting, to be NPPF compliant, and this is an area that is always a challenge and we would welcome a discussion on this.
LPIO655	Lichfield District Council	LDC does consider that sites above a certain threshold with consent should be allocated as indicated. This would be consistent with its own approach in the recently adopted allocations DPD.
LPIO656	Wright, T (c/o Pegasus Group)	No. there should be a 'monitor and manage' approach so if sites stall for any reason then others should be brought forward to ensure a consistent and reliable supply throughout the plan period.

LPIO657	Association of Black Country Authorities (c/o Walsall Council)	Sites with planning permissions (that have not yet been implemented) should be allocated in the Local Plan, as circumstances might change and leave such sites without an allocation or commitment.
Safeguarding future land for development and 'reserve' sites		
Question 70 Should the Council consider identifying additional safeguarded land or reserve sites through the new Local Plan taking into account national policy and the local context? Are there any alternative approaches that the Council could take?		
LPIO658	Home Builders Federation	The Council should consider identifying additional safeguarded land and/or reserve sites in the new Local Plan. The new Local Plan should set out the circumstances for the release of such sites including triggers for under performance against planned housing delivery set out in the housing trajectory and 5YHLS.
LPIO659	KGL Estates Ltd (c/o John Heminsley)	Housing growth is likely to continue to be a major issue beyond the end of the plan period of 2036 and as significant land and major areas of green space network, so identifying safeguarded sites is considered to be an appropriate response in line with national policy not to alter GB boundaries at the end of each plan period. Further work would need to be done to identify the amount of safeguarded land required.
LPIO660	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	Richborough Estates consider it necessary for the Council to identify 'safeguarded land' to meet development needs beyond the Plan period. The identification of safeguarded land should allow for Green Belt boundaries to endure for a minimum of 5 to 10 years beyond 2036. Safeguarded sites should be capable of being brought forward under a 'monitor and manage' approach should the plan be failing to deliver on its requirements, which should include an element on the delivery of housing shortfall of the GBBCHMA as a whole.
LPIO661	Severn Trent	There is the added benefit that safeguarded land provides visibility to those sites that sit somewhat further down the supply chain, this allow scenario testing for infrastructure partners to understand where future pressures may be and opens the door for conversations on these.
LPIO662	Taylor Wimpey (c/o Lichfields)	In order to ensure that Green Belt boundaries will not need to be altered at the end of the plan period, Taylor Wimpey considers that the Local Plan should identify safeguarded land. Taylor Wimpey also considers that the most effective way of ensuring sufficient housing supply is to identify 'Plan B' sites. In addition to allocating additional sites and identifying safeguarded land in the Local Plan a new policy should be introduced which provides a mechanism for its early review. Specific sites should be identified as 'Plan B' sites now. This will ensure that the Local Plan is flexible and can respond quickly to the potential non-delivery of committed sites and any other shortcomings in its housing land supply. It is crucial that the Council monitors its housing land supply position and where it is found to have fallen below an identified trigger point, it will permit these Plan B sites to come forward. This would ensure greater flexibility as it would remove the need for a formal plan review process to be undertaken if additional sites that are not allocated for housing are needed to boost the borough's housing supply. If there is a need for the release of Green Belt to provide sufficient 'Plan B' sites, these sites should be identified for release now.

		Without such a mechanism in place, the Local Plan may not deliver the significant boost in housing that is required to meet the needs of the Borough and any wider shortfall boost in housing that is required to meet the needs of the Borough and any wider shortfall from the GBBCHMA and the Government's objective of significantly boosting the supply of homes.
LPIO663	Bloor Homes Ltd (c/o Define Planning & Design)	NPPF Paragraphs 136 & 139 are considered. Therefore, to accord with the NPPF it is necessary for the Council to identify 'safeguarded land' to meet development needs beyond the Local Plan period, particularly given that housing need will continue to arise and the opportunities for development outside of the Green Belt in the District are extremely limited and finite.
LPIO664	Gladman	Gladman considers that the CCLP should identify both reserve sites and safeguarded land for future development needs. The identification of reserve sites would be advisable in the event that allocated sites do not come forward as expected and the Council is unable to demonstrate a 5year supply of housing land. [...] Identification of an adequate amount of safeguarded land in the CCLP will therefore avoid the need for further green belt releases in the next review of the Local Plan.
LPIO665	Wright, T (c/o Pegasus Group)	It is considered necessary for the Council to identify 'safeguarded land' to meet development needs beyond the Plan period. This is particularly important as housing need will continue to be identified beyond the plan period and opportunities for development outside of the Green Belt are finite. The identification of safeguarded land should allow for Green Belt boundaries to endure for a minimum of 5 to 10years beyond 2036. In addition, this approach is supported within national policy with Paragraph 136 of the NPPF. Safeguarded sites should be capable of being brought forward under a 'monitor and manage' approach should the plan be failing to deliver its requirement, which should include an element on the delivery of the housing shortfall of the GBBCHMA as a whole. This situation would need to be kept under review as a strategic matter, given that Local Plan policies have to be reviewed every five years to assess whether or not they remain up to date.
Question 71 If safeguarded land or reserve sites are necessary, how much capacity should be identified and should this be distributed in accordance with the overall preferred strategies for housing/employment development?		
LPIO666	Home Builders Federation	There is no numerical formula to determine the appropriate quantum of safeguarded land and/or reserve sites but where the HLS is highly dependent upon one or relatively few strategic sites and/or specific settlements/localities then greater numerical flexibility is necessary than if the HLS is more diversified.
LPIO667	KGL Estates Ltd (c/o John Heminsley)	Rather than consider the concept of reserve sites, flexibility in the plan to 2036 could be achieved by recommendations for phasing development which could be varied if allocated sites do not come forward within the anticipated timescales.
LPIO668	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	The approach used by South Staffs Council through its Site Allocations Document is supported and it is recommended Cannock Chase Council adopt a similar approach.
LPIO669	Taylor Wimpey (c/o Lichfields)	Taylor Wimpey considers that there should be a sufficient supply to meet housing needs for at least 10years following the end of the plan period. It is considered that the overall distribution of safeguarded land should broadly align with the overall preferred strategy for housing and employment development.

LPIO670	Wright, T (c/o Pegasus Group)	The approach used by South Staffordshire Council through its Site Allocations Document (SAD) is supported and it is recommended Cannock Chase Council adopt a similar approach.
LPIO671	Association of Black Country Authorities (c/o Walsall Council)	Paragraph 13.34 refers to the national policy requirement to safeguard land for needs beyond the plan period when the Green Belt is reviewed. If the plan is to amend the boundaries of the Green Belt, including where necessary to help meet the need for housing and possibly employment land arising from the Black Country and Birmingham, there appears to be no option but to safeguard such land. The amount involved should be based on a projection of the requirement for the chosen plan period.
Draft methodology for site selection		
Question 72 Do you have any comments on our proposed site selection methodology?		
LPIO672	Bromford Housing Group Ltd (c/o Define Planning and Design)	<p>We have a number of concerns with the 2018 SHLAA and its conclusions on the suitability and the deliverability of sites and in particular site C64 – Land off Rawnsley Road, Hazelslade. It is suggested that the site is potentially suitable for a Green Belt allocation or a local green space designation without any explanation as to why this is the case. This conclusion does not appear to be supported by the Green Belt assessment. As part of the preparation of the emerging plan further SHLAA consultation should be undertaken including the opportunity to comment upon sites identified within the current SHLAA.</p> <p>In terms of Table 2 – The Site Selection Process, it is our view that Green Belt sites should only be considered for release where exceptional circumstances are identified. It is our view that exceptional circumstances will not be identified unless it is demonstrated that all suitable and sustainable non-Green belt sites identified by the SHLAA have been allocated for development in the first instance.</p> <p>The Council should also provide maximum flexibility within its overall housing land supply to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market.</p>
LPIO673	Home Builders Federation	<p>The HBF do not comment on the merits or otherwise of individual sites selected for allocation.</p> <p>When selecting housing sites for allocation the Council should select the widest possible range of sites by both size and market locations to provide suitable land for small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p> <p>The Council should also provide maximum flexibility within its overall HLS to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market.</p>
LPIO674	Richborough Estates (Brownhills Rd & S of Cannock Rd) (c/o Pegasus Group)	<p>The assessment process is broadly supported and the ‘traffic light’ or RAG – rating method of scoring is considered appropriate provided that the process is open and transparent and allows for submitted information to be utilised in the rating process, enabling each site to be considered on its merits.</p> <p>It is essential that the site assessment criteria are considered ‘in the round’ rather than any particular order of importance, as it will be a combination of factors which contribute to the overall sustainability of a scheme. It is also vital to ensure that information relating to consideration of how the site contributes to Green Belt purposes is based upon the site boundaries.</p>

		<p>It is also imperative that ‘sustainability’ outcomes are considered in the round from all of the information submitted and not limited to the conclusions of the Sustainability Appraisal.</p> <p>Information is provided which demonstrates how land off Brownhills Rd, Norton Canes performs highly against the proposed criteria, providing the exceptional circumstances needed to release the site from the Green Belt, delivering a highly sustainable development within a sustainable settlement. It is vital that this information is used when assessing the site.</p>
LPIO675	Taylor Wimpey (c/o Lichfields)	<p>Taylor Wimpey welcomes the Council’s proposal to prepare a site selection methodology as this will help to ensure that the process of site allocation is dealt with in a transparent manner with a fully justified approach. More detailed comments on the Council’s proposed methodology for the site selection process are set out below.</p> <p><u>Stage 1: Establish Evidence Base</u></p> <p>TW would suggest that as well as a dwelling threshold, a minimum site size is also identified within the parameters for selecting sites.</p> <p><u>Stage 2: Establish a Pool of Sites and First Site Sift</u></p> <p>TW considers that sites with existing planning permission or in the early stages of construction should not be considered for allocation as development on these sites has already been established as acceptable in principle.</p> <p><u>Stage 3: Detailed Assessment</u></p> <p>The use of a traffic light system with associated commentary to pick up significant factors and evidence is generally supported. However, it is not clear, from the methodology proposed in the LPIO how the sites will be scored and taken forwards and what weight is given to each of the criteria in the tables. TW therefore considers that more detail needs to be provided to confirm how the traffic light ratings will be weighted.</p> <p>This stage of the assessment should also consider how each site aligns with the Council’s chosen strategy for meeting overall housing growth.</p> <p>The identification of key locational/mitigation opportunities as part of the detailed assessment process is welcomed as sites are likely to be subject to some form of constraint that it may be possible to overcome through appropriate mitigation measures.</p> <p>An evidence base will need to be put together to ensure that sites are assessed against the appropriate evidence.</p> <p>TW considers that all of the sites being considered at the detailed assessment stage should be considered in the Sustainability Appraisal.</p> <p><u>Stage 4: Evaluation Stage</u></p> <p>Whilst it is appreciated that an element of professional judgement is always required in assessments of this nature, the detailed site assessment process at Stage 3 should be sufficiently logical and transparent to ensure that any judgements reached at Stage 4 are clearly justified.</p> <p>TW agrees with the suggested use of information gathered for sites recommended for selection to inform a policy for each site to ensure that appropriate mitigation, infrastructure and other site specific requirements are delivered when the site is developed.</p> <p><u>Stage 5: Public Consultation</u></p>

		TW fully supports the proposed public consultation process to inform final site selection. It is essential that this consultation is undertaken in order to give those promoting sites an opportunity to review the Council's assessment as there may be issues identified in the site selection process to which solutions can be identified, but which the Council may not be aware of.
LPIO676	Bloor Homes Ltd (c/o PlanIt Planning and Design)	<p>A staged site selection process is set out, and whilst that establishes a logical sequence for the process of assessing individual assessments, clearly it must also take account of the spatial strategy matters highlighted in respect of Question 17.</p> <p>Notably, whilst the Green Belt is an important policy consideration, the overall sustainability and deliverability of the identified options must be the determinative consideration. Account should also be taken of whether sites are geographically well placed to address unmet needs arising to the south of the District in the wider HMA.</p> <p>Otherwise, ensuring that the allocation sites are deliverable will be key to the Local Plan's soundness and on that basis the factors presented are suitable considerations for the selection of preferred sites. However, several of those factors are not definitive and may be improved or overcome directly through the spatial disposition of development on a site or developer contributions. These include local road network capacity, availability of public transport and the achievability of vehicular/pedestrian access to individual sites. Similarly, factors such as landscape impact and sensitivity can be mitigated or improved through the implementation of a carefully designed landscaping scheme.</p>
LPIO677	Briggs, T	<p>The proposals as drafted allow for the gradual slicing up of greenfield and/or AONB land over the course of several Plan periods. A greenbelt review will never add more land to greenbelt than it takes out, so it is obvious what the purpose of the review is.</p> <p>Rural development is counter intuitive to the stated wishes to protect green spaces, to reduce carbon emissions/travel etc. and to ensure residents have access to a good standard of facilities nearby.</p> <p><u>Table 2</u></p> <p>There needs to be far greater clarity on this point as methodology such as this would soon see many sites removed from greenfield designation, and all the stated aims of protecting greenbelt/AONB then come to nought as the land is no longer protected by those designations. Greenfield land appears particularly vulnerable here and such methodology would serve to miss the point of greenfield entirely.</p> <p><u>Stage 4</u></p> <p>I am also concerned as to the robustness of the 'professional planning judgement' reference in stage 4.</p>
LPIO678	Cannock Chase AONB Partnership	<p>Reference to NPPF Paragraph 172 (<i>"The Scale and Extent of development..."</i>) Sites for major development should therefore not be allocated in the AONB, unless there has been full consideration and assessment of the type of development and the site in question, as set out in Paragraph 172 (a), (b) and (c).</p> <p>A number of site options fall inside or in the setting of the AONB. If the Authority is minded that the principle of allocating sites within the AONB or its setting is not unacceptable, rather than rule this out at the 'first sift', it would be appropriate to locally define major development to ensure that the scale and type of development could be accommodated in these sensitive landscapes without detriment to the natural beauty of the AONB. Additionally, sites should only be put forward if they have been fully assessed in terms of landscape and visual sensitivity and there is confidence that impacts could either be avoided or mitigated. Should any sites be considered appropriate for allocation, guidance through an SPD or</p>

		development briefs should set out expectations for the form and character of any potential development, along with any necessary mitigation enhancement in support of the AONB Management Plan.
LPIO679	Historic England	We are encouraged to see the inclusion of heritage in the list of constraints and benefits. I include a link to Historic England's Advice Note 3 on preparing site allocations and appropriate site selection methodology which we would be supportive of the Council following. Additionally, our Good Practice Advice documents are also a useful tool to assess how to prepare local plans with respect to the historic environment, including the issue of setting. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ https://historicengland.org.uk/advice/planning/planning-system/
LPIO680	Lichfield District Council	Lichfield has reviewed the broad methodology set out on pages 123 to page 125 and generally supports the approach set out. Lichfield DC does suggest on page 123 that sites not being actively promoted should not be discounted unless it is supported by the evidence base through the District Council contacting the owners and establishing the situation.
LPIO681	St Modwen (Watling Street) (c/o RPS Planning and Development)	Row 6 in Table 2 defines one of the assessment factors ' <i>Key locational criteria for specific development types</i> '. A sub-criterion to this refers to ' <i>key additional factors for employment sites</i> '. Unfortunately, the Local draft methodology does not clarify what these factors might entail for the employment site options. To help clarify this omission, St Modwen would suggest that weight should be given to the potential for extensions to existing employment sites already within the Green Belt in the area of the search, compared with creating wholly new employment locations. The extension of current sites which exist within the Green Belt would be far more sustainable, due partly to existing links and established uses in the area, compared with releasing Green Belt land for wholly new employment sites. A new employment site in the Green Belt would be more likely to impact heavily on the surrounding countryside due to the new infrastructure requirements. By clarifying the methodology in this way, the selection process would properly recognise that extensions to existing employment sites would enable the economies of scale for existing infrastructure along with enabling expansion of existing businesses, pursuant to Plan Objective 4.
LPIO682	Staffordshire County Council	<u>Transport</u> In transport terms, the County Council supports the proposed methodology for site selection. The agreed package of measures to be included in revised policy must recognise potential constraints. Transport accessibility analysis of site options can be provided by the County Council. The accessibility analysis needs to acknowledge that the most sustainable housing developments will enable walking and cycling access to both primary and secondary schools. The County Council is working towards publishing the Staffordshire Local Cycling and Walking Infrastructure Plan. It is expected that the process that is developed through the LCWIP will help inform the appropriate mitigation measures required to deliver the emerging Preferred Option. The County Council will provide advice on existing highway constraints at locations such as Five Ways junction and the impact of traffic generated from potential new development sites, to help inform the selection of the Preferred Option. Appropriate traffic appraisals will need to take account of emerging Midland Connect studies and the impact on the local highway network of strategic highways schemes such as M54/M6 link road.

		<p><u>Ecology</u> The inclusion of ecological constraints and considerations is welcomed.</p> <p><u>Minerals and Waste</u> Previously we have commented on the need to include the safeguarding of waste sites in the consideration of site selection and similarly, the consultation document refers to safeguarding mineral resources. [...]</p>
LPIO683	Wright, T (c/o Pegasus Group)	<p>The assessment process is broadly supported, and the ‘traffic light’ or RAG – rating method of scoring is considered appropriate provided that the process is open and transparent and allows for submitted information to be utilised in the rating process, enabling each site to be considered on its merits.</p> <p>It is essential that the site assessment criteria are considered ‘in the round’ rather than any particular order of importance, as it will be a combination of factors which contribute to the overall sustainability of a scheme. It is also vital to ensure that information relating to consideration of how the site contributes to Green Belt purposes is based upon the site boundaries and not any wider parcel within which it sits as this will provide an inaccurate and misleading picture.</p> <p>It is also imperative that ‘Sustainability’ outcomes are considered in the round from all of the information submitted and not limited to the conclusions of the Sustainability Appraisal.</p>
LPIO684	Association of Black Country Authorities (c/o Walsall Council)	We have no strategic comments to make about this question. We might wish, in future, to discuss its application to specific sites. We would also be happy to discuss the selection of sites in the work for the Black Country Plan.

Local Plan Review Sustainability Appraisal Issues and Options Assessment Consultation: Summary of Responses

Rep ID No.	Respondent	Comment
Overall/General Comments		
SASc1	Canal & River Trust	<p>NE6: Jubilee Field, Lime Lane/Watling Street, Norton Canes</p> <p>This site is adjacent to the Cannock Extension Canal, which is registered as a SSSI. The Classification is, in part, due to the canal providing a habitat for Floating Water Plantain.</p> <p>SA Objective 1: We recognise and welcome the recognition that the site scores a double negative under part 1 of the SA objectives (page 533). This should help ensure that adverse impacts from the development on the SSSI are taken into account and can be fully assessed as part of the overall Local Plan assessment when determining which sites to bring forward, and what policies may apply to future site allocations.</p> <p>SA Objective 6: Due to the proximity of the site to the Cannock Extension Canal, we believe that the SA score should take into account the impact on the canal corridor, which forms part of the Strategic Green Infrastructure within the borough. The Green Infrastructure network associated with the canal forms a key part of the character and appearance of the Districts’ landscape and townscape, and could be significantly impacted by the proposed development.</p> <p>SA Objective 13: The site is in proximity to the towpath of the Cannock Extension Canal, which would provide a key green link and access to open space for future employees of the site. Development of this site could, however, result in potential harm to the quality of this resource, contrary to the aims of the SA objective.</p> <p>There are risks that development of this site could result in additional demands on the use of the towpath (which lies alongside the site), which would result in greater erosion and liabilities for the owners and operators of this infrastructure.</p>

	<p>The Trust currently maintains our towpaths to a 'steady state' based on present use, which is presently relatively low. The towpath, is unpaved, and is liable to suffer from significant harm if user numbers increase substantially. The Canal is also a SSSI, which could be harmed by the additional use of the canal corridor, such as through the deposition of litter from users. We believe that these risks should be fully included in the assessment of the SA score. This is essential to ensure that the risks are taken into account in both determining whether to allocate the site, and determining what mitigation measures may need to be included within any future policy.</p> <p>Due to the identified risks to the existing green link and SSSI, we believe that the double positive SA score may require reassessment.</p> <p>CE19: Site between A5 and M6 Toll</p> <p>We note that the proposed site boundary of CE19 includes land identified as forming part of the potential Hatherton Canal restoration route, promoted by the Lichfield & Hatherton Canals Restoration Trust (LHCRT). Unless development on site is adequately designed to mitigate against any adverse impact to the route, the allocation could threaten any future canal re-installment in this location.</p> <p>The LHCRT is working to reinstate the Hatherton Canal which, in combination with existing waterways, could promote leisure and tourism use of the local canal network with resulting benefits to the wider area. It would likely provide a future walking and cycling route for the community to utilise upon the new towpath.</p> <p>The Canal & River Trust recognises the importance of waterway restoration projects and the broad range of economic, environmental, health and social impacts that they can bring. [...] We therefore support the aspirations of the LHCRT. We believe that SA Objective 13 should specifically refer to the safeguarded route, and should assess the potential impact on the provision of future infrastructure. There are risks that development on site could hamper future efforts to extend and enhance the leisure and recreational infrastructure that the canal restoration would bring to the community. We therefore request that, if this site is brought forward for allocation, site-specific policies should be incorporated to ensure that future development sets aside land appropriately to facilitate the canal restoration.</p> <p>CE20: Watling Street Business Park</p> <p>Although the justification under SA Objective 13 suggests that the site is 125m to the East of the Cannock Extension Canal, the boundary shown in the document in Map 4.2 shows that the western boundary of this proposed site would lie adjacent to the Cannock Extension Canal [...]. We therefore advise that it should be amended to take account of the potential impact of development on the waterway, which could have a significant impact on the overall SA score.</p> <p>SA Objective 1: The site is adjacent to the Cannock Extension Canal SSSI, which is a habitat for Floating Water Plantain, a protected species. We believe that the assessment and SA score should be amended to fully reflect the potential impact of development upon the SSSI. This would help ensure that adverse impacts from the development on the SSSI are taken into account and can be fully assessed as part of the overall Local Plan assessment when determining which sites to bring forward, and what policies may apply to future site allocations.</p> <p>We note that site NE6 has an SA score of double negative, which we believe may also apply to this site once the SSSI is taken into account.</p> <p>SA Objective 6: [...], we believe that the SA score should take into account the impact on the canal corridor, which forms part of the Strategic Green Infrastructure within the borough. [...]</p> <p>SA Objective 13: The site is in proximity to the towpath of the Cannock Extension Canal, [...]. Development of this site could, however, result in potential harm to the quality of this resource, contrary to the aims of the SA objective.</p>
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	<p>There are risks that development of this site could result in additional demands on the use of the towpath (which lies alongside the site), which would result in greater erosion and liabilities for the owners and operations of this infrastructure. [...]. The towpath is unpaved, and is liable to suffer from significant harm if user numbers increase substantially. [...]. We believe that these risks should be fully included in the assessment of the SA score. This is essential to ensure that risks are taken into account in both determining whether to allocate the site, and determining what mitigation measures may need included within any future policy associated with a future allocation.</p> <p>Due to the identified risks to the existing green link and SSSI, we believe that the double positive SA score may require reassessment.</p> <p>NE11: Former Grove Colliery, Little Wyrley & NE8/N57 Wyrley Grove, Lime Lane, Little Wyrley</p> <p>The above sites are in proximity to the Cannock Extension Canal, which is registered as SSSI. [...].</p> <p>SA Objective 1: We recognise and welcome the recognition that the site scores a double negative under part 1 of the SA Objectives (pages 582 and 579). This should help ensure that adverse impacts from the development on the SSSI are taken into account and can be fully assessed as part of the overall Local Plan assessment when determining which sites to bring forward, and what policies may apply to future site allocations.</p> <p>SA Objective 13: The site is in proximity to the towpath of the Cannock Extension Canal, [...]. Development of this site could, however, result in potential harm to the quality of this resource (through damage caused by additional use), which could harm existing access, contrary to the aims of the SA objective.</p> <p>We believe that these risks (e.g. erosion of footpaths) should be fully included in the assessment of the SA score. This is essential to ensure that the risks are taken into account in both determining whether to allocate the site, and determining what mitigation measures may need to be included within any future policy associated with a future allocation.</p> <p>Due to the risk of the existing green link and SSSI, the double positive SA score may require reassessment.</p> <p>R18: Land at The Mossley, off Armitage Road, Rugeley</p> <p>The site is located adjacent to the Trent & Mersey Canal. The sole access to the site would likely be via The Mossley, which is accessed via a bridge over the Canal. Although not listed, the bridge itself is of heritage value, and we believe constitutes a non-designated heritage asset.</p> <p>SA Objective 4: We agree that the effects of new housing development on the SA objective will depend, to a large extent, on the design of housing. We wish to highlight that the location of the site next to the canal offers an opportunity for the utilisation of our water for low-carbon energy production. [...]. We consider that heating and cooling schemes can be delivered without any adverse impact on biodiversity.</p> <p>As a result, we would welcome reference to the potential opportunity as part of the assessment and any policy wording with respect to a future site allocation. This would help make the Local Plan more effective, as it would help ensure that decision makers are aware of this opportunity which is specific to sites in proximity to the District's waterways.</p> <p>SA Objective 6: [...], we believe that the SA score should take into account the impact on the canal corridor, which forms part of the Strategic Green Infrastructure within the borough. [...].</p> <p>It is essential that future development positively addresses the waterside space, so as to ensure that the community can utilise this asset positively.</p> <p>SA Objective 11: The canal offers a key walking and cycling route, which could be impacted by development on this site. We believe that future development should positively address the waterfront to provide passive surveillance, which would help to reduce any fear of crime along our network.</p>
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	<p>SA Objective 13: The site is in proximity to the towpath of the Trent & Mersey Canal,[...]. Development of this site could, however, result in potential harm to the quality of this resource (through damage caused by additional use), which could harm existing access, contrary to the aims of the SA objective.</p> <p>As a result, we believe that these risks (e.g. litter, damage to towpath structures) should be fully included in the assessment of the SA score. This is essential to ensure that the risks are taken into account in both determining whether to allocate the site, and determining what mitigation measures may need to be included within any future policy associated with a future allocation.</p> <p>SA Objective 17: We are concerned that the sole vehicular access to the site could be via the canal bridge upon The Mossley. This bridge is of heritage value, and is limited to a single carriageway width. There is a significant risk that additional traffic brought by the development could result in vehicular collisions and parapet strikes upon the bridge, which would cause damage to the heritage asset. This is pertinent in this location due to the proximity of the bridge to Armitage Road, the narrow width of carriageway upon the structure, and the absence of any pavement for pedestrian use.</p> <p>We believe that an alternative access may be required in order to ensure that the bridge is not inadvertently damaged by the extra use that development on this site could bring. The formation of a new access road from Wheelhouse Lane to the south or from the Industrial Estate to the north may be required and could offer a solution.</p> <p>We advise that the SA score should take account of these risks to this bridge.</p> <p>TBP: Towers Business Park Employment Area (includes the sites RE2(a) and RE4)</p> <p>The site is bordered by the Trent & Mersey canal along its south-western curtilage boundary. Development here could have a significant impact upon the canal corridor, and we believe that the SA Assessment should aim to take account of any potential adverse impact to ensure that any impact can be effectively mitigated against should this site be brought forward.</p> <p>SA Objective 4: We agree that the effects of new development on the SA objective will depend, to a large extent, on the design of any scheme that comes forward. We wish to highlight that the location of the site next to the canal offers an opportunity for the utilisation of our water for low-carbon energy. [...].</p> <p>SA Objective 6: Due to the proximity of the site to the Trent & Mersey Canal, we believe that the SA score should take into account the impact on the canal corridor which forms part of the Strategic Green Infrastructure within the borough, the Green Infrastructure network associated with the canal forms a key part of the character and appearance of the Districts' landscape and townscape, and could be significantly impacted by the proposed development.</p> <p>It is essential that future development positively addresses the waterside space, so as to ensure that the community can utilise this asset positively.</p> <p>SA Objective 8: the canal towpath lies next to the site, and provides an uninterrupted, traffic-free route between the employment site and community in Rugeley and Brereton. We believe that account of this should be included in this justification. We believe that mitigation measures, such as additional signage, may be required in order to maximise the benefits of our network and to minimise any potential harm that could be caused by additional use of the canal towpath.</p> <p>SA Objective 11: The canal offers a key walking and cycling route, which could be impacted by development on this site. We believe that future development should positively address the waterfront to provide passive surveillance, which would help to reduce any fear of crime along our network.</p> <p>SA Objective 13: The site is in proximity to the towpath of the Trent & Mersey,[...]. Development of this site could, however, result in potential harm to the quality of this resource (through damage caused by additional use, which could harm existing access, contrary to the aims of the SA Objective.</p>
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		As a result, we believe that these risks (e.g. litter, damage to towpath structures) should be fully included in the assessment of the SA score. This is essential to ensure that the risks are taken into account in both determining whether to allocate the site, and determining what mitigation measures may need included within any future policy associated with a future allocation.
SASc2	Richborough Estates (Brownhills Rd) (C/O Pegasus Group)	<p>There are a number of inaccuracies relating to the site off Brownhills Road, Norton Canes which will have impacted upon current scoring. These are as follows.</p> <p>It is noted at this stage all assessment is undertaken assuming no mitigation. It is essential that mitigation is factored in, utilising the information submitted as part of these representations plus commitments to providing further technical evidence to ensure that the site is considered fairly and accurately.</p> <p>Objective 1: [...], a double negative/uncertain score is given, however this fails to take into account mitigation that could be provided on site, including the provision of open space to complement provision delivered as part of the adjacent Chasewater Grange development that will assist in internalising recreational pressures.</p> <p>Objective 2: [...] SA concludes a significant negative effect. Whilst it is acknowledged that the site is located close to an AQMA these give rise to issues which can be mitigated for to ensure that no negative impact results.</p> <p>Objective 5: [...] a minor negative effect is concluded, however mitigation would be incorporated which would result in an improvement to this score.</p> <p>Objective 9: the strong positive score is wholly supported as the site will deliver a range of homes to serve a range of needs.</p> <p>Objective 17: it is recognised that the site lies within the CHECZ-19 historic environment zone, however the site is the only element of this zone that lies to the north of the M6 Toll which now severs this zone. It should be noted that many of the important assets identified are remote from Richborough Estates' site with no inter-visibility between the site and identified features including Wyrley Common and those to the south of the A5 Watling Street.</p>
SASc3	Richborough Estates (S of Cannock Rd) (C/O Pegasus Group)	<p>There are a number of inaccuracies relating to the site at Land South of Cannock Road, Heath Hayes which will have impacted upon current scoring. These are as follows.</p> <p>Firstly map 4.1.2 does not reflect the accurate site boundary. The map attached at Appendix 1 should be used.</p> <p>Sites C116 (a) and C116 (b) have been scored independently of one another, when in fact the two sites (with accurately redrawn boundaries) must be considered as a whole as C116 (a) will contain the built development and C116 (b) will provide the country park and establish the new permanent Green Belt boundaries as this part of the site will remain as Green Belt. Please see the attached vision document including masterplans for further information. To score the two sites separately is misleading and will skew the scoring in a way which is incorrect and misrepresentative.</p> <p>It is noted at this stage all assessment is undertaken assuming no mitigation. It is essential that mitigation is factored in, utilising the information submitted as part of these representations plus commitments to providing further technical evidence to ensure that the site (with boundaries corrected) is considered fairly and accurately.</p> <p>Objective 1: [...] an uncertain minor negative score is given, however with mitigation impacts upon the Cannock Chase SAC [...] as set out elsewhere in these representations this should result in a significant positive score for a combined site.</p> <p>Objective 2[...] the SA concludes an uncertain significant negative effect. Whilst it is acknowledged that the site is agricultural (albeit not the best and most versatile agricultural land) and located close to an AQMA these are all issues which can be mitigated for to ensure that no negative impact results.</p> <p>[...] (Objective 3) a significant negative effect has been concluded. For (incorrectly drawn) site C116a it is stated that there is an expectation that the site would provide 700-937 homes, and for (incorrectly drawn) site C116 (b), 784 homes are sited.</p>

		<p>The SA states ‘there is little opportunity to re-use any materials any materials that already exist on site and will likely lead to the vast loss of greenfield land.’</p> <p>This statement and assessment is vehemently disputed by Richborough Estates. That as a <u>whole</u>, the site is being promoted for around 700 homes, <u>not</u> the 1700 implied by the assessment. The statement ‘vast loss’ is emotive rather than objective and wholly misleading, taking absolutely no account of the inclusion of the country park and significant level of green infrastructure. These are essential elements of the proposals and illustrate the reasons the site need to be assessed as a whole, utilising accurate information.</p> <p>Objective 5 [...] a minor negative effect is concluded, however mitigation would be incorporated which would result in an improvement to this score.</p> <p>Objective 9, the strong positive scoring is wholly supported as the site will deliver a range of homes to serve a range of needs. However the assessment states that there may be potential for gypsy and traveller provision as part of the development. Richborough Estates would wish to confirm that this does not form part of the site proposals. [...].</p>
SASc4	Environment Agency	<p>We have reviewed the SA scoping report submitted in support of this consultation and have no observations to make at present.</p>
SASc5	Highways England	<p>In relation to an earlier draft of the Sustainability Appraisal, Highways England set out the following: <i>“It is noted that Appendix 1 of the document provides a table of all the plans policies and programmes relevant to the preparation of the Cannock Chase Local Plan and the SA. It is important to recognise that Circular 02/12 ‘The SRN and the delivery of Sustainable Development’ is highly materials, [...]. It also includes guidance on when new accesses to the SRN will be acceptable, the implications of traffic growth for plan making and policies for specific activities, including roadside facilities. Given the relevance of these policies to development plan decisions, [...] is a key document which should be referenced.”</i></p> <p>It is noted that the May 2019 version of the Sustainability Appraisal takes into account the previous comment made by Highways England. This is welcomed. [...].</p>
SASc6	Historic England	<ul style="list-style-type: none"> • We support the inclusion of a specific objective for cultural heritage and in this case an objective that specifically aims to conserve and enhance heritage assets, including their setting. • Figure 2.1 on page 14 we appreciate is a standard table that sets out the likely effects for the objectives as a result of the policies or development options. However, we raise concerns about the ‘uncertain’ effect as there should be reasonable evidence available in order to make an informed decision about what the likely effects will be and what avoidance/mitigation measures can be put in place. • Paragraph 3.44 under this heading we would recommend including additional documents for the historic environment [...]. • We are supportive of the heritage comments on page 28 • In reference to Table 4.1 there were no specific sites identified within the local plan consultation May 2019 to comment on, however, we note that the Sustainability Appraisal has highlighted a significant number of sites with the majority of the effects identified as uncertain or negative effects for the historic environment. [...]. We would anticipate that the Council would prepare site assessment to justify the inclusion or exclusion of sites. [...]. • Paragraph 4.57 we are cautious of using distances to judge likely effects for the historic environment. As you will be aware effects can occur directly to heritage assets or their setting and the significance of a heritage asset can be affected even where there is no visual link between a heritage asset and proposed development as well as where large distances occur between heritage assets and proposed development for such reasons, not exhaustive, as the

		<p>topography [...]. As such we recommend that a site assessment is undertaken that assesses how proposed development will affect the significance of the identified heritage assets, including their setting, in line with the NPPF.</p> <ul style="list-style-type: none"> • We are unclear how the judgements have been arrived at on page 43 and would recommend that we have sight of the full assessments for the sites and historic environment so that we can be confident that accurate judgements have been made. Paragraph 4.61 states that 25 sites are a negligible effect but based on the key used 'o?' actually relates to negligible or uncertain and as such we are uncertain as to what the likely effects are. • Page 47 we note that many of the proposed employment sites also show as pink/red in the SEA/SA assessment for the historic environment objective. Paragraph 4.105 our comments are the same as above, that we are cautious in using distances only to ascertain likely impacts [...]. • Our comments are the same for the differing development uses throughout the Plan, as the same methodological approach has been applied. • We would question some of the judgements raised in the policy assumptions, such as paragraph 4.222 where it is stated that there would be positive effects for the historic environment as a result of green space and recreation site yet no details are known as to what these may be or how they would relate to the historic environment of the area and if they would be appropriate in a historic landscape context. • We welcome the reference to the consideration of historic environment evidence within the site assessment section. We note that a variety of documents are referenced [...], which we welcome. The Council has considered what heritage assets are within the proximity of the proposed development (distance only). However, we note that when it comes to making a judgement, it is often considered as uncertain due to issues such as design and layout in a future planning application. Historic England would consider a sound approach to be one that assesses the impact and considers what avoidance and mitigation measures could be put in place, if any. Where there are none it may be an unsuitable site for development and where there are some, then these should be brought forward into the local plan as design principles in site specific policies. <p>[...].</p>
SASc7	Inland Waterways Association	<p><u>Appendix 3. Para 34</u> It is the Trent & Mersey Canal at Rugeley not the Staffordshire and Worcestershire.</p>
SASc8	Natural England	<p>AONB Management Plan – Page 18 paragraph 3.8 – the Cannock Chase AONB Management Plan 2019-2024 has now been published so please refer to the updated version in the SA process.</p>
SASc9	St Modwen (West of Pye Green Rd) (C/O RPS Planning & Development)	<p>It is noted that the SA (2019) accompanying the plan includes at pages 30 and 31 the potential sites being considered for allocation. The land west of Pye Green Road clearly represents as 'reasonable alternative' for housing (as opposed to a mixed use site referenced as site C113 on Table 4.3) and should be included with the next iteration of the SA, based on the likely capacity for the site to deliver additional housing land over the plan period. Additionally, the evidence for the Allocation of the site in the Core Strategy and subsequent ES demonstrates the assessment of potential for significant negative effect for Objectives SA1, 2, 3 and 6 does not exist and should be screened out.</p>
SASc10	St Modwen (Watling Street) (C/O RPS Planning & Development)	<p>This iteration of the Sustainability Appraisal (SA), broadly equating SA Stage C, follows on from the SA Scoping Report (Stage A) published in June 2018 as part of the Issues and Scope consultation exercise. However, the scoring that has been undertaken [...] appears to broadly follow the SA scoring undertaken for the Local Plan (Part 2): Issues and Options, [...].</p>

		<p>RPS does not consider this to be a logical approach to take, given that the Plan period is now changed (end date 2036, not 2028) and that the evidence base has been largely updated in terms of assessing housing and employment needs and land supply,[...]. The result is a ‘hangover’ of SA assessments relating to the consideration of reasonable alternative sites, particularly regarding employment site options.</p> <p>In relation to the employment site options, the summary of SA scoring for each of those sites (Table 4.2 in the IIA) is presented below, as an extract. An initial consideration of the scoring of the sites taken as a whole, illustrates that against the SA environmental objectives (SA1 to SA8) all the sites scored negatively to a lesser or greater extent. [...]. This therefore requires a realistic and pragmatic application of these findings when the Council comes to select its preferred site options.</p> <p>SA Scoring applied to Watling Street Business Park (CE20)</p> <p><u>SA Objective 2</u></p> <p>[...], the site has scored positively and negatively across the SA objectives. Nonetheless, RPS has issues with a number of negative scores assigned to CE20.</p> <p>With respect to air quality, this due to proximity to an AQMA. [...]</p> <p>The Council’s own Air Quality Annual Status Report 2018 notes that, <i>“Levels at the A5 Watling Street hotspots have shown some decrease in recent years, [...]. It has previously been hoped that if improved pollution levels were sustained, the AQMA designation for the A5 could be revoked. However, 2017 monitoring results have demonstrated this is not yet the case. [...].”</i></p> <p>However, the only site in the graph that measured exceedances of the objective in 2017 is not adjacent to the A5 but located in the recently declared AQMA 3 (Five Ways Island). Measured concentrations at the closest tube to the site, WS 268, were below the objective in 2017, as they have been in all previous years with the exception of 2016. [...].</p> <p>Based on this, it is unreasonable to determine the impact of development of a particular site (including CE20) upon air quality should be based purely on proximity to an AQMA. There are two reasons for this; firstly, the presence of an AQMA does not necessarily mean that the air quality objectives are being exceeded; secondly, concentrations are anticipated to reduce during the plan period.</p> <p>In relation to CE20 specifically, there are very few properties located adjacent to roads that would be affected by any changes in traffic. Furthermore, monitoring near to one of the few properties that could be affected indicates that the annual mean nitrogen dioxide objective has been achieved for a number of years, with the exception of a single year (2016) which was a high pollution year due to meteorological conditions.</p> <p>Consequently, it is considered that the SA scoring is overly pessimistic and does not adequately represent the available evidence, and there is not a credible score. Accordingly, RPS consider that the SA score should be changed to from ‘-’ to ‘0’ or ‘?’.</p> <p><u>SA Objective 3</u></p> <p>The score of ‘-’ ignores the fact that the site would not be brought forward as ‘stand-alone’ employment development, but as part of an expansion of an existing business park. [...]. Therefore, on the basis of the reasoning applied in the IIA, an expansion of an existing development would clearly offer opportunities for some reuse or remodelling of those premises and would also result in a larger brownfield site once development has taken place, utilising the brownfield land already in-situ.[...]. Accordingly, RPS consider that the SA score should be changed from ‘-’ to ‘0/-?’.</p> <p><u>SA Objective 5</u></p>
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	<p>The IIA (page 512 refers) identifies the site as being 'outside Flood zone 3'. [...]. RPS agrees with this score, as this does not properly reflect the available evidence on flood risk on the site. [...] extent of the site based on flood map provided by the Environment Agency mapping system, the site is in fact outside both Flood Zone 2 and Flood Zone 3. Accordingly, given the site is located in Flood Zone 1 and so not at risk of fluvial flooding, RPS consider the score should be reduced from '-' to '0'.</p> <p><u>SA Objective 6</u></p> <p>[...]. RPS does not agree that a moderate sensitivity to development in general terms equates to an adverse (and thus negative) impact on a specific landscape. [...], there are no designated valued landscapes in the vicinity of the site and therefore we do not consider it justified to score the site as harshly as the IIA does. Accordingly, RPS consider that the SA score should be changed from '-?' to '?' given no approved scheme is in place at this time.</p> <p><u>SA Objective 8</u></p> <p>[...]. On the matter of public transport, whilst it is acknowledged that the SA scoring does not take into account mitigation measures at this stage (but will have to prior to selecting the preferred option sites, it is clear that opportunities exist to promote measures to encourage sustainable transport in accordance with already adopted Local Plan policies (Policy CP10) [...]. Consequently, it can be assumed that such measures would be needed (subject to viability) in order to facilitate policy-compliant development.</p> <p>On the matter of cycle routes, the site is contiguous with an existing business park that is directly adjacent to a major transport where cycle provision could likely be accommodated into the footpath network. Furthermore, a shared pedestrian/cycle route does run along the northern side of A5 Watling Street, [...]. The location does therefore provide viable cycle links to local residential areas. Accordingly, RPS consider that the SA score should be changed from '-' to '0'.</p> <p><u>SA Objective 14</u></p> <p>The IIA has scored the site '-' as a significantly negative impact due to a perceived lack of access to local community facilities in the area and impact on 'isolation'. This again is relation to a perception of lack of access to public transport. RPS consider the issue of isolation to be over-stated in relation to the site and ignored the fact that there are two public houses (Toby; and Crown at Brownhills) and a social club (Yates Sports & Social Club), all within 800m or so of the site [...]. In addition, Cannock Chase (Chasewater) Country Park is located within easy access to the north of the A5. Accordingly, RPS considers that the SA score should be changed from '- -' to '-' or '-/+ '.</p> <p><u>SA Objective 15</u></p> <p>The IIA has assigned a score of '+' to the site. RPS does not agree with this score as this clearly under-states the contribution that the site (c.5ha in area) could make towards addressing the acknowledged shortfall in employment land supply in Cannock Chase up to 2028, a factor not referred to in the SA summary for the site. Accordingly, RPS consider that the SA score should be changed from '+' to '++'.</p> <p>Re-appraised SA scoring – Watling Street Business Park</p> <p>Based on the foregoing analysis, it is clear that site described as 'Watling Street Business Park' (CE20) scores relatively highly when compared with the other employment site options appraised in the IIA, demonstrating that the Site has good sustainability credentials for accommodating development. Accordingly, RPS have demonstrated (alongside separate evidence submitted at this stage) that the Watling Street Business Park would represent an appropriate location that the Council should give real consideration to in the next iteration of the Local Plan review, which is anticipated to cover the preferred selection of employment sites.</p>
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<p>SASc11</p>	<p>Wright, T (C/O Pegasus Group)</p>	<p>The Upper Birches Farm site was assessed in the Sustainability Appraisal under Reference R112: Land between the Rising Brook and Hednesford Road, Rugeley.</p> <p>It is noted at this stage all assessment is undertaken assuming no mitigation. It is essential that mitigation is factored in as site assessment is undertaken, [...] to ensure that the site is considered fairly and accurately.</p> <p>Objective 1: [...] a negative/uncertain score is given, however this fails to take into account mitigation that could be provided on site, including the provision of open space to mitigate for impacts on Cannock Chase SAC, [...]. A positive score should therefore be given.</p> <p>Objective 2: [...] the SA concludes a significant negative effect. Whilst it is acknowledged that the site is in agricultural use it can deliver net gains locally including providing an alternative location for users of Cannock Chase to keep them away from the most sensitive areas i.e. the SAC.</p> <p>Objective 3, as per Objective 2 it is acknowledged that this is a greenfield site but it could deliver significant net gains. The figure of 68homes is incorrect [...] Appendix 3 shows how between 210 and 245 homes could be accommodated.</p> <p>For Objective 5 the SA states that R112 will have a minor effect [...]. The site is entirely within Flood Zone 1 which is acknowledge in the SA and it is not clear why this minor negative score has been given, as such it is disputed.</p> <p>Objective 6 [...]. It notes that the site is located within SF07 (Ancient Settled Farmlands), which is stated as having a moderate level of sensitivity to development. However, the SA concludes that an '<i>overall significant negative effect is expected on this SA objective.</i>' We strongly disagree with this assessment.</p> <p>Pegasus Group have conducted a Landscape Appraisal of the site which is contained at Appendix 2. The conclusions of this appraisal are clear that the northern part of Upper Birches Farm is capable of accommodating development given it is well related to the existing settlement and would be acceptable in landscape and visual terms. This evidence points to a different conclusion than the Council's SA and the is asked to Council consider the submitted Landscape Appraisal when undertaking any further assessment of this site.</p> <p>The client intends to provide part of the site as a Country Park which would establish a permanent and defensible boundary to the South of Rugeley. [...].</p> <p>It is considered that a landscape led scheme could be provided on site which would mitigate the impacts of the development on the Cannock Chase AONB. [...]. The masterplan shows how the development could be designed to retain key views across the site to the wider AONB beyond, [...]. As a result it is considered that a positive score should result.</p> <p>We agree with the findings of the SA in relation to objectives 8-10, [...], although the capacity needs amending to reflect this submission. [...].</p> <p>In relation to objective 12 of the SA, it is stated that there will be a minor negative effect with regards to the aim [...]. Although the nearest GP to the site (Sandy Lane Surgery) is located in excess of the 600m threshold, the GP can easily be accessed by the bus route serving Hednesford Road. [...] and performs favourably in this objective.</p> <p>Objective 13 [...], with the site performing well in this category. As discussed previously there is potential to explore the provision of a Country Park [...], therefore it is considered that this site has the potential to perform even higher than the score indicated on objective 13 of the SA.</p> <p>Objective 14 is supported: it is agreed the site is an excellent location for accessing community services and facilities.</p> <p>Objective 17 [...]. The SA lists a number of listed buildings within the parcel of land assessed. However, the land area we are proposing for housing contains no Listed Buildings or other heritage assets. It is therefore considered that residential development on this site would not lead to any negative impacts on designated heritage assets. Furthermore, there would be a positive impact from the reinstatement of historic field patterns, boundaries and hedgerows to the site [...].</p>
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SASc12	Lichfield & Hatherton Canals Restoration Trust	<p><u>Page 508 – regarding site CE19, also paragraph 4.97 which refers to this site</u></p> <p>We refer specifically to the site identified as CE19 between the M6 Toll and the A5. The projected route for the Hatherton Canal runs across this area so the necessary provision of space to accommodate the canal is an important constraint on the development of this area of land. The plan to construct the canal in this area should be presented as a positive – this location is particularly attractive for businesses offering appropriate hospitality, leisure, or boating -related services.</p>
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Local Plan Review Habitat Regulations Assessment Scoping Report Consultation: Summary of Responses

Rep ID No.	Respondent	Comment
Overall/General Comments		
HRASc1	Lichfield & Hatherton Canals Restoration Trust	<p><u>Paragraph 4.10</u></p> <p>As a point of information, the water level in the Cannock Extension Canal is managed by Canal & River Trust as the navigation authority for the Canal and other canals connected to it.</p>
HRASc2	Inland Waterways Association	<p><u>Page 32 Local Transport Plans</u></p> <p>Reference to “supporting a limit on the levels of boat traffic on the Cannock Extension Canal” relates to now discredited and withdrawn representations from Natural England (see IDP response). This text should be removed from the report.</p>
HRASc3	Natural England	<p>The scoping assessment sets out a methodology for further stages of assessment to assess if significant effects are likely to occur, either alone or in combination. It also takes into account recent rulings such as the interpretation of the Habitats Directive in the case of People over Wind and Sweetman vs Coillte Teoranta (ref: C-323/17).</p> <p>We have no particular comments to make on the scoping assessment and look forward to the next iteration of the report.</p>
HRASc4	St Modwen (Watling St) (C/O RPS Planning & Development)	<p>The following European-designation sites are within 15km of Cannock Chase District:</p> <ul style="list-style-type: none"> • Cannock Chase SAC – within and adjacent to the District; • Cannock Extension Canal SAC – within and adjacent to the District; • Pasture fields Salt Marsh SAC – c.6km away; • Midland Meres and Mosses (Phase 1) Ramsar Site/ West Midland Mosses SAC – c.8km away;

		<ul style="list-style-type: none"> • Mottley Meadows SAC – c.13km away; and • River Mease SAC – c.13km away. <p>The above sites therefore fall within the 15km threshold zone of influence in terms of their proximity to Watling Street Business Park. The SAC in closest proximity to the site is Cannock Extension Canal SAC. [...].</p> <p><u>Assessment Assumptions</u></p> <p>In terms of air pollution, the screening criteria set out in Natural England are if a plan or project would lend to a change in Annual Average Daily Traffic (AADT) vehicle flow of more than 1,000 total traffic or 200 HDV on roads within 200m of the SAC, either alone or in combination.</p> <p>The HRA Scoping Report notes that (paragraph 4.4 refers), “Traffic forecast data (based on the planned level of growth) will therefore be needed to determine [...]. An assessment will also be undertaken to identify which European sites lie within 200m of the strategic road network.” In addition it states:</p> <p><i>“Potential effects will also be considered if there is any significant development identified in the plan that would cause aerial emissions...”</i> (Paragraph 4.5).</p> <p>In relation to the Watling Street Business Park site, traffic data used in modelling air quality in November 2017 indicated that the screening criteria would not be breached by the proposed development of site CE20 in isolation. The modelling of air quality based on this data indicated that an employment development at Watling Street Business Park could lead to a change annual mean nitrogen oxides concentration and nutrient nitrogen deposition that would exceed 1% of the critical level/load within the site boundary, but not in the area of open water (which is where the water plantain species is located). Consequently, in terms of impact on the Cannock Extension Canal SAC, the available data suggests the proposals on the site are not likely to cause adverse impact on the integrity of this European site.</p>
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Appendix 4 - Comments Received during the Preferred Options Consultation

	Consultee/Organisation Name	Consultancy & Consultants name (If applicable)	Summary
REF			General Whole Plan Responses
LPPO001	A, Webster		It's a well-considered and thorough proposal. I really value the effort taken to ensure consultation takes place during these times of restricted access.

LPPO002	L, Morrall		<p>Cannock Chase has fulfilled its housing quota for approximately the next 5 years (4.8 years certainly - although this is likely to be more with additional building counts). However, the council has an obligation to build so many houses in line with national housing needs policy, and I believe from scouring the documents that the council needs to look for availability for 275 dwellings per year for after this 5-year buffer period is over. Looking at the Green Belt map, most of the brownfield land in the district has now been used for housing and construction. Most of the Chase is obviously, under special protection as an AONB. However, much of the remaining land in the area of the district including Hednesford and Heath Hayes is Greenbelt land. So does this mean that it is inevitable that the greenbelt will be used for future housing to supply for the ever-expanding national population, and the flow from the urban West Mids into the surrounds? Currently the areas to the east of Heath Hayes towards Gentleshaw and to the South towards Norton Canes (Newlands area) are greenbelt, and these are highly vulnerable. The housing explosion in the district has included the huge Hawkes Green estate, Wimblebury estates, and currently Pye Green area extensive developments. Does this mean that because the Chase is fairly protected, it is inevitable that the rest of the District will become completely urbanised? Is it fair when other districts, like Stafford have vast amounts of land compared to the much smaller Cannock Chase district which is dominated by the Chase? There is a pocket of land to the east of Heath Hayes that is not included in the Greenbelt and I believe it is currently farmland privately owned by Taylor Wimpey. If this land was developed it would set a precedent for building to the east of the village of Heath Hayes. There is also an area to the south of Heath Hayes from opposite Cleeton Street to the mini island where plans have been pitched by developers. This rich area is used by deer and contains numerous important flora and fauna. The increased traffic flow and pollution levels in the Heath Hayes area and especially Cannock and Hednesford Roads are already problematic to residents, and this is before the inevitable traffic increase from the new retail village, and the new crematorium. I know the country needs housing, its population is still increasing, but why should the burden be put on smaller districts with very little brownfield, when larger districts may have large areas of brownfield and much more extensive greenbelt? The green belt is a buffer between provincial Cannock Chase district and neighbouring districts. The district of Cannock Chase has already been developed almost out of recognition, and has certainly contributed hugely to housing needs for the past several decades, with extensive home building and industrial sites. Cannock Chase AONB should of course have protection status, but this should not be at the detriment of the rest of the district, and its greenbelt buffer zone between villages and other districts. The government have relaxed building on greenbelt, which I think is a huge mistake, and it shows the country has reached a point where it can't sustain a much higher population, without irreversible damage to the country's greenbelt and infrastructure. Having spoken to various councillors from different parties in the area, I know my concerns and frustrations are also shared by many of them. I hope special efforts can be made to sustain our</p>
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			wonderful district as a semi rural gateway to Cannock Chase from the heavily urbanised West Midlands districts.
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LPPO003	Transport for West Midlands - H, Davies		<p>Transport for West Midlands (TfWM), the transport arm of the WMCA feels this local plan is very relevant to the West Midlands Metropolitan area. In general, we support its vision and associated aims and policies, especially given the strategic importance of the plan and the key role it will play in meeting future economic and housing demand, attracting investment and delivering enhanced connectivity. It is therefore important that TfWM works alongside Cannock Chase DC, as well as the wider region, to provide the necessary transport infrastructure to support such growth.</p> <p>Strategic cross boundary matters such as journey patterns are particularly important for TfWM, with significant numbers of people community into the met area daily from Cannock; impacting on the wider journey to work area. Pre-covid travel data of Cannock Chases 63,379 working age population - 8,851 people (14%) commute into the met area daily, and a further 4,427 commute from the met area into Cannock. This is very high compared to other non-met areas, with rail passengers representing a significant proportion of commuters. Next Steps: TfWM understands the potential benefits growth can bring, such as providing new opportunities for improved sustainable transport infrastructure, which can benefit both new and existing communities and we fully support the local plan in its objectives and vision. In delivering the right transport infrastructure and services, it will deliver multiple benefits and make a huge contribution to communities through quality of life, promotion of good mental and physical health and support economic growth, TfWM will continue to support Cannock Chase in taking forward their Local Plan and we reiterate our support for the partnership approach that has been taken to addressing the strategic transport needs within the plan to date.</p>
LPPO004	Walsall Council - N, Ball		<p>ABCA have engaged actively and positively to the various stages in the preparation of the Local Plan, and we welcome the cooperative engagement with Cannock Chase Council throughout our most recent engagement was our response to the Regulation 18 consultation in September 2019. Our representations addressed two principal issues – housing and employment land, associated with the requirement for the Local Plan to address the Duty to Cooperate and specifically to respond positively to help address the identified shortfall of land to meet growth needs arising in the Black Country. We also made detailed comments in relation to the Hatherton Canal restoration, Special Areas of Conservation, and Gypsies and Travellers. We acknowledge the amendments made to the Regulation 18 Plan in responding to our representations. However, we note that the Preferred Options Plan proposes a contribution to meeting housing needs arising in the Black Country very much at the lower end of the range indicated in the Issues and Options consultation, and the reasoning for this in comparison with the potential higher levels of contribution is not clear. There is also ambiguity about what the total proposed housing target in the Plan actually is.</p>

LPPO005	L, Barratt	<p>The target set for the number of new homes should reflect the views of the neighbourhood and not be driven the views of developers. LPPO Page 63 para. 152 Option C and D recommend the highest number of houses should be built, 6,612 net dwellings for the district(2018-2026) and 7,612 respectively. Page 64 para 6.155 states the above numbers reflects the volume of responses by site promoters which is disproportionate against the number of responses by local groups and individuals. The local groups supported the lower levels of growth. Their views must be reflected. Page 66 LPPO para 6.163 more protection should be given to the districts main villages and hamlets which are currently considered to be semi-rural and not considered remote from the main urban areas. This policy should be reviewed. It's essential we retain the character and distinctiveness of the landscape. SO 7 P188 - This target is not specific enough.</p> <p>Development that would form a hard edge to protected and designated sites should not be permitted. The site referred to as C64 in the current Local Plan (H30 on page 75 Table C LPPO) is still being considered for development even though it was denied permission in 1999. The proposed development would allow a housing estate to run along the edge of the AONB for approx. 0.5km. The Document - Housing Development Capacity Study 2018-2038 March 2020 has this site listed in table 5 (page 10). This site is not part of the housing development capacity and so is not required for the housing need to be met. Why is this site still included when it is 1.7km from a SAC, 100m from an SSSI, 400m from the SBI (Hazelslade Nature Reserve), 350m from the SBI on Rawnsley Hill and adjoining the AONB and Forest of Mercia. On Page 46 - of 16 SHLAA December 2020, categorisation is mentioned. It says that its status as a restricted site may change. The locals have been pushing to have this as part of the Green Space Network. It needs protection. The objectives at the moment offer little or no protection to sites like these. In Appendix 11 in the same document, the site is described as not available and more important not suitable for development. Yet it still appears under objective 3 Table C page 75 (H30) as an additional site. SO7.3 Page 188 - The target doesn't mention the distances from the SAC where development can take place. The 8km and 15km boundaries are usually used to calculate impact but no mention is made of building that is very close. This should be taken into consideration. It should mention alongside the SAC other sensitive areas such as SSSIs and SBIs. SO7.1 the table here says no development if it impacts on designated sites unless exceptional circumstances. This statement needs more clarity. Page 141 objective 7 LPPO para 6.434 mentions the safeguarding of international, national and locally designated sites of importance for biodiversity: wildlife corridors and stepping stones that connect them. This statement is not reflected in the strategic objectives. In LPPO - page 153 para 6.91 under NEW EVIDENCE Enhancing the Beauty of Landscapes is mentioned and para 6.492, The Government White Paper, Planning for the Future (August 2020) proposes a range of changes to Local Plans. These include the identification of protected areas (including important areas of green space and locally important features such as protected views). SO7.4 protecting, conserving and enhancing the</p>
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			<p>landscape character of page 155 of the LPPO Preferred Policy Direction. Development proposals within or on land forming the setting of the AONB. Development proposals which individually or cumulatively adversely impact on the landscape and scenic beauty of the AONB or its setting will be resisted. The above is a strong statement that is not reflected in SO7.4. SO7.5 the target here does mention detrimental impact but it is still too vague. While its target is to meet the objectives of the AONB Management Plan, neither SO7.4 or 7.5 mention the Views and Settings Guide by the AONB. Not enough detail on the targets again. It should also mention light and noise pollution under protecting, conserving and enhancing the Green Belt (SO7.6). In addition to mentioning these factors in SO8.5.</p>
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LPPO006	Highways England - Pyner, D		<p>It is our role to maintain the safe and efficient operation of the Strategic Road Network (SRN) whilst acting as a delivery partner to national economic growth. In relation to the Cannock Chase Plan area, Highways England's principle interest is in safeguarding the A5, which routes through the Plan area. In line with the DfT Circular 02/2013, we consider that Local Plans should promote development at locations that are or can be made sustainable, that allows for uptakes of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth. We support a pattern of development that minimises trip generation at source and encourage the notion to make the best use of existing infrastructure, reduce the need to travel and increase opportunities for non-car travel such as the use of public transport, walking and cycling, to encourage modal shift away from the car and help to reduce congestion on the SRN. Therefore, we generally support an increase of development within and adjoining the larger settlements in the area, which benefit from a good concentration of amenities and public transport services. We consider that focusing housing in urban areas would be likely to have a lesser impact on the SRN than in rural locations or in close proximity to the A5 due to reduced vehicle trip generation and availability of key facilities and services locally, therefore minimising journey lengths for employment, shopping, leisure, education and other activities. We would expect that future allocated sites within these strategic locations or any other sites with the potential to impact the operation of the SRN to be subject to Transport Assessments in order for their impacts to be assessed appropriately and mitigation to be identified as required.</p>
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LPPO007	Spedeworth Motorsports - D, Wood	Rolling Start - D, Carter	<p>Spedeworth Motorsports (incorporating Incarace Ltd) are promoters of short circuit oval motorsports at venues across the UK. Hednesford Hills Raceway was established in the 1950s and is one of the premier venues in the country for stadium motorsports, staging events of national and international significance. The venue attracts participants in a wide range of different race classes not only locally and from across the UK but also internationally, particularly from Mainland Europe and Eire. These participants form part of an active drive base comprising many thousands of people. The events are spectacular and regularly draw large crowds to the venue. As such the raceway also represents one of the most important visitor attractions in Cannock Chase. Users of the stadium make a significant contribution to the local economy in a number of ways. Numerous local businesses built, service and maintain competitors cars and visiting spectators stay overnight in nearby hotels and utilise local services and facilities. While the racing activities are a noisy sport, the number of events is 20 per annum meaning that the site, which lies at the heart of the surrounding SSSI, is maintained and kept secure at all other times. This is a considerable community benefit. Over the past couple of years several motorsport venues have been lost and one of the reasons cited is that no specific protection has been given in the local development plan. This representation seeks to remedy this situation in respect of the Cannock Chase District Local Plan. From our analysis of the consultation there is no reference to Hednesford hills Raceway and its significance as both a sports stadium and important visitor attraction. As a sports venue the need for the raceway is clear and continuing, as evidenced by the number of drivers who wish to participate at the venue. As a visitor attraction, major events continue to attract large numbers of spectators. While many of those spectators will not come from the local community they are sourced from wider 'communities of interest'. This is a strategic consideration that should be reflected by the local plan. Our request is that the Council should consider amendments to the local plan, so the rich heritage and continuing importance of Hednesford Hills Raceway is both recognised and protected. Ideally this would be reflected not only in policy but also through identification of the stadium site (including the parking area) on the policies map. The policy might usefully draw attention to the nature of the activities that take place and, how any nearby future developments need to take full account of this. Without such changes we content that the plan would be unsound as it would fail to be consistent with the provisions of national planning policy as set out in the NPPF. Incidentally, we believe that the similar representations to those above regarding the lack of recognition in the local plan to Hednesford Town Football Club might also apply.</p>
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LPPO008	Stafford Borough Council - A, Yendole		<p>We note that a minimum 5,516 dwellings will be delivered to meet the District's housing need between 2018 and 2038 at a rate of 276 dwellings per annum. A further 500 dwellings are being delivered to help meet a shortfall arising from the wider housing market area, (increasing total delivery to 6,016 dwellings at a rate of 301 dpa). It is also noted that up to 50ha of employment land will be provided to meet the District's requirements. It is acknowledged that in order to meet the District's housing need requires the release of land identified within the Green Belt. We have identified that amendments to the Green Belt are not directly related to the boundary with Stafford Borough and that no sites (employment, housing or mixed use) have been allocated on land that would have an impact on Stafford Borough. We acknowledge Rugeley as an important Town Centre and the opportunities for redevelopment. It is noted that there is a proposal for local design codes to be created based on character areas, of which Etchinghill and Springfields are identified. As this forms part of the built form of Rugeley on the border with Stafford Borough, we would support the creation of design codes and would welcome being involved in this on-going work. In terms of strategic cross border issues we will continue to work with you on all relevant matters relating to protection of the Cannock Chase AONB, SAC & Ramsar Sites, in particular Cannock Chase SAC and the wider nitrogen deposition project. Finally Stafford Borough supports the position of policies seeking to balance recreational uses and control development to protect areas from negative impacts, in particular Cannock Chase AONB.</p>
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LPPO009	Historic England - E, Boden	<p>Firstly, we note that the Plan is accompanied by a HIA, which assesses the impact of development on designated and non-designated heritage assets and their settings, Historic England welcomes this approach and is pleased that the methodology used is generally in line with that set out in Historic England's Advice Note 2: The Historic Environment and Site Allocations in Local Plans, 2015 (HEAN3). We also welcome the fact that this HIA has been prepared with reference to HEAN3 and Good Practice Advice Note 3 (Second Edition): The Setting of Heritage Assets (2017) (GPAN3). However, we note that some of the proposed allocations which may have an impact on the significance of designated heritage assets have not been carried through to the second stage of assessment within the HIA. Historic England considers that the following proposed allocations would benefit from such assessment work to inform decisions, prior to their allocation: H37, H48, H49, H51, H53, M4, M8 and E6. Please see our tabulated comments in the attached Appendix A for further detail. We understand that for certain of the above sites (H37, H48, H49 and H52) the methodology adopted by the HIA has omitted their assessment because they are either located within, or within the setting of, a Conservation Area, and with no other heritage constraints. In these cases, we also note that the HIA recommends that the requirements for new development set out in the relevant Conservation Area Management Plan should be brought to bear for all planning applications on these sites. However, Historic England considers that in omitting these sites from assessment within the HIA it is not clear how the impact on the significance of the relevant Conservation Area has been assessed and how the Council envisages development would take place in respect of the historic environment. The NPPF (Para 185) requires that a positive approach to the historic environment should be demonstrated as part of the Plan process. Since this is not clear at this time Historic England recommends that these matters are addressed in relation to the above sites, prior to the Regulation 19 stage, so as to avoid any issues over the soundness of the Plan. Given the number of sites that have the potential to impact on the significance of designated heritage assets and their settings, historic England would urge you to consider obtaining specialist conservation advice, particularly with regard to interpreting the findings of the HIA. Assessment of potential development should fully consider the impact on the setting of Scheduled Monuments, including the landscape views from Castle Ring (e.g. for development to the north in Rugeley), as well as, and, assets which are outside of the District (e.g. the setting of the Saucer barrow on Spring Hill, or Shugborough Registered Park & Garden). With specific reference to non-designated heritage assets, these can make a positive contribution to the character of our settlements and enrich our sense of place. We recommend that the views of your chosen specialist archaeologists adviser are sought on these allocations to confirm that the evidence base is sufficiently robust to ensure that any proposed allocation is deliverable in accordance with local and national planning policies. Your adviser will inform you on whether further assessment work is required though field assessment prior to allocation to ensure the extent, character and significance has been</p>
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			<p>adequately understood to inform the allocation of a site. Our tabulated comments in the attached Appendix A and your own assessments, highlight a number of non-designated heritage assets that may be affected by the proposed allocations. Areas within the District of note for non-designated historic assets are the A5 corridor and the Cannock Chase AONB. We note that the Local Plan makes reference to the Cannock Chase AONB Management Plan 2019-2024 and recommend that specific links are made to the policies in the Management Plan which have the objectives with the Chase's history and culture. With regard to the interactive policies map, we recommend that this should show the Scheduled Monuments as polygons, not as points, and it should also show Registered Parks and Gardens within the District.</p>
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LPPO010	Norton Canes Parish Council		<p>Healthy Living - The NP is proposing policies on provision and improvements to indoor and outdoor sports facilities, play areas, informal open spaces, a formal park, the rural footpath/cycleway network and health services. The proposed options for the development of a formal park are The Mount south of Jerome Road and the recreation round east of Brownhills Road adjoining the community centre. This latter site is also the preferred location for provision of indoor sport and recreation facilities which are currently lacking in the village. The PO document recognises that whilst there are good quality indoor sports facilities across the District there are not easily accessible by public transport from outside the main urban areas. It also recognises the need for improvements to outdoor facilities including artificial green pitches and multi-use games areas. So, it is considered that priority should be given to investment in indoor facilities and improvements to outdoor facilities in the village using S106 funds already obtained any new funding arising from future housing developments. Proposed PO Policy SO2.1 and Policy SO2.3 are supported in principle in the context of the above aims of the NP. The major open spaces within the village are currently protected as part of the Green Space Network (GSN) which PO Policy SO7.8 proposes to continue to protect, conserve and enhance. These spaces include the two possible locations for a formal park so this is welcome. The policy also enables new areas of GSN to be added as they come forward in connection with major new housing developments and areas of green space allocated in Neighbourhood Plans to be afforded the same level of protection which is welcomed. A survey of open spaces not currently in the GSN has been undertaken as part of the NP process and suggestions for improvements will be invited as part of the proposed NP consultation. The NP has not currently addressed the issue of allotment provision but notes that PO Policy SO2.5 lends support to protection of existing and provision of new allotments and this matter will be included in the consultation on use of local open spaces.</p> <p>Sustainable travel – The NP is seeking to achieve delivery of sustainable improvements to bus services, key walking and cycling routes and for major developments to make appropriate financial and practical contributions to deliver such improvements. Negotiations on use of existing committed S106 funds to achieve these aims will continue separately from the new Local Plan. However, support of PO Policy SO5.2 aiming to reduce reliance on private car journeys by improving public transport, walking and cycling routes is welcomed. PO Policies SO5.3 & SO5.4 building on the theme of sustainable travel particularly in relation to electric vehicle charging points, provision of safe walking and cycling routes including canal towpaths, High frequency bus services connecting schools, health services and key employment sites is also welcomed as is support for demand responsive public transport options where timetabled services may not be sustainable. PO Policy SO5.6 aims to safeguard proposed recreational footpath and cycle routes connecting villages, countryside and main urban areas including related infrastructure such as highway crossing points and this is also supported. The NP is putting forward for consultation 4 key walking/cycling routes linking the village to schools, employment and leisure/countryside</p>
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			<p>sites. One priority highway crossing point in need of major safety improvement has been identified as the A5 at the northern end of the Cannock Extension Canal. There is a gap in National Cycle Route 5 (NCR5) between Burntwood and Stafford. The NP is looking at opportunities for an option to route NCR5 through the recreation routes of Norton Canes and onward through Heath Hayes Parish and the AONB. The new Local Plan could support this initiative.</p>
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		<p>Protecting the countryside as a whole and specific sites of ecological value – The NP is seeking to improve the biodiversity of all protected sites and require all major new developments to make appropriate financial or practical contributions to deliver net environmental gain. PO Policies SO7.1, SO7.2, SO7.3, SO7.4 and SO7.6 are broadly supportive of the NP aims. Reference is made to the Council’s Urban Forestry Strategy 2019-2024 which seeks to expand tree and woodland cover. Tree planting as an option on areas of open space within the village will be the subject of NP consultation. The area of the Parish south of the A5 in the Little Wyrley area contains some of the best quality rural landscape outside the AONB some of which has a sense of tranquillity. Policy SO7.4 would provide appropriate support for an NP policy to identify the need to conserve these qualities. Improving the choice of local shopping facilities whilst supporting the vitality and viability of existing local shops, pubs, take-aways, restaurants and other local services – The NP is proposing to identify a boundary for the village centre within which erection of new buildings/extensions for uses within Class E and related food and drink uses would be supported. The NP is also proposing to achieve environmental improvements to the centre and car park, including vehicle charging points, support the provision of a new convenience store at Norton Hall lane and support roadside retail and service uses on land adjacent to the Turf Inn. The introduction of a national Permitted Development right to change Class E Uses to residential as from the beginning of August may pose some challenge to supporting the retention of Class E uses. PO Policy SO6.1 identifies Norton Canes as a local centre with a role to provide small scale town centre services to serve local need. PO Policy SO5.1 requires all major developments to contribute to reduction in carbon intensive modes of transport including provision of electric vehicle charging points. The land adjoining The Turf is identified as a new employment site in Policy SO4.2.</p>
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LPPO011	CPRE Staffordshire - S, Burgess		<p>We recognise and support the council's eight Strategic Objectives. We welcome the increased emphasis on sustainability shown in the document and the encouragement of the development of brownfield sites in preference to new greenfield and Green Belt development. The District Context (Section 3) is useful and the updating and structural change in population and employment are helpful. The consequences for residents of problems arising from deprivation identified. The key issues are well justified. We welcome the emphasis in the protection of the Cannock Chase AONB, the Special Areas of Conservation and the Green Belt. The wider context is well covered in Section 4, although we were surprised that the prospective fundamental changes in planning proposed in the "Planning for the Future" White Paper have not been referred to. (We acknowledge that the Government's current stance following consultation on the White Paper is unknown - as is whether the Queen's Speech will indicate whether there will be new legislation for radical changes in planning during the next parliamentary session. If the proposals of the White Paper are given legislative force, the Local Plan will need to be dramatically changed; it would become much shorter, radically different, omit major elements and, in practice, would largely become a land allocation document). We agree with the eight Strategic Objectives of Section 5, and with the Local Plan Vision and Objectives. We are pleased with the reference in the detailed objectives to the wish to see better design in new developments, which in future are to be distinctive, attractive and safe. We do not agree with Cannock Chase District Council that support for an uplifted housing target figure for housing is the best way to support the delivery of affordable housing (your final bullet point on page 65). We regret that the current document is so unambitious in the provision to be made for affordable homes and housing for social rent (your reference to only 20% on page 79 is well below what has been set and achieved by most other councils). We oppose a number of your proposed amendments to Green Belt in Policy SO7.7 on page 158 which, in all cases, seem to involve removal of land from the Green Belt. We have failed to find the exceptional circumstances and evidence of the offsetting referred to in paragraph 6.513. The primary purpose of the amendments appears to be to provide land for new development. We have major concerns in relation to the additional housing proposed in the Green Belt, particularly land to the south of the A5190, Cannock Road, to the east of Wimblebury Road and to the west of Hednesford Road. It would be helpful if the plan could be usable to iPad users as currently it cannot be zoomed. It would also be very helpful if the plan included the site-specific reference numbers used in the text.</p>
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LPPO012	Birmingham City Council, I MacLeod		<p>The City Council previously provided comments to the Issues and Options Stage and welcomes the fact that many of the issues raised in our response have been carried through into the Preferred Options document. The City Council fully supports the approach taken within the document, in particular, in meeting Strategic Objective 3: To deliver a sufficient supply of homes to provide for housing choice and ensure all people are able to live in a decent home which meets their needs. We therefore welcome the commitment set out in the Spatial Strategy to deliver sufficient housing to meet the District's own need and an appropriate and sustainable contribution to the wider housing market area shortfall where justified in adopted plans. As part of this approach, the document acknowledges that Cannock Chase District forms part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) and has resolved to contribute 500 dwellings where infrastructure permits, to meet the shortfall arising from the GBBCHMA. Given the strategic position highlighted above, this potential contribution is welcomed in assisting to meet any shortfalls within the GBBCHMA area and emphasises the commitment of Cannock Chase District Council in fulfilling its Duty to Co-operate obligations in this respect. Birmingham City Council has been instrumental in ensuring that the 14 local authorities that make up the HMA continue to work together to ensure that strategic housing requirements are met. The City Council would therefore endorse and support the development of an agreed Statement of Common Ground in relation to the approach set out in the Preferred Options document at the Submission stage of the Cannock Chase Local Plan. This could either be an agreement across the GBBCHMA, or as a separate agreement between the two Councils if appropriate. The Council is committed to continuing to work with Cannock Chase Council, alongside other local authorities making up the Housing Market Area, to ensure that strategic issues (including identified housing and employment land shortfalls within the West Midlands) can continue to be addressed.</p>
LPPO013	Natural England- G, Driver		<p>Cross Boundary Issues: We note the cross boundary issues identified. We would advise that additional cross boundary issues should be included: • Air quality impacts on designated sites including but not limited to Cannock Chase SAC and Cannock Extension Canal SAC. • Pressure on existing ecological networks and a need to increase these networks and reduce fragmentation of these networks to alleviate pressure and for climate change adaptation and mitigation.</p>
LPPO014	P, Hewitt (Cllr)		<p>1. Area alongside Cannock Road, Heath Hayes - This is a large area of land, I am concerned about the over development of Heath Hayes and Hawks Green and the village losing its identity. I would challenge that the area could sustain a further influx of people re health care and education. With the new shopping development and the waste site close there are already traffic issues that would be made substantially worse. 2. I would like to confirm that no development or redevelopment is agreed for Hednesford Town FC and it remains a sporting venue. Also that Hednesford Raceway is not used for development.</p>

LPPO015	Lichfield District Council - S, Stray		Lichfield DC agrees that issues identified such as the Cannock Chase SAC, AONB, employment and housing and Rugeley Power Station will be cross boundary issues and also welcomes the continued recognition of the cross boundary travel relationships between Lichfield District and Cannock Chase District.
LPPO016	J, Tovey		<p>There are several things that are of concern to me: 1. Woodcock Road, Crabtree Way, Green Lane, Fermount Way and going on down towards the Springfields. People taking and using the grass verges for their own means, rather than leaving these areas for all to enjoy as intended. Trees have also been incorporated into some of these additional areas by being fenced in. Also in some cases may even been cut down altogether but I am not 100% certain of this but I would not be surprised if it had not happened. The fact that all of the homes around this area are actually owned but seem to have very few rights when other overzealous home owners want more than their allocated pocket of land. This is unfair for those who are trying to do the correct thing. Persimmon Homes are the Venders for the Old William Whittingham Ltd and Area 5 and Weston half of Area 3. 2. There are definite 'Health and Safety' issues for the general public i.e. children coming and going to school. Parents also pickup and take their children to school and this is an added issue of safety. Apart from the fact that the area is 'Open Plan', nothing in front of the building line. I was told recently when I wanted a new window. 3. There are a great deal more people using wood burners as heating in the area and it can be very unpleasant. It would not help people with breathing problems. You go out of the house for a short period and come back in smelling. There are several the other side of the playing fields, March Banks and around there. 4. As I have used a mobility scooter for many years, I do find that there are a few things which could enhance the experience. More dropped kerbs would be good for many, no just people on scooters. I know of places which could be very much improved but I can give you information where they could be introduced but I don't have the time at the minute as I need to get this sent to you before 4.45pm. Perhaps I can make a list of potential sites at a later date? 5. Another point of interest, can mobility scooters use cycle paths if needed and if not, are there other alternatives? Would there be a possibility of having somewhere local where people who have or would like to use a scooter to have a proper lesson, so that they would feel safer when out and about? Just a thought as there are more and more people using them than ever. 6. Cars, trees or bushes either overlapping or parked on the footpaths and on dropped kerns and there are no alternatives but to back up and go another way. 7. Keeping out open spaces. Like the Green Lane Playing Fields and Harley Fields. They are real gems in our community, for us as locals as well as visitors. 8. The Heritage Trail, is a real gem too. 9. If there was a chance to open up a footpath from Rugeley to Wolseley Gardens and the Wildlife Centre etc. That would be amazing for all. Maybe Stafford Council could help?</p>

LPPO017	Christopher, Walker		<p>Whilst I do feel we need to preserve all the green spaces possible for our future generations, I do know there is a need for further growth within the area. This new proposal with the preferred options location given has considered our green spaces and protected them much better than previous plans. Locations highlighted for expansion are now more centralised and have been given better understanding to the flows of traffic and movement of people that will be necessary around the area. Giving much better links for transport in and out of the area without affecting the green spaces and wildlife as much. Previous plans spread the expansion further from the central resources which would have put strain on the already overloaded infrastructures.</p>
LPPO018	S, Walker		<p>Whilst I do feel we need to preserve all the green spaces possible for our future generations, I do know there is a need for further growth within the area. This new proposal with the preferred options location given has considered our green spaces and protected them much better than previous plans. Locations highlighted for expansion are now more centralised and have been given better understanding to the flows of traffic and movement of people that will be necessary around the area. Giving much better links for transport in and out of the area without affecting the green spaces and wildlife as much. Previous plans spread the expansion further from the central resources which would have put strain on the already overloaded infrastructures.</p>
LPPO019	Claire, Walker		<p>My preferred option for building of residential properties would not involve greenbelt land. The plans that have been produced have areas for expansion that have given some understanding to the flows of traffic and movement of people that will be necessary around the area. The larger areas for development are situated where they can give access easier to the A5 and main routes into Cannock. They are also placed close to areas of work and train stations giving rise to fewer cars on the road than there would be if building was placed in other greenbelt areas. Previous plans spread the expansion further from the central resources which would have put strain on the already overloaded infrastructure. Overall, I can see that consideration has been given to concerns about some areas lack of transport links and inability to cope with larger urban sprawls. These options would be preferable to use of any other greenbelt land.</p>
LPPO020	Clive, Walker		<p>My preferred option for building of residential properties would not involve greenbelt land. The plans that have been produced have areas for expansion that have given some understanding to the flows of traffic and movement of people that will be necessary around the area. The larger areas for development are situated where they can give access easier to the A5 and main routes into Cannock. They are also placed close to areas of work and train stations giving rise to fewer cars on the road than there would be if building was placed in other greenbelt areas. Previous plans spread the expansion further from the central resources which would have put strain on the already overloaded infrastructure. Overall, I can see that consideration has been given to concerns about some areas lack of transport links and inability to cope with larger urban sprawls. These options would be preferable to use of any other greenbelt land.</p>

LPPO021	Wyrley Estates	Fisher German LLP - N, Borseley	<p>Conclusion: The Local Plan review process is welcomed, and the consultation document is, overall, thorough, and transparent about the challenges facing the district. It is essential to ensure that the needs of the district in terms of housing and employment land are kept under review, and that the figures are both ambitious and achievable. The resultant plan needs to be sufficiently flexible to take account of any uncertainty ahead. As mentioned above, our client has undertaken a masterplan exercise and is also liaising with Norton Canes Parish Council over their draft Neighbourhood Plan. Our client is also very keen to engage with the district councils over the future of the Grove Colliery site, and the current process is a golden opportunity to finally address this under-used site of the benefit of the whole district.</p>
LPPO022	Bloor Homes Ltd	Define Planning & Design Ltd - M, Rose	<p>National and Regional Context: The "presumption in favour of sustainable development" underpins the NPPF and requires plans to "positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change." Except in very specific circumstances, local plans and the strategic policies within them should "as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas" (paragraph 11). That guidance is particularly relevant to CCDC, given that the District forms part of the GBBCHMA, and in light of the ongoing and potential future inability of Birmingham City Council (BCC) and the Black Country authorities to meet their own housing needs. As an authority that borders the Black Country authority of Walsall, as well as the HMA authorities of Lichfield and South Staffordshire, the duty to co-operate with surrounding authorities on strategic matters such as unmet housing need is clearly a central consideration in coming to CCDC's housing requirement and allocating sufficient and suitable land to meet that. As such, it is essential that the emerging Local Plan is positively prepared in a manner that is aspirational but deliverable, in order to provide a framework for addressing housing needs and other priorities, in accordance with NPPF paragraphs 15 and 16. Bloor Homes Ltd (BHL) supports the intention of Policies SO1.2, SO1.3, SO2.2, SO2.3, SO2.4 and SO7.8 which seek to promote well-designed developments by ensuring that new developments;</p> <ul style="list-style-type: none"> • Enhance the quality of the built environment by making a positive contribution to the townscape and landscape (Policy SO1.2); • Create safe places that deter crime and reduce the fear of crime by promoting urban design best practice principles including the creation of natural surveillance, active frontages and spaces of vitality (Policy SO1.3); • Safeguard health and amenity by providing sufficient residential amenity, accessible and attractive green spaces, and active travel and recreational opportunities, as well as achieving low carbon developments (Policy SO2.2); • Improve the provision of active leisure and sports facilities by contributing to new, or enhanced, active leisure and sports facilities (Policy SO2.3); • Provide opportunities for healthy living and activity by promoting active travel, connective green space provision, and physical activity (Policy SO2.4); and • Protect, conserve and enhance the Green Space Network (Policy SO7.8). <p>The above policy requirements reflect what BHL considers to be the key principles of good urban design and have driven the emerging</p>

			<p>Masterplan that has been prepared for site SH5 that is proposed to be allocated. Further details are provided in the response to Policy SO3.1 However, the LPP fails to set open space standards for new development, despite the LPPO highlighting that an Open Space Assessment and Strategy has been commissioned. It is important that this document comes forward without delay, given the implications that the amount and type of open space provision can have both on the development capacity and viability of proposed allocation sites. Indeed, that will be a particularly important consideration if CCDC are to pursue the suggested approach of requiring a higher level of open space provision within sites to reduce visitor pressures on Cannock Chase. That approach will need to be justified based on proportionate evidence with the implications in relation to development capacity and viability of proposed allocation sites carefully considered. [...].</p>
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LPPO023	ENGIE - D, Sager	Barton Willmore - J, Bonner	<p>[...]. We make these representations on behalf of our client, Rugeley Power Ltd, who is the landowner and developer of the former Rugeley Power Station site (the site). Planning permission for redevelopment of the site was granted by CCDC on 7th April 2021 and by Lichfield District Council (LDC) on 8h April with the references CH/19/201 and 19/00753/OUTMEI and the following description of development: [...]. As part of the approved outline, approximately 1,036 of the 2,300 dwellings proposed will be in Cannock Chase District, subject to detailed design and reserved matters. Our client propose to build out the development over some 20years. This broadly aligns with the proposed Plan period, which will guide and manage development of the District during the period 2023 to 2038. The site is a previously developed site in a sustainable location adjacent to Rugeley with close links to two train stations. Connectivity to the town and the stations for pedestrians and cyclists will be improved significantly and a new Riverside Park will be delivered early in the development for the benefit of existing and new residents. The locational characteristics and sustainability of the site is noted in the Officers Reports to CCDC and LDC Planning Committees. We consider that the delivery of this mixed-use development at the site could help to address many of the key issues identified at Section 3 'The District Context' of the draft Plan including:</p> <ul style="list-style-type: none"> • Housing need, including for affordable housing – the site can deliver a significant contribution towards the Council’s housing requirements in the Plan period • Contributions towards Birmingham’s unmet housing need – this site is well placed with sustainable links to Birmingham • Ageing population – the site can deliver housing for older people across C2 and C3 uses • Health and education – provision of an all through school with new community sports pitches, as well as significant levels of open space and the Riverside Park • Community deprivation – investment in a previously developed site for a new mixed use community including employment uses • Employment – provision of 5 hectares of employment land, as well as retail and community uses • Transport and Infrastructure – the site contributes towards public transport improvements, including a significant bus subsidy to deliver improved buses in Rugeley; improvements are also made to encourage walking and cycling along the canal • Climate change – the proposals will help with the transition towards a zero carbon future, for instance in the provision of electric vehicle charging and renewables. <p>It should be noted within the draft Plan that Rugeley "A" Power Station and Rugeley "B" Power Station are under different ownerships. Rugeley "A" Power Station was demolished in the 1990s and most of it has subsequently been redeveloped into dwellings, with some land left undeveloped (and included as a draft allocation E4, see below). Our Client is the landowner and developer of Rugeley "B" Power Station, which has now closed and is undergoing demolition and remediation. Conclusion and suggested changes: As discussed above, our client supports the Residential Site Allocation in line with Policy SO3.1.</p>
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		<p>However, we set out a number of suggested changes below will we consider will ensure the draft Plan's objectives are achieved and delivery of the key former Power Station site is protected. 1. Amend the proposed allocation at Rugeley Power Station (Site Ref H20) to say a 'minimum of 1,000 dwellings' rather than 'approximately'. 2. Amend the housing mix policy to ensure the requirements for meeting the mix within Table D are flexible and responsive to changing evidence and site-specific matters. 3. Amend Policy SO3.3 to ensure that minimum space standards and accessibility standards do not apply retrospectively to sites with outline planning permissions which predate the adoption of the draft: and provide evidence to support the policy. 4. Amend SO8.2 and SO8.3 so that the measures are not required retrospectively for outline planning permissions that pre-date adoption of the draft Plan. 5. Policy SO4.2 - we object to Site Ref. E4 (Former Power Station off A51) as an employment land allocation. Given the approved development at the former Power Station site, we suggest that a residential allocation would be better suited to the location to ensure compatibility with adjacent uses. 6. It is noted that the draft Residential Site Allocation boundary is not consistent with the approved parameter plans (see Access Parameter Plan at Appendix 1). In particular, the western access point into the site, as shown within the red line, is not covered by the allocation. For completeness, we request that this is amended. 7. In addition, the Employment Site Allocation, which although crossing into LDC site, is inconsistent with the location specified on the approved Land Use Parameter Plan (included at Appendix 2).</p>
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LPPO024	The Church Commissioners for England	Barton Willmore - A, Bird	<p>[...]. The commissioners have previously submitted representations to the Cannock Chase Local Plan process and SHLAA, with their most recent representations being to the Local Plan Review Issues and Options consultation in July 2019. The 2020 SHLAA identifies the Commissioners Site as 'Land to the east of John Street/Wimblebury Road' under SHLAA Reference C264, and sub-divided into smaller land parcels under C264(a) to (e) reflecting the proposed phasing of the Site. The SHLAA notes that the Site has an estimated overall capacity of 1,069 dwellings (sub-total of the individual parcels). It is submitted that our Client's site offers a sustainable location for residential development. It is suitable, available and achievable for meeting housing needs within Cannock Chase District. The site should be removed from the Green Belt and identified as a residential allocation. In support of this, an updated Vision Document is included at Appendix 2 to these representations. We have previously submitted supporting technical work alongside the Vision Document, which has been undertaken by the consultancy team appointed by the Commissioners. This work provides a thorough understanding of the site and has informed the proposed development illustrated in the Concept Masterplan within the Vision Document. We attach the following documents at Appendices 3-8. • Landscape and Visual Appraisal and Green Belt Review (LVAGBR) (Appendix 3) • Heritage and Archaeology Appraisal (Appendix 4) • Arboricultural Technical Note (Appendix 5) • Ecology Technical Note (Appendix 6) • Transport Note (Initial Access Appraisal) (Appendix 7) • Sustainable Drainage Statement (Appendix 8). Please note that the updated Vision Document (2021) submitted at Appendix 2 considers the Council's updated evidence on Green Belt matters (Cannock Chase Green Belt Harm Assessment, prepared by LUC, February 2021) which has been prepared since our original Green Belt Review work from 2015 (at Appendix 3). The NPPF sets out the key framework for plan-making including the 'tests of soundness' for Local Plans (paragraph 35). The National Planning Practice Guidance (PPG) provides further advice on plan making and how these tests can be met, for instance in terms of evidence base gathering and working collaboratively with other relevant bodies on strategic planning matters. It is noted that this current framework for the preparation and examination of Local Plans is subject to a future review, as detailed in the recent 'Planning for the Future' White Paper (August 2020). However, our comments are submitted with the current national policy framework considerations in mind. We firstly provide an overview of the site and then respond in chronological order to the specific sections and Questions set out in the draft Plan and provide a series of suggested changes as relevant. Further details are provided on our Client's site in support of our comments.</p>
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LPPO025	Staffordshire County Council - J, Chadwick	<p>The 8 Strategic Objectives for the Plan are supported and provide a clear vision for the development of the District. It is acknowledged that the Plan sets out the provision for 6,016 dwellings (including 500 for the wider housing market shortfall) at 276 units per annum and 50ha of employment land. Coupled with the spatial distribution of this growth in the Preferred Options Plan we can now work with you towards identifying the precise infrastructure requirements necessary to support the delivery of the Plan. [...]. Education: This sections provides an overview of the likely education infrastructure requirements necessary to support the delivery of identified residential development sites in the Plan. We have provided a summary of the likely mitigation required within each school place planning area. If a school place planning area has not been included, it is because there are no identified sites in that area. This review has been undertaken as at April 2021 and the school organisation team will continue to undertake detailed analysis as the Local Plan emerges and further detail about the potential sites are known and take into consideration any changes in local demographic information.</p> <p>Norton Canes Primary School Place Planning Cluster: The two sites in Norton Canes are both within Jerome Primary School's catchment area. Along with Norton Canes Primary Academy, these are the only two primary schools in Norton Canes. There is existing pressure for primary school places in this area, with an identified need to provide additional primary school places to mitigate housing developments that have recently been built, are ongoing or are due to commence. Any further housing will therefore require the provision of additional primary school places to mitigate its impact. The two identified sites in this school place planning cluster will generate a total of 41 pupils and will increase the pressure for places. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contribution requirements may change in the future.</p> <p>Cannock 1 Primary School Place Planning Cluster: You may be aware that a 1 Form Entry (FE) primary school (Poppyfield Academy) has opened in this cluster area to provide primary school places for the ongoing Pye Green development and has been designed to be able to expand by 1/2 FE. Two of the proposed sites are already known to the school organisation team as planning applications have been submitted and the level of mitigation for these two sites are included in draft S106 agreements. It is also expected that Poppyfield will provide the mitigation for the other proposed site which appears to be an extension of the Pye Green development. There are a further 768 additional dwellings proposed across the remainder of the cluster. Whilst it is noted that there is limited or no expansion potential at two primary schools within this planning area the current pupil movement trend would suggest that there would be potential for primary pupils from proposed housing development(s) in these catchment areas to be accommodated; on the assumption that not all the housing is delivered at the same time. The remaining schools in the cluster either have no proposed housing development in their catchment area or if they do it is expected that the level of development could be accommodated</p>
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			<p>within existing capacity. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contribution requirements may change in the future. Cannock 2 Primary School Place Planning Cluster: There are seven sites identified within this planning cluster, potentially delivering 1, 328 dwellings, with sites identified in all three of the primary schools. Heath Hayes Primary School could not support the proposed level of development within its existing capacity and there is no potential to increase the school site. It may be possible to accommodate a smaller level of development. The number of dwellings proposed are too few to make the provision of a new 1FE primary school viable.</p>
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			<p>The small development within the catchment area of Five Ways primary could be accommodated within the existing capacity of the school. Within the catchment of Gorsemoor primary, four sites are identified delivering 905 dwellings, three relating to a strategic site delivering the majority of the dwellings (875). Whilst there may be limited expansion potential at the school, currently there is some available capacity. The overall level of development proposed would require the provision of additional capacity which could be achieved by a new 1FE primary school, which would need to be located within one of the proposed sites and additional land may also be required to future proof this area for any future proposed housing development. We would wish to work with CCDC to better understand the timing and size of the development (so being allocated to establish the most appropriate means of mitigation and advise on appropriate Policy provision in the Plan to secure the required infrastructure. This is based on current demographics and the assumption that not all housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contribution requirements may change in the future. During the analysis of the proposed sites in this planning cluster it was noted that a previously considered potential development site East of Wimblebury is no longer included. As such the impact and mitigation required is not included within this response. Cannock Secondary School Place Planning Cluster: Within the five secondary schools within this cluster there are 2,821 dwellings proposed. The number of potential dwellings located in Norton Canes High School catchment is 1,510 dwellings. The school site provides some potential for expansion. The current pupil movement trend would suggest that there is likely to be potential for secondary pupils from proposed housing development(s) in this catchment area to be accommodated. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contributions may be required in the future. There are 164 dwellings proposed within the catchment area of Kingsmead. Whilst it is noted that there is no potential for expansion at the school, the current pupil movement trend would suggest that depending on the timing of delivery of the dwellings some secondary pupils may be accommodated. The remaining three schools in the cluster could accommodate the level of development proposed within their catchment areas. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change of this period and education contributions requirements may change in the future.</p>
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		<p>Rugeley Town Primary School Place Planning Cluster: There are fourteen sites identified within this planning cluster, with all sites located within only three of the nine primary school catchment areas. The total number of dwellings within this area is 1,450 of which the majority of dwellings proposed (1,000) are on the Former Rugeley Power Station Development. This development has now been granted planning permission with a suitably sized All Through School/Primary School on site to mitigate its impact. The remaining 450 dwellings proposed to be built in this school place planning cluster will be delivered within the catchment areas of Chancel, Redbrook Hayes and Hob Hill primary schools. There are six sites to be proposed to be built within Chancel Primary School catchment area, the school is currently full and there is limited potential to increase the school size. Four sites are proposed to be built in the catchment area of Hob Hill CE Methodist (VC) Primary, recently expanded by 105 houses (1/2 FE) to mitigate the impact of development in the South of Rugeley in the current Local Plan. Three sites are proposed to be built within the catchment area of Redbrook Hayes Community Primary School, this school is currently full and offers no opportunity for further expansion. Whilst it is noted that there is limited area or no expansion potential at the above-named primary schools, within this planning area some surplus capacity currently exists. The current pupil movement trend would suggest that there is likely to be potential for primary pupils from proposed housing development(s) in these catchment areas to be accommodated. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contributions may be required in the future.</p> <p>Rugeley Secondary School Place Planning Cluster: There is currently one secondary school which serves the Rugeley area. This school is full and is expected to remain under pressure for places without any additional housing in the area. Any level of housing will therefore necessitate additional secondary school provision in the town. Secondary school places will be provided either through the delivery of a new All Through School proposed as part of the Rugeley Power Station Development or through the delivery of new secondary school provision in the town. All future development will need to contribute proportionately to support the provision of additional school places.</p> <p>Transport: Five Ways Junction (A5190/B4154/ Wimblebury Road): At the Last Local Plan consultation phase we identified a constraint at the Five Ways junction. It is noted that Policy SO3.1: PROVISION FOR NEW HOMES identifies new strategic housing sites at : • SH1 South of Lichfield Road, Cannock approx. 875 dwellings; • SH2 East of Wimblebury Road approx. 410 dwellings; • SH5 Land to the north of no.2 west of Hednesford Road, Norton Canes approx. 175 dwellings. Staffordshire County Council (SCC) is concerned that traffic generated by new housing developed in these locations will adversely impact on the A5190/B4154/Wimblebury Road Five Ways Junction. This junction is a known congestion hot spot at peak times and has also been identified as an AQMA. Data shows that the A5190 approach exceeds the national objective for transport related NO2</p>
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			<p>pollutants impacting on residential properties. Prior to the pandemic, work was undertaken by SCC to identify an improvement scheme (larger roundabout) to address existing deficiencies in the current junction design. This resulted in an expression of interest (Eoi) being submitted for Local Pinch Point (LPP) Funding to the DfT in 2020 (Appendix 1).</p>
			<p>The LPP Eoi notes a number of deficiencies in the current roundabout design; • All 5 arms have single lane approaches with no flaring on the entry or exit • Heavy Goods Vehicles can only circulate at very low speeds due to tight radii • There are no formal crossing facilities and pedestrians and cyclists do so via dropped kerbs and during gaps in traffic. There is no guard rail or tactile paving • Speed limits on the approach roads vary from 30mph to the national speed limit. Capacity constraints are evident in the AM and PM Peak Hours (0800-0900 and 1700-1800 hours) causing significant delays to travellers through the junction. Traffic demand to use the junction is significant with 2017 traffic flows over 2500 vehicles per hour during peak times.</p>

			<p>The main movements through the junction are along A5190 Cannock Road with Average Annual Daily Traffic flows (AADT) of between 17366 and 12,616 vehicles per day. There are heavy movements on the B4154 northern and southern approaches of 10,552 and 9682 vapid respectively. Unfortunately, at the details stage it emerged that land outside the Highway maintainable public expense (HMPE) was required to develop and deliver the concept design, and this could not be made available to the planned delivery programme. Funding for third party land acquisition had not been included within the EoI and the submission was withdrawn from consideration for funding (to the successive Levelling Up Fund - LUF), although there is an opportunity to resubmit to a later round of LUF. The LPP EoI was formulated using data collected pre-pandemic. We do not know what the successive 'new normal' travelling conditions might be on this part of the network. Assuming that the pre-pandemic travelling conditions return, we know that improvements are required to address existing concerns and that traffic generated by the proposed allocations will add to the transport and environmental problems in this location. The opening of McArthur Glen West Midlands Designer Outlet opening in 2021 to the west will also add to the traffic demand at Five Ways. In addition to highway works to increase capacity, there will be a need to provide a significant improvement in facilities to enhance connectivity for non-motorised users, particularly cyclists to LTN 1/20 standards (published by July 2020). This will further increase the necessary land take for any improvement scheme. Currently there is no identified solution or funding mechanism to deliver improvements to make these strategic housing allocations acceptable in transport terms. Sustainable Transport (Policy CP10) in the currently adopted Local Plan recognises the need to seek development contributions to support key road infrastructure improvements including Five Ways Island, Heath Hayes. Policies SO5.1: ACCESSIBLE DEVELOPMENT and SO5.4: MAINTAINING AND IMPROVING THE TRANSPORT SYSTEM do not recognise the need for highway improvements at Five Ways. Solution: Work is required to establish new baseline traffic conditions or confirm previous conditions at Five Ways. Traffic forecasts need to be developed to the end of the Local Plan Period, that include the cumulative traffic from these sites.</p>
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		<p>A deliverable improvement scheme needs to be identified that can deliver acceptable travelling conditions through Five Ways and reduce traffic related NO2 emissions to acceptable levels. It is requested that a meeting be held between the County and District council to discuss the issues at hand, potential options and mechanisms for delivery (including roles and responsibilities) so that we can work towards an agreed approach for the Publication Plan and future examination. It is recommended that Strategic policies SO5.1 and SO5.4 need to be amended to address this issue positively: 1. SO 5.1 • Developments which, individually or cumulatively, cause an unacceptable impact on the highway network in terms of safety, air quality, capacity or congestion will not be supported, unless it can be demonstrated that they can be satisfactorily mitigated; 2. SO 5.4 ; • Supporting traffic management and highway improvement schemes that will provide for the safe and efficient use of the local highway network; • Reducing transport pollution and carbon emissions, protect the natural environment, and promote improved public health and wellbeing. Site Specific Policies are needed to require the developers of SH1, SH2 and SH5 to work together to develop an evidence base that demonstrates that residential development in these locations can and be made acceptable in transport terms by delivering the necessary improvements at Five Ways to fully mitigate their transport impact. General transport comments: At Paragraph 4.6 replace 'Transport Strategies' with the following: • DfT Gear Change: A bold vision for cycling and walking, July 2020 • Statutory Cycling and Walking Investment Strategy (CWIS), 2017 • Staffordshire Local Cycling and Walking Infrastructure Plan 2021 • Cannock Chase Integrated Transport Strategy (to be reviewed). Strategic Objective: 5 (S05) should recognise the Core Design Principles for walking and cycling that are embedded in Gear Change and Local Transport Note 1/2 (LTN 1/20) Cycle Infrastructure Design, which is referenced in the National Model Design Code. Walking and cycling networks need to be Coherent, Direct, Safe, Comfortable and Attractive. The Spatial Strategy for Cannock/Hednesford/Heath Hayes (Par 5.16) does not reflect the need to provide walking and cycling network in line with the five Core Design Principles. At Paragraph 6.17 Design and Access Statements need to consider LTN 1/20. List of Relevant Evidence The following should be included in the appropriate lustrs of relevant evidence: • DfT Gear Change: A bold vision for cycling and walking July 2020 • Statutory Cycling and Walking Investment Strategy (CWIS), 2017 • Local Transport Note LTN 1/20 Cycle Infrastructure Design, 2020 • Staffordshire Local Cycling and Walking Infrastructure Plan, 2021. Within Gear Change, the Government has announced the setting up of an inspectorate led by a new national walking and cycling commissioner. They will be a statutory consultee within the planning system, pressing for high quality walking and cycle provision in Local Plans and planning applications, in line with new standards laid down in LTN 1/20 guidance. Active Travel England will also be publishing annual reports on highway authorities and grading our performance. National Policy Context: The Local Plan should recognise NPPF Paragraph 110a that is highlighted in 14.2.2 of LTN 1/20: NPPF paragraph 110a states that applications for development</p>
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			<p>should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas. Paragraph 6.335 should also make reference to the Cannock Chase Integrated Transport Strategy being supported by Staffordshire's LCWIP. Any relevant Local Design Code to be produced will need ensure consistency with LTN 1/20. Monitoring and Evaluation SO5.1: An indicator should be the number of developments delivered in line with LTN 1/20/ Monitoring and Evaluation SO5.4: Staffordshire County Council will work with the planning authority to agree the appropriate monitoring indicators, targets and contingencies.</p>
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		<p>Rail: In relation to rail provision in the District we have the following comments to make: Page 12: The Rugeley-Hednesford-Cannock-Walsall-Birmingham, 'Chase Line' rail service continues to grow in its popularity and the three station at Cannock, Hednesford and Rugeley Town carry of 700,000 passengers' per year. The Chase Line electrification and line speed improvements completed in May 2019 have enabled the introduction of faster, longer and more frequent services, including two trains per hour throughout the day to Birmingham, and new direct services to the NEC/Birmingham Airport. The Council is also actively involved in the innovative Chase Line 'Stations Alliance', with the West Midlands Combined Authority, LEPs, Network Rail and West Midlands Trains (the new West Midlands franchise operator). Cannock station in particular is the focus of attention for a major upgrade, in view of its close proximity to the £160m, Mill Green retail designer outlet village, which will attract 3-4million visitors per annum. • Having checked footfall levels from official ORR figures for 2018/19 at these stations, the total footfall is around 500,000. The data therefore needs to be checked and the source and date of the data needs to be referenced. • Reference to the impact of Covid on footfall levels needs to be made in conjunction with the expectation that footfall will begin to grow again with the return of passengers to the railway and building back better. • The Chase Line Stations Alliance is with West Midlands Rail Executive and also Staffordshire County Council. This should replace West Midlands Combined Authority and also the LEPs are involved. Page 15: Rail services have seen significant improvements and strong growth in passenger numbers leading to continued investment in infrastructure. Parts of the District have seen reduced levels or even loss of their bus services and are now more isolated, especially away from the main commuter routes. Social isolation is an issue for many people who do not have access to cars. • It is suggested that this needs to be slightly reworded to take into account the impact of Covid on passenger numbers. This could be reworded to say strong growth in passenger numbers in recent years and prior to the Covid pandemic. Page 16: Rail services have seen significant improvements to Birmingham, London and the north-west. The off-peak Chase Line service frequency to Birmingham has been increased, while the electrification and line speed increase schemes have been completed, including the introduction of longer, faster services to Birmingham with direct services to Birmingham International (Airport/NEC). • It is important to note that whilst there is an hourly direct service to Birmingham International this could change (not aware that it is changing) in the future following the conclusion of negotiations with Government over the content of the Franchise going forward.</p>
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		<p>Page 28: A masterplan approach to the improvements to the Town Centre will be taken forward that will take in the opportunities to integrate the train station with the Town Centre and Mill Green. The recent upgrade of rail services to Birmingham and London will be reflected in the masterplan to harness the benefits of these improved links and provide a station facility that will be a key feature of the regeneration of Cannock Town Centre. [...]. Page 34: Option B: As above but also to add more specific reference to particular local heritage opportunities in town centres, canals and collieries and former mineral railway lines to help bring new life into town centres and historic commercial buildings, consider other regeneration/leisure opportunities and enhance the footway/cycleway network. This more specific reference to heritage opportunities could also refer in generic terms to the (forthcoming) HIA evidence to provide guidance for managing change at allocated sites. • The concept of using disused railway to enhance the footway/cycleway network is acceptable as long as it is no longer required for railway use in the future. [...]. Page 106: Support the development of rail freight within the District, in particular, the promotion of the Mid-Cannock site as a road/rail interchange depot, and safeguarding inland waterways and wharfage. • Support the above statement but should include the caveat where there is available capacity on the rail network. There also needs to be consideration of impacts on the local and strategic road network. Page 114: The same comments as on page 106 applies. Page 120: These routes are largely former mineral railway lines that carried coal from the coalfields on Cannock Chase to the main line railway for onward distribution to local customers and markets further away. Some routes have been restored as opportunities allow, but the remaining protected routes provide an opportunity for a wider network of off-road sustainable transport corridors. They also link with other local off-road routes including the Cannock Chase Heritage Trail from Cannock to Rugeley via Hednesford and phase 1 of the Brereton and Ravenhill Way from Rugeley Town Railway Station to Brereton. • Need to ensure that these railway lines are not required for future railway use. It may be useful to include a caveat here. Local Design Code: The Plan makes reference to the preparation of Local Design Codes following on from the National Design Code and Guidance. It will be important for discussions to be help with the County Council on the preparation of any design code primarily relation to the design and layout of highway maintainable at public expense and SuDS. Digital Connectivity. There are a couple of key principles that would be worth adopting. Any reference to improving access to services is equally important to both business and residents alike. Government and the industry are moving away from the language of "superfast broadband" to "gigabit capable". "full fibre" or "ultrafast broadband". The Cannock district is quite well served with superfast broadband at 99.54% and are currently 26.70% gigabit capable. It is highly likely suppliers such as Openreach and Virgin will start to address the gigabit capable service, given the majority of the premises in Cannock ought to be commercially viable. Openreach have already announced the Cannock exchange for upgrade to full fibre within their First Fibre programme. [...].</p>
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		<p>Other Comments: 7 Monitoring Framework - Suggestions above with regards to the production of a Heritage Statement as part of the Design and Access Statement and the production of a Historic Environment Desk Vase Assessment should be considered for inclusion here. Appendix I: Glossary - A definition of what a heritage asset is would be useful here - this could draw the distinction between designated and non-designated. Public Rights of Way The plan doesn't really contain any specific information about public rights of way other than acknowledge that improvements to cycle and footpath networks will be made to enhance connectivity and encourage more active travel, health and well-being (5.17). Whilst this is fully supported ultimately the Plan needs to aspire to improve accessibility on the walking and cycling networks (including towpath links) throughout the District. It is noted that the Plan does not mention horse riding, which is an omission given Cannock Chase District has a number of livery yards and there are public bridleways throughout the District. Future iterations of the Plan should give consideration to the equestrian community and their usage of bridleways, roads and lanes across the District.</p>
		<p>The Plan requires new developments should seek to improve non-vehicular public access to the wider path network. This is essential of the aims of increasing the levels of physical activity are to be met and the public rights of way network should be integral to any schemes that are developed to promote this. Where development is likely to affect the path network, either directly or indirectly, such as where development is likely to lead to an increase in usage of the network in the vicinity the Plan should make policy provision for improvements to be sought. This could be via direct delivery via Planning Condition, use of Section 106 Obligations and/or CIL. Where developers are to provide direct improvements the Plan should signpost them to enhance the existing path network where possible in line with SCC's Rights of Way Improvement Plan. This could include:</p> <ul style="list-style-type: none"> • the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists across Staffordshire where there is currently a shortfall in available access routes. • the creation and promotion of short circular walks to promote the health benefits of walking • the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture. The County Council expects to be consulted on any submitted applications in due course and is able to provide further advice and guidance as and when required. The Plan should ensure that the supporting text makes it clear that where appropriate development needs to take suitable mitigation to ensure the public path network is protected. Further, the Plan should make reference that there are likely to be many non-definitive routes across proposed development sites that should be considered by any applicants. In many cases these routes could have become rights of way by virtue of established usage and should be treated as public. There will also be sites where such usage or historic evidence has already resulted in applications being made to the County Council under Section 53 of the Wildlife and Countryside Act 1981 to add or modify the Definitive Map of Public Rights of Way which affects the land in question.

		<p>Employment It is noted that the plan provides for 50ha of Employment sites against a range of 46-66ha (9net) as identified in the EDNA. The ELAA identifies that 12.47ha of employment sites have been completed since 2018 and the Plan proposes to allocate 27ha of new employment sites to meet the 50ha target. We acknowledge that the target sits within the range identified by the EDNA albeit at the lower end of the range suggested. However, when considering potential losses of employment sites over the plan period the EDNA suggested a higher range which the Plan target is below. Whilst Policy SO4.1 provides protection to safeguard against losses of existing employment areas, which is supported. There is a concern that with only allocating 27ha of new sites against a relatively low target of 50ha will not provide sufficient flexibility to ensure a sustainable pipeline of site and jobs coming forward. The County Council has further land holdings available at the Kingswood Lakeside Business Park, which it has regenerated over the years. The site is now well established and highly regarded. We have received repeated approaches from developers keen to build on the success of Kingswood Lakeside and expand the park further. There is potentially one development area left that would complete the site. We are presently considering a smaller area than that shown in the ELAA 2020 and on the Cannock Chase 2014 Policies Map. The 10.68ha platform under consideration would allow better connectivity for landscape and ecology around each end of the plot towards the open countryside to the northwest. The revised approach could allow us to achieve Biodiversity Net Gain targets more easily and retain more of the existing green space. We recognise that the area under consideration sits within the Green Belt but as it is adjacent to an existing high quality employment site with good sustainable transport links we feel the very special circumstances for its release from the Green Belt could be easily met. We would wish to meet with you to share our plans and discuss the potential for the site to be included as an allocation in the Plan. We would also wish to engage with you on the other site in our ownership A5/M6T that has been allocated and options that could be considered. Economy and Skills The County Council recognises the importance of access to good jobs for its residents. Whilst the new development proposed in the Plan will provide job opportunities for local residents and both construction and operational phases these could be reinforced and complemented by the provision of Employment and Skills Plans (ESP). As such we fully support POLICY SO4.5: PROVISION FOR LOCAL EMPLOYMENT AND SKILLS. The County has been working with District, Borough, and Stoke on Trent City Council colleagues to prepare a draft Employment and Skills Plan Framework that will provide advice and structure on the preparation of Employment and Skills Plans associated with new development. We would welcome that the Plan includes reference in the supporting text to the ESP Framework that will hopefully be agreed and adopted across the SSLEP area in the Summer 2021. [...]. Public Health SCC and partners have recently commenced work to establish and implement a whole systems approach (WSA) to address obesity and promote a healthy weight. Obesity is a complex problem with multiple causes and significant implications for health and</p>
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			<p>beyond. Tackling such an ingrained problem requires a long-term, system-wide approach that makes obesity everybody's business, tailored to local needs and works across the life course. Cannock Chase is one of three 'pathfinder' districts in Staffordshire that will be piloting the WSA to obesity in 2021, along with East Staffordshire and Staffordshire Moorlands. The use of the planning system to promote health and reduce inequalities is well established. The Local Plan provides opportunities to demonstrate how CCDC, along with SCC, are working as part of a WSA, where planning forms part of a wider approach to addressing obesity.</p>
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		<p>The Local Plan 'Preferred Options' document includes eight Strategic Objectives, all of which have some relevance to the health and wellbeing of the community. Key Issues The Key Issues identified within the Updated District Profile include many issues related to health and wellbeing, including:</p> <ul style="list-style-type: none"> • Low standards of health, which require improvement; • The natural and built environment (inclusive of indoor, built and outdoor sports), which should be planned effectively to encourage opportunities for healthy and active lifestyles amongst all sections of the community; [...]. <p>The Updated District Profiles for Health and Education, Community Deprivation, Transport and Infrastructure, Environment and Climate Change provide detailed overviews and supporting data and evidence of the range of health inequalities which impact on the welfare of the District and its residents. The data and other supporting evidence identified around health inequalities within the Local Plan Preferred Options document is welcome.</p>
		<p>The Local Plan Preferred Options document doesn't satisfactorily demonstrate how health inequalities, and health and wellbeing needs identified within the Updated District Profile, might apply to development proposals. Policies The County Council notes that there is an absence of specific detail within the existing and proposed Local Plan Policies that would explicitly support addressing health inequalities or the health and wellbeing needs of the District and its residents. Existing Local Plan Policy "CP5: Social Inclusion and Healthy Living" is referred to in relation to Strategic Objectives 1,2 and 7. It is considered specifically to help deliver Strategic Objective2, where Option A is to update and bolster this existing policy in order to help deliver this strategic objective. Option B, to help deliver Strategic Objective 2 is as per Option A but with further policy elaboration via supplementary planning documents, appears to have received the least support/been discounted (as per paragraphs 6.101). The current Policy CP5 includes key elements of infrastructure related to health and wellbeing, including health facilities, parks, open spaces and woodlands, playing pitches and facilities for athletics, tennis and bowling, cycling/pedestrian routes and pathways, sport and physical activity facilities and community facilities and leisure/activity opportunities. It also states that the standard of provision of open space sport and recreation facilities will be identified in a SPD. Notwithstanding the above the proposed updating and strengthening of existing Policy CP5 is welcome. We also welcome and note the inclusion of Strategic Objective 2: to create community infrastructure and healthy living opportunities across the District, and the inclusion of these policies within the Local Plan Preferred Options document. We note that these current policies refer to major development and requirements upon them. There is no indication of any thresholds, other than major development, at which proposals must demonstrate how they will maximise positive impacts on health and healthy living within the development and adjoining areas or how these requirement will apply to smaller-scale developments where there are reasons to indicate that a proposal may give rise to a significant impact on health.</p>

		<p>We also note that these policies do not reference any mechanism for development proposals to comprehensively set out how health and wellbeing impacts will be avoided, if not mitigated. The Local Plan Preferred Options document sets out the national policy context around Strategic Objective 2: to create community infrastructure and healthy living opportunities across the district. There are references to the NPPF 2019 paragraphs 91 (b) and 96. There are several other chapters of the NPPF 2019 which promote the wider health and wellbeing of communities, including active travel and physical activity, as well as access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation: [See response for Fig 1. NPPF Chapter's and policies relevant to healthy weight Environment (19)] There is an opportunity to strengthen CCDC's delivery of Strategic Objective 2, by not only elaborating and bolstering existing Policy CP5, but also adding an SPD. A 'healthy lifestyles' SPD would provide detailed advice and requirements in accordance with the Local Plan objectives related to health and wellbeing and draw upon the wider NPPF chapters relating to a healthy weight environment. A SPD would support the authority to better determine planning applications in accordance with the Local Plan and its objectives around health and wellbeing, and health inequalities. Local Plan Preferred Options document paragraph 6.69 references 'Active Design' developed by Sports England and supported by Public Health England. It also states that planning applications will be assessed against how they support healthy lifestyles by facilitating participation in sport and physical activity. paragraph 6.69 is the only reference to assessing health and wellbeing impacts of proposed development. However, the Design and Access Statement information provided within the Local Plan Preferred Options document (paragraphs 6.70 and 6.71) do not include any reference to an Active Design assessment and does not specify that the Design and Access statement should consider health and well-being requirement/impacts. The Local Plan Preferred Options document does not currently provide any mechanism for development proposals to comprehensively set out how health and wellbeing impacts will be avoided, or if not, mitigated. A Health Impact Assessment (HIA) could be used to identify issues related to health and wellbeing which might apply to development proposals. Health Impact Assessments are defined as a "combination of procedures, methods and tools by which a policy, programme or project may be judged as to its potential effects on the health of a population" (European Centre for Health Policy, 1999). HIAs could be applied for the purposes of development management as a process and tool for assessing both the potential positive and negative impacts of a proposal on health and wellbeing and suggest ways in which opportunities to improve health can be maximised and risks to health or negative impacts on health minimised. HIAs could be combined with an EIA if it makes sense to integrate health impacts into the methodology for the EIA. if an EIA is not required, the HIA should form a stand-alone assessment and submission, but would not be recommended as part of the Design and Access Statement, although the design and access statement should draw on the outcomes of the HIA. It is suggested that a meeting is concerned</p>
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			<p>with officers from our Public Health team to discuss further collaborative working address the issues raised above. Sustainability & Climate Change We acknowledge that Climate Change is a key consideration in the Plan and cuts across numerous Policies.</p>
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		<p>We worked jointly along with the other Staffordshire Borough's and District's to commission the 'Climate Change Adaptation and Mitigation' study that has been used to help inform policies within the Plan. The report suggested opportunities for off-site mitigation/off-setting would potentially have a greater scope if considered over a broader geography than individual District/Borough areas. It is suggested over a broader geography than individual District/Borough areas. It is suggested we progress this matter through the Staffordshire Development Officers Group to consider the merits and operation of a collaborative approach. It is noted that the Norton Canes and Rural areas spatial strategy does not make reference to net zero as per the other areas set out in the Plan. Minerals and Waste Our comments at the previous stage of consultation, in June 2019, highlighted the need to recognise the importance of safeguarding underlying mineral resources, and existing waste and management facilities. These points appear to have been effectively addressed through Draft Policies SO8.7 and SO8.8. In the light of these draft policies, and Policy 2.5 of the Staffordshire and Stoke-on-Trent Waste Local Plan, concerns should be raised over the proximity of Strategic Housing Site SH1 to the boundary of Poplars Landfill. Great care will be needed to ensure that proposals to introduce housing nearby do not lead to constraints on the continued operation of the site. Whilst landfill is at the bottom of the waste hierarchy, and other methods of disposal should be used wherever possible, the demand for this form of disposal will continue for the foreseeable future. Older Persons Housing In relation to the ageing population issue we refer to our comments from the previous rounds of consultation where we set out work undertaken on our 'Next Generation Care' project would be useful in Plan making and provide evidence on need for older age accommodation. However, the evidence base does not appear to include anything other than the Local Housing Needs Assessment 2019. We are happy to provide officer input and assistance from our Next Generation Care project team, which could be useful in helping shape and refine the housing choice and mix policy options. The evidence base and locality analysis, can be found at https://www.staffordshire.gov.uk/Care-for-all-ages/Information-for-providers/Information-for-providers.aspx Flood Risk & SUDS We have provided to you separately technical input on flood risk for the sites proposed for allocation, which we will not repeat here. It is noted that Policies SO8.3 and SO8.4 make reference to sustainable drainage systems (SuDS) and surface water management. However, it is not clear to which developments SuDS would apply as SO8.3 refers to SuDS in the context of Protect, improve, and enhance existing woodlands and habitats, and integrate new green and blue infrastructure with SuDS. Policy SO8.4 Managing Flood Risk includes in the supporting text reference to our Sustainable Drainage Systems Handbook but the Policy itself is more about management of flood risk and avoidance of sites known to flood. It is suggested these policies are reviewed to make clear where SuDS would be expected to be delivered and it would also be helpful if the Plan could signpost developers to our website containing our relevant advice:</p>
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			https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-planners-and-developers.aspx
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LPOO026	St Modwen Industrial & Logistics	RPS - J, Bonehill	<p>Introduction: [...]. RPS and St Modwen welcome the progress being made by the CCDC in preparing the Plan. However, we are concerned that by omitting the Site the Plan is not taking advantage of all opportunities to secure the most positive future for the residents and businesses of the District and based on the evidence base would appear to represent an unsound approach. In particular we consider the proposed employment land requirement to be unjustified and suggest that a higher employment land requirement would maximise the potential of the advantages offered by the Districts excellent connectivity, as well as capitalising on the significant infrastructure being delivered nearby including the West Midlands Interchange and the M6/M54/M6 Toll link road. We also note that there is expected to be significant shortfall in the ability of the Black Country to meet its employment land requirement and to discharge its responsibilities under the Duty to cooperate suggest that the Council need to seek to accommodate some of this unmet need. We note that the Site is currently located within the Green Belt, however having undertaken a Site Specific Green Belt Assessment (see Appendix C) and having regard to the Council's previous detailed Green Belt assessment of the site, which has not been undertaken at this stage we consider the harm to the purposes of the Green Belt that would be caused by the release of the Site to be very low. We have also identified inconsistencies in the SA and recommend how they can be addressed. RPS and St Modwen welcome the proposed policy seeking to safeguard existing employment sites for employment uses, including the existing Watling Street Business Park, however we consider that the proposed policy could be strengthened by explicitly stating that the redevelopment of these sites for employment purposes will be supported, particular where, as in the case of the Watling Street Business Park, it is catering for a sector of the employment market that is not being addressed by other sites. [...].</p>
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		<p>Watling Street Business Park Expansion Land: A vision document has been provided for the Site and has previously been submitted as part of previous representations. This Vision Document is attached as Appendix D. The Vision Document sets out the potential to expand the existing Business Park in a sustainable way which meets the future requirements, expectations and aspirations of CCDC. The Site presents an excellent opportunity to deliver employment development within the current plan period. The expansion land (5.45ha) is situated immediately adjacent to the established Business Park and benefits from the existing access and infrastructure serving the current development. Existing business operators would be able to continue to operate with minimal disruption. The Site is also very well located in relation to the strategic highways network being accessed off the A5 Watling Street and lying in close proximity to the junction with the M6 (Toll), a location attractive to the expansion of existing businesses and providing opportunity for new inward investment. Proposed built development would be screened very effectively at the outset by the established framework of hedgerows, tree belts and woodland corpses located along the Site's perimeter. Such features will be retained as the basis for a comprehensive Green Infrastructure framework, which encompasses the site. There are no substantive constraints which prohibit the expansion of the Business Park. The whole site area would measure approximately 12ha and its removal from the Green Belt would not undermine the overall purposes and integrity of the Green Belt. The landscape within which the site sits is visually enclosed by the existing Business Park and A5 Watling Street to the north, the Cannock Extension Canal to the west, and by woodland at Wyrley Common to the south. The Site can deliver sustainable high quality employment development meeting the following objectives:</p> <ul style="list-style-type: none"> • Provide opportunities for employment development at a strategic location; • Provide development in a sustainable location extending the existing Business Park; • Provide development in a location without detriment to the local landscape character or visual amenities of the rights of way network; • Create a cohesive Green Infrastructure centred on the framework of retained hedgerows and tree belts; and • Existing retained features to be supplemented with new habitats maximising opportunities for biodiversity and landscape enhancement.
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			<p>Conclusions: RPS, on behalf of St Modwen, welcome the progress that the Council are making with the preparation of the Cannock Chase Local Plan. However, we content that the Watling Street Business Park site should be included as an allocated employment site. We have identified issues with the current employment land evidence with regards to demonstrating that the approach set out in the PPG has been followed and have made suggestions as to how this can be addressed. In particular we note that limited consideration has been given to demand and market signals and so St. Modwen will instruct further work to provide evidence regarding this which will be provided to the Council in due course. It is not clear from the available evidence that an allowance has been made to address likely losses of employment land over the plan period and we encourage the Council to include this within the employment land requirement to ensure that it is robust. We consider that the most appropriate allowance for losses if 0.96ha per annum or a further 19.2ha over the 20 year plan period. We also consider there to be a compelling case for the Plan to accommodate some of the anticipated unmet need for employment land that is expected to arise from the Black Country, given the significant shortfall that has been identified through the initial evidence for the Black Country Plan. This will ensure that the Council can demonstrate that they have met the Duty to Cooperate. The District has enviable location al advantages and further sites, including the Site, should be identified along the A5 corridor which is an established industrial location to maximise the opportunities for the residents and businesses of Cannock Chase District that this provides. RPS understand the employment requirement in the Plan to be based on a labour supply restricted scenario. We note that the methodology for calculating this requirement assumes out commuting continues at the same rate throughout the plan period. This would have negative sustainability implications and does not recognise that providing additional employment land above the labour supply restricted level would in fact have beneficial effects on sustainability by providing opportunities to recue out commuting. RPS have identified inconsistencies with how the SA has scored the Site in relation to the following objectives: • SA objective 1: Protect and enhance biodiversity, fauna and flora and geodiversity • SA objective 2: Minimise pollution and protect and enhance air, water, and soils • SA objective 5: Reduce the risk of flooding • SA Objective 14: Access to services Provide easy access to community services and facilities to meet people’s needs and avoid isolation</p>
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		<p>• SA objective 17: Conserve and enhance the built and historic environment (including heritage assets and their respective settings) . Amending the scoring for the Site as we have suggested indicates that the development of the site would be sustainable. We have undertaken a Site Specific Green Belt Assessment (Appendix C) which demonstrates that the release of the Site from the Green Belt would only cause very low harm to the purposes of the Green Belt. RPS suggests that even if the Expansion Land Parcel is not released from the Green Belt that there is a compelling case for the release of the Business Park Parcel as it does not make any contribution to Purposes 1-4 of the Green Belt and only a very weak contribution to Purpose 5. RPS also note that this would be consistent with the proposal to release site NE5 Turf Field. As demonstrated by the accompanying vision document the Site can deliver sustainable high quality employment development meeting the following objectives: • Provide opportunities for employment development at a strategic location; • Provide development in a sustainable location extending the existing Business Park; • Provide development in a location without detriment to the local landscape character or visual amenities of the rights of way network; • Create a cohesive Green Infrastructure centred on the framework of retained hedgerows and tree belts; and • Existing retained features to be supplemented with new habitats maximising opportunities for biodiversity and landscape enhancement. RPS welcomes the proposed policy identifying Watling Street Business Park as an existing employment area to be safeguarded for employment uses. However, we suggest that the policy could be more positively prepared by being amended to make clear that the redevelopment of such sites for employment uses will be supported. RPS is broadly supportive of the proposed policy for Employment and Skills Plans, but RPS recommend that the policy is redrafted to make clear that it will only be applied to operational phase if the end occupier is known. This will avoid potential issues with speculative development. RPS also recommend that the policy is redrafted to allow for Employment and Skills Plans to be secured by way of planning condition when appropriate as this is more proportionate than requiring a legal agreement, with the associated costs, in all circumstances. Finally, additional work is being undertaken to address concerns expressed by officers with regards to the potential development of the Site. This will be provided to officers in due course.</p>
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LLPO027	Taylor Wimpey (Land East of Wimblebury Rd)	RPS - P, Hill	<p>Conclusions: These representations have been prepared on behalf of Taylor Wimpey with respect to their interest in Land East of Wimblebury Road. The site has been identified in the Cannock Chase Local Plan Review Preferred Options consultation document (CCLPR) as a housing allocation (SH2 - for 410 dwellings). The identification of the site in the CCLPR is welcomed and supported. However, a number of concerns have been identified that should be considered prior to publishing the next iteration of the CCLPR. These include:</p> <ul style="list-style-type: none"> • Define site allocations capacities as 'minima' rather than as 'approximate' as currently stated. • Consider taking a greater proportion of unmet need (housing shortfall) from neighbouring areas, on the basis that the Council assumes other neighbouring authorities are proposing to take higher numbers than otherwise suggested in their own local plan reviews to date. This relates to South Staffordshire District, who the Council assume will be taking 4,500 dwellings, but is actually only considering a figure up to 4,000. • As drafted, the wording of the CCLPR assumes that site SH2 is being expected to accommodate a new primary school. However, given the nearby site allocation (Land South of Lichfield Road) is over twice the size (in area) it is not considered fair and reasonable to expect SH2 to accommodate such a large piece of infrastructure. A fairer approach would be to allow SH2 to provide a financial contribution to assist the viability of providing the school on the larger allocation. • Whilst it is considered the proposed release of Land East of Wimblebury Road (ref. WI12) from the Green Belt is justified, concerns are raised that the Council's updated Green Belt Assessment for WI12 and other adjacent land parcels (summarised in chapter 4 of this submission) potentially over-states the potential harm that would be caused were these parcels, in particular WI12 and OA9, to be released from the Green Belt. • In addition, the CCLPR does not identify any additional safeguarded land to help meet the development needs of the District beyond the plan period (2018-2038). This is despite the fact that Green Belt release is likely to be a recurring feature of plan reviews in Cannock Chase given the lack of capacity to accommodate significant growth within existing urban areas (as reflected in the wording of proposed Policy SO7.7 of the CCLPR – see paragraph 4.5 of this submission). • This submission therefore proposes additional land ('Proposed Safeguarded land Parcel') to be safeguarded for future needs in the CCLPR located contiguous with the Proposed Allocated Land Parcel identified in SH2 (Figure 4.4 illustrates the extent of the land in question)
The District Context			
LLPO028	P, Dale-Pearson		<p>Health and Education (Page 7) - With Cannock Chase residents demonstrating a higher than national average in obesity, why are we continually reducing Green belt for housing? Would this land be better served as an outside usable space for families to exercise. I strongly object to these plans.</p>

LPPO029	P, Dale-Pearson		Housing (Page 9) - As one of the 14 authorities of Greater Birmingham and Black Country, I assume we have a larger proportion of Green Belt vs the urban authorities. However the Brownfield sites are largely untapped within these areas. The Green Belt should not be an easy overspill of the urban areas of leaving behind the brownfield sites to decay. I strongly object to these plans.
LPPO030	Cannock Chase AONB Partnership		I note the references to Cannock Chase AONB as a vital asset for outdoor leisure, and the observations regarding increased value of access to open space and nature during the pandemic. As a result of the pandemic the AONB, has seen a significant increase in user pressure with direct and indirect effects such as littering, path erosion, off trail mountain biking, resulting in erosion of its natural beauty and special qualities. This is relevant in the context of the Local Plan to ensure an enhanced awareness of the potential effect of further development on the AONB. The AONB notes reference to the need to protect and enhance the highly valuable and sensitive natural environment, whilst meeting the demand for housing and recreation. Recreation is not the primary purpose of the AONB designation under the Countryside and Rights of Way Act 2000 (CROW), which places a duty on all public bodies to "have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."
LPPO031	G, Green		Preferred Options Policies Map - My concern is for the preservation of the natural environment, which will come under pressure as more housing is built, so I refer to the proposed Safeguarded country park and the SBI. There is something I had hoped would be shown on the map but it missing. I know that the Countryside Officer is aware of it. In between the area highlighted for the countryside park and the highlighted SBA there is a bank site which I have shown on my hand drawn map. This site is known to some as the 'Millennium Woods' because we planted trees there to commemorate the millennium. The site has a right of way. I have voluntarily worked to keep open the paths there which have become overgrown with brambles and unwalkable. During the period of the Covid pandemic, many people have enjoyed walking there and observing the rich variety of birds, animals, trees and plants that exist there. The Countryside Officer has been aware of this and appreciated our tidy-ups. I have put up a barn owl box facing the meadow your map refers to as of biological interest. I think this site should be valued and protected as it already has a well developed ecology, built up over the last decade or so.

LPPO032	Cannock Chase Green Party - Jenking, R		<p>The local plan talks about enhancing and protecting the Green Belt, biodiversity and wildlife and yet is equivocal when it comes to the detail. The comments that concern us the most are: "Ensure that any loss of Green Belt is suitably mitigated" (SO7.7) Clearly there shouldn't be ANY loss of Green Belt. "Green Belt release in order to provide sufficient land to meet Cannock Chase District's housing need with an element of flexibility". There should not be any release of Green Belt land. The Green Belt protections are not designed to be flexible. With regard to housing need. The Green Party believes that housing need can be met by building on brownfield sites. Too often developers are granted planning permission for sites within the existing urban environment that then sit underdeveloped for years and years. The Green Party call upon the Council to produce a register of all planning permissions granted over the last 20-30 years that have yet to be developed. The Council should give notice to the developers that the planning permission will be rescinded if not developed in an appropriate timeframe. The Council should also look at extending it's use of housing management orders to bring back into use un-occupied dwellings.</p>
LPPO033	Canal & River Trust - H, Smith		<p>As at the Issues & Options stage we welcome the identification of the canal within the Transport and Infrastructure and Environment sections of the District Context. Although we strongly welcome reference to the role that our network can play with regards to heritage-led regeneration within the Environment Section, but we do believe that reference to the wider benefits of the canal should be included. Notably, the canal network provides an opportunity for leisure, recreation and sporting activities, supporting physical and healthy outdoor activity. The Heath & Education section identifies that the District has particular health related issues in the areas of life expectancy, obesity, early deaths from cardiovascular disease and higher rates of diabetes. Our network provides an easily accessible green infrastructure resource that can help to promote healthy lifestyles, and could help to address some of these challenges, notably in Rugeley & Brereton (communities next to the Trent & Mersey Canal). We therefore advise that reference to canals within the 'Environment Section' should be expanded to refer to their role as strategic Blue-Green Infrastructure corridors. This would help to make the Local Plan more effective, as it would make the potential benefits of our network more obvious to future Decision Makers in addressing some of the key objectives for the Local Plan Period. With regards to the identified Key Issues, for the reasons described above, we strongly welcome the references to the canal network, notably with regards to the potential role of our network in contributing towards recreation, heritage led regeneration, and the aims to promote connections between the canal network and the wider walking and cycling network.</p>

LPPO034	Norton Canes Councillors as at March/April 2021		<p>In your document on page 16, as part of the District Context you identify Norton Canes as an individual area and give a reasonably accurate description of the urban village as it currently stands. Our concern though is that on the next page you then process to list rural areas as a separate entity yet include "the rural area to the south of the M6 Toll". In our opinion, these areas are still an integral part of Norton Canes, any description - or indeed analysis - of Norton Canes should treat the rural areas as part and parcel of the community that this Local Plan should represent. We believe the Local Plan should view the rural areas of southern Norton Canes as a unique feature for the district that acts as a natural divide between the urban West Midlands and Staffordshire. The document states that "This area contains some of the most intact rural landscape character in the District." - we believe that the document should contain specific policies to ensure it remains so.</p>
LPPO035	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	<p>Richborough Estates is generally supportive of the identified District Profile. The profile reflects the requirement to utilise the NPPF and the Standard Method to calculate housing need within the District. This approach is supported rather than utilising the Cannock Chase Local Housing Needs Assessment (2018-2038). In addition, recognition of the shortfall in the GBBCHMA and the need for Cannock Chase to contribute towards the meeting the shortfall is supported. However, the profile needs to incorporate the growth ambitions of the GBSLEP and the Staffordshire and Stoke LEP. The Council is a member of both LEPs and they both show clear support for housing growth and delivery. Similarly, the Council's role as a non-constituent member of the WMCA and the commitment of the WMCA to deliver homes at an accelerated rate should be recognised. The District Profile identifies Cannock Chase District as having a greater employment rate than both the regional and national average. In order to respond to this factor, the District Profile should recognise that the Standard Method does not consider economic growth and, therefore, housing provision should be considered in excess of the Standard Method, which should be treated as a minimum in order to support growth within the district and to ensure a balance between jobs and homes provision. [...] greater recognition should be given to the ability of the District to meet not only the unmet housing need arising from GBBCHMA but also in support of its own local growth agenda and those of the two LEPs and those of the WMCA. The profile recognises the important of the Green Belt in having a number of roles but particularly in maintaining the openness and the rural/urban fringe on the edge of the West Midlands Conurbation. Richborough Estates acknowledges this but the recognition of the Preferred Options approach to release certain sites from the Green Belt, the District Profile should recognise that development in certain locations can have significant sustainability benefits which can provide the exceptional circumstances necessary to amend Green Belt Boundaries. The profile identifies the principle urban areas within the district. These consist of Cannock/Hednesford/Heath Hayes, Rugeley/Brereton and Norton Canes. Richborough Estates supports the recognition of these principle urban areas however greater emphasis should be given to their role in delivering sustainable development in the</p>

			context of them being the main centres of population and with the greatest range of facilities and transport opportunities.
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LPOO036	Richborough Estates (Land South of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	<p>Richborough Estates is generally supportive of the identified District Profile. The profile reflects the requirement to utilise the NPPF and the Standard Method to calculate housing need within the District. This approach is supported rather than utilising the Cannock Chase Local Housing Needs Assessment (2018-2038). In addition, recognition of the shortfall in the GBBCHMA and the need for Cannock Chase to contribute towards the meeting the shortfall is supported. However, the profile needs to incorporate the growth ambitions of the GBSLEP and the Staffordshire and Stoke LEP. The Council is a member of both LEPs and they both show clear support for housing growth and delivery. Similarly, the Council's role as a non-constituent member of the WMCA and the commitment of the WMCA to deliver homes at an accelerated rate should be recognised. The District Profile identifies Cannock Chase District as having a greater employment rate than both the regional and national average. In order to respond to this factor, the District Profile should recognise that the Standard Method does not consider economic growth and, therefore, housing provision should be considered in excess of the Standard Method, which should be treated as a minimum in order to support growth within the district and to ensure a balance between jobs and homes provision. [...] greater recognition should be given to the ability of the District to meet not only the unmet housing need arising from GBBCHMA but also in support of its own local growth agenda and those of the two LEPs and those of the WMCA. The profile recognises the important of the Green Belt in having a number of roles but particularly in maintaining the openness and the rural/urban fringe on the edge of the West Midlands Conurbation. Richborough Estates acknowledges this but the recognition of the Preferred Options approach to release certain sites from the Green Belt, the District Profile should recognise that development in certain locations can have significant sustainability benefits which can provide the exceptional circumstances necessary to amend Green Belt Boundaries. The profile identifies the principle urban areas within the district. These consist of Cannock/Hednesford/Heath Hayes, Rugeley/Brereton and Norton Canes. Richborough Estates supports the recognition of these principle urban areas however greater emphasis should be given to their role in delivering sustainable development in the context of them being the main centres of population and with the greatest range of facilities and transport opportunities.</p>
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LPPO037	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	<p>Richborough Estates is generally supportive of the identified District Profile. The profile reflects the requirement to utilise the NPPF and the Standard Method to calculate housing need within the District. This approach is supported rather than utilising the Cannock Chase Local Housing Needs Assessment (2018-2038). In addition, recognition of the shortfall in the GBBCHMA and the need for Cannock Chase to contribute towards the meeting the shortfall is supported. However, the profile needs to incorporate the growth ambitions of the GBSLEP and the Staffordshire and Stoke LEP. The Council is a member of both LEPs and they both show clear support for housing growth and delivery. Similarly, the Council's role as a non-constituent member of the WMCA and the commitment of the WMCA to deliver homes at an accelerated rate should be recognised. The District Profile identifies Cannock Chase District as having a greater employment rate than both the regional and national average. In order to respond to this factor, the District Profile should recognise that the Standard Method does not consider economic growth and, therefore, housing provision should be considered in excess of the Standard Method, which should be treated as a minimum in order to support growth within the district and to ensure a balance between jobs and homes provision. [...] greater recognition should be given to the ability of the District to meet not only the unmet housing need arising from GBBCHMA but also in support of its own local growth agenda and those of the two LEPs and those of the WMCA. The profile recognises the important of the Green Belt in having a number of roles but particularly in maintaining the openness and the rural/urban fringe on the edge of the West Midlands Conurbation. Richborough Estates acknowledges this but the recognition of the Preferred Options approach to release certain sites from the Green Belt, the District Profile should recognise that development in certain locations can have significant sustainability benefits which can provide the exceptional circumstances necessary to amend Green Belt Boundaries. The profile identifies the principle urban areas within the district. These consist of Cannock/Hednesford/Heath Hayes, Rugeley/Brereton and Norton Canes. Richborough Estates supports the recognition of these principle urban areas however greater emphasis should be given to their role in delivering sustainable development in the context of them being the main centres of population and with the greatest range of facilities and transport opportunities.</p>
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LPPO038	Inspired Villages - E, Pearce		<p>The LPPO consultation document identifies a need for around 4% of new homes to be for nursing homes and other residential institutions of page 10. These targets specifically mention younger people and small households with a combined 88% of new dwellings over the plan period identified for these groups. The target of 4% would equate to just 11 dwellings per annum of the overall housing requirement of 276 dwellings per annum, or 228 units over the plan period (2018-2038). The targets provided are at odds with both population projections outlined at Page 6 of the LPPO consultation document [...]. Further, the age profiles of the District is projected to rise further with those over 70- identified as group with a particular projected rise. Using the ONS, 2018 - Based Population Projections for LAs: Table 2, as reference in footnote 4 of the Preferred Options Consultation document, in 2020, those over 65 in Cannock Chase District comprised 19,643 persons. In 2038, over the plan period, the number of persons in this age group is projected to rise to 27,452, an increase of approx. 40%. paragraph 6.216 identifies that 60% of new housing should be suitable for the needs of households with health problems or disabilities that affect their housing requirement. Crucially, the Preferred Options Consultation document acknowledges that the increase in older age people raises the profile of health conditions, particularly dementia, the prevalence of which is higher in Cannock Chase District than average in England. Whilst it is accepted that some older people will wish to remain in their homes, there is a clear need for specialist housing for older people in the District, particularly given the existing prevalence of disabilities related to old age, such as dementia.</p>
LPPO039	Cannock Designer Outlet (GP)Ltd o/b Cannock Designer Outlet Ltd Partnership	Carter Jonas - K, Gregson	<p>Whilst the Local Plan Preferred Options document is supported in principle, on behalf of our client who is the operator of McArthurGlen Design Outlet West Midlands ('MGDOWM'), there are several aspects we want to comment on. Transport & Infrastructure (P12) Within the District Context, there is reference to Cannock train station being the 'focus of attention for a major upgrade, in view of its close proximity to the £160m, Mill Green retail designer outlet village, which will attract 3-4million visitors per annum'. As the MGDOWM serves a wide catchment, we support the delivery of the major upgrade to Cannock train station (alongside the electrifying of the line) which will improve a key transport link to the development for a vast number of visitors. The upgrade works will also increase the attractiveness for people having the option of using sustainable modes of travel to one of the major visitor attractions in the District.</p>
How the Local Plan Fits within the Wider Context			

LPPO040	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	In terms of the wider context and how the Local Plan fits into the broader more strategic framework, support is given to the Council recognising the Local Plan's role in delivering some key objectives from bodies such as the two LEPs, the WMCA and the GBBCHMA. This should also refer to the objectives of these organisations and in particular their aspirations. At paragraph 4.10 the document refers to discussions with duty to corporate partners and the potential assistance to meet Cannock's housing need and ongoing dialogue in relation to the wider HMA shortfall. Whilst support is given for the need to address the short fall in the HMA, concern is raised relative to the suggestion that the Council is seeking assistance to meet its own housing needs. There is no evidence to establish that the Council cannot meet its own housing requirements, as well as contributing towards meeting the short fall in the wider HMA, and on this basis this element of paragraph 4.10 should be omitted as not being justified.
LPPO041	Richborough Estates (Land South of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	In terms of the wider context and how the Local Plan fits into the broader more strategic framework, support is given to the Council recognising the Local Plan's role in delivering some key objectives from bodies such as the two LEPs, the WMCA and the GBBCHMA. This should also refer to the objectives of these organisations and in particular their aspirations. At paragraph 4.10 the document refers to discussions with duty to corporate partners and the potential assistance to meet Cannock's housing need and ongoing dialogue in relation to the wider HMA shortfall. Whilst support is given for the need to address the short fall in the HMA, concern is raised relative to the suggestion that the Council is seeking assistance to meet its own housing needs. There is no evidence to establish that the Council cannot meet its own housing requirements, as well as contributing towards meeting the short fall in the wider HMA, and on this basis this element of paragraph 4.10 should be omitted as not being justified.
LPPO042	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	In terms of the wider context and how the Local Plan fits into the broader more strategic framework, support is given to the Council recognising the Local Plan's role in delivering some key objectives from bodies such as the two LEPs, the WMCA and the GBBCHMA. This should also refer to the objectives of these organisations and in particular their aspirations. At paragraph 4.10 the document refers to discussions with duty to corporate partners and the potential assistance to meet Cannock's housing need and ongoing dialogue in relation to the wider HMA shortfall. Whilst support is given for the need to address the short fall in the HMA, concern is raised relative to the suggestion that the Council is seeking assistance to meet its own housing needs. There is no evidence to establish that the Council cannot meet its own housing requirements, as well as contributing towards meeting the short fall in the wider HMA, and on this basis this element of paragraph 4.10 should be omitted as not being justified.

LPPO043	Cannock Designer Outlet (GP)Ltd o/b Cannock Designer Outlet Ltd Partnership	Carter Jonas - K, Gregson	Paragraph 4.2 We support the Council's seven strategic objectives in promoting prosperity across Cannock and in particular, "establishing Mill Green Designer Outlet Village as a major visitor attraction and maximise the benefits it will bring to the District." To ensure the importance of MGDOWM to the local economy is realised alongside it being used to enhance the District's reputation (see paragraph 6.398), we suggest the site is designated as a Designer Outlet offering a specialist retail/leisure destination in the emerging Local Plan Review. This will assist in MGDOWM being recognised as one of the District's key visitor and tourism destinations and is able to be supported through planning policy. We therefore proposed the following policy should be incorporated into the Local Plan: McArthurGlen Designer Outlet West Midlands The area shown below is designated for the purposes of specialist retailing and as a leisure destination in accordance with planning permission CH/20/435. It is important that the specialist offer is maintained so that it complements town centres in the District.
Local Plan Vision & Objectives			
LPPO044		Croft development Consultancy UK Ltd, N, Bubalo	We support Strategic Objective 3 of the Plan to deliver a sufficient supply of housing, of quality and choice and support that in order to achieve this not all need will be able to met in certain locations in the district without the release of greenfield land. Support is also given that the needs of both the wider Black Country and adjoining districts may need to be considered in the plan making process and the Duty to Cooperate provides the appropriate mechanism and working forum in which to carry that debate forward.
LPPO045	Transport for West Midlands - H Davies		Overall, TfWM is very supportive of the documents vision and core aims - including delivering on high quality development, creating healthy living opportunities, providing a sufficient supply of homes, creating a vibrant economy and supporting the provision of sustainable transport and communications infrastructure, which are all vital for the area and wider region. Delivering on this growth, ensuring the right infrastructure provision and necessary transport improvements will be fundamental.

LPPO046	Bromford Housing Group	PlanIt Planning and Development - J, Williams	<p>We are generally supportive of the Strategic Objectives identified by the emerging Plan. Strategic Objective 3 refers to delivering a sufficient supply of homes to provide for housing choice and ensure that people are able to live in a decent home. It is our view that this objective should be clearer to reflect the requirements of the NPPF. Paragraph 59 of the Framework requires a sufficient amount and variety of land to come forward to meet the needs of specific housing requirements and that land is developed without unnecessary delay. The size, type and tenure of housing needed for different groups in the community should be addressed and reflected in planning policies. This includes, but is not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families and travellers. Strategic Objective 3 should be expanded to confirm that the District Council is committed to delivering sufficient supply of both market and affordable homes across a variety of tenures to help cater for the requirements of the District's population, and also to contribute towards meeting the growth requirements of the Black Country and Birmingham conurbation.</p> <p>Strategic Objective 4 - Economic Growth We support the reference in paragraph 6.255 of the Plan to the Council adopting a strategy which champions clean growth principles and a highly productive resilient economy. It must be ensured that there is a sufficient number of homes provided to meet the requirements of the working population. The Plan's ambitious employment growth objectives must correspond to the housing requirement. As detailed in our representations this is not, however, the case. The housing requirement is insufficient to meet household growth and support the local economy.</p>
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LPPO047	D, Green	<p>Objectives 1-8: Throughout the Evidence Base supporting these proposed objectives, the fact that 80% of the Cannock Chase District's land is either AONB or Green Belt is spoken of in negative terms, it is the clear thrust of the evidence that this 80% of land is an inconvenience and an obstacle. My view is that this is the opposite starting point from the one that the evidence supporting the Local Plan should be taking The fact our District is 80% AONB and Green Belt is what makes it so special, it is a haven for wildlife, it is home to some nationally important landscapes and it provides immense pleasure and wellbeing to the people of Cannock Chase and surrounding areas. It is only an inconvenience or obstacle to those seeking to develop it for their own profits. Rather than looking at how we can assist the surrounding local authorities in the West Midlands by satisfying their housing needs, our contribution should be the natural one. With this in mind, the order of the Objectives should be changed. The first priority should be the protection and enhancement of all of the Green Belt and AONB for the benefit of all of the animals, plants and people that rely on it. Objectives 7 and 8 should be Objectives 1 and 2. All the other Objectives should be expressly stated to be subject to these two over-riding objectives. In terms of the wording of the proposed Objectives 7 and 8. I believe that the language of protection and conservation should be far more robustly and unambiguously stated. There should be a clear statement that there should be no further reduction in the land allocated to Green Belt. To not do this will simply allow a gradual chipping away at the edges of the Green Belt year on year and Local Plan on Local Plan until the Green Belt has been significantly diminished, There is no such thing as a low impact reduction of the Green Belt because the overall impact of reduction will always be severe. Likewise there should be an express statement that development up to the boundary of the AONB and Green Belt should be permitted. Objective 5: should be amended to require the appointment of a "Sustainable Transport Tsar" who will have oversight of the entire sustainable transport network in the district. This will ensure that different permitted developments work together to provide a cohesive sustainable transport network.</p>
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		<p>At present the sustainable transport network is developed piecemeal leading to cycle paths that lead nowhere and a lack of safe routes for pedestrians and cyclists to complete their entire journey. I have specific comments to make about two of the areas where the Local Development Framework Interactive Policies Map indicates there will be a reduction of/development on land that was declared Green Belt in the 2014 Local Plan: Land to the East of Wimblebury Road: This land is recorded as being within the Green Belt in the 2014 Local Plan, but is marked as a Residential Strategic Sites in the latest documents. I object to this site being removed from the Green Belt and to it being designated for development. I note that the site has not been included in the Green Belt Detailed Harm Assessment for Wimblebury and we believe that it should have been. I believe that failing to do so demonstrates a flawed approach to the consideration of this parcel of land. The land is an important area of Green Belt representing the hard Eastern border of Heath Hayes. To allow development here is to encourage urban sprawl and is a first, inappropriate, step towards neighbouring areas of Green Belt suffering the same fate. Developing here would be contrary to Objectives 7 and 8 of the proposed Local Plan. Land to the South of the A5 at Churchbridge, designated CA10 in the Green Belt Detailed Harm Assessment for Cannock and Churchbridge: The Local Development Framework Interactive Policies Map suggests that it is proposed to remove this site from the Green Belt. We object to this. There should be no diminution of the Green Belt. This site is an important green buffer between the settlement at Churchbridge and the wider open countryside, given the substantial impact of the A5 and M6 Toll on its border. It should be preserved as a buffer and sanctuary/green corridor for wildlife. To develop this site would be contrary to Objectives 7 and 8 of the proposed Local Plan. It would also be contrary to Objectives 1-3 which talk of providing "safe", "healthy" and "decent" development and housing. To allow housing so close to the pollution emanating from the A5 and M6 Toll would be seriously detrimental to the wellbeing of anybody living or working on that land.</p>
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LPPO048	Historic England - E, Boden	<p>Strategic Objectives: Historic England welcomes that the 'Preferred Options' document includes policies that seek to conserve and enhance the historic Environment, and thus deliver Strategic Objective 1. However, it is not readily apparent from the title of Strategic Objective 1, that the consideration of the historic environment is encompassed within this objective and we suggest that the title of this objective is amended to make specific reference to this historic environment. With regard to Strategic 6, Historic England recommend that reference be made to the wider, social, cultural, economic and environmental benefits that conservation of the historic environment can bring such areas (NPPF Para 185). With regard to Strategic Objective 8, Historic England recognises the urgent need for positive action in response to the global climate crisis and is committed to achieving net zero carbon emissions. Heritage assets can be a valuable aid to achieving sustainable development and we therefore suggest that reference to the re-use of historic buildings should be specifically included within this strategic objective; with reference made to the carbon saving benefits of sympathetic restoration and retention of historic buildings, rather than their demolition and replacement. Spatial Priorities: Historic England welcomes the inclusion of safeguarding historic assets as a spatial priority in the future development of the District (para 5.1). The Spatial Strategy: Reference to the Local Plan protecting cultural and heritage assets within the overall spatial strategy is welcomed by Historic England. With regard to the spatial strategies for Cannock and Rugeley, historic England welcomes the Masterplan approach to town centre improvements in these settlements and would welcome the opportunity to be involved in the master planning process at an early stage. Historic England also suggests that within the spatial strategies for these settlements reference should be made to maximising opportunities to better reveal the significance of heritage assets and their Conservation Area. We also welcome reference to the prioritisation of residential and commercial units that respect the historic town centre of Rugeley but note that any such reference to the historic Environment is absent from the spatial strategy for Cannock and should be included.</p>
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LPPO049	Norton Canes Parish Council	<p>The Spatial Strategy for Norton Canes should identify the key issues and opportunities faced by the area and propose that they be addressed positively. Norton Canes is a large parish stretching to Cannock and Heath Hayes to the west and north and incorporating large areas of Green Belt and the rural area south of the A5. The importance of economic, social and environmental connectivity to these areas, as well as to neighbouring Chasewater, Burntwood and Brownhills should be acknowledged. Much of the spatial strategy for Norton Canes on p.29 of the PO is welcomed. In particular, that the identity of Norton Canes as a separate settlement safeguarded and enhanced. However, the rest of the strategy does not go far enough in setting a positive vision for the area's issue and opportunities. We suggest the following amendments. - Residential and commercial development opportunities will be prioritised within the urbanised areas of Norton Canes where they can make a positive and sustainable contribution to the growth of the district. Employment opportunities aimed at providing for the growth of small businesses will be a priority. - The delivery of transport, education and sports and recreation facility infrastructure required to support previous major developments will be a priority; and any further major developments will be supported by contemporaneous infrastructure provision. - The provision of specialist housing accommodation for the elderly will be supported to address the lack of this type of facility to serve what is a large and separate community. Major new housing developments will incorporate a proportion of small bungalows for the elderly. - A masterplan approach will be supported for heritage-led regeneration of this historic site at Grove Colliery. This will consider enabling development to support the creation of a work, recreation and leisure hub connected to appropriate recreation uses in the surrounding countryside. - Norton Canes is a designated Local Centre and opportunities for its improvement will be supported in order that it is better able to serve the local needs of a growing population, the result of past and current major residential developments. - Improvements to transport networks will include improved cycle/footpath links to Kingswood Lakeside to Heath Hayes; to Chasewater; and to the employment areas and canal towpath and recreation routes south of the A5. In this context, a safe crossing of the A5 in the vicinity of the Cannock Extension Canal will be supported. - The unique characteristics of Norton Canes parish creates opportunities to provide extensive recreational footpath/cycle routes connecting the urban areas with the surrounding Green Belt and rural countryside. The improvement of such routes will be prioritised. In particular, the relocation of unauthorised Gypsy and Traveller encampments from the bridleways in Norton Canes will be a priority. - The Local Plan supports the enhancement of the biodiversity link between Sutton Park and Cannock Chase as well as areas further afield and in this context the protection and improvement of the No Man's Bank SSSI and the several SBIs in Norton Canes will be supported. - The intact rural landscape south of the A5, with its historic farmsteads and the hamlet of Little Wyrley dating back to medieval times will be protected. Conservation Area status will be considered for the hamlet with its Listed Buildings and the industrial heritage of the former Grove Colliery and the Cannock</p>
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			Extension Canal. Some of the above may require consequential amendments to The District Context Section.
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LPPO050	Canal & River Trust - H, Smith	<p>The updated objectives have removed reference to the canals from Strategic Objective 2. Whilst we can see that the more generic wording can be more widely interpreted, we would suggest that the wording be amended to create and improve existing community infrastructure for sport and leisure opportunities. Where existing facilities are provided along the canals and other watercourses improvements can enhance the benefits for local communities. Including this wording will help to ensure that third party developments and planning decisions take account of these benefits and how they might be provided. We welcome the revised wording to Strategic Objective 5, which takes on the comments made at the Issues and Objectives stage regarding the need for the canal network to be seen as part of an integrated transport network. We welcome reference to the promotion of renewable technology and green technologies within Strategic Objective 8. We also welcome the aim to reduce pollution, which could help to promote improved water quality our canals, the protection of the canals as important wildlife habitats and would be compliant with the aims of paragraph 170 (part e) of the NPPF. Spatial Strategy (pages 25-29): We welcome the aims of the spatial strategy which encompasses many of our objectives for the canals. We do request that the strategy should include wording that states that new developments will seek to connect and positively engage with strategic green infrastructure and open space. To make the Local Plan more effective and precise, we advise that an additional statement should be included that states that development will positively engage with and link in with existing walking and cycling routes. We believe this would directly help to promote active travel in the District. The "Improvements to cycle and footpath networks will be made to enhance connectivity and encourage more active travel, health and well-being" within the Spatial Strategy for Rugeley and Brereton is welcomed along with "high-quality natural environment will be protected and enhanced through improved quality of the existing green space network, enabling greater use and support for wildlife." Strategic Objective 2 (page 48) Our Waterways are accessible to and can be easily utilised by a wide section of the population. We believe that our network is uniquely placed to make a significant contribution to improving the wellbeing of those people living within easy reach of one of the free-to-use towpaths running alongside our canals and rivers. A report commissioned by the Trust 'Assessing the wellbeing impacts of waterways usage in England and Wales' written by social impact consultancy Simerica, reveals: - The associated benefits of visiting a canal or river increase with the length of visit, with research showing higher levels of happiness and low levels of anxiety for longer trips. - Any visit to a waterway is associated with higher levels of life satisfaction and visiting regularly is associated with even higher levels of life satisfaction. The Trust's research also reveals that three quarters of towpath users say that they visit to 'get away from it all and clear my head'. and because they are 'great places to relax and de-stress' (Towpath Survey, 2017). Nationwide, whilst 8 million people live within 1km of our network, only 3/10 ever visit (as calculated by the Trust's Waterway Engagement Monitor (WM) April 17 to March 18). As a result, any policy that promotes additional visits to our network has the</p>
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			<p>potential to make a significant impact to the wellbeing of local populations. The wording of this Strategic Objective 2 differs from the wording of Strategic Objective 2 on page 22. The wording of this Strategic Objective (Page 48) encompasses the need for new/improved community infrastructure to meet the needs arising from new development, such as the improvement of an existing towpath with surfacing/signage/improved access.</p>
LPPO051	E, Waldron		<p>My query is page 26. What reassurances will the council provide, that brownland urban sites will be used as the preferred area for development. Which areas of Green Belt have been identified for housing?</p>

LPPO052	West Midlands Housing Association Planning Consortium	Tetlow King Planning - L, Stoate	We support the draft Strategic Objectives which all seem appropriate and reasonable expectations for the delivery of local plan. In particular, we fully support Strategic Objective 3 which states that the local plan will deliver a sufficient supply of homes to provide for housing choice and ensure all people are able to live in a decent home which meets their needs, including helping meet local need for affordable dwellings. Housing Associations can facilitate the achievement of Strategic Objective 3 by maximising the delivering affordable homes in the district.
LPPO053	Cannock Chase Independents Group - P, Woodhead (Cllr)		Whilst the Strategic Objectives are to be taken as a collective we believe that the current Objective 8 should be drafted higher in the order. This is important to reflect the Council declaration of a Climate Emergency and should be the first thing people read when considering development in our community. The language within this section is non-committal and should be drafted stronger to reflect the desire of the Council and the Community that all new developments must be Zero-Carbon and must incorporate measures around thermal insulation, micro power generation in every home, grey water harvesting etc. Further that any developments over 10 dwellings must be constructed to be energy consumption which does not need to draw upon the national grid. There should be a specific policy statement which does not permit the extraction of fossil fuels and in particular unconventional means within the District. Carbon offsetting and external measures should not be accepted. Linking Objective 8 to Objective 5 all developments over 10 dwellings must create means of active travel linking to the existing active travel routes and developments over 100 dwellings must contribute to the wider establishment of active travel in the District with the creation of new routes to link up our communities. This may include the promotion of public transport infrastructure linked to the active travel routes. Social infrastructure should be developed as a priority within the timing of a development being built with a presumption of these elements being built first before dwellings are occupied. Strategic Objective 1 talks about the distinctive, high quality development where development over the past decade of more has been more about the standard build by standard building companies. If this is to be a Strategic Objective then we need to define what we mean by distinctive and high quality. The quality of employment land is insufficient for our resident population and this must be balanced against any proposed growth in housing. A key element of addressing the Climate Emergency is to reduce the travelling miles in particular for work, therefore the development of commercial and industrial infrastructure should have greater emphasis to accompany a wider commitment to the promotion of smaller business, business incubation and local services. We believe there should be a dedicated quantity of land directed towards sustainable energy production in the same manner as employment land. Objective 2 should emphasise creating a healthy environment in which to live and less emphasis on more built facilities. We acknowledge this is more difficult to achieve but greater research and understanding of active travel and outdoor living as opposed to more Leisure Centres will likely improve life outcomes for everyone in Cannock Chase.

LPPO054	Severn Trent		<p>Strategic Objective 8: Supporting a Greener Future We recognise the objectives effort to reduce flood risk and maximise flood protection. This will be especially important in the context of climate change. New development can play a pivotal role in improving the current level of flood risk within communities. The objective around ensuring development makes efficient use of previously developed land where possible, minimising further development of greenfield will help towards reducing flood risk. We would emphasise the importance of surface water management and adherence to the drainage hierarchy especially when considering potential allocations for the emerging plan. Allocating development whereby no sustainable discharge for surface water exists locally may result in such development connecting surface water to the combined or foul sewerage system. This would be detrimental to the strategic objective of reducing flood risk and protecting communities from the impact of climate change.</p>
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LPPO055	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	<p>Strategic Objective 1: It is noted that the context for preparing the policies relating to objective 1 has included taking on board the proposed revisions to the NPPF published in January 2021. This includes such considerations as:</p> <ul style="list-style-type: none"> • Referring to the term 'beautiful' in response to the Building Better; Building Beautiful Commission's Findings • The role that neighbourhood planning groups can have in regard to design policies • Preparation of design guides or codes which reflect local character and preferences • Reference to giving communities a greater say in the design standards set for their area . <p>Some caution should be exercised in preparing a local plan based on what are potential changes to the Framework and are subject to consultation, as these changes may not necessarily be taken through to be adopted as national policy. However, the Local Plan's approach in taking on board other changes including to the Town and Country Planning (Use Classes) Regulations 2020, which have been enacted, are supported as representing the current regulatory framework. Similarly, a recognition of the extension to permitted development rights as set out in the Preferred Options is supported. The Spatial Strategy for the District has set out the number of bullet points over pages 25-29 of the Local Plan Preferred Option document. Whilst the general approach of the Spatial Strategy, in particular to focus development on the most sustainable locations it should identify the settlements which are the most sustainable. These would consist of Cannock Chase/Hednesford/Heath Hayes, Rugeley and Brereton, and Norton Canes. The Spatial Strategy for Rugeley and Brereton should make plain that it constitutes the second most sustainable location in the District and also identified that there is potential for Green Belt release to allow for sustainable housing development. The approach for Norton Canes similarly identifies that there is potential for Green Belt release to deliver sustainable residential development. In addition, the Spatial Strategy should not be left to supporting text within the broader document. It should be set out in its own strategic level policy identifying the three settlements which are the most sustainable and their overarching objectives relative to new development including the potential for Green Belt release to deliver sustainable development.</p> <p>Strategic Objective 2: The objective deals with safeguarding existing community infrastructure and providing new community infrastructure, safeguarding the health and amenity of local communities, providing active leisure and sports facilities, providing healthy living opportunities and increasing physical activity and providing opportunities for allotments and local food growing.</p> <p>Strategic Objective 3: The objective set out does not reflect the Government's overall objective for housing which is to significantly boost the supply of homes. This should be reflected in the overall wording of the Strategic Objective 3. The document sets out the various scenarios for housing provision set out in the Issues and Options Consultation of 2019. There are four options ranging from not providing any contribution towards meeting unmet need across the wider HMA to potentially contributing 2,500 dwellings. Richborough Estates had previously commented that the 2,500 dwelling contribution was the most appropriate, should be set as a minimum requirement and should also be boosted in conjunction with the economic growth</p>
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			<p>ambitions of the District Council and the LEPs of which it is a member. The consultation document acknowledged that the majority of respondents considered the higher levels of growth included in Option C (contribution towards 1,500 dwellings towards the shortfall) and Option D (a contribution of 2,500 dwellings towards the shortfall) were the options which received most support. In terms of housing mix policy options, the 2019 Issues & Options Consultation proposed four options. This included continuing with the current policy approach of encouraging appropriate mix of housing sizes, types and tenures on a district wide basis or alternative towards specific percentages of housing on sites.</p>
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		<p>Richborough Estates make clear that Option A of continuing with the current policy approach was the most appropriate and that recognition should be given to the larger sites being able to provide a broader mix of accommodation. Strategic Objective 4: Strategic Objective 4 deals with the economy and employment land. It sets out a number of key issues but does not refer to the Local Plan making sufficient provision for employment development within the area. It also does not refer to the need to support economic growth nor does it refer to local industrial strategies. The objective should be reworded to provide a more positive context for economic growth within the District and development of employment land. As part of the Issues & Options consultation the Council identified a number of potential options. Richborough Estates supported Option A which sought to consider utilising sites already identified for employment development within urban areas and exploring opportunities for further supply on urban sites, Option B1 using an employment led mixed use redevelopment of Rugeley Power Station and Option C1 focusing on the Green Belt around Kingswood Lakeside and other existing employment areas. In particular, previous representations made on behalf of Richborough noted that this approach for employment development would enable a balanced strategy for the District as Rugeley's economic growth needs would be assisted by the employment-led redevelopment of Rugeley Power Station. It is also noted that the Cannock Chase Economic Prosperity Strategy sets out an ambitious vision for the District whereby it could be a leader in West Midlands in championing clean growth principles. The supporting text also refers to an over reliance on manufacturing, skill and trades and elementary occupations in comparison to regional and national averages. Whilst it is acknowledge that there is little support to continue with a reliance on elementary occupations, it is not clear why skilled trades would fall into the same categorisation as a negative current circumstance. In addition, the supporting text also notes that the ABCA have indicated that there is a potential shortfall of employment land within their administrative area and ask whether Cannock Chase could deliver employment land in excess of local needs. Strategic Objective 5: deals with sustainable transport and communications infrastructure. It seeks to manage the need to travel by providing for major new development in locations that can provide access for all sections of the community. It also requires the clustering of the development of services and facilities in locations that can provide convenience access for all sections of the community. It also requires the clustering of the development of services and facilities in locations that can provide convenience access for all sections of the community. Policy SO5.1 deals with accessible development.</p>
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		<p>Amongst other things the policy identifies that proposals should set out, as appropriate, how and when the development will contribute to the delivery of the reduction in reliance on the private car by locating a development where it can provide a full choice of sustainable travel options, co-locate shopping, education and leisure facilities in convenient "hubs", and layouts should provide the capacity for public transport access. The policy also refers to development which individually or cumulatively cause an unacceptable impact on the highway network, will not be supported.</p> <p>Strategic Objective 6: Strategic Objective 6 and the subsequent policies of SO6.1 , SO6.2, SO6.3, SO6.4, SO6.5. SO6.6 and SO6.7 relate to town centres. Richborough Estates have no comment to make on the above policies or supporting text. Strategic Objective 7: Strategic objective 7 deals with the protection and enhancement of the natural environment. It seeks to minimise impact on and provide net gains for biodiversity. The policy refers to highest degree of protection been given to the protected landscape of the Cannock Chase AONB and the Green Belt. In terms of this objective it is not clear how the Green Belt has been identified as having any "protected landscape" character. Green Belt designation is a policy tool rather than a recognition of landscape. The objective should be amended to remove reference to the Green Belt and its "protected landscape". Policy SO7.1 states development proposals will support the protection, conservation, enhancement and restoration of designated biodiversity sites. It also indicates that development that results in the loss of harm to SAC, ancient woodland, ancient trees or veteran trees will need to demonstrate there are imperative reasons for overriding public interest.</p>
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LPPO056	Richborough Estates (Land South of Cannock Road, Heath Hayes)		<p>Strategic Objective 1: It is noted that the context for preparing the policies relating to objective 1 has included taking on board the proposed revisions to the NPPF published in January 2021. This includes such considerations as:</p> <ul style="list-style-type: none"> • Referring to the term 'beautiful' in response to the Building Better; Building Beautiful Commission's Findings • The role that neighbourhood planning groups can have in regard to design policies • Preparation of design guides or codes which reflect local character and preferences • Reference to giving communities a greater say in the design standards set for their area <p>Some caution should be exercised in preparing a local plan based on what are potential changes to the Framework and are subject to consultation, as these changes may not necessarily be taken through to be adopted as national policy. However, the Local Plan's approach in taking on board other changes including to the Town and Country Planning (Use Classes) Regulations 2020, which have been enacted, are supported as representing the current regulatory framework. Similarly, a recognition of the extension to permitted development rights as set out in the Preferred Options is supported. The Spatial Strategy for the District has set out the number of bullet points over pages 25-29 of the Local Plan Preferred Option document. Whilst the general approach of the Spatial Strategy, in particular to focus development on the most sustainable locations it should identify the settlements which are the most sustainable. These would consist of Cannock Chase/Hednesford/Heath Hayes, Rugeley and Brereton, and Norton Canes. The Spatial Strategy for Rugeley and Brereton should make plain that it constitutes the second most sustainable location in the District and also identified that there is potential for Green Belt release to allow for sustainable housing development. The approach for Norton Canes similarly identifies that there is potential for Green Belt release to deliver sustainable residential development. In addition, the Spatial Strategy should not be left to supporting text within the broader document. It should be set out in its own strategic level policy identifying the three settlements which are the most sustainable and their overarching objectives relative to new development including the potential for Green Belt release to deliver sustainable development.</p> <p>Strategic Objective 2: The objective deals with safeguarding existing community infrastructure and providing new community infrastructure, safeguarding the health and amenity of local communities, providing active leisure and sports facilities, providing healthy living opportunities and increasing physical activity and providing opportunities for allotments and local food growing.</p> <p>Strategic Objective 3: The objective set out does not reflect the Government's overall objective for housing which is to significantly boost the supply of homes. This should be reflected in the overall wording of the Strategic Objective 3. The document sets out the various scenarios for housing provision set out in the Issues and options Consultation of 2019. There are four options ranging from not providing any contribution towards meeting unmet need across the wider HMA to potentially contributing 2,500 dwellings. Richborough Estates had previously commented that the 2,500 dwelling contribution was the most appropriate, should be set as a minimum requirement and should also be boosted in conjunction with the economic growth</p>
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		<p>sustainable travel options, co-locate shopping, education and leisure facilities in convenient "hubs", and layouts should provide the capacity for public transport access. The policy also refers to development which individually or cumulatively cause an unacceptable impact on the highway network, will not be supported. Strategic Objective 6: Strategic Objective 6 and the subsequent policies of SO6.1 , SO6.2, SO6.3, SO6.4, SO6.5. SO6.6 and SO6.7 relate to town centres. Richborough estates have no comment to make on the above policies or supporting text. Strategic Objective 7: Strategic Objective 7 deals with the protection and enhancement of the natural environment. It seeks to minimise impact on and provide net gains for biodiversity. The policy refers to highest degree of protection been given to the protected landscape of the Cannock Chase AONB and the Green Belt. In terms of this objective it is not clear how the Green Belt has been identified as having any "protected landscape" character. Green Belt designation is a policy tool rather than a recognition of landscape. The objective should be amended to remove reference to the Green Belt and its "protected landscape". Policy SO7.1 states development proposals will support the protection, conservation enhancement and restoration of designated biodiversity sites. It also indicates that development that results in the loss of harm to SAC, ancient woodland, ancient trees or veteran trees will need to demonstrate there are imperative reasons for overriding public interest.</p>
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LPO057	Richborough Estates (Land off Main Road, Brereton)		<p>Strategic Objective 1: It is noted that the context for preparing the policies relating to objective 1 has included taking on board the proposed revisions to the NPPF published in January 2021. This includes such considerations as:</p> <ul style="list-style-type: none"> • Referring to the term 'beautiful' in response to the Building Better; Building Beautiful Commission's Findings • The role that neighbourhood planning groups can have in regard to design policies • Preparation of design guides or codes which reflect local character and preferences • Reference to giving communities a greater say in the design standards set for their area. <p>Some caution should be exercised in preparing a local plan based on what are potential changes to the Framework and are subject to consultation, as these changes may not necessarily be taken through to be adopted as national policy. However, the Local Plan's approach in taking on board other changes including to the Town and Country Planning (Use Classes) Regulations 2020, which have been enacted, are supported as representing the current regulatory framework. Similarly, a recognition of the extension to permitted development rights as set out in the Preferred Options is supported. The Spatial Strategy for the District has set out the number of bullet points over pages 25-29 of the Local Plan Preferred Option document. Whilst the general approach of the Spatial Strategy, in particular to focus development on the most sustainable locations it should identify the settlements which are the most sustainable. These would consist of Cannock Chase/Hednesford/Heath Hayes, Rugeley and Brereton, and Norton Canes. The Spatial Strategy for Rugeley and Brereton should make plain that it constitutes the second most sustainable location in the District and also identified that there is potential for Green Belt release to allow for sustainable housing development. The approach for Norton Canes similarly identifies that there is potential for Green Belt release to deliver sustainable residential development. In addition, the Spatial Strategy should not be left to supporting text within the broader document. It should be set out in its own strategic level policy identifying the three settlements which are the most sustainable and their overarching objectives relative to new development including the potential for Green Belt release to deliver sustainable development.</p> <p>Strategic Objective 2: The objective deals with safeguarding existing community infrastructure and providing new community infrastructure, safeguarding the health and amenity of local communities, providing active leisure and sports facilities, providing healthy living opportunities and increasing physical activity and providing opportunities for allotments and local food growing.</p> <p>Strategic Objective 3: The objective set out does not reflect the Government's overall objective for housing which is to significantly boost the supply of homes. This should be reflected in the overall wording of the Strategic Objective 3. The document sets out the various scenarios for housing provision set out in the Issues and options Consultation of 2019. There are four options ranging from not providing any contribution towards meeting unmet need across the wider HMA to potentially contributing 2,500 dwellings. Richborough Estates had previously commented that the 2,500 dwelling contribution was the most appropriate, should be set as a minimum requirement and should also be boosted in conjunction with the economic growth ambitions of the District</p>
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			<p>Council and the LEPs of which it is a member. The consultation document acknowledged that the majority of respondents considered the higher levels of growth included in Option C (contribution towards 1,500 dwellings towards the shortfall) and Option D (a contribution of 2,500 dwellings towards the shortfall) were the options which received most support. In terms of housing mix policy options, the 2019 Issues & Options Consultation proposed four options. This included continuing with the current policy approach of encouraging appropriate mix of housing sizes, types and tenures on a district wide basis or alternative towards specific percentages of housing on sites. Richborough Estates make clear that Option A of continuing with the current policy approach was the most appropriate and that recognition should be given to the larger sites being able to provide a broader mix of accommodation.</p>
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		<p>Strategic Objective 4: Strategic Objective 4 deals with the economy and employment land. It sets out a number of key issues but does not refer to the Local Plan making sufficient provision for employment development within the area. It also does not refer to the need to support economic growth nor does it refer to local industrial strategies. The objective should be reworded to provide a more positive context for economic growth within the District and development of employment land. As part of the Issues & Options consultation the Council identified a number of potential options. Richborough Estates supported Option A which sought to consider utilising sites already identified for employment development within urban areas and exploring opportunities for further supply on urban sites, Option B1 using an employment led mixed use redevelopment of Rugeley Power Station and Option C1 focusing on the Green Belt around Kingswood Lakeside and other existing employment areas. In particular, previous representations made on behalf of Richborough noted that this approach for employment development would enable a balanced strategy for the District as Rugeley's economic growth needs would be assisted by the employment-led redevelopment of Rugeley Power Station. It is also noted that the Cannock Chase Economic Prosperity Strategy sets out an ambitious vision for the District whereby it could be a leader in West Midlands in championing clean growth principles. The supporting text also refers to an over reliance on manufacturing, skill and trades and elementary occupations in comparison to regional and national averages. Whilst it is acknowledge that there is little support to continue with a reliance on elementary occupations, it is not clear why skilled trades would fall into the same categorisation as a negative current circumstance. In addition, the supporting text also notes that the ABCA have indicated that there is a potential shortfall of employment land within their administrative area and ask whether Cannock Chase could deliver employment land in excess of local needs. Strategic Objective 5: deals with sustainable transport and communications infrastructure. It seeks to manage the need to travel by providing for major new development in locations that can provide access for all sections of the community. It also requires the clustering of the development of services and facilities in locations that can provide convenience access for all sections of the community. It also requires the clustering of the development of services and facilities in locations that can provide convenience access for all sections of the community. Policy SO5.1 deals with accessible development. Amongst other things the policy identifies that proposals should set out, as appropriate, how and when the development will contribute to the delivery of the reduction in reliance on the private car by locating a development where it can provide a full choice of sustainable travel options, , co-locate shopping, education and leisure facilities in convenient "hubs",</p>
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			<p>and layouts should provide the capacity for public transport access. The policy also refers to development which individually or cumulatively cause an unacceptable impact on the highway network, will not be supported. Strategic Objective 6: Strategic Objective 6 and the subsequent policies of SO6.1 , SO6.2, SO6.3, SO6.4, SO6.5. SO6.6 and SO6.7 relate to town centres. Richborough estates have no comment to make on the above policies or supporting text. Strategic Objective 7: Strategic Objective 7 deals with the protection and enhancement of the natural environment. It seeks to minimise impact on and provide net gains for biodiversity. The policy refers to highest degree of protection been given to the protected landscape of the Cannock Chase AONB and the Green Belt. In terms of this objective it is not clear how the Green Belt has been identified as having any "protected landscape" character. Green Belt designation is a policy tool rather than a recognition of landscape. The objective should be amended to remove reference to the Green Belt and its "protected landscape". Policy SO7.1 states development proposals will support the protection, conservation enhancement and restoration of designated biodiversity sites. It also indicates that development that results in the loss of harm to SAC, ancient woodland, ancient trees or veteran trees will need to demonstrate there are imperative reasons for overriding public interest.</p>
LPPO058	Inspired Villages - E, Pearce		<p>The Local Plan Preferred Options sets out eight strategic objectives. Objectives two and three relate to the provision of housing and infrastructure for people within the district. Objective 2, 'Creating Community Infrastructure and Healthy Living Opportunities' sets out at the first bullet point that development should contribute towards new community infrastructure (SO2.1). Retirement Communities, such as those operated by Inspired Villages, provide significant communal facilities. They typical quantum of such communal facilities in a typical Inspired Villages retirement community comprise approx. 25% of its floorspace as non-saleable space. This includes the communal and care facilities available to its residents. Facilities such as a wellbeing centre, cafe and restaurant are typically open to the wider community and can make significant contribution to local infrastructure, as well as the health of the local population. The strategic objectives should acknowledge the contribution and need for such facilities, particularly for older residents, outside of the definition of Community Infrastructure as defined on Page 53.</p>

LPPO059	A, Newton	CT Planning - P, Kreuser	<p>This representation is made on behalf of Mr A Newton with respect to Land at UK Architectural Antiques, Hayfield Hill, Cannock Wood, Staff, WS15 4RU, shown marked red on the attached location plan 4721.77. Land at Hayfield Hill comprises some 0.6ha of previously developed land. Additional land in the ownership of Mr Newton is shown blue on the attached plan. Object to the preferred Spatial Strategy as set out on page 26 of the Preferred Options document. No new housing development is proposed within the larger key villages of the District. The Spatial Strategy therefore fails to meet the requirement of paragraph 78 of the NPPF which states that "Planning Policies should identify opportunities for villages to grow and thrive, especially where this will support local services." The Spatial Strategy does not plan positively for the larger rural villages of the District. Cannock Wood for example, has a degree of sustainable services and facilities in the village that should be actively supported rather than just preserved. The Spatial Strategy should seek to enhance the viability and vitality of key rural settlements as well as urban settlements in the District; the advantages of housing growth and investment should be spread across the District and not just centred on urban areas. Sites for small scale, organic growth in the larger rural villages should be identified through Policy SO3.1 to maintain and enhance vitality and community wellbeing. The Spatial Strategy should be amended to provide for growth in key rural settlements and that allocations for residential development should be appropriately made through the Local Plan/ Such allocations should not be left to inconsistencies of Neighbourhood Planning.</p>
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LPPO060	Wyrley Estates	Fisher German LLP - N, Borseley	<p>The overall aim to promote sustainable development is welcomed, as is the ambition to protect and enhance Green Belt land and the AONB. Similarly, the ambition to protect cultural and heritage assets is welcomed. However, this ambition could go much further, particularly in terms of the sustainable enhancement and development of new cultural and heritage assets. Indeed, the suggested approach in this regard is somewhat less ambitious than the 2014 Local Plan, which looked to positively promote historic assets in the rural areas. The District has a rich industrial heritage and existing assets should not only be looked to be maintained, but new opportunities for enhancement should be actively pursued and a policy framework created so that proposals can be confidently brought forward. The enhancement and development of new cultural and heritage assets does not have to conflict with the protection of the Green Belt. It is recognised that Green Belt release has to pass stiff national policy tests. However, the insertion of positively worded policies to provide a positive basis for suitable schemes to come forward within the Green Belt is eminently possible and is an approach which has been successfully employed in other Local Authorities. Strategic Objective 1: This objective states that the historic environment will be protected, conserved, and enhanced, and that local character and distinctiveness will be sustained through managing designated and non-designated heritage assets and their townscape and landscape settings. This is completely supported. However, as stated above, the ambition does not go far enough. The good intentions will not succeed unless there is a clear policy basis for schemes to come forward in a planned and sustainable manner. paragraph 184 of the NPPF provides guidance for LPAs in drawing up heritage policies [...]. The key points to highlight are the need to take a positive approach, the broader benefits of heritage-led development to the wellbeing and sustainability of the wider area, and recognition of the role of new development. Whilst the Cannock Extension Canal SAC and Grove Colliery site are mentioned in the objective, together with the long-standing ambition to see the area developed as a leisure and recreation (and heritage) centre recognised, there is disappointingly no suggestion of a suitable policy to enable a scheme to be progressed, or for the future Norton Canes Neighbourhood Plan to take the matter a step further. This could comprise a more specific Neighbourhood Plan policy, which may in turn create a clearer and more certain policy framework for proposals to come forward through a masterplan, and potentially even through a Neighbourhood Development Order subject to local support and due process. It is crucially important to get the Local Plan policy right to ensure that aspirations at the Cannock Extension SAC/Grove site can be brought to fruition. It is recognised that previous policy has not led to any tangible progress, but the Estate has been looking to establish partnership working with the District Council (who own a large part of the site), the Norton Canes Parish Council (who are developing a Neighbourhood Plan, and who recognise the value of the site and its potential) and suitable developers. There is clear potential and interest in the site, but it requires the certainty of District Council support and a Local Plan policy hook to provide the certainty and confidence to take matters forward to the next level. Most recently, the</p>
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			<p>Estate have undertaken the following actions to try and move a scheme forward towards reality: i. It is in the final stages of purchasing the former Colliery Offices site from the Borough Council; ii. It has commissioned a high-level masterplan through Richborough Estates, which is the first stage to putting together a more detail set of proposals and timeframe for delivery. These achievements signal the clear intention from the Estate to take the matter forwards and to see the long-standing ambitions finally realised. It will require the collaboration and cooperation of all stakeholders, not least the District Council, who own a large part of the land. Recent discussions have been encouraging and the site is indeed at a crossroads.</p>
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		<p>The ambitions can only be delivered as a partnership, and this requires all parties to hold the shared ambition and to use any tools at their disposal to try to provide the most favourable background. The District Council has a unique position, as it owns a large part of the land, but also has a golden opportunity to create a local planning policy basis for the realisation of future development proposals. Clearly, the site will remain within the boundaries of the Green Belt. Although its removal would be the best outcome, it is understood that this is unlikely to pass the strict NPPF tests. However, there is no reason why a positively worded policy could not be included which recognised the high bar for development set by Green Belt policy, but which provided a route for a suitable leisure, recreation, and heritage scheme to come forward as part of a comprehensive masterplan, which was linked to a suitable Neighbourhood Plan policy and would deliver specified and significant benefits. There are examples of other important Green Belt sites elsewhere that have specific policies which provide a broad framework for the forms of development that may be acceptable, subject to passing certain minimum tests. One such example is Chester Zoo near Chester. The Local Plan Part 2 contains a broad policy identifying key commercial sites in the Green Belt (Policy GBC1) and then a range of specific policies relating to each site (in the case of Chester Zoo, Policy GBC1.A). These policies do not seek to override Green Belt policy, which remains the fundamental policy basis, but sets out the broad classes of development which may be acceptable in principle, subject to Green Belt considerations and range of criteria. Similarly, there are examples where there has been the successful regeneration of former colliery sites, such examples include:</p> <ul style="list-style-type: none"> • Bates Colliery in Blyth- 30-acre site has been regenerated to provide a Primary School, development of specialist accommodation and residential development of 142 homes. • Kellingley Colliery in Yorkshire (closed 2015)- small section of land at the site to be redeveloped to provide industrial units for small-medium sized businesses, forms part of a wider 151ac future scheme. • Cefn Coed Colliery Museum in Neath- Providing a museum of the former site for visitors. It is noted at paragraphs 6.51 and 6.52 that a Local List is currently being taken forward through the Design Guide PSG, and it is suggested that the remaining buildings on site centred on the former colliery office buildings are a prime candidate. This would give some policy recognition of their local importance and assist in bringing forward suitable proposals. <p>Strategic Objective 3: The objective strives to deliver a sufficient supply of homes, and the provide and range of housing types accessible to all people. The Grove Colliery site has the potential to deliver specialist housing to meet with the Objective 3 in striving to achieve diverse types of housing. For example, live/work housing, this type of housing can enable development to meet with targets whilst also delivering other council priorities.</p>
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			<p>Strategic Objective 4: The objective seeks to encourage a vibrant local economy and workforce, including supporting sustainable tourism and the rural economy and encouraging development of live/work housing types. In achieving this objective there requires a specific suitable policy which is clear and robust. Strategic Objective 7: Protecting and enhancing the natural Environment is a very important Objective. The objective strives to achieve this through appropriate preferred policies. The objectives seek overall to provide support for biodiversity and natural environment protection and enhancement, Green Belt protection, and recognition of the importance of the Cannock Extension Canal SAC. The related policies need to be aligned to provide a basis for suitable proposals to deliver these aspirations. Strategic Objective 8: What development takes place now and within the next 10 years will be critical to how we achieve Net Zero by 2050 (or earlier). It's important that the points made within Strategic Objective 8 are carried out through development, and importantly included within the Local Plan and its policies. Without clear-cut policies to follow through development it will be difficult for the council to achieve this Objective.</p>
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LPO061	The Church Commissioners for England	Barton Willmore - A, Bird	<p>At Objective 3, the draft Plan states it will deliver a sufficient supply of homes to provide for housing choice via several key priorities including 'facilitating sustainable housing provision for this plan period and the next' and 'delivering sufficient housing to meet the District's own need and an appropriate and sustainable contribution to the wider housing market areas shortfall where justified in adopted plans.' We are supportive of objective 3 and the need for the draft Plan to accommodate both local housing needs and the wider housing market area needs. In the context of 60% of the District being designated Green Belt, we also support the principle that exceptional circumstances exist to warrant a review of the Green Belt to meet housing needs and the need to consider longer term planning of Green Belt boundaries. This is in accordance with the NPPF, paragraphs 136-137 and case law, namely that of <i>Calverton Parish Council v Great Nottingham Councils</i> [2015] EWHC 1078 (ADMIN). As recognised within the draft Plan, we consider that these exceptional circumstances exist by virtue of the degree of the housing needs of the District and the wider housing market area; the lack of sufficient urban capacity (including potential for density uplifts) and other suitable non-Green Belt sites; and the inability of neighbouring authorities to assist in meeting the District's housing needs (as detailed further in the supporting text to draft Policy SO1.3). The principles of this Objective do not however appear to have been carried through fully within the draft Plan policies. We comment in further detail on these draft Plan policies within these representations, however, we particularly note that the draft Plan does not safeguard land for development beyond the Plan period. In line with the NPPF (paragraph 139(e)) the draft Plan should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period. This safeguarded land should be identified in accordance with the spatial strategy. The Draft Plan (pages 26-29) sets out the Spatial Strategy for future development up to 2038. This identifies that new development will be located in the most sustainable locations, focused on the existing urban areas and will protect and enhance Green Belt land and the AONB. Housing and employment requirements will be met as far as possible within the existing urban areas or within a planned expansion to the urban areas in accessible and sustainable locations. In our view, this includes our Client's site. The draft Plan identifies that Green Belt release is considered necessary to provide sufficient land to meet the District's housing need with an element of flexibility. The draft Plan will seek to deliver a minimum of 5,516 dwellings (2018-2038) to meet local housing needs, with a further 500 dwellings provided to help meet the GBBCHMA shortfall. Therefore, a total minimum of 6,016 dwellings is to be provided. The draft Plan (page 27) identifies that the urban area of Cannock/Hednesford/Heath Hayes will be the main priority area for the new residential and commercial development. Paragraph 138 of the NPPF states that "when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account" and that "plans should give first consideration to land which has been previously-developed and/or is well-served by public transport".</p>
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			The principle that sustainable development should be of paramount importance has been reinforced by the findings of Local Plan examinations. Most recently a High Court judgement (Compton Parish Council & Ors v Guildford Borough Council & Anor [2019] EWHC 3242 (Admin) (04 December 2019)) in relation to the Guildford Local Plan (2019) identifies that 'exceptional circumstances' for the release of Green Belt land in relation to the meeting of housing needs can take into account the nature and degree of the need, alongside considerations of why the need cannot be met in sequentially preferable sites; the impact on the functioning of the Green Belt; and what other advantages sites released from the Green Belt might bring, for example, in terms of a sound spatial distribution strategy. We therefore support the draft Plan approach to the release of Green Belt sites adjacent to the most sustainable urban areas, particularly at the main urban area of Cannock/Hednesford/Heath Hayes. We consider that the draft Plan should allocate further sites in line with this approach, as per our responses to Questions 10, 11, 13 and 46 of these representations. Our Client's Site lies adjacent to the Cannock/Hednesford/Heath Hayes urban boundary at Wimblebury and represents a sustainable location for residential development.
			SO1.1: Protecting, Conserving & Enhancing the Distinctive Local Historic Environment
			Question 1: Do you support the preferred policy direction to protect, conserve and enhance the distinctive local historic environment?
LPPO062	Inland Waterways Association, P, Sharpe		IWA supports policy SO1.1 on the historic environment
LPPO063	Cannock Chase AONB Partnership		The policy direction is supported to ensure protection of historic assets within the AONB.
LPPO064	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We support policy option 1.1. to protect and enhance the historic Environment - particularly in respect of the Hatherton Canal on the route shown.

LPPO065	Historic England - E, Boden		<p>Historic England welcomes this policy direction on the historic Environment and has the following comments to bring the policy into greater alignment with the NPPF: - The policy should set out a positive strategy for the conservation and enjoyment of the historic Environment. - We suggest that designated and non-designated heritage assets are dealt with separately within the policy; - The policy asks for a 'Design and Access Statement' for development proposals affecting heritage assets. We recommend that the policy should require a specific 'Heritage Statement' and that this should also consider the contribution to significance made by the setting of a heritage asset and the effect of proposals therein. - We recommend that the policy includes recognition of the historic Environment as a catalyst for positive recognition of the historic Environment as a catalyst for positive regeneration. For example, with regard to new development in Conservation Areas, and within the setting of heritage assets, we suggest inclusion of a positive policy approach, to encourage development proposals to preserve elements of their setting and to enhance, or better reveal their significance. - We suggest a separate section/point within the policy on non-designated archaeology, requiring an appropriate desk-based assessment/field evaluation as necessary and setting out how development proposals affecting archaeological interests will be considered. - Great benefits can be realised from the re-use of historic buildings, but conversions/changes of use should be carried out sensitively. We suggest that consideration/guidance on this should be included within the policy. - We suggest that the scope of the policy should be widened to include measures for preserving or enhancing heritage assets, including Heritage at Risk. -With regards to the 'Explanatory Text', accompanying the draft policy, we welcome reference to the Cannock Chase District Conservation Areas Management Plan SPD, to the area-specific Management Plans relating to the individual Conservation Areas and to the Local List. These are useful sources of information and indicators about the state of the historic environment locally, and we recommend that they are kept up-to date.</p>
LPPO066	Norton Canes Parish Council		<p>The NP is proposing to consult on a list of buildings which could be candidates for local listing, to take a master planning approach to heritage-led regeneration of the former Grove Colliery and surrounding rural landscape and support Conservation Area status for the hamlet of Little Wyrley with the potential to include the industrial heritage of the former colliery and canal wharf. PO Policy S01.1 makes general reference to the protection of historic features associated inter alia with the coal industry, supports the general principle of having locally listed buildings and notes that the historic environment can act as a catalyst for positive regeneration. In addition to Policy SO1.1 the Parish Council would wish to see specific policies in the Preferred Option to support heritage led regeneration of the former Grove Colliery including permitting reasonable scope for "enabling development" which would otherwise be contrary to normal Green Belt policy together with a commitment to taking forward designation of a Conservation Area for the Cannock Extension Canal linked to the hamlet of Little Wyrley.</p>

LPPO067	Canal & River Trust - H, Smith		The canal network is a valuable reminder of the industrial heritage of the area and is a multi-functional resource which can play a wide range of roles in supporting and helping to deliver new development which can bring a variety of benefits which enhance a working heritage asset by providing an attractive and positive setting for new development as well as being an important leisure and recreational resource for both visitors and the local community, and can thus help to support social and economic regeneration schemes. Although parts of our network are within Conservation Areas and include listed assets, we strongly believe that our network as a whole forms a heritage asset, which would need to be considered as part of any future development proposals that could impact its setting. This would include the need for non-designated heritage assets to be considered and would comply within the aims of the NPPF, which asks for the effect of applications on the significance of non-designated assets to be taken into account (e.g. paragraph 197).
LPPO068	Norton Canes Councillors as at March/April 2021		We wholeheartedly agree with the Parish Council's submission regarding the recognition of the Grove Colliery site and would strongly urge officers to beef up proposals for heritage-led regeneration of this area; positive words must be matched with action. This is a key aspect of our emerging Neighbourhood Plan, we implore the District Council to work constructively and proactively with Norton Canes Parish Council and Little Wyrley Estates to realise a sensitive and varied regeneration of the site.
LPPO069	Together Active - J, Brennan		Yes support his policy direction. 6.22 but also support the inclusion of additional design standards in the Local Plan including active design principles and protection of the historic Environment. 6.25 also particularly supportive of securing the future of the Cannock Extension Canal SAC to promote both active leisure and active travel as a safe and connected cycling and walking routes.
LPPO070	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates are supportive of the general approach and that the Policy does refer to public benefits and the potential mitigation to limit harm. However, the policy could be developed further to recognise that suitable sensitive development can result in improvements to existing heritage assets.
LPPO071	Richborough Estates (Land South of Cannock Road, Heath Hayes)		Richborough Estates are supportive of the general approach and that the Policy does refer to public benefits and the potential mitigation to limit harm. However, the policy could be developed further to recognise that suitable sensitive development can result in improvements to existing heritage assets.
LPPO072	Richborough Estates (Land off Main Road, Brereton)		Richborough Estates are supportive of the general approach and that the Policy does refer to public benefits and the potential mitigation to limit harm. However, the policy could be developed further to recognise that suitable sensitive development can result in improvements to existing heritage assets.

LPPO073	Wyrley Estates	Fisher German LLP - N, Borseley	<p>The only relevant preferred policy SO1.1. In principle, the preferred policy direction is supported, but it does not go far enough to encourage the creation of new facilities in a sustainable manner, with particular reference to the Cannock Extension Canal SAC and Grove Colliery Site. A high-level Masterplan has been created, and this is attached to this representation, at appendix A. Being the last remaining evidence of the District's former mining past, it is considered that the site and its regeneration should be a key priority in the next Local Plan. The Council is asked to reconsider the matter and to include an additional specific policy which provides broad support to a leisure, recreation, and heritage-led regeneration of the former Grove Colliery site, which shall come forward as part of a masterplan framework and subject to Green Belt policy and the criteria set out in any future specific policies or guidance notes, including any subsequent Neighbourhood Plan policy. Such a policy would be NPPF compliant and provide the necessary hook for a Neighbourhood Plan policy and future collaboration to see the scheme become a reality. As mentioned above, and as set out in the NPPF, a sensitive and well-planned development scheme would have wider benefits. This would link to several other Local Plan preferred policies and objectives.</p>
LPPO074	Staffordshire County Council - J, Chadwick		<p>Firstly, it must be noted that one of the key aspirations of the emerging Local Plan to ensure that new development in the district will be accommodated whilst protecting and enhancing the historic and built environment is very much welcomed. The preferred policy direction, which sees the protection, conservation and enhancement of the distinctive local historic environment forming part of the SO1.1 is supported, however, it is suggested that consideration is given to the overall title of Strategic Objective 1 to better reflect the inclusion of the historic environment here. A suggested simple amendment could be: 'Delivering High Quality Development that is Appropriate, Distinctive, Attractive and Safe'. It is also suggested that mention of sites of archaeological interest could be specifically mentioned in SO1.1 (as is the case in Section 1.10 in the non-technical summary). With regards to the Preferred Policy Direction (page 36) where the requirement for a Design and Access Statement to be produced for all major development proposals and all Listed Building consent applications is proposed, it is recommended that this Design and Access Statement should incorporate, or be supported by a Heritage Statement which would 'describe the significance of any heritage assets affected, including any contribution to their setting' as per Para 189 of the NPPF, and where more complex remains or larger developments are being considered, then a full historic Environment Desk-Based Assessment should be prepared. In all cases these documents should be prepared at an early stage by appropriately experienced historic environment specialists and they will inform discussions with the LPA and their historic environment advisors regarding the need for and scale of any historic Environment interventions including opportunities (where appropriate) to enhance heritage assets within a scheme. Other Suggestions: 6.41 could also include reference to the Extensive Urban Surveys and historic Environment Character Assessments which form part of the evidence base.</p>

			Likewise, the Chase Through Time Project. Also, would it be appropriate to include these studies and the HIA in the list of relevant evidence on Page 39?
SO1.2: Enhancing the Quality of the Built Environment			
Question 2: Do you support the preferred policy direction to enhance the quality of the built environment?			
LPPO075	Cannock Chase AONB Partnership		The AONB would welcome reference to the need for particular attention to sympathetic design and enhancement in the AONB, as appropriate to its designated status along with sign posting potential applicants/developers to the AONB Design Guide.
LPPO076	Historic England - E, Boden		Historic England welcomes the references in this policy direction to local distinctiveness and character, in terms of heritage, as well as building materials and detailing, which offers the opportunity to enhance townscape and landscape quality through the built environment. We are also pleased to see the intention to prepare Local Design Codes for the defined Character Areas and Historic England would welcome the opportunity to engage in developing these, with regard to specific considerations for the historic environment.
LPPO077	Canal & River Trust - H, Smith		The integration of high quality proposals with existing features and facilities is important to the success of schemes. We support the wording of this policy, in particular respecting the local distinctiveness of the surroundings and the provision of access to and from nearby locations and facilities.

LPPO078	Together Active - J, Brennan		Yes support his policy and 6.55 also support the inclusion of additional design standards in the Local Plan including active design principles, and increased protection of the historic Environment. 6.61 also support in line with draft revisions (Jan 2021) of the NPPF ambition to ensure that all new streets are tree-lines and that existing trees are retained wherever possible; improves attractiveness of public help and to contribute to carbon offsetting. 6.69 Active Design is included in the list of other relevant plans and policies. This should be included in future SPDs or Design Codes.
LPPO079	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Policy SO1.2 relates to enhancing the quality of the built environment. It refers to the need to retain and enhance the distinct and separate character of each of the District's settlements. This approach has some inconsistency with the recognition in other parts of the local plan that Cannock/Hednesford/Heath Hayes have an extent merged to become a single settlement and therefore a more homogeneous character. The policy should be refined to further make clear that different approaches to character may be required depending on the location within the District. In general terms and subject to the caveats set out above the approach in the local plan is supported.
LPPO080	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Policy SO1.2 relates to enhancing the quality of the built environment. It refers to the need to retain and enhance the distinct and separate character of each of the District's settlements. This approach has some inconsistency with the recognition in other parts of the local plan that Cannock/Hednesford/Heath Hayes have an extent merged to become a single settlement and therefore a more homogeneous character. The policy should be refined to further make clear that different approaches to character may be required depending on the location within the District. In general terms and subject to the caveats set out above the approach in the local plan is supported.
LPPO081	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Policy SO1.2 relates to enhancing the quality of the built environment. It refers to the need to retain and enhance the distinct and separate character of each of the District's settlements. This approach has some inconsistency with the recognition in other parts of the local plan that Cannock/Hednesford/Heath Hayes have merged to become a single settlement and therefore a more homogeneous character. The policy should be refined to further make clear that different approaches to character may be required depending on the location within the District. In general terms and subject to the caveats set out above the approach in the local plan is supported.
LPPO082	Staffordshire County Council - J, Chadwick		Yes, the proposed policy direction to retain and enhance the district and separate character of each of the District's settlements, and deliver the highest quality of building design and layout which has been developed to enhance the District's distinctive character and heritage assets is very much supported. Also please see under Q1 above regarding what should be included/accompany a Design and Access Statement in terms of archaeology and the historic environment.

			Question 3: Should the preparation of Local Design Codes be based on the Character Areas that were included in the Cannock Chase Design SPD?
LPPO083	Cannock Chase AONB Partnership		Local Design Codes are supported as a means of ensuring development is appropriate to local character. Figure 2(P43) identifies Character Areas, of which Slitting Mill, Cannock Wood and (part of) Hazelsalde & Rawnsley fall within the AONB. The AONB would welcome reference to the recently produced AONB Design Guide to be considered alongside the Cannock Chase Design Supplementary Planning Document (2016), in these areas and across the AONB. The AONB Guide aims to promote good practice and encourage future building development that is landscape-led and would not detract from the natural beauty of the AONB. The Guide includes an overview of Cannock Chase AONB, describing its varied character and characteristic settlement types and this provides the evidence base that supports design advice. The advice (Part 2 of the Guide) covers principles of good design and detailed guidance for different types of development appropriate for the AONB, including sections on domestic development; commercial; employment & industrial development; public realm; agricultural and other rural development buildings; recreation and leisure and stabling and menages.
LPPO084	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The SPD identified 20 character areas, not all of which will be in locations where they'll be any significant development. An approach which targeted those parts of the district where development is likely to come forward would potentially be a better focus for resources. Policy SO1.3 deals with the need to deter and reduce a fear of crime.
LPPO085	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The SPD identified 20 character areas, not all of which will be in locations where they'll be any significant development. An approach which targeted those parts of the district where development is likely to come forward would potentially be a better focus for resources. Policy SO1.3 deals with the need to deter and reduce a fear of crime.
LPPO086	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The SPD identified 20 character areas, not all of which will be in locations where they'll be any significant development. An approach which targeted those parts of the district where development is likely to come forward would potentially be a better focus for resources. Policy SO1.3 deals with the need to deter and reduce a fear of crime.
LPPO087	Staffordshire County Council - J, Chadwick		Yes, and it is suggested that the (ideally updated - as per our suggestion in our response to the I&O consultation) Historic Environment Character Assessments and Extensive Urban Survey should be utilised to help better understand the special character of these areas.
			SO1.3: Creating Safe Places Which Deter Crime and Reduce the Fear of Crime
			Question 4: Do you support the preferred policy direction to create safe places which deter crime and reduce the fear of crime?

LPPO088	Brindley Heath Parish Council		Brindley Heath Parish Council has noted the significant increase in crime over the past few years within its boundaries and beyond and at the same time a drastic reduction in Police numbers. It is beyond belief that the area of Etching Hill and the Chase is covered by just two PCSOs and a visiting real Policeman, compared with other areas in the Country. This is utter stupidity and CCDC should be putting pressure on the Police Authority to improve provision across the District where night provision is probably the worst in the country.
LPPO089	Together Active - J, Brennan		Yes partially support clear sight lines for paths and cycle ways.
LPP0090	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates support this approach.
LPPO091	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates support this approach.
LPPO092	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates support this approach.
SO2.1: Safeguarding the Provision of Community Infrastructure			
Question 5: Do you support the preferred policy direction to safeguard the provision of community infrastructure?			
LPPO093	K, Jones		I have lived on the Longford Estate for 2 years. Sadly there are very poor facilities here. Is there any development of community facilities planned for the estate? For example to my knowledge the children's park on Wellington Drive has not been updated for 25years. The pavements on all roads on the estate are also in very poor condition.
LPPO094	Cannock Chase AONB Partnership		A requirement that all major development will contribute towards new community infrastructure, and amenity space is supported. The AONB welcomes a requirement to link, and to and enhance the authority's district wide green space network, particularly where this would provide alternative semi-natural recreational sites away from the AONB that could potentially help to relieve recreational pressure in the AONB, and thereby assist in delivering a more sustainable future for the AONB.

LPPO095	Norton Canes Parish Council		<p>Community Facilities - The NP is proposing a policy to protect existing community facilities comprising the Community Centre, Library, churches, church halls, pubs and clubs whereby potential loss will only be supported if a replacement facility of equal or better quality is provided or after a minimum 12 months of active marketing it is concluded that the facility is no longer viable in either its existing use or an alternative community use. PO Policy SO2.1 is supportive of the proposed NP policy so is welcomed. Education - The NP is seeking to ensure that SCC delivers appropriate improvements to primary education arising from the committed major new housing developments in the village using S106 funds and asking for an assurance that there is a secure future for Norton High School. PO Policy SO2.1 continues with the existing processes of new residential developments contributing to improvements to education arising from increases in demand generated by them via either S106 agreements or CIL. In addition, in connection with a proposed new housing allocation site C116a south of A5190 Cannock Road a capacity of approx. 885 units is needing a new primary school. It is understood that this will be delivered on land within the development. The Parish Council wishes to receive an assurance that no additional pressure will be put on the two village primary schools in the event that site C116a is confirmed as a proposed housing allocation.</p>
LPPO096	Canal & River Trust - H, Smith		<p>The Canal & River Trust generally seeks to maintain its assets in a "steady state", and this is based on current usage. Where new development has the likelihood to increase usage, this could result in additional liabilities for the Trust, from erosion and litter for example. We consider that it is reasonable to request a financial contribution from developers to mitigate this impact of additional use, which could include resurfacing works to make routes more robust, or safety improvements necessary to ensure that the network can accommodate additional users safely. Should this not be included, there is a risk that new developments could result in the degradation of existing walking and cycling routes, which could hamper efforts by the Plan to promote sustainable means of transport. Where new development has the likelihood to increase usage we consider that it is reasonable to request a financial contribution from developers to mitigate this impact by addressing issues such as those set out above. Community Infrastructure is very tightly defined by this policy to the exclusion of informal recreation which is acknowledged elsewhere within the plan to be of significant importance to the health and wellbeing of the District. Whilst CIL would allow for the funding of key infrastructure investments, as set out in the regulation 123 list, we believe there is a need for policy to identify that S106 payments may be necessary to fund improvements to accommodate the expected increased usage brought by specific developments onto our network (i.e. to mitigate any harm, and to make the development acceptable in planning terms). It is noted that the detail of the policy awaits further guidance from Government, but in doing so we suggest that mechanisms through which improvements to the canal corridors are provided are considered further ensuring that the impacts of developments on the canal network are mitigated by developers. The Trust are happy to engage further with the Authority on this.</p>

LPPO097	Brindley Heath Parish Council		Attention is needed to the educational provision across the area which is clearly failing the less academic students and leads to real difficulties to their finding suitable employment later. It is a poor reflection on the District and is the source of many later problems when schooldays are over. The provision of help to young children with special needs is very poor and requires immediate improvement.
LPPO098	Theatres Trust - T, Clarke		We welcome the Council's approach to supporting arts and cultural facilities within town centres, which is supported by policy SO2.1 which seeks to protect valued facilities. We recommend it is made clear this policy applies to cultural facilities such as theatres in accordance with the range of uses covered by paragraph 92 of the NPPF (2019).
LPPO099	Norton Canes Councillors as at March/April 2021		Since the development of the Chasewater Grange estate on the former greyhound track site on Brownhills Road, every housing site in Norton Canes has come with an allocation of money from developers for the provision of an additional primary school places in the village. We would like to stress how important it is that the more than £1 million already received from developers for this purpose is spent sooner rather than later. We are concerned with the suggestion that a new primary school could be built on the development south of Cannock Road. We would like assurances in the Local Plan that this would not affect the provision of the much-needed expansion of one of our primary schools in Norton Canes. To illustrate this point, please note that Jerome Primary School received 71 applications for 30 places for the 2021/22 school year. This high level of demand is largely being driven by the new Norton Hall Meadow estate off of Norton Hall Lane, an estate which will expand by around 200 additional homes in the coming years. We believe that a combination of a rebuilt two form entry school at the Norton Canes Primary Academy on School Road and redrawn catchment areas for the village's two primary schools is the best option to expand local capacity. We welcome the recognition on page 12 that there are concerns about local capacity for GP surgeries and would like to see this specifically mentioned in the spatial strategy for Norton Canes. The failure of local health authorities to request funding from developments for local GP provision means this is likely to be a particular pressure point in terms of local infrastructure. Residents already report difficulties in booking appointments and in addition to patients from our village, Norton Canes Health Centre serves many residents from Heath Hayes, an area identified in the Local Plan for significant housing growth.

LPPO100	Together Active - J, Brennan		Yes I wholeheartedly support this but with the emphasis on the new draft NPPF 2021 guidance for attractive pedestrian and cycle routes and the Building Better Building Beautiful Commission's recommendations on supporting walkable neighbourhoods; and emphasis that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and efforts to address climate change. PPS focuses on more formal structured use of playing pitches, but it is also important to secure, improve and increase access to informal green space necessary for leisure, recreation and play. 6.101 I support Option C but the principle of the importance of smaller local areas of green space to wellbeing and supporting climate change needs to be included in the local plan. Also support Option D 6.102 support the enhancement of opportunities to walk and cycle, the provision of adequate green space within new developments for wellbeing and physical activity - green space should be welcoming space and accessible to all and not merely adequate.
LPPO101	Sport England - R, Bahey		Sport England notes that both Policy SO2.1 and SO2.3 sets out exceptions for when development proposal will result in the reduction in the provision of active leisure and sports facilities. However, the exceptions are not consistent with each other with the wording being slightly different in the relation to the alternative provision criteria. It would also assist if a definition of active leisure and sports facilities is provided to establish where best elements of the provision would be best considered in either SO2.1 or SO2.3. It should be noted that the policies relating to open space, sports and recreational buildings and land, including playing fields should be consistent with NPPF para 97 criteria (b) and (c). Policy SO2.1 also makes reference to the co-location of community infrastructure where practicable, and the provision will be planned and phased in parallel with new development. Sport England supports this provision though consider reference to SO2.4 should also be incorporated within the policy.
LPPO102	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The Policy needs to refer to major development contributing towards new community infrastructure where no current capacity exists and where directly and proportionally applied to the proposed development and in accordance with the CIL Regulations or their equivalent successors. However, it would also be appropriate, subject to the above tests for new facilities in association with new housing developments. The policy should give recognition in general terms to new housing developments being able to deliver additional community facilities which can meet the needs not only of new residents but also of the existing community, meeting current gaps in infrastructure provision.

LPPO103	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The Policy needs to refer to major development contributing towards new community infrastructure where no current capacity exists and where directly and proportionally applied to the proposed development and in accordance with the CIL Regulations or their equivalent successors. However, it would also be appropriate, subject to the above tests for new facilities in association with new housing developments. The policy should give recognition in general terms to new housing developments being able to deliver additional community facilities which can meet the needs not only of new residents but also of the existing community, meeting current gaps in infrastructure provision.
LPPO104	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The Policy needs to refer to major development contributing towards new community infrastructure where no current capacity exists and where directly and proportionally applied to the proposed development and in accordance with the CIL Regulations or their equivalent successors. However, it would also be appropriate, subject to the above tests for new facilities in association with new housing developments. The policy should give recognition in general terms to new housing developments being able to deliver additional community facilities which can meet the needs not only of new residents but also of the existing community, meeting current gaps in infrastructure provision.
LPPO105	Inspired Villages - E, Pearce		In response to Question 5, the policy direction to safeguard the provision of community infrastructure is supported, however, alternative providers of such infrastructure should be given greater acknowledgement and support in the wording of Draft Policy SO2.1
			SO2.2: Safeguarding Health and Amenity
			Question 6: Do you support the preferred policy direction to safeguard health and amenity?
LPPO106	Cannock Chase AONB Partnership		A requirement that all major development will contribute towards new community infrastructure, and amenity space is supported. The AONB welcomes a requirement to link, add to and enhance the authority's district wide green space network, particularly where this would provide alternative semi-natural recreational sites away from the AONB that could potentially help to relieve recreational pressure in the AONB, and thereby assist in delivering a more sustainable future for the AONB.
LPPO107	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We support policy option 2.2. in respect of creating linkages to the Greenspace Network, including to the towpath of the Hatherton Canal.
LPPO108	Historic England - E, Boden		We suggest that acknowledgment of the critical role the historic environment plays in the health and welfare of individuals and communities is included within this policy.

LPPO109	Together Active - J, Brennan		Yes support this 'promote walking and cycling' needs to be strengthened to prioritising active travel through safe, integrated walking and cycling routes. Local Design Codes need to include SE Active Design Code.
LPPO110	Natural England- G, Driver		We welcome this policy direction, specifically the links to the natural environment and reducing pollution and carbon. Natural England is one of the partners involved in a project to test how to increase use and connectivity to green social prescribing in England to improve people's mental health.
LPPO111	Severn Trent		We welcome policy SO2.2 suggestion for linking to and enhancing a district wide Greenspace Network, we too recognise the multiple benefits that these can provide. We have a designated programmes seeking opportunities to collaborate with partners such as planning authorities, lead local flood authorities, the Environment Agency or community action groups, Natural England for enhancing biodiversity and implementing green infrastructure, We welcome any discussion and wish to be approachable for any such ideas. Green infrastructure and sustainable urban drainage system can provide health and amenity value as well a wider flood risk and water quality benefit, helping to protect communities from the impact of climate change.
LPPO112	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Whilst the general approach of the policy is supported certain elements either repeat what is set out in other policies (the requirements of Policy SO8.2 which is separately objected to) or are too vague to be meaningful (reference to avoiding unacceptable on-site or off-site risk or harm). In addition, reference to achieving the lowest carbon emissions that can be achieved lacks any evidential basis or method of assessment. This should be deleted. Subject to the revision set out above a general approach is supported.
LPPO113	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Whilst the general approach of the policy is supported certain elements either repeat what is set out in other policies (the requirements of Policy SO8.2 which is separately objected to) or are too vague to be meaningful (reference to avoiding unacceptable on-site or off-site risk or harm). In addition, reference to achieving the lowest carbon emissions that can be achieved lacks any evidential basis or method of assessment. This should be deleted. Subject to the revision set out above a general approach is supported.
LPPO114	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Whilst the general approach of the policy is supported certain elements either repeat what is set out in other policies (the requirements of Policy SO8.2 which is separately objected to) or are too vague to be meaningful (reference to avoiding unacceptable on-site or off-site risk or harm). In addition, reference to achieving the lowest carbon emissions that can be achieved lacks any evidential basis or method of assessment. This should be deleted. Subject to the revision set out above a general approach is supported.
SO2.3: Provision of Active Leisure and Sport Facilities			

			Question 7: Do you support the preferred policy direction to provide active leisure and sports facilities?
LPPO115	Podmore, D		Please when formulating a plan for the future, do not forget our young people. Whilst sports facilities in the area are good, entertainment and leisure for young people is abysmal. Please get fairs back to our parks as soon as possible. The majority of our pubs at least those that survive Covid are in fact now restaurants. Many of our young people have mental issues not only do they have the poison of the internet to deal with they have little in the way of entertainment or leisure as a release valve. I know that many of the issues in this letter are not of your making or your responsibility however any measures that can be taken to improve facilities, leisure and socialising for our young people should be pursued with vigour. We cannot just bung up thousands of new houses and retail parks and kid ourselves we have improved the area.
LPPO116	A, Johnson		Cannock Chase is fortunate to have two excellent sports facilities, neither of which, I believe, has been referenced nor included in the Local Plan. Hednesford Hills Raceway: The area is fortunate to have a longstanding motorsport stadium of national and international significance. It attracts competitors and spectators locally, nationally and indeed, internationally. This provides recognition of the area and benefits local services and accommodation providers. It is an important visitor attraction for the area. Several motor sport stadiums have been lost over recent years and continue to be under threat. Inclusion in the Local Plan would offer some protection to Hednesford Hills Raceway. Hednesford Hills raceway is a thriving asset for the area. I have studied to the best of my ability the requirements of the NPPF document. Inclusion of the Hednesford Hills Raceway in the Local Plan, would be consistent with the requirements of this document. Hednesford Town Football Stadium: Hednesford Town Football Club is another local sports stadium of significance that doesn't seem to have been reference in the local plan. It is another asset to the area that I believe ought to be recognised and included in the Local Plan as a facility of local, national importance and indeed, international importance having not so long ago, in 2019, hosted an England v. Brazil under 18s international match.
LPPO117	Canal & River Trust - H, Smith		Whilst this policy does support the integration of new development with links to the wider Green Space Network this is only required for major developments. Within built up areas minor proposals can have a significant affect on accessibility and legibility if not carefully designed by third parties. We would therefore support the widening of this policy to ensure that any development proposals promote active leisure.

LPPO118	Norton Canes Councillors as at March/April 2021		<p>We believe that Norton Canes has considerable potential to be a hub for outdoor recreational activity but our current infrastructure with respect to this is lacking. The canal and mineral lines that run through the village, as well as the proximity to the National Cycle Route through Chasewater, offer the potential for Norton Canes to act as a gateway for district and regional wide cycle and footpath routes that can offer access to the Cannock Chase AONB, Chasewater, the West Midlands canal network and beyond. This potential should not be underestimated, but for this we must amplify the Parish Council's suggestion that there must be a toucan crossing over the A5 to ensure a safe exit from those using the Cannock Extension Canal routes. As you are aware, Norton Canes is due to receive sums of money for sport and leisure facilities from local housing developments. Although it is recognised in the Local Plan that access to indoor sporting facilities is not good for areas like Norton Canes, we agree with the Parish Council's submission that there needs to be investment in an indoor sporting facility in the village. Furthermore, we would like to extend this suggestion to include a provision for youth facilities within that facility and the Local Plan to recognise this ambition which would go a long way to making up for provision which has been lost in the last decade, causing a range of knock-on effects for our young people. We feel that access for youth facilities would be a good way of adding value to indoor sporting facilities in the community – since the closure of the youth clubs the existing community facilities have been inadequate to accommodate more energetic youth activities such as indoor football, dodgeball and basketball.</p>
LPPO119	Together Active - J, Brennan		<p>Yes support this policy direction. Also welcome the acknowledgment that "All major development will ensure that the design and layout of the development will promote walking and cycling (in line with Policy SO5.3) and create new green infrastructure within the development which links to the wider Green Space Network" but 'promote walking and cycling' needs to be strengthened to prioritising active travel through safe, integrated walking and cycling routes. As well as formal leisure and sports facilities it is also important to protect more informal sports, recreation and play areas not covered by the PPS or Cannock Chase Sport and Leisure Facilities Needs Assessment to encourage active, healthy and integrated communities.</p>

LPPO120	Sport England - R, Bahey		Sport England notes that both Policy SO2.1 and SO2.3 sets out exceptions for when development proposal will result in the reduction in the provision of active leisure and sports facilities. However, the exceptions are not consistent with each other with the wording being slightly different in the relation to the alternative provision criteria. It should be noted that the policies relating to open space, sports and recreational buildings and land, including playing fields should be consistent with NPPF para 97 criterions (b) and (c). Sport England consider that the policy and/or its supporting text should make reference to the proposed approach as to how contributions will be sought from developments towards sports facilities (swimming pools and sports hall) and playing pitches, with reference being made to Sport England's planning tools such as Sport Facilities Calculator and the Playing Pitch Strategy New Development Calculator (NDC). The policy could also be improved by stating that proposals for active leisure and sports facilities will be supported where it meets an identified need within the Playing Pitch Strategy (and any subsequent updates). As a note Sport England would encourage the authority to undertake an annual update of its Playing Pitch Strategy to ensure that it remains robust in line with Sport England's Playing Pitch Strategy Guide (Stage E).
LPPO121	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The reference to contribution to improvement to sports/leisure facilities being linked to where additional demand is created is welcomed. However, it also should reference capacity exists so as to be compliant with national policy. Finally, not all sites are likely to be directly linked to the Green Space network so this element should be qualified.
LPPO122	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The reference to contribution to improvement to sports/leisure facilities being linked to where additional demand is created is welcomed. However, it also should reference capacity exists so as to be compliant with national policy. Finally, not all sites are likely to be directly linked to the Green Space network so this element should be qualified.
LPPO123	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The reference to contribution to improvement to sports/leisure facilities being linked to where additional demand is created is welcomed. However, it also should reference capacity exists so as to be compliant with national policy. Finally, not all sites are likely to be directly linked to the Green Space network so this element should be qualified.
			SO2.4: Providing Opportunities for Healthy Living and Activity
			Question 8: Do you support the preferred policy direction to provide opportunities for healthy living and activity?
LPPO124	Cannock Chase AONB Partnership		A requirement that all major development will contribute towards new community infrastructure, and amenity space is supported. The AONB welcomes a requirement to link, add to and enhance the authority's district wide green space network, particularly where this would provide alternative semi-natural recreational sites away from the AONB that could potentially help to relieve recreational pressure in the AONB, and thereby assist in delivering a more sustainable future for the AONB.

LPPO125	G, Green		I whole heartedly supports this and fear that our area will receive less attention in the government's drive to increase the number of cycle routes. I have responded previously to the consultation about the crematorium at Heath Hayes, suggesting that it presented an opportunity to make an off-road cycle route between Five Ways and the 'Skoda' roundabout at Burntwood, as that road is very hazardous for cyclists, and traffic is slowed down by any cyclists. I have also lobbied my MP and local councillors about this. Many people could use that road to go to work, visit people or cycle to Chasewater.
LPPO126	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We support policy option 2.4 in respect of the Green Space Network, including the towpath of the Hatherton Canal. With respect to Strategic Objective 4 , on page 86, we note and welcome the emphasis on sustainable tourism and the rural economy - to which the restoration of the Hatherton Canal contributes.
LPPO127	Canal & River Trust - H, Smith		The aims of this policy are supported and we would wish to be involved in the drafting of Local Design Code to assist further in the integration of the canals into the wider community.
LPPO128	Together Active - J, Brennan		Yes, completely support this policy and welcome the consideration of SE Active Design principles. I would like to see the SE Active Design principles formally adopted as a design code or SPD.
LPPO129	Natural England- G, Driver		We welcome this policy direction, specifically the link to human well being and environment. Long term projects such as the Midlands Heartland Heathland and Policy SO7.2: Biodiversity Net Gain will provide more green spaces for wildlife and people. Natural England continuously works on green infrastructure and has a number of publications on health and the natural environment. We are currently working on the green infrastructure standards. If you would like further information, please contact us.
LPPO130	Sport England - R, Bahey		Sport England supports the inclusion of Active Design principles and Active Travel within Policy SO2.4. The policy provides a positive and proactive approach to help address health and inactivity issues within the authority by ensuring good design which will contribute positively to making places better for people, to create environments that make the active choice the easy and attractive choice for people and communities. In relation to the policy text relating to development proposals resulting in a reduction in the Greenspace Network, this seems to be out of context with thrust of the policy. Sport England also considers that the provisions within this policy are also covered Policy SO7.8. If there is no crossover then clarity is sought as to the difference between the two policies.
LPPO131	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	In general terms Richborough Estates support the approach, however some elements of the policy are unclear. One criterion refers to providing infrastructure that will enable sport and physical activity to take place inside and around buildings. It is unclear what this policy criteria is aimed at achieving, particularly the reference to 'around buildings'. This requires further clarification. As above the contention that all sites can link to the Green Space Network needs

			amendment. Sites in the Cannock Town Centre, for instance, are unlikely to link to the Green Space Network.
LPPO132	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	In general terms Richborough Estates support the approach, however some elements of the policy are unclear. One criterion refers to providing infrastructure that will enable sport and physical activity to take place inside and around buildings. It is unclear what this policy criteria is aimed at achieving, particularly the reference to 'around buildings'. This requires further clarification. As above the contention that all sites can link to the Green Space Network needs amendment. Sites in the Cannock Town Centre, for instance, are unlikely to link to the Green Space Network.
LPPO133	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	In general terms Richborough Estates support the approach, however some elements of the policy are unclear. One criterion refers to providing infrastructure that will enable sport and physical activity to take place inside and around buildings. It is unclear what this policy criteria is aimed at achieving, particularly the reference to 'around buildings'. This requires further clarification. As above the contention that all sites can link to the Green Space Network needs amendment. Sites in the Cannock Town Centre, for instance, are unlikely to link to the Green Space Network.
			SO2.5: Allotments and Community Food Growing
			Question 9: Do you support the preferred policy direction to protect existing, and provide additional, allotments and community food growing sites?
LPPO134	Together Active - J, Brennan		Yes, welcome this policy and would welcome the provision of additional allotments and community food growing sites which can help reduce food mileage and reduce carbon emissions.s.
LPPO135	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates supports the overall objective set out in the policy. Reference could be given to support being given for new developments which can deliver additional allotments/community food growing sites. In particular it is new housing development that is the potential delivery mechanism for new facilities of this type and this ought to be recognised in the policy.
LPPO136	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates supports the overall objective set out in the policy. Reference could be given to support being given for new developments which can deliver additional allotments/community food growing sites. In particular it is new housing development that is the potential delivery mechanism for new facilities of this type and this ought to be recognised in the policy.

LPPO137	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates supports the overall objective set out in the policy. Reference could be given to support being given for new developments which can deliver additional allotments/community food growing sites. In particular it is new housing development that is the potential delivery mechanism for new facilities of this type and this ought to be recognised in the policy.
LPPO138	Staffordshire County Council - J, Chadwick		Yes, these provide small areas of linking habitat in otherwise poor areas. New allotments should be designed with good biodiversity principles in mind too.
			SO3.1: Provision for New Homes
			Question 10: Do you agree that the amount of housing proposed will meet the local needs of Cannock Chase District as required by the standard methodology?
LPPO139	Walsall Council - N, Ball		Our representations at Issues and Options stage endorsed Option D, the highest figure with a proposal for 2,500 homes beyond local need to contribute to the requirements of Birmingham and the Black Country. This would have resulted in the plan containing a total housing target of 7,612 homes, or 423 dwellings per annum. We noted that between 2010/11 and 2015/16 the net total number of residents exported from the Black Country to Cannock Chase was 4,450 people (278 per annum). Looking in more detail at the migration data for 2016 – 2017, there was a net-inflow of 480 people to Cannock Chase from the Black Country. Our more recent household migration data suggest that between 2002 and 2019 there was net inflow of 5,596 people moving from the Black Country to Cannock Chase (the equivalent of 321 pa annum). The current draft of the Plan has extended the plan period from 2036 to 2038, which means that there is a commensurate increase in the housing requirement to meet local need. The national methodology used in the standard method to calculate local housing need means that the precise figure changes each year, but in the case of Cannock Chase this has only resulted in the local housing need reducing by 1, from 277 to 276 dwellings per annum. However, the Plan only proposes to offer 500 homes to meet the needs of Birmingham and the Black Country, or only 25 per year. The migration data suggests that the net local housing need of Cannock Chase almost entirely comprises migration from the Black Country. It is unclear what the total housing target would be. Policy SO3.1 states Housing provision will be made for a minimum of 5,516 dwellings (net) to meet the objectively assessed local housing needs, and ensuring a sufficient supply of deliverable and developable land is available to deliver around 276 dwellings each year. Housing provision will be made for a minimum of 5,516 dwellings (net) to meet the objectively assessed local housing needs, and ensuring a sufficient supply of deliverable and developable land is available to deliver around 276 dwellings each year. This would imply that the actual total target would be 6,016, however this is considerably lower than the target of 7,612 under Option D in the Issues and Options consultation, despite the Plan now intending to cover an additional two years. Paragraph 6.155 of the Plan states Representations to the Issue and Options consultation showed that the majority of

			<p>respondents considered the higher levels of growth options C and D should be chosen, this reflects the larger number of responses from site promoters. The majority of individual responses preferred the options supporting the lower levels of growth. Representations were received from neighbouring authorities who considered that the option A was unlikely to assist in meeting the cross boundary needs that were known at the time. Paragraph 6.154 acknowledges that a large proportion of the potential site options available to meet the unmet need lie within the Green Belt, however it is unclear from the Plan what the total capacity of non-Green Belt sites would be.</p>
LPPO140	J, Astbury		<p>No more housing developments in Heath Hayes. Excessive in terms of numbers proposal, locations; (Protect & Preserve Green Belt). Loss of village identity. Infrastructure of Roads, in particular Five Ways Island (Clean Air Enforcement Required). Too much saturation concentrated on one community.</p>

LPPO141	Bromford Housing Group	PlanIt Planning and Development - J, Williams	<p>Policy SO3.1 advises that provision will be made for a "minimum" of 5,516 dwellings (275.8dpa) during the period 2018-2038 to meet the objectively assessed local housing needs of the District. In addition, provision will be made for 500 dwellings (25dpa) to help meet the unmet needs of neighbouring authority areas. We have concerns with both aspects of the proposed housing requirements. The NPPF advises at paragraph 60 that when quantifying the minimum number of homes needed, strategic policies should be informed by a Local Housing Needs Assessment, conducted using the "Standard Method" as set out in the NPPG, unless exceptional circumstances justify an alternative approach. In addition to the Local Housing Needs figure, any needs that cannot be met in neighboring areas should also be taken into account in establishing the amount of housing to be planned for. In the first instance it is, therefore, necessary to use the Standard Method to identify the required minimum number of homes. It is then necessary to consider whether there is any additional evidence to increase the housing requirement beyond the Standard Method figure. Applying the Standard Method in Cannock Chase results in a minimum housing needs figure of 276dpa, and this is carried forward into the Preferred Options consultation version of the Local Plan without any form of amendment. There are however a number of considerations which suggest that the housing requirement should be increased significantly beyond the Standard Method figure 1) Delivering Affordable Housing Footnote 23 of the Preferred Options plan confirms that the annual need for affordable housing is 110dpa. This is equivalent to 40% of the total housing requirement. The principal delivery mechanism during the course of the Plan period will be through S106 Agreements. The emerging Plan only requires 20% affordable housing provision on qualifying sites due to viability constraints. A number of residential development sites will fall below the 10 units threshold and will not deliver affordable housing at all. The emerging Plan is, therefore, not capable of delivering a quantum of affordable housing required for the District. One way of addressing this would be to increase the overall housing requirements. That way a greater number of affordable houses could be provided. It is our view that the housing requirement for the Plan should have been increased to assist in the delivery of affordable housing. 2) Up to date Household Projections The current version of the Standard Method is based upon the application of 2014 household projections. These household projections are, however, out-of-date. The most recent household projections have a base date of 2018. The 2018 household projections advise that in 2018 CCDC had a population of 42,982. By 2038 this is predicted to increase to 50,696. This amounts to an increase of 7,714 households during the course of the 20 year plan period. This is equivalent to 385.7 households per annum. The emerging Plan is planning for significantly fewer homes than is required to meet the projected household growth within the District. There is no explanation within the Plan, or any other supporting evidence base document, to explain how the 2018 household projections have been considered in the context of the Standard Method housing figure. This is, in our view, a significant omission.</p>
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		<p>The growth strategy in the emerging plan will result in households either leaving the District, or becoming "concelaed" households, due to a shortfall in provision. 3) Preventing Economic Decline It is confirmed at page 7 of the emerging Plan that the 2018 based population estimates suggest that the population profile of the District will change during the course of the Plan period. There is expected to be a rise in the proportion of older residents in the District compared to other age groups. The emerging Plan rightly seeks to support economic growth. The housing figure should be increased upwards to ensure that a sufficient number of people of working age are retained in the District to support its economic base. The 500 dwellings proposed to support the growth requirements of the conurbation is not based upon robust evidence. The Birmingham Development Plan was adopted in Jan 2017. Policy PG1 - Overall Levels of Growth, advises that 89,000 dwellings are required to meet the growth requirements of Birmingham between 2011 and 2031. It is not, however, possible for this quantum of development to be accommodated within Birmingham's administrative area. As such the BDP makes provision for the development of 51,100 dwellings. The shortfall of 37,900 dwellings is expected to be met in the other authorities and HMA, including Cannock Chase. The City's most recent AMR 2019-2020 advises that a review of the Plan is not yet required. There is no suggestion that Policy PG1 requires amending in part of whole. As such the shortfall figure remains real and robust. Whilst the City Council have produced a SHLAA that suggests that there may be greater urban capacity than previously expected, the SHLAA confirms that not all sites identified would be suitable for planning permission. Clearly, just because a site is included in the SHLAA does not mean that it will come forward for residential development or a planning application will be approved if it is submitted. The fact that there is a more up-to-date SHLAA does not, therefore, reduce the housing shortfall identified by PG1. There are also other related matters which are a concerns; these are: - The revised changed to the Standard Method increase Birmingham's housing requirement significantly. The adopted BDP plans for 4,450 dpa. The changes to the Standard Method put in place a minimum housing requirement of 4,829 dwellings for Birmingham. - The BDP Plan period runs to 2030. The Cannock Chase Plan period runs to 2038. There will be a housing shortfall in Birmingham between 2030 and 2038 that needs to be accommodated in other local authoirty areas. It is not catered for in the emerging Cannock Chase Plan. In terms of the Black Country housing shortfall the Black Country authorities produced and I&O Black Country Core Strategy in June 2017. This document identiied a housing requirement of 78,000 dwellings for the Black Country authority. However, it is established that only 56,000 of these dwellings could be accommodated within the ruban area. This left a housing shortfall of approximately 22,000 dwellings. As referred to in paragraph 6.180 of the Preferred options Cannock Chase Plan, the Black Country authorities have more recently announced that they have a housing shortfall of 29,260 dwellings. The total housing conurbation shortfall is in the region of 67,160 dwellings. Cannock Chase has offered to accommodate 500 dwellings which is the equivalet of</p>
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			<p>0.7% of the entire shortfall. As detailed in paragraph 6.179 of the Preferred Options document South Staffordshire, by way of example, is proposing to deliver nine times this amount of development to meet the growth requirements of the conurbation. Drawing upon this, it is our view that the housing requirement should be increased significantly and, consequently, additional allocations will need to be included the Plan.</p>
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LPPO142	KGL (Estates) Ltd	J, Heminsley	<p>Land South of Cannock Road A5190 Heath Hayes SHLAA Site C116(c): These representations propose that the site be included in the land to be released from the Green Belt for housing development during the new Local Plan period to 2038. The evidence to justify release of the site has been obtained from the Preferred Options document itself, with all the relevant background information relating to formulation of proposed policy SO3.1 in addition the contents of the 2020 SHLAA, the Cannock Chase Development Capacity Study and The Green Belt Study Part 2 March 2021 have been examined. KGL (Estates) Ltd is intending to work with Cameron Homes to bring the site forward for development of approximately 160 units with a range of market and affordable homes. A separate statement has been produced by Cameron Homes in this regard.</p> <p>Description of Site: The site with a total area of 7.93ha largely comprises low grade grazing land divided into three main fenced enclosures together with an area of unmanaged deciduous woodland containing a pond (approx.2.8ha) through which runs the Newlands Brook. The woodland continues to the west of the site onto land within proposed housing site SH1.</p> <p>[...]Adjoining the site to the east is a detached dwelling associated within a petrol station and vehicle hire business, beyond which are two storey dwellings with long gardens backing on to gardens of dwellings fronting eastern end of Newlands Lane. [...].</p> <p>Case for release of the KGL Land: The components of the case for release of the site are as follows: 1. The site is identified in the Green Belt study as contributing less overall value to the main functions of a Green Belt than the land to the west being proposed for release. If not developed it would comprise a small area of open land sandwiched between existing and proposed housing developments, which could make no significant contribution to any of the functions of Green Belts identified in the NPPF. 2. The site has the same sustainability credentials as the adjoining land to the west with no constraints on deliverability. In relation to sustainability it is a more appropriate location than land east of Wimblebury Road which is also proposed for release from the Green Belt for housing. 3. The Council is likely to come under considerable pressure to offer more than a contribution of 500 units to the wider GBBCHMA housing shortfall currently proposed in order to fulfil its duty to cooperate. 4. A number of sites in the 2020 SHLAA and Urban Capacity Study identified as deliverable in the 5 to 15 year period have significant constraints on development and it is considered that the Council has overestimated the contribution these can make to overall supply. 5. The KGL site can make contributions via a S106 agreement and/or CIL to the local infrastructure needed to support the proposed housing developments in this part of the District comprising a primary school, improvements to Five Ways Island, new and improved open spaces, improvements to biodiversity and access to the countryside. 6. The site can be developed with around 160 units via a single access to Cannock Road and there is a housebuilder in a position to deliver the development in the short to medium term.</p> <p>1. Green Belt Having considered all other options within the urban areas of the District the Council has decided that it needs to release Green Belt land for housing development in order to meet its locally generated housing need plus</p>
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			<p>a small contribution to the wider GBBCHMA need which cannot be met within the West Midlands conurbation. [...]. The most strategic and largest proposed releases are sites SH1 south of A5190 in Norton Vanes Parish but adjoining existing housing areas in Heath Hayes and SH2 east of Wimblebury Rd Heath Hayes with a combined capacity of 1285 units of which 875 are on site SH1. The Council commissioned a detailed Green Belt study to help inform choices on release of sites analysing the contributions to the purposes of GBs/potential harm of release. Of the five criteria in the NPPF, preserving the setting and special character of historic towns was not considered to be relevant to Cannock Chase District and assisting in urban regeneration was considered to be of equal weight in all cases. [...].</p>
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		<p>Site SH1 was assessed as high and Site SH2 was assessed as moderate/high but nevertheless both sites have been chosen on the basis of best strategic fit and having no "show stopping" environmental constraints such as AONB and Nature Conservation designations. The KGL land is assessed as partly moderate/high and partly high, so overall less harm than site SH1 which it adjoins. As noted in the site description it is less prominent in the currently rural landscape than site SH1 which rises rather than falls away from the A5190 and has a much more open prospect. If not released for development the site would be sandwiched between the proposed development at SH1 and existing housing/commercial development on the south side of Cannock Road, in both cases extending south to Newlands Lane. It would therefore make no contribution to checking the unrestricted spread of large built up areas nor preventing neighbouring towns merging from one another. The site would no longer be seen as a significant area of open countryside but would be dominated by urban development on three of four boundaries. The southern boundary of Newlands Lane would form a very defensible new Green Belt boundary as described above, which has been accepted as an appropriate boundary for site SH1 to the west. So there is no logical reason for excluding the KGL land from the proposed strategic Green Belt release south of the A5190. The other site proposed for release to the west of Newlands Lane is dominated by the substantial mounds of the Poplars landfill site which is operational with no agreed end date. It is unlikely to be a site which would be attractive to housing developers.</p> <p>2. Sustainability Issues</p> <p>Having made the decision that SH1 is the most sustainable location for a major urban extension in the Green Belt there is no logical reason on sustainability grounds for excluding the KGL land. It is equally accessible by public transport to Cannock, Burntwood, Brownhills and Lichfield and within reasonable distance of Cannock railway station. It is also easily accessible to local shopping facilities in Hednesford Road Heath Hayes and the Hawks Green District Centre. In relation to these matters the site is better located than proposed site SH2. A new primary school is proposed on site SH1.</p> <p>3. Wider housing supply issues across the GBBCHMA</p> <p>The Council acknowledges that it will need to make a contribution to the shortfall in housing land supply in the wider GBBCHMA and the Preferred Option offers a figure of 500. South Staffordshire and Lichfield are proposing contributions of 4000 and 2665 respectively including releases of Green Belt Land. The ABCB has formally requested the authorities in the GBBCHMA, including Cannock Chase District, to assist in meeting unmet needs. Cannock Chase Council will need to be part to a "duty to cooperate" agreement across the wider HMA in order for its Local Plan to be found sound.</p>
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		<p>It is very unlikely that the current offer of 500 units will be sufficient to achieve an agreement. Including the KGL site for housing can clearly assist with moving towards an agreement without damaging the overall strategy put forward in the Preferred Options. 4. SHLAA and Urban Capacity Figures For several reasons it is considered that there is some uncertainty that a number of sites identified as deliverable will in fact come forward during the proposed plan period. There is an inherent conflict between proposed policies in the Preferred Options which proposed protection of existing industrial estates/business parks for employment use and sites in these locations which are included in the SHLAA for residential development. SHLAA sites C220a and C220b with a combined capacity of 67 units are included in the 15-year developable category but are both within industrial estates in the Hawks Green area identified for protection and are both occupied by businesses. R43a and R43b (also identified in Table C in the Preferred Options Document) at Redbrook Lane industrial estate Brereton with a combined capacity of 93 are currently fully occupied by a major logistics company. The western edge of the site also has a historic underground fire in a former railway embankment which would be extremely expensive to resolve to enable residential development to be achieved but it is nevertheless identified as developable. These four sites have been included in the SHLAA for many years with no evidence of progress having been achieved to bring forward residential development. None of the town centre sites identified in tables B and C in the Preferred Options document have schemes that have been worked up and tested for viability. [...]. For the record the former Aelfgar School site in Rugeley has a capacity of 58 dwellings (planning permission recently granted) not 85 as recorded in Table C. So in conclusion it is considered that expected contribution to housing supply from these sites is likely to be overestimated. 5 Planning Obligations and CIL Development of the KGL site can deliver improved public access to and management of the woodland which extends along the western site of the site and links with another part of the same area of woodland on site SH1. In addition either via a planning obligation and/or CIL the development can make appropriate contributions to the major infrastructure items identified in the Preferred Options, the proposed primary school, country park and a solution to the problem of congestion at Five Ways Island. 6 Delivery of housing requirement Please see separate letter from Cameron Homes Ltd confirming their intentions to progress an agreement with KGL to deliver a comprehensive housing development on the site.</p>
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LPPO143	Hazel Slade & Rawnsley Community Association - D, Williams		<p>The association agree that a need for new housing has to be met, and that consultation with those most affected (i.e. residents) is a key part of the process of determining where the preferred locations should be. However we do not agree that the provision of new homes should be guided by the supply side of the housing market. We strongly object to outside organisations with wide ranging commercial objectives associated with the housing market should be able to exercise influence in a process left by our democratically elected representatives. It is not acceptable that development promoters should be a valid determinant of how and where development should take place. (page 64 para 6.155). It may be inevitable that neighbouring authorities would not consider that option A (page 64 para 6.152) would not deliver the requisite volume of new build homes that pressure on availability in their own area struggles to meet. We recognise the obligation to cooperate with neighbours in this regard, but do not consider it is inevitable that provision should be made for their lack of capacity without the most rigorous demonstration of need. The amount of housing need should be constrained to Option A levels.</p>
LPPO144	Canal & River Trust - H , Smith		<p>A number of existing and allocated residential areas lie adjacent to the Trent and Mersey Canal in Rugeley. This includes the residential site allocations (H49; H52; and H20). The ecological network provided by the canal should be considered an integral part of the design of such allocated sites, to secure measurable net gains for biodiversity and contribute to climate change resilience with air, water, soil, noise and light pollution avoided or mitigated, as per Objectives 7 and 8 of the Local Plan Policy Options document.</p>
LPPO145	Brindley Heath Parish Council		<p>Currently we are not meeting our local need but simply catering for the desires of people within the West Midlands to move from their town homes to a more rural aspect. The majority of new build are 3/4/5 bed houses with hardly any social or renting dwellings. This reflects the greed of both the developers and the Council and is not in the interests of less affluent families and individuals within the District. We do not recognise the figure of 5,516 as being anything but a shot in the air by regional planners and then imposed on our District Council. Over recent years, this area has provided more expensive housing than enough outsiders and needs to get to grips with its own needs. The proposal of 20% social and renting housing in the future is a pipe dream - it has not been achieved in the past and would not be entertained by the developers in the future. The density of housing today is deplorable. It is a disgrace in this day and age and once again reflects the greed of both the developers and this Council. Gardens are the size of postage stamps and hark back to the days of Victorian mass housing. It is little wonder that these families have to get in their cars and come to the AONB or other recreational areas to enjoy a little space. The car parking provision for flats and similar developments is woeful given that couples and families tend to have two cars and thus the surrounding streets become blocked with parked cars. At the very least there should be an off-road space for each dwelling.</p>

LPPO146	Home Builders Federation - S, Green	<p>As set out in the 2019 NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period (para65)). The determination of the minimum number of homes needed should be informed by LHN assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). In Cannock Chase, there are no exceptional circumstances to justify an alternative approach. The NPPG sets out the standard methodology for calculating the LHN figure using demographic data and an affordability adjustment. Using the standard methodology, the minimum LHN for Cannock Chase is 276 dwellings per annum based on 2014 SNHP, 2020 as the current year and 2019 affordability ration of 6.73. As set out in the NPPG, the LHN is calculated at the start of the plan-making process but this number should be kept under review and when appropriate revised until the Local Plan is submitted for examination. The minimum LHN for the District may change as inputs are variable. The minimum LHN for Cannock Chase based on 2014 SNHP, 2021 as the current year and 2020 affordability ration of 6.72 increases to 317 dwellings per annum. The NPPG clearly states that the standard methodology is the minimum starting point in determining the number of homes needed. The NPPG explains that "circumstances" may exist to justify a figure higher than the minimum LHN. The "circumstances" for increasing the minimum LHN are listed in the NPPG including, but not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous level of housing delivery/assessments of need, which are significantly greater than the outcome from the standard methodology. The NPPG indicates that if previous housing delivery has exceeded the minimum LHN, the Council should consider whether this level of delivery is indicative of greater housing need. It is noted that the 2020 Housing Delivery Test Results identify housing completions of 930 dwellings in 2019/20, which exceeds the proposed minimum LHN of 276 dwellings per annum and the adopted Local Plan housing requirement of 241 dwellings per annum. The Council should consider if there are "circumstances" to justify a housing requirement above the minimum LHN. Th 2019 NPPF seeks to achieve sustainable development by pursuing economic, social and environmental objectives in mutually supportive ways (para 8.). The Council should be seeking to support the long-term sustainability of the District by achieving a sustainable balance between employment and housing growth. The Council should also recognise economic benefits of housing development in supporting local communities as highlighted by the HBF's latest publication Building Communities - Making Place A home (Autumn 2020).</p>
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		<p>The Housing Calculation based on The Economic Footprint of House Building (July 2018) commissioned by the HBF estimates for every additional house built in Cannock Chase the benefits for the local community include creation of 3 jobs (direct & indirect employment), financial contributions of £27, 754 towards affordable housing, £806 towards education, £297 towards open space/leisure, £1, 129 extra in Council Tax and £26, 339 spent in local shops. The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. As set out in the NPPG, an increase in the total housing figures may be considered where it could help deliver affordable housing. The NPPG also sets out that households whose needs are not met by the market, who are eligible for one or more of the types of affordable housing as defined in Annex 2: Glossary of the 2019 NPPF, should be considered in need of affordable housing. The Council's calculation of affordable housing need may be significant in comparison to the minimum LHN. The HBF acknowledges that the Council may not be able to meet all affordable housing needs but a housing requirement above the minimum LHN will make a greater contribution to delivering more affordable housing. As set out in the NPPG, the Government is committed to ensuring that more homes are built and support ambitious Councils wanting to plan for growth. The NPPG states that a higher figure "can be considered sound" providing it "adequately reflects current and future demographic trends and market signals". However, the NPPG does not set any limitations on a higher figure, which is a matter of judgement. The Government's objective of significantly boosting the supply of homes set out in the 2019 NPPF remains (para 59). A housing requirement above the minimum LHN would support economic growth, deliver more affordable housing and contribute to any arising unmet housing needs from neighbouring authorities.</p>
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LPPO147	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	<p>Richborough Estates support the general approach of Policy SO3.1 in providing to meet the objectively assessed local needs for Cannock District and also contributing towards the unmet needs in neighbouring areas. However, utilisation of the standard method alone does not take account of the need to address the economic growth aspirations of both the Local Plan itself, the District Council and its membership of the two principal LEPs. The level of housing provision set out in Policy SO3.1 should include an uplift to take account of these economic factors. In addition, the level of contribution being made towards meeting the undersupply in the wider HMA of 500 dwellings is considered inadequate in the context of neighbouring authorities, the sustainability of the District and in particular some of the settlements within it and the need to meet that unmet housing need as close as possible to where the need is being generated, i.e. the West Midlands Conurbation. Cannock Chase District is located immediately adjacent to the conurbation, is relatively sustainable with good transport links into the conurbation and could meet a higher proportion of the unmet need in a manner which would be more sustainable than it being met in further distant locations. There is limited evidence available to substantiate how the 500 dwelling contribution has been identified. As a comparison it is notable that for the period 2018-2020 the supporting text within the Local Plan Preferred Options identified that the District had completed 1,124 dwellings which equates to an annual delivery of 562 dwellings. This single year of completions exceeds the amount of contribution towards the unmet needs of the GBBCHMA. It is clear from both the comparison and the contributions being made by others in similarly constrained Green Belt locations (South Staffordshire DC and Lichfield DC) that the contribution by Cannock Chase is not proportionate. The supporting text of Policy SO3.1 includes Table A, Table B and Table C. With regards to Table C these all represent in effect windfall sites which the Council have already made an allowance for in their housing supply and as a consequence could result in double counting. Furthermore, the veracity of the Development Capacity Study is open to some debate when it includes numerous sites which are still in operation for alternative uses which may prohibit their potential redevelopment for housing e.g. the Beecroft Road car park, Danilo Road car Park or Park Road bus station. There is significant doubt that a large number of their sites will come forward in the LP period. The policy also fails to identify any remedial measures that would result if housing did ever fall below targets and the Council were not able to establish a five-year supply. Policy SO3.1 should deal with this issue based on the principles established in the Spatial Strategy, however, the Spatial Strategy is not set out clearly within any of the Local Plan documents. This would be necessary to provide a clear foundation to both the approach within the Local Plan itself and circumstances when housing delivery may be falling short of the requirement. Whilst the plan identifies the key and most sustainable settlements within the District this ought to be set out in a specific overarching policy. The settlements identified should be referred to and are: Cannock/Hednesford/Heath Hayes, Rugeley/Brereton, Norton Canes. Lastly, it is not clear why the Council is utilising 2018 as a base-date for the Local</p>
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			<p>Plan. Given that the Plan is not anticipated to be adopted until 2023, it will therefore already be five years into the plan period upon adoption. Indeed, if this date slipped further and the Plan was adopted past 2023 the Plan will have less than 15years to run. Moving the plan-period forward to 2019-2039 would reduce this risk.</p>
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LPPO148	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	<p>Richborough Estates support the general approach of Policy SO3.1 in providing to meet the objectively assessed local needs for Cannock District and also contributing towards the unmet needs in neighbouring areas. However, utilisation of the standard method alone does not take account of the need to address the economic growth aspirations of both the Local Plan itself, the District Council and its membership of the two principal LEPs. The level of housing provision set out in Policy SO3.1 should include an uplift to take account of these economic factors. In addition, the level of contribution being made towards meeting the undersupply in the wider HMA of 500 dwellings is considered inadequate in the context of neighbouring authorities, the sustainability of the District and in particular some of the settlements within it and the need to meet that unmet housing need as close as possible to where the need is being generated, i.e. the West Midlands Conurbation. Cannock Chase District is located immediately adjacent to the conurbation, is relatively sustainable with good transport links into the conurbation and could meet a higher proportion of the unmet need in a manner which would be more sustainable than it being met in further distant locations. There is limited evidence available to substantiate how the 500 dwelling contribution has been identified. As a comparison it is notable that for the period 2018-2020 the supporting text within the Local Plan Preferred Options identified that the District had completed 1,124 dwellings which equates to an annual delivery of 562 dwellings. This single year of completions exceeds the amount of contribution towards the unmet needs of the GBBCHMA. It is clear from both the comparison and the contributions being made by others in similarly constrained Green Belt locations (South Staffordshire DC and Lichfield DC) that the contribution by Cannock Chase is not proportionate. The supporting text of Policy SO3.1 includes Table A, Table B and Table C. With regards to Table C these all represent in effect windfall sites which the Council have already made an allowance for in their housing supply and as a consequence could result in double counting. Furthermore, the veracity of the Development Capacity Study is open to some debate when it includes numerous sites which are still in operation for alternative uses which may prohibit their potential redevelopment for housing e.g. the Beecroft Road car park, Danilo Road car Park or Park Road bus station. There is significant doubt that a large number of their sites will come forward in the LP period. The policy also fails to identify any remedial measures that would result if housing did ever fall below targets and the Council were not able to establish a five-year supply. Policy SO3.1 should deal with this issue based on the principles established in the Spatial Strategy, however, the Spatial Strategy is not set out clearly within any of the Local Plan documents. This would be necessary to provide a clear foundation to both the approach within the Local Plan itself and circumstances when housing delivery may be falling short of the requirement. Whilst the plan identifies the key and most sustainable settlements within the District this ought to be set out in a specific overarching policy. The settlements identified should be referred to and are: Cannock/Hednesford/Heath Hayes, Rugeley/Brereton, Norton Canes. Lastly, it is not clear why the Council is utilising 2018 as a base-date for the Local</p>
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			<p>Plan. Given that the Plan is not anticipated to be adopted until 2023, it will therefore already be five years into the plan period upon adoption. Indeed, if this date slipped further and the Plan was adopted past 2023 the Plan will have less than 15years to run. Moving the plan-period forward to 2019-2039 would reduce this risk.</p>
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LPPO149	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	<p>Richborough Estates support the general approach of Policy SO3.1 in providing to meet the objectively assessed local needs for Cannock District and also contributing towards the unmet needs in neighbouring areas. However, utilisation of the standard method alone does not take account of the need to address the economic growth aspirations of both the Local Plan itself, the District Council and its membership of the two principal LEPs. The level of housing provision set out in Policy SO3.1 should include an uplift to take account of these economic factors. In addition, the level of contribution being made towards meeting the undersupply in the wider HMA of 500 dwellings is considered inadequate in the context of neighbouring authorities, the sustainability of the District and in particular some of the settlements within it and the need to meet that unmet housing need as close as possible to where the need is being generated, i.e. the West Midlands Conurbation. Cannock Chase District is located immediately adjacent to the conurbation, is relatively sustainable with good transport links into the conurbation and could meet a higher proportion of the unmet need in a manner which would be more sustainable than it being met in further distant locations. There is limited evidence available to substantiate how the 500 dwelling contribution has been identified. As a comparison it is notable that for the period 2018-2020 the supporting text within the Local Plan Preferred Options identified that the District had completed 1,124 dwellings which equates to an annual delivery of 562 dwellings. This single year of completions exceeds the amount of contribution towards the unmet needs of the GBBCHMA. It is clear from both the comparison and the contributions being made by others in similarly constrained Green Belt locations (South Staffordshire DC and Lichfield DC) that the contribution by Cannock Chase is not proportionate. The supporting text of Policy SO3.1 includes Table A, Table B and Table C. With regards to Table C these all represent in effect windfall sites which the Council have already made an allowance for in their housing supply and as a consequence could result in double counting. Furthermore, the veracity of the Development Capacity Study is open to some debate when it includes numerous sites which are still in operation for alternative uses which may prohibit their potential redevelopment for housing e.g. the Beecroft Road car park, Danilo Road car Park or Park Road bus station. There is significant doubt that a large number of their sites will come forward in the LP period. The policy also fails to identify any remedial measures that would result if housing did ever fall below targets and the Council were not able to establish a five-year supply. Policy SO3.1 should deal with this issue based on the principles established in the Spatial Strategy, however, the Spatial Strategy is not set out clearly within any of the Local Plan documents. This would be necessary to provide a clear foundation to both the approach within the Local Plan itself and circumstances when housing delivery may be falling short of the requirement. Whilst the plan identifies the key and most sustainable settlements within the District this ought to be set out in a specific overarching policy. The settlements identified should be referred to and are: Cannock/Hednesford/Heath Hayes, Rugeley/Brereton, Norton Canes. Lastly, it is not clear why the Council is utilising 2018 as a base-date for the Local</p>
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			<p>Plan. Given that the Plan is not anticipated to be adopted until 2023, it will therefore already be five years into the plan period upon adoption. Indeed, if this date slipped further and the Plan was adopted past 2023 the Plan will have less than 15years to run. Moving the plan-period forward to 2019-2039 would reduce this risk.</p>
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LPPO150	Inspired Villages - E, Pearce		<p>In response to Question 10, the target of 4% of new dwellings to be provided for nursing homes and residential institution is not considered to sufficiently address the current and projected ageing population of the District and would conflict with the strategic objective 3 which explicitly aims to provide "housing choices for an ageing population". The provision of choice for the elderly, including housing and care options, are also reference on Page 63 of the Preferred Options Consultation Document. The Planning Practice Guidance advises that plan-making authorities "could also provide indicative figure figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period"(Paragraph: 006 Reference ID: 63-006-20190626). This emphasis is in accordance with the PPG identifying that the need to provide housing for older people is 'critical', the only group identified as such in national policy guidance (Paragraph: 001 Reference ID: 63-001-20190626).We would recommend Cannock Chase District Council to commission an older persons housing need assessment to fully understand the current provision of different forms of housing for older people, and projected demand across different tenures and types, including retirement communities. Following such an assessment, the Council should include a specific policy identifying a minimum provision of specialist housing for older people.</p>
LPPO151	Bloor Homes Ltd	Define Planning & Design Ltd - M, Rose	<p>Housing Requirements: Bloor Homes Ltd (BHL) welcome the recognition throughout the plan that the District must meet its own local housing need (LHN) as well as make a contribution towards the unmet needs arising elsewhere in the GBBCHMA, and recognise that this approach is wholly in accordance with the requirements of the NPPF. BHL do, however, dispute the level of the contribution to be made to meeting the unmet needs of the wider HMA, and as such are not in agreement with the overall level of growth specified by Policy SO3.1. Policy SO3.1 as currently drafted sets out [...]. That is, CCDC effectively identify an overall requirement of 6,116 dwellings, albeit that housing requirement is not explicitly stated within the policy as NPPF paragraph 65 requires. Whilst BHL has no objection to the minimum housing requirement being based upon the LHN figure of 5,516dpa (276dpa), which has been calculated in accordance with the Government's Planning Practice Guidance (PPG), it does not agree that a contribution of 500 dwellings to the unmet needs arising in the wider HMA is sufficient or appropriate. Rather, it is BHL's position that an increased contribution should be made to reflect the perilous housing supply position that BCC and the Black Country Authorities are in. Indeed, the latest GBBCHMA Position Statement (July 2020) found that, whilst the unmet need from BCC had reduced to 2,597 dwellings in the period to 2031, there would still be a significant shortfall beyond 2031 (the scale of which is currently unknown), and that there is an anticipated shortfall of 7,485 dwellings arising from the Black Country Authorities alone in the period to 2031, and a further 20,000 dwellings post-2031. As CCDC's emerging plan period runs to 2038, it should take into consideration the shortfall both prior to and post-2031. However, that position does not take into account the Government's current approach to the calculation of LHN in urban areas. The updated PPG</p>

			<p>specifies that urban areas including Birmingham and Wolverhampton should apply a 35% uplift above the authority's LHN to boost housing delivery. Both BCC and the Black Country authorities will now have yet more substantial shortfalls both in the period to 2031 and post-2031 as a result of that. CCDC's March 2021 Sustainability Appraisal Report/ Integrated Impact Assessment assesses at Page 682 the SA outcomes for the overall housing growth policy options that were considered, including a contribution of 500 dwellings as pursued (Option B), 1,500 dwellings (Option C) and 2,500 dwellings (Option D).</p>
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		<p>That assessment finds that Options C and D have an identical assessment to Option B (the chosen option) but for a potentially (i.e. uncertain) greater negative impact on Previously Developed Land (PDL) and a potential (again, uncertain) negative impact on housing; which appears somewhat counter-intuitive given that the delivery of more houses does not impact upon the delivery of PDL sites, and will unlock greater housing benefits by meeting a higher proportion of the unmet need. CCDC must therefore incorporate an increased contribution (and consequently overall housing requirement) to address the growing unmet need in the surrounding HMA and clearly should not limit their contribution to neighbouring authorities where there are suitable and available sites in sustainable locations for growth; as is the case here. Policy SO3.1 should therefore be revised to set a housing requirement of a minimum of between 7,016 dwellings (LHN of 5,516 dwellings, plus a contribution of 1,500 dwellings) to 8,016 dwellings (LHN of 5,516 dwellings, plus a contribution of 2,500 dwellings), depending on the availability of suitable and deliverable sites. Unlike the current iteration of Policy SO3.1, that should be included as an explicit housing requirement. Furthermore, given the scale of the unmet need, any caveat that this housing contribution should only be provided "where infrastructure permits" (see paragraph 5.9 for example) should be removed to provide certainty of CCDC's commitment to the HMA's unmet needs. Rather, it is for the LPR itself and its supporting Infrastructure Delivery Plan to ensure that key stakeholders identify and facilitate the delivery of the infrastructure needed to support the level of growth required in the District, in accordance with NPPF paragraph 20. That is, the level of growth should inform the level of infrastructure required, as opposed to the level of infrastructure informing (and potentially limiting) the level of growth. Spatial Strategy: BHL support the recognition in Policy SO3.1 that development will be guided by the Spatial Strategy, [...]. Moreover, the recognition that Green Belt release is required to provide sufficient land to meet the needs arising in the District and wider HMA is welcomed and is a wholly sound approach to the District's spatial strategy for growth that is in accordance with the requirements of the NPPF. NPPF paragraph 136 states that Green Belt boundaries "should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans." That requirement is demonstrably met in the context of the District's own housing need and the growing unmet need in the wider HMA, particularly in light of the lack of clarity given as to the HMA authorities' ability to meet that unmet need given the uplift in housing delivery that is now required for some urban authorities. Therefore, the approach to releasing Green Belt land is considered sound in that regard. Furthermore, CCDC can clearly demonstrate that it has fully examined "all other reasonable options for meeting its identified need for development" besides Green Belt release, as required by NPPF paragraph 137. CCDC's SA considered numerous options in relation to its "strategy for meeting overall housing growth" including focus development on urban areas (Option A), urban areas in conjunction with the mixed-use redevelopment of the former Rugeley Power Station (Options B1 and B2), and finally a combination of focussing</p>
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			<p>development on urban areas, the former Rugeley Power Station have sought to maximise the potential of existing non-Green Belt land within urban areas, including previously developed land, as reflected in the inclusion of some 1,000 dwellings to be delivered from sites that were identified through the Council's Development Capacity Study.</p>
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		<p>The requirements of paragraph 137 of the NPPF have been demonstrably met in that regard. BHL also supports CCDC's recognition within the Spatial Strategy (paragraph 5.18) that Norton Canes is a sustainable settlement and, therefore, an entirely suitable location for significant growth. Indeed, that Spatial Strategy states that "residential and commercial development opportunities will be priorities within Norton Canes where they can make a positive and sustainable contribution to the growth of the District." As such the proposed release of Green Belt land immediately adjacent to Norton Canes for development (through the proposed allocation of Strategic Housing Allocation SH5) is also in accordance with the NPPF's approach to removing land from the Green Belt. Primarily, the release of the land would promote "sustainable patterns of development" in accordance with NPPF paragraph 138, in that the site is considerably less constrained than other alternatives given its distance from the Cannock Chase AONB and its relative distance from SACs, and is also well-served by public transport (including a bus route that runs adjacent to the site along Hednesford Road, and an excellent pedestrian and cycle network surrounding the site). Thus, the release of Green Belt land to the north-west of Norton Canes is justified and sound, and reflects the demonstrable suitability of this location to accommodate residential growth. That said, however, BHL are of the position that CCDC should take the opportunity to release additional land from the Green Belt immediately adjacent to Strategic Housing Allocation SH5 given that the site is an eminently suitable opportunity for development that is demonstrably available and deliverable. Indeed, the development of SHLAA Parcels N24 and N64 alongside proposed Strategic Housing Allocation SH5 would assist in meeting the District's own housing need *which the current supply falls short of doing, as below), would remove any risk from the District's supply (arising as a result of the matters raised in relation to 'housing supply' below), and in doing so would make a valuable contribution to meeting the longer-term housing needs of the District and wider HMA. BHL are of the view that CCDC should release SHLAA Parcels N24 and N64 for residential development on that basis. That approach would be entirely justified in accordance with NPPF paragraph 139, which requires alterations to the Green Belt to effectively ensure that sufficient land has been identified to meet identified requirements (requirement a), that longer-term development needs beyond the plan period have been taken into account, which may be through the safeguarding of land (requirement c), that Green Belt boundaries will not be need to be altered at the end of the plan period (requirement e), and that clear and defensible boundaries that are likely to be permanent are defined (requirement f). That is, when an authority seeks to adjust its Green Belt boundaries, it should seek to release sufficient land at that point, to ensure that it does not have to continually revisit the Green Belt boundaries during subsequent plan period. CCDC should therefore consider the opportunity available releasing additional land to the north-west of Norton Canes to meet the needs of the authority (preferably as an allocated site, or as safeguarded land); particularly given the location's clear suitability for development. Indeed the allocation, or even safeguarding (for future development), of SHLAA Parcels N24 and N64 would</p>
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			<p>be wholly in accordance with the NPPF as demonstrated below, and would provide CCDC with more flexibility in its supply of land. In addition, taking a comprehensive approach to SHLAA Parcels N24, N33 and N64 would allow the provision of a very high-quality development that creates a robust Green Belt boundary along Long Lane. The suitability of those additional parcels, as well as the opportunities present for their development, is discussed below. Notwithstanding that point, the other objectives set out within the Spatial Strategy for Norton Canes are noted by BHL, and include the desire to deliver enhanced transport links including those to Kingswood Lakeside, enhance biodiversity strategic links, and enhance Grove Colliery and support appropriate recreational uses therein.</p>
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		<p>Those aspirations are recognised by BHL, who note that residential development can play an important role in realising those objectives, and more generally can enhance or maintain the vitality of such settlements (as identified by NPPF paragraph 78). Housing Supply: Policy SO3.1 and its supporting text sets out that CCDC's housing supply comprises the following: • Strategic Housing Allocations (i.e. Allocations SH1 – SH5): 1,538 dwellings; • Sites under Construction (Table A): 1,260 dwellings; • Proposed allocations which already have planning permission, are already allocated, or have a resolution to grant planning permission (Table B): 1,432 dwellings • Additional Sites from Development Capacity Study: 1,007 dwellings. Supply from those sites totals 5,237 dwellings, which is below the housing requirement of 6,116 dwellings as currently set out in Policy SO3.1 and is a long way short of the housing requirement of between 7,016 and 8,106 dwellings as put forward by BHL. Regardless of what the housing requirement is, NPPF paragraph 67 is clear in stating that local authorities should "identify a sufficient supply" of housing land, and as such further site allocations should be made to, as a minimum, meet the final housing requirement. SHLAA sites N24 and N64 should be allocated in that regard. In addition to that, it is important that those sites are considered to be deliverable (for years 6 onwards) to ensure that there is a degree of certainty that sufficient land will come forward. Specifically, it is noted that there is a considerable dependence on the complex Rugeley Power Station site (1,000 dwellings) and land that has been identified in the Development Capacity Study (1,007 dwellings) which may no longer be available or being promoted for residential development. Indeed, whilst a planning application for the development of the Former Rugeley Power Station site is currently being determined, it's development will nonetheless be complex. Indeed, the SHLAA assessment of the site (REF.127) notes the requirement for significant demolition, the presence of historic landfill, the requirement for ground remediation works (which can often delay or halt development schemes), and the need to sensitively accommodate the retained substations and associated infrastructure on-site, alongside existing wayleaves/easements, and new residential development and its associated infrastructure. For that reason, the proposed development constitutes EIA development and the site is very clearly a sensitive and complex one. As such, whilst BHL have no objection to the inclusion of brownfield sites within CCDC's housing supply, the increased potential for delays halting of development should be taken into account in ensuring that CCDC can identify sufficient land to meet its housing requirement (whatever that may be). As such, it is BHL's position that a buffer should be incorporated above CCDC's housing requirement to ensure that there is flexibility in the Council's land supply and therefore certainty that sufficient housing land will come forward throughout the plan period. Indeed, a March 2016 report by the Local Plans Expert Group recommends that an additional 20% uplift is incorporated into a Council's housing supply above its base requirement to allow for flexibility in the District's land supply. Whilst a 20% uplift would be considerable, given the constraints present within the District, it is suggested that CCDC's housing supply should</p>
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			comfortably exceed the housing requirement of either 7,016 dwellings or 8,016 dwellings (by BHL's contention).
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LPPO152	ENGIE - D, Sager	Barton Willmore - J, Bonner	<p>The draft Plan identifies that housing provision will be made for a minimum of 5,516 dwellings (net) to meet the objectively assessed local housing needs and ensuring a sufficient supply of deliverable and developable land is available to deliver around 276 dwellings each year. Alongside the NPPF (paragraph 60) which requires application of the standard method, the PPG 'Housing and Economic Assessment' (Reference ID: 2a-010-20201216) states this is the minimum starting point in determining housing need and that there will be circumstances where it is appropriate to plan for a higher housing need figure than the standard method. This can include factors related to growth strategies for an area or taking on unmet need from neighbouring authorities. The draft Plan proposes to accommodate an additional 500 dwellings to the minimum local housing need figure to help meet the GBBCHMA shortfall. However, we consider that the proposed contribution of 500 dwellings is not a sufficient contribution in terms of the scale of unmet needs over the draft Plan period. It is noted that the unmet needs of Birmingham (and likely the Black Country) are an ongoing issue that remains unresolved - more so now regarding growth beyond 2031, as set out in the latest Greater Birmingham and Black Country Housing Need and Housing Land Supply Position Statement Update (dated 21st September 2020). To meet housing needs, the draft Plan gives priority to the re-use of previously developed land, including the former Rugeley Power Station site. Indeed, supporting paragraph 6.198 states that "the delivery of the redevelopment of the former Rugeley Power Station and the opportunities identified locally through this are fundamental to the delivery of sustainable development." We support this and agree that the former Power Station will be fundamental in delivering sustainable development, as well as a number of other objectives including regeneration. This approach to maximise opportunities on brownfield sites is supported by the NPPF, where there is a string emphasis placed on encouraging the effective use of land by reusing previously developed land. Para 117 states that: "Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land." The proposed allocation at Rugeley Power Station (Ste Ref. H20) is listed in Table B within the draft Plan. The capacity for the site (taken from the SHLAA) is 1,000 homes. This has fed into the Spatial Strategy for Rugeley which sets out the: "provision of approx. 1,000 additional homes within Cannock Chase District will be delivered through the larger cross boundary replacement of the former Rugeley Power Station." Given the identified housing need in the District and the wider unmet needs, and the contribution the site can make delivering this housing sustainably, it is considered the draft policy (Site Ref. H20) should not restrict the site's potential to deliver above and beyond this, subject to a future planning application. It is considered that there is greater capacity on the site than approved through the outline planning permission (approximately 1,036 dwellings in Cannock). Based on the above and opportunities around this brownfield site, it is considered that the draft Plan should refer to a "minimum" of 1,000 dwellings, not approximately. This should also be reflected in the site-specific allocation</p>
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			<p>policies which we understand will be prepared as part of the next stage of the Local Plan process. In terms of local infrastructure requirements, Table B should list the off-site highway works that our Client has committed to, so that any subsequent developments in the local area take account of the extant permission and the related infrastructure requirements, and make proportionate contributions where required. This includes the potential improvements to the Horsefair roundabout.</p>
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LPPO153	The Church Commissioners for England	Barton Willmore - A, Bird	<p>Housing need and requirement: The draft Plan (at paragraphs 6.167-6.169, 6.189 and 6.196) identifies how the application of the standard method for calculating local housing needs results in a minimum housing requirement of 5,516 dwellings (2018-2038). Alongside the NPPF (paragraph 60) which requires application of the standard method, the PPG 'Housing and Economic Needs Assessment' (paragraph: 010 Reference ID: 2a-010-20201216) states this is the minimum starting point and that there will be circumstances where it is appropriate to plan for a higher housing need figure than the standard method. This can include circumstances related to growth strategies for an area or taking on unmet need for neighbouring authorities. The draft Plan proposes to accommodate an additional 500 dwellings to the minimum local housing need figure to help meet the GBBCHMA shortfall (we comment on this further at Question 11). However, there does not appear to be consideration of whether other factors, such as economic growth ambitions, necessitate any increases to the minimum local housing need figure in addition to unmet need. The EDNA Update (December 2020) recommends range of 48-66ha (net) or 63-81 hectares (gross) of employment land is provided (2018-2038) and identifies (at paragraph 5.115) that the preferred level of employment land will be influenced by the Economic Prosperity Strategy for Cannock Chase District. The draft Plan (at draft Policy SO4.2 Provision for New Employment Uses) looks to provide up to 50 hectares of employment land which lies within the range recommended by the EDNA. The EDNA (at paragraph 6.8) goes on to state the following: "If the housing requirement is at or below the 7,020 net dwelling growth under about supply scenario 5 (276 dwellings per annum standard method + 1,500 dwellings unmet need, which equates to 46ha net, or 61ha gross [employment land]) then this could have repercussions on the employment land target which may have to be reduced as a consequence to ensure the two are not misaligned. It is strongly recommended that in these circumstances the Council undertake more detailed housing modelling to ensure the job projections are aligned closely with their housing requirement." In line with national policy and guidance, the draft Plan should therefore consider whether there is a need for additional housing growth over and above the standard method to ensure alignment with economic growth ambitions, taking account of its own evidence base recommendations. The PPG also notes that "an increase in the total housing figures included in the local plan may need to be considered where it could help deliver the required number of affordable homes" (PPG Paragraph: 024 Reference ID: 2a-024-20190220).</p>
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		<p>At paragraph 6.123 of the draft Plan it is noted that the evidence shows the need for affordable dwellings across the District will not be met in entirety by the Plan. Whilst it is recognised that the standard method for calculating local housing needs includes an affordability uplift (and that affordable housing needs will not necessarily be met in full) the Council should consider whether any further uplift to the minimum local housing need figure could help to deliver additional affordable housing in the context of the Plan's Objective 3 priorities; including helping to meet local needs for affordable dwellings. Housing Supply: The draft Plan (2018-2020), deliverable and developable sites within the SHLAA there is a shortfall in supply of 1,384 dwellings (against the minimum local housing need of 5,516 dwellings) or 1,883 dwellings (against the housing requirement of 6,016 dwellings including 500 dwellings towards unmet needs from neighbouring authorities. The DCS then reviewed the potential for additional supply from other non-Green Belt sources to meet this shortfall (in line with the NPPF paragraphs 136-137) and identified that a further 989 dwellings could be provided (Table 18 within the DCS). Combined with the SHLAA supply of 4,132 dwellings, this provides a total supply of 5,121 dwellings., The remaining shortfall is therefore 395 dwellings (against the minimum local housing need of 5,516 dwellings) or 895 dwellings (against the housing requirement of 6,016 dwellings including 500 dwellings towards unmet needs from neighbouring authorities). This has been addressed via the release of Green Belt sites within the District, focused around the main urban areas and mainly adjacent to the Cannock/Hednesford/Heath Hayes settlements. We are supportive of the draft Plan considering the release of Green Belt sites to accommodate the identified shortfall in the housing land supply.</p>
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LPO154	Trine Developments Ltd - N, Beattie	G, Fergus	<p>Proposed Objection: Paragraph 138 of the NPPF says "when drawing up or reviewing Green Belt boundaries [...]" This is clear guidance that adhering to Green Belt boundaries should not be at the expense of sustainable patterns of growth. This should come as no surprise, after all, the opening words of the NPPF are: "The purpose of the planning system is to contribute to the achievement of sustainable development." The Warwick Local Plan was adopted in September 2017; it is an LPA where 80% of District is covered by Green Belt and this is a similar case to Cannock. In that case the Inspector had to wrestle with the release of Green Belt and how significant growth, including meeting of unmet needs from Coventry, could be sustainably distributed; while sustainable towns such as Kenilworth, which are enclosed by Green Belt, could still be allowed to prosper, and meet the needs of existing and future residents over the plan period. The Inspector who considered the Warwick Local Plan demonstrated that Green Belt should not be used as a barrier to providing sustainable patterns of growth, and that releasing Green Belt that is well-related to sustainable settlements, whose needs cannot be met in non-Green Belt land, is a clear demonstration of the requisite exceptional circumstances; and equally importantly, that sustainable levels of growth in non-Green Belt areas which fail to conform with the spatial strategy for an area are not to be considered sound - demonstrating clearly that Green Belt release is not a last resort. In the Inspector's report into the Lichfield Local Plan, he states that "In my judgement the lack of more sustainable sites outside the Green Belt to meet the identified need for housing in a way that is consistent with the Plan; urban and Key Centre strategy amounts, in this instance, to the exceptional circumstances that justify the release of Green Belt Land ... [207]" The Inspector clearly in this case balanced a range of sustainable considerations in forming the view that the demonstration of exceptional circumstances and determination of Green Belt boundaries should take account of the need to promote sustainable patterns of development - to approach this from the alternate perspective that sustainability is secondary to retaining Green Belt boundaries would be wrong and inconsistent with national policy. Norton Canes is a sustainable settlement, and the LPA is correct in its decision to allow it to grow during the plan period. However, the above case studies demonstrate clearly that sustainability is not the servant of Green Belt designation; on the contrary, the duty in determining Green Belt boundaries is to take account of the need to promote sustainable patterns of development. Our case is that the LPA in this instance has taken the wrong decision in relation to the allocation of Residential Strategic Site (S03.1). We will utilise the evidence that we have prepared to date to frame an objection to the LPA Preferred Option, arguing that the strategic allocation at Norton Farm (SH5 Land West of Hednesford Road, Norton Canes - 175 dwellings) is unsustainable and remote from facilities and services, and should therefore be reduced in size overall, by deletion of the northern field, NC28 (Green Belt Review) which makes a strong contribution to encroachment on the countryside (NPPF Paragraph 134). That is why, the harm resulting from its release, as an expansion of Norton Canes is recognised to be 'moderate-high'.</p>
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			<p>The site we are promoting - The land off Norton Springs (NC23), will accommodate 64 dwellings and under the Green Belt Review it is 'moderate' and more sustainable in terms of the existing pattern of development and proximity to facilities and services in Norton Canes; and through a combination of this site and the southern field that part of the Strategic Site (NC26) will accommodate the dwellings number above. Furthermore, we are proposing to introduce new open space and new tree and woodland planning along the northern and western site of parcel NC23. This is recognised by the LPA to help reduce the urbanising influence of the development and enhance the coalfield farmlands landscape character, in accordance with landscape strategies set out in the Landscape Character Assessment for Cannock Chase (2016).</p>
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LPPO155	Taylor Wimpey (Land East of Wemblebury Rd)	RPS - P, Hill	RPS is broadly supportive of the overall approach to the identification of land to meet the local needs of the District based on the standard method. Nonetheless, RPS notes that the Council cannot currently demonstrate a five-year supply of deliverable land (calculated as 4.8years in Table 8 of the SHLAA December 2020 report) as at April 2020. On this basis, any reference to housing targets and site allocation capacities should be expressed as 'minima' rather than 'approximate'. RPS notes that Policy SO3.1 makes provision for a 'minimum of 5,516 dwellings' and so for consistency, this qualification should be applied to new site allocations. This will ensure greater opportunity for the Council to meet its housing needs over the plan period.
			Question 11: Do you agree that provision should be made to meet the unmet needs of neighbouring areas?

LLPO156	Walsall Council - N, Ball	<p>The Housing Development Capacity Study has been published alongside the document, however this takes as its starting point the question of whether there is capacity for the 6,016 dwellings proposed in the Plan, rather than an assessment of capacity that is independent of the numbers proposed in the plan. It may assist the robustness of this study if it clarified two figures independent of the local housing need, first the total capacity without the use of Green Belt and second what capacity might be provided if potential Green Belt sites were brought forward through a Green Belt review. The Black Country has provided detailed evidence in the form of an Urban Capacity Review Update 2019. This study has demonstrated that the Black Country's housing need between 2019 – 2038 is 71,500 homes, of which 44,500 homes can be accommodated in the urban area leaving a shortfall of 27,000. This shortfall is likely to increase by around 5,000 homes as a result of the publication in December 2020 of the new national method to calculate local housing need. The up-to-date shortfall figure, based on housing need and supply data for 2020-2039 and the most recent delivery evidence, will be made available in the UCR Update 2020, which is due to be published in May 2021. The draft Black Country Plan, due to be published for consultation in summer 2021, will be based on the UCR Update 2020 figures. From this evidence, it is clear that the Black Country cannot accommodate all of its needs in the urban area. We have undertaken discussions with our neighbouring local authorities, as part of our Duty to Co-operate requirements, to determine their ability to accommodate some of the Black Country's unmet need. A number of local authorities including South Staffordshire, Lichfield, Cannock and Shropshire have indicated that they will seek to test their ability to accommodate additional housing needs over and above their own local needs as part of their local plan review process. At this stage, we anticipate that these contributions could accommodate in the region of up to 10,500-12,500 homes and in the best-case scenario, this would leave the Black Country with a significant shortfall of approximately 14,550-16,500 houses, plus some further 5,000 homes added to this shortfall as a result of the new national method outlined above. We are engaging with other local authorities who have a functional relationship with the Black Country and it is possible that further contributions will come forward - these include Telford & Wrekin, Solihull and Bromsgrove. In terms of non-urban opportunities within the Black Country, we have undertaken a Green Belt and Landscape Sensitivity Assessment, supplemented by comprehensive environmental evidence, including historic landscape characterization and ecological surveys, which severely constrain capacity to deliver large scale development across much of the Black Country. Whilst we have still to finalise our site assessment, viability and delivery work, we envisage that market deliverability will also limit the capacity of the Black Country Green Belt up to 2039. This assumption is based on the case of the Birmingham Plan, where the Peter Brett Associates (PBA) Delivery Study concluded that market deliverability placed significant constraints on the amount of housing which could be delivered in the Birmingham Green Belt up to 2031. These constraints reduced the actual capacity of the</p>
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			<p>urban extension identified in the Plan consultation from 10,000 to 5,000 homes, over the 15-year period of the Plan. This assumption was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands. As the majority of the Black Country Green Belt is located primarily in Walsall and, to a lesser extent, in Dudley, these are the two main housing market areas for potential delivery of housing in the Green Belt, with only small amounts of housing potential in Wolverhampton and Sandwell.</p>
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		<p>Therefore, based on a scenario that there was sufficient unconstrained capacity identified in the Black Country Green Belt, a Delivery Study based on similar principles to that completed for Birmingham, may reasonably conclude that the Black Country could only be expected to deliver some 10,000 homes in the Green Belt over the 15-year Plan period, leaving a significant shortfall to be met in neighbouring authorities. Please note that at this stage the statement does not reflect the findings of any of our key studies or our Green Belt assessment. We will be able to provide a clearer idea of the Black Country's position once we have finalised our evidence base. This will be set out in our Draft Plan, due to be published in late Summer 2021. However, it is clear that on the basis of the maximum capacity of the urban area, the potential contribution of neighbouring local authorities, and the indicative market capacity of the Green Belt, it is likely that the Black Country will be unable to meet its own housing land needs. We understand that neighbouring authorities may be reluctant to consider releasing Green Belt land to meet the needs of the Black Country in advance of the publication of the Black Country Plan. However, we request that the Cannock Chase Local Plan should recognize that there could continue to be a shortfall of land in neighbouring areas which could be accommodated within the Plan area. This could form a suitable trigger for an early review of the Local Plan. This approach has been used in a number of West Midlands Local Plans - most recently in Wyre Forest, Stratford on Avon and North Warwickshire where it was considered that there was sufficient information to progress the Plan at that time, but recognizing that there could be a shortfall of land in neighbouring areas which could be accommodated within that Plan area. The scope of an early review would need to be guided by the scale and locational requirements of an identified need, and could test the capacity for new sources of land supply, or the early release of Safeguarded Land on sites which have been taken out of the Green Belt but not proposed to be brought forward within the current Plan period. We would welcome the opportunity to discuss the detailed wording of an appropriate early review approach with you.</p>
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LPPO157	South Staffordshire Council - E, Fox		<p>We welcome the publication of the Preferred Options Plan and support the commitment towards contributing towards the GBHMA housing supply shortfall. In our submission to the Issues and Options consultation we noted that a contribution of 500 dwellings towards the shortfall would align with the approach South Staffordshire has adopted in responding to the recommendations within the 2018 HL Hearn Study. This approach is welcomed however we note that there is no reference to the GL Hearn study in the explanatory text supporting the proposed 500 dwelling contribution. It is suggested that references to this study be included prior to submitting the plan for public examination. The GL Hearn study represents the primary evidential basis which provides the context for consideration by the GBHMA constituent authorities of potential approaches to making good the wider HMA shortfall. The omission of reference to the study removes the principal justification for the proposed 500 dwelling contribution within the draft plan. The proposed contribution now appears as an apparently arbitrary response to an issue which the plan recognises is significant and which needs to be addressed. Whilst we welcome the proposed contribution of 500 homes towards unmet HMA needs, South Staffordshire would support any further suitable site opportunities for proportionate dispersal identified within Cannock that would increase this contribution, should these be forthcoming at a later date. It is evident that the new Cannock Chase Local Plan will lead to new development in close proximity to communities in South Staffordshire. It is therefore essential that the impact of proposals in Cannock on local amenities and the surrounding road network, including in South Staffordshire, is fully considered through the plan-making process. It is anticipated that we continue an ongoing dialogue with Cannock Chase District Council to consider the implication of any cross-boundary issues including the potential impact of growth and air quality on designated sites of nature conservation value.</p>
LPPO158	Hazel Slade & Rawnsley Community Association - D, Williams		<p>Much greater rigor should be adopted in ensuring that an unmet need in neighbouring authorities is a realistic evaluation of their available land use.</p>

LPPO159	Birmingham City Council - I, MacLeod	<p>Strategic Housing Need and Duty to Cooperate. As you are aware, the adoption of the Birmingham Development Plan (BDP) in 2017 confirmed a housing shortfall of 37,900 homes primarily to be met by other authorities in the Greater Birmingham and Black Country Housing Market Area (HMA). In arriving at the scale of the housing shortfall to be met outside of Birmingham, the BDP Inspector concluded that the allocation of additional sites within the city boundaries would not be justified and that evidence shows that, for many years, a substantial proportion of Birmingham's need has been met in other parts of the West Midlands. Since that time, the 14 authorities that comprise the HMA, including Cannock Chase District Council, have worked together to regularly update housing land supply capacity across the whole HMA area. In addition, the HMA authorities commissioned and published a Strategic Growth Locations Study to identify possible solutions and areas of search which could be further explored within individual Local Plan reviews across the HMA area. Significant progress has been made in identifying land to meet the shortfall identified within the Housing Market area (including that of Birmingham) up to 2031. The latest position Statement published by the 14 HMA Authorities in September 2020 identifies a shortfall of only 2,597 homes across the whole HMA up to 2031, with a significant proportion of this shortfall met by Birmingham City Council itself, mainly through high density windfall schemes not previously identified coming forward in and around the City Centre. However, a proportion of this shortfall is also being met through local plan reviews where local planning authorities are proposing to provide additional housing over and above their Local Housing Need (LHN) figures. The West Midlands Strategic Growth Study (GL Hearn) was also commissioned by the 14 local authorities which make up the HMA which suggested scenarios for higher growth to meet housing shortfalls which were to be tested in Local Plan Reviews across the HMA area. The situation beyond 2031 is emerging as we shall be seeking authority from Council Cabinet in June to officially begin an update of the Birmingham Development Plan following a recent review. Work is also progressing on the Black Country Plan and it is therefore envisaged that housing shortfalls will continue to be experienced within the HMA beyond 2031. The Black Country has already evidenced a shortfall of 29,260 dwellings between 2019 and 2038 through its 2019 Urban Capacity Review, which it will consider through the Black Country Plan review. This position will be further exacerbated by recent changes to the Government's housing needs methodology which is to place a 35% uplift on top of the identified housing need for Birmingham (as well as for Wolverhampton) as one of the top twenty largest cities within England. This means that, potentially, a significant pre-2031 shortfall could arise and so the need for Duty to Cooperate arrangements within the HMA will therefore continue to be crucial to ensure that shortfalls can be considered within local plan reviews in neighbouring local authorities.</p>
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LPPO160	Lichfield District Council - S, Stray	<p>The contribution of 500 homes to meet HMA need is welcomed; however, it is noted this will be at the lowest end of the 500-1500 range identified within the previous consultation. It is acknowledged by Lichfield District, along with other authorities within the HMA and neighbouring CCDC that they should seek to provide a proportionate and meaningful contribution toward the unmet need arising from the GBBCHMA. Accordingly and given CCDCs links to the HMA and in particular the Black Country Authorities, who have identified a significant emerging shortfall, LDC would like to stress the importance of proactively seeking to identify potential sites from Urban Capacity work and from robust consideration of additional Green Belt release where appropriate. It is acknowledge within the supporting evidence (Housing Development Capacity Study 2021) that there is the potential for an additional 554 dwellings which could be policy compliant and allocated within the Cannock Chase District Local Plan. These are excluded from allocation over concerns regarding deliverability. Further evidence/justification as to why these sites have been excluded from allocation and potential supply, particularly given the HMA context, may therefore be beneficial. It is of course entirely possibly that such constraints could be overcome within the plan period and it is suggested that should this take place such windfall developments assist in meeting CCDCs and/or wider HMA need. Lichfield DC note the recent housing delivery rates referenced at para 6.173 with 1,124 homes delivered between 2018 and 2020. With this in mind it is considered that further evidence and justification could be required as to why CCDC have not suggested delivering a higher quantum of housing over the plan period, particularly when considering the shortfall from the wider HMA area and CCDCs close geographical links to the HMA when recent delivery rates would suggest there is scope for delivery at a higher rate. The Green Belt Review evidence base work is noted along with the intention to release three sites from the Green Belt to bring forward housing development. It is also noted that the evidence suggests that there are further potential Green Belt sites that have been assessed that could be brought forward to meet CCDCs own housing need and to enhance the contribution to the HMA shortfall. Noting the Housing Development Capacity Study 2021, the Green Belt Review evidence and CCDCs recent delivery rates outlined above it may be helpful for CCDC to review their contribution of 500 dwellings and consider whether further provision could be made towards the HMA over the plan period which is justified and appropriate. Particularly given CCDCs geographical links to the HMA in particular the Black Country Authorities. Paragraph 6.179: LDC suggests the below amendment to paragraph 6.170 for clarity: "A number of authorities have contributed additional housing to meet this identified shortfall. Our neighbouring authorities of South Staffordshire and Lichfield, who share the GBBCHMA are proposing an additional provision for up to 4,000 between 2018-2038 and 2,665 homes between 2018-2040 through their Local Plans respectively. These proposals include sites being release from the Green Belt to help meet the shortfall. Our other neighbouring authority is Stafford Borough and they are not part of the GBBCHMA".</p>
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LPPO161	Solihull Metropolitan Borough Council - C, Jones		<p>Solihull Council welcome the provision in the Preferred Options Plan to meet CCDCs housing and employment land needs in full, as well as the principle of contributing an additional 500 dwellings to meet the wider HMA unmet housing needs up to 2038. It would be helpful to have further clarification on whether these assumptions have been taken into account in the July 2020 GBBCHMA Position Statement, or if it is intended to include them within the next update, currently under consideration. The latest position on the Contribution from Solihull is set out in the 2020 Draft Submission Plan, upon which CCDC were invited to make representations. The two Councils are close to agreement on the Statement of Common Ground for Solihull's Draft Submission Plan. Solihull welcomes continuing dialogue with CCDC as their plan progresses to examination, through the Duty-to-Cooperate process.</p>
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LPO162	Home Builders Federation - S, Green	<p>As set out in the 2019 NPPF, the Council is under a Duty to Cooperate with other LPAs and prescribed bodies on strategic matters that cross administrative boundaries (para 24). To maximise the effectiveness of plan-making and fully meet the legal requirements of the Duty to Cooperate, the Council's engagement should be constructive, active and on-going. This collaboration should identify the relevant strategic matters to be addressed (para 25). Effective and on-going joint working is integral to the production of a positively prepared and justified strategy (para 26). The Council should demonstrate such working by the preparation and maintenance of one or more Statements of Common Ground identifying the cross-boundary matters to be addressed and the progress of cooperation in addressing these matters. Therefore, as set out in the 2019 NPPF, the Local Plan should be positively prepared and provide a strategy, which as a minimum seeks to meet its own LHNs in full and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a). The GBBCHMA Position Statement published in July 2020 seeks to demonstrate that the housing need can be met across the sub-region for the period 2011-2031. However, Table 5: Housing Shortfall for GBBCHMA 2011-2031 is somewhat misleading by showing a housing shortfall of only 2,597 dwellings. Table 5 compares an updated Housing Land Supply against a minimum housing requirement of 207, 979 dwellings (based on Strategic Growth Study re-based 2014 household projections model plus a contribution to Coventry & Warwickshire HMA) rather than the adopted housing requirements and unmet housing needs set out in Table 2. The minimum housing requirement in Table 5 of 10,399 dwellings per annum is below the housing requirement in Table 2 of 10, 961 dwellings per annum (annual housing requirement plus unmet need not provided for). Table 2 is also an under-estimation of housing need because of the exclusion of the identified shortfall in the Black Country of 29, 260 dwellings between 2019-2038 of which 7,485 dwellings arise by 2031 (see para 4.2). The addition of the Black Country shortfall would increase the housing requirement in Table 2 to 11, 585 dwellings per annum. Furthermore, future housing need in Local Plan Reviews will be based on the Government's revised standard methodology for calculating LHN including Step 4 - Cities & Urban Centres uplift of 35% which is applicable to Birmingham, Coventry and Wolverhampton. The estimated HLS in 2019 of 205, 382 dwellings set out in Table 3 relies upon unevidenced allowances of 11, 413 dwellings from proposed allocations in emerging Local Plans yet to be tested at Examination, an additional urban supply of 19, 410 dwellings and windfall development of 14, 111 dwellings. It is noted that Table 6: Changes in Housing Capacity 2017-2018 identified a 27% increase of 13,492 dwellings in Birmingham. The deliverability of residential development in these locations will be dependent upon the viability of previously developed land and the demand of high density city living post Covid-19. The HBF content that the housing shortfall in the GBBCHMA is greater than 2,597 dwellings shown in Table 5 of the Position Statement because housing need has been under-estimated and HLS has been overestimated. There is a long history of on-going engagement between the GBBCHMA</p>
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			<p>authorities but to date there is no conclusive outcome from this engagement in relation to the strategic cross-boundary matter of re-distribution of unmet housing needs from Birmingham and Black Country authorities which indicates that this engagement is an unsound basis for plan-making. After 4 years since the adoption of the Birmingham Development Plan in January 2017, which identified an unmet housing need of 37, 900 dwellings, there is no agreement on meeting in full the housing needs of the GBBCHMA. There is every likelihood that reaching a consensus on this strategic matter will be a lengthy disharmonious process within the GBBCHMA authorities. The Cannock Chase Local Plan should make a provision to meet unmet housing needs of neighbouring areas. However, in absence of any signed SoCG, there is no real commitment to resolving the redistribution of unmet housing needs. The GBBCHMA authorities should produce a SoCG setting out where unmet housing need will be met.</p>
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LPPO163	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	In accordance with the Duty to Cooperate, which still remains, the Council must do its utmost to assist in meeting unmet needs across the HMA. For the reasons already set out above the identification of 500 additional dwellings is insufficient and disproportionate contribution towards meeting the unmet needs of the GBBCHMA. There is little evidence to substantiate why 500 additional dwellings is considered an appropriate contribution and in the absence of this and detailed evidence to substantial that any increase should result in significant harm, the figures should be increased to that set out in the initial Issues and Options document of 2,500 dwellings. The Council should demonstrate how it has arrived at any figure through the preparation and maintenance of one or more Statements of Common Ground with neighbouring authorities identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters.
LPPO164	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	In accordance with the Duty to Cooperate, which still remains, the Council must do its utmost to assist in meeting unmet needs across the HMA. For the reasons already set out above the identification of 500 additional dwellings is insufficient and disproportionate contribution towards meeting the unmet needs of the GBBCHMA. There is little evidence to substantiate why 500 additional dwellings is considered an appropriate contribution and in the absence of this and detailed evidence to substantial that any increase should result in significant harm, the figures should be increased to that set out in the initial Issues and Options document of 2,500 dwellings. The Council should demonstrate how it has arrived at any figure through the preparation and maintenance of one or more Statements of Common Ground with neighbouring authorities identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters.

LPPO165	St Modwens (Land at York's Bridge, Pelsall)	RPS - P, Hill	<p>The Principle: Yes, Cannock Chase should be making a contribution towards meeting the unmet need of neighbouring areas. Cannock Chase lies within South Staffordshire on the northern edge of the Black Country administrative areas. Cannock Chase District is one of the 14 authorities in the GBBCHMA. The GBBCHMA has a significant housing shortfall and Cannock Chase should be helping to meet the unmet housing need. As set out in the 2019 NPPF, the Council is under Duty to Cooperate with other LPAs and prescribed bodies on strategic matters that cross administrative boundaries (para 24.). To maximise the effectiveness of plan-making and fully meet the legal requirements of the Duty to Cooperate, the Council's engagement should be constructive, active and on-going. This collaboration should identify the relevant strategic matters to be addressed (para 25). Effective and on-going joint working is integral to the production of a positively prepared and justified strategy (para 26). The council should demonstrate such working by the preparation and maintenance of one or more SoCG identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters. Therefore, as set out in the 2019 NPPF, the Local Plan should be positively prepared and provide a strategy, which as a minimum seeks to meet its own LHNs in full and is informed by agreements with other authorities so that unmet need for neighbouring areas is accommodated (para 35a). The GBBCHMA Position Statement published in July 2020 seeks to demonstrate that the housing need can be met across the sub-region for the period 2011-2031. However, Table 4: Housing Shortfall for GB&BCHMA 2011-2031 is somewhat misleading by showing a housing shortfall of only 2,597 dwellings. Table 5 compares an updated Housing Land Supply (HLS) against a minimum housing requirement of 207, 979 dwellings (based on Strategic Growth Study re-based 2014 household projections model plus a contribution to Coventry & Warwickshire HMA) rather than the adopted housing requirements and unmet housing needs set out in Table 2. The minimum housing requirement in Table 5 of 10,399 dwellings per annum is below the housing requirement in Table 2 of 10,961 dwellings per annum (annual housing requirement plus unmet need not provided for). Table 2 is also an under-estimation of housing need because of the exclusion of the identified shortfall in the Black Country of 29,960 dwellings between 2019-2038 of which 7,485 dwellings arise by 2031 (para 4.2). The addition of the Black Country shortfall would increase the housing requirement in Table 2 to 11,585 dwellings per annum. Furthermore, future housing need in Local Plan Reviews will be based on the Government's revised standard methodology for calculating LHN including Step 4 - Cities & Urban Centres uplift of 35%, which is applicable to in Birmingham, Coventry and Wolverhampton (ID 2a-004-20201216). The estimated HLS in 2019 of 205, 382 dwellings set out in Table 3 relies upon unevidenced allowance of 11,413 dwellings from proposed allocations in emerging Local Plans yet to be tested at Examination, an additional urban supply of 19, 410 dwellings and windfall development of 14, 111 dwellings. It is noted that Table 6: Changes in Housing Capacity 2017-2019 identifies a 27% increase of 13, 942 dwellings in Birmingham. The</p>
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			deliverability of residential development in these locations will be dependent upon the viability of previously developed land and the demand for high density living post Covid-19.
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		<p>The HBF contend that the housing shortfall in the GBBCHMA is greater than 2,597 dwellings shown in Table 5 of the Position Statement because housing need has been under-estimated and HLS has been over-estimated. There is a long history of on-going engagement between the GBBCHMA authorities but to date there is no conclusive engagement from this engagement in relation to strategic cross-boundary matter of redistribution of unmet housing needs from Birmingham and Black Country authorities, which indicates that this engagement is an unsound basis for plan-making. After four years since the adoption of the Birmingham Development Plan in January 2017, which identified an unmet housing need of 37,900 dwellings, there is no agreement on meeting in full the housing needs of the GBBCHMA. There is every likelihood that reaching a consensus on this strategic matter will be lengthy disharmonious process within the GBBCHMA authorities. The Cannock Chase Local Plan should make provision to meet unmet housing needs of neighbouring areas. However, in the absence of any signed SoCG there is no real commitment to resolving the redistribution of unmet housing needs. The GBBCHMA authorities should produce a SoCG setting out where unmet housing need will be met. The approach of the Preferred Options: We support that the Preferred Options recognises this significant housing shortfall across the GBBCHMA and Cannock Chase's commitment to assisting in meeting the unmet housing needs of the neighbouring authorities is reflected in Strategic Objective 3 in Fig 5. Policy SO3.1 sets out that a housing provision will be made for 500 dwellings to meet unmet needs of neighbouring areas and ensuring a sufficient supply of deliverable and developable land is available to deliver around an additional 25 dwellings each year. There is clearly a recognised housing need arising from neighbouring authorities and Cannock Chase are proposing that they assist in meeting this unmet housing need, which is very much supported. However, RPS notes that the Council has chosen to go forward with Housing Growth Option B: LHN figure plus unmet need of an additional 500 dwellings giving a total housing growth figure of 5,612 dwellings for the District (2018-2036) or 312 net dwellings per annum, which was presented in the Local Plan I&O Consultation (May 2019). It is our view that Cannock should consider making a contribution greater than 500 dwellings to assist in addressing the significant shortfall from the GBBCHMA. Notwithstanding the figure of dwellings proposed by Cannock to address the unmet need, we propose that including a policy mechanism in the Cannock Chase Local Plan for the land at York's Bridge, Pelsall would help to demonstrate that the District is helping to meet Walsall, and the wider unmet housing needs of the GBBCHMA and enable the sites full potential to be delivered. Whilst it is acknowledged the principal components of the site, including the site access falling within Walsall District and within the remit of the BCP, it is essential that the Cannock Plan is sufficiently flexible within its policy base, to enable the element of the site which sites within its administrative boundary to come forward, in the event the BCP allocated the principal component of the site for housing. RPS acknowledges, that the element of the site which falls within Cannock</p>
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			would be unlikely to allocated in isolation and therefore we are suggesting a policy mechanism is provided to ensure an appropriate and sound approach is taken with regard to DtC issues.
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			<p>The Need for a Policy Mechanism - The SWDP/JCS Example: By way of an example, we set out below how Wychavon District Council and Tewkesbury Borough Council have allocated a cross boundary site to assist in meeting the unmet housing needs of Tewkesbury. A situation which is very similar. [...] The allocation of the land at Mitton is a good example of a commitment to assisting neighbouring authorities in meeting their unmet housing needs under the duty to cooperate through allocation of a cross boundary site. We propose that the land at York's Bridge is committed, in a similar way as the land at Mitton, through one of the following: a) The provision of a policy hook in the Cannock Local Plan, entailing a future review of the Cannock Local Plan to take place and ensure the site's full development potential is realised, in the event that the BCP allocates the site, or b) Removing the land within Cannock Chase from the Green Belt and safeguarding for residential development so in the event that the wider site is proposed for allocation in the BCP Preferred Options it can be released for development. RPS would be happy to work with the Council on the precise wording and to ensure that the Local Plan and its strategic policies establishes the vase for any subsequent change to the Green Belt at this location, given its clear cross boundary basis. As such we propose that Draft Policy SO3.1 is amended in line with one of the following two options a) or b) (See Main Document for Options).</p>
LPPO167	Wyrley Estates	Fisher German LLP - N, Borsey	<p>The estate agrees and supports the housing numbers, however, does recognise the LP needs to make provision for specialist housing types, such as self-builds, live/work units, first homes, among others. However, the 'rural areas' section of Policy SO3.1 needs to include the provision of specialist housing types and enabling development for identified regeneration schemes in rural area, such as Grove Colliery. The estate does have other land which remains potentially available for new housing development, of which may provide such specific specialist housing types.</p>

LPPO168	The Church Commissioners for England	Barton Willmore - A, Bird	<p>We agree that the draft Plan should be contributing to the unmet needs of the GBBCHMA. However, we consider that the current contribution of 500 dwellings is not a sufficient contribution in terms of the scale of unmet needs over the draft Plan period. At paragraphs 6.176-6.182 the draft Plan provides the background to the need for Cannock Chase to accommodate the unmet housing needs of neighbouring authorities. It notes the Birmingham City Council shortfall (established as part of the Birmingham Development Plan, 2017) as well as the more recent Black Country authority's shortfall of 29,260 dwellings for 2019-2038 (established via the Black Country Urban Capacity Study, 2019). The preferred option of a 500 dwelling contribution towards the GBBCHMA shortfall represents the minimum option proposed in the previous Issues and Options Local Plan consultation (2019), which was based upon the Strategic Growth Study (2018) suggested options for accommodating additional development. We consider that the level of contribution should be higher considering the evidence base for the shortfall. It should firstly be noted that since the adoption of the Birmingham Development Plan, no Local Plan has been adopted in the GBBCHMA which provides for Birmingham's unmet needs; the North Warwickshire Local Plan Review has reached the most advanced stage but is not yet adopted (at Examination). Whilst the GBBCHMA Position Statement (September 2020) suggests that the shortfall has reduced to 2,597 dwellings it should be noted that some of the capacity within this statement remains untested via Local Plan examinations and unsecured i.e. within the Position Statement (at Table 3) some of the capacity identified to meet the shortfall is that which is 'emerging' in Local Plans. There is also a significant proportion of windfall supply identified 914,111 dwellings across the GBBCHMA) and not all of the GBBCHMA authorities include a non-implementation discount to their supply (Table 4 of the Position Statement). It is unclear if this is justified. Furthermore, the Position Statement only monitors housing requirements and land supply up to 2031. It does not provide an assessment up to 2031 (end of plan period for the draft Plan). The Position Statement (paragraphs 4.2-4.3) notes the post-2031 picture setting out how the Black Country Authorities have evidenced a significant shortfall of up to 29,000 dwellings between 2019-2038. Some of this shortfall (7,500 dwellings) arises up to 2031, however the majority is beyond. The GBBCHMA shortfall post 2031 will also be further informed by the review of the BDP when it commences. Whilst figures may not be confirmed, the Position Statement concludes that a shortfall post 2031 is emerging (paragraph 6.3) stating it is: "now apparent that there will be a HMA shortfall post 2031, with the Black Country along estimating a shortfall of 29,260 dwellings, which it will consider through the Black Country Plan review. The scale of the post 2031 shortfall for Birmingham, and potentially over authorities, is not yet know, therefore the post 2031 shortfall for the whole HMA cannot yet be calculated." It is clear that the GBBCHMA authorities are of the view a significant shortfall post-2031 will exist. We would also highlight that the recent changes to the standard method for local housing needs (December 2020) result in a 35% uplift to the minimum local housing needs of Birmingham and Wolverhampton, with implications for the wider</p>
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			housing market area shortfall. Consequently, it is considered that the Council should seek to provide further flexibility within the housing land supply to help meet the ongoing shortfall up to 2038.
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		<p>At present, the difference between the local housing need for Cannock Chase itself 95,516 dwellings - minimum local housing need) and the housing land supply secured for allocations and permissions of 6,361 dwellings represents a headroom of only 15%. This is reduced to 6% once the 500 dwelling contribution to unmet needs is taken into account. As noted above in response to Question 10, this flexibility may also be lower once non-implementation rates are taken account of. This is less than what has been considered reasonable in other recent Local Plans where unmet needs are also being considered. For instance, in the case of Guildford Local Plan (2019) the Inspector considered that additional 'headroom' in the housing land supply was justified, partly as a result of helping to meet likely unmet housing needs from Woking which whilst not fully qualified was expected to demonstrate an ongoing shortfall in supply. The headroom between the local housing requirement for Guildford (which does not include a specific requirement for Woking's unmet needs) and the supply was around 36%, which was considered reasonable by the Inspector. This also provided flexibility for slippage in the housing trajectory and to address affordability issues. In the case of the South Oxfordshire Local Plan (adopted December 2020 the Inspector supported the housing land supply position that provides the equivalent to a 27% headroom to the housing requirement (which includes local unmet housing needs) [see footnote 1 in response]. The draft Plan should therefore look to provide further flexibility within the housing land supply, equivalent to similar levels considered reasonable in recent Local Plan examinations. This would help to provide for the current shortfall up to 2031 and the significant shortfall post 2031 as detailed in the evidence base. We would also note that there does not appear to be any evidence at this stage on the extent of agreement with other GBBCHMA authorities on the appropriateness of this level of contribution to unmet needs. The Council has not published a separate Duty to Cooperate Statement or any Statement of Common Ground to address strategic policy matters as required by the NPPF (paragraph 27) to date. The PPG ' Maintaining Effective Cooperation' section provides guidance on the format of these statements and states these should be maintained throughout the plan production process and published with the draft Plan (paragraph 020 ID: 61-020-20190315). Given that there are no accompanying Statements of Common Ground the extent of agreement with other local authorities on strategic issues such as the GBBCHMA shortfall contribution is not fully apparent.</p>
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LPPO169	Taylor Wimpey (Land East of Wimblebury Rd)	RPS - P, Hill	<p>In principle, yes Cannock Chase should make a contribution towards meeting the unmet needs of neighbouring areas. Nonetheless, RPS notes that the CCLPR (at paragraph 6.179) refers to South Staffordshire proposal to an additional provision of 4,500 dwellings to assist the wider GBBCHMA. However, at this time, South Staffordshire has only consulted on proposals for 'up to 4,000 dwellings' (as set out at paragraph 5.1 of the South Staffordshire Council Local Plan Review - Spatial Housing Strategy & Infrastructure Delivery October 2019) and has yet to issue any further updated material for consultation since that time. It is therefore incorrect for the Council to suggest that other areas are taking more of the housing shortfall than what has been formally concluded on in their own plans up to this point. The implication here is that the Council is assuming more of the unmet need is being catered for elsewhere than is actually the case. Consequently, the Council should reconsider the need for additional housing land from the GBBCHMA shortfall to be accommodated in Cannock Chase. RPS notes that the Council has chosen a preference for taking 500 dwellings (under Growth Policy Option B referred to at paragraph 6.152 of the CCLPR). In light of the comments raised above, RPS contends that Cannock could, and should, consider making a contribution greater than 500 dwellings for the unmet housing numbers emanating from the GBBCHMA.</p>
			<p>Question 12: We know the large strategic allocations at South of Lichfield Road and East of Wimblebury Road will need to address the congestion issue at Five Ways island and will require a new primary school, are there any other infrastructure requirements they or any of the other strategic allocations should address?</p>
LPPO170	L & J, Astbury		<p>We were dismayed to find that Heath Hayes has been suggested for both removal from Greenbelt and earmarked for yet more housing development. Three areas of concern. The development on Wimblebury Road, initially for 150houses opposite Heath Hayes Primary School, followed by 400 plus houses further up the road. This area looks to be removed from the Greenbelt? The development on Cannock Road/Lichfield Road? A development on the Hednesford Road opposite the new Crematorium? In our opinion these developments are excessive and we would like to know how the road network is going to cope with these proposals? The area around Five Ways is already subject to poor quality air condition. The tailbacks past our house which is close to said island are horrendous. Can you tell us how soon these proposals are likely to come to pass and also what you would be doing to mitigate an environmental disaster?</p>
LPPO171	Hazel Slade & Rawnsley Community Association - D, Williams		<p>The potential development I Rawnsley Road (submission made in the Autumn of 2020) H30 cannot address the many strategic (AONB, SSSI, SAC, SBIS) and local constraints (severe contours of land, drainage, service provision) as a viable development, and the land should be redesignated as originally proposed in 2014.</p>

LPPO172	Natural England- G, Driver		We advise that there is a requirement for green and blue infrastructure. Green/blue infrastructure is the network of green/blue spaces and natural elements that intersperse and connect our cities, towns and villages. It is the open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage and open countryside. Green blue/infrastructure provides multiple benefits for the economy, the environment and people and will be essential in reducing recreational pressure on protected sites such as Cannock Chase SAC. Further information on green/blue infrastructure can be found here.
LPPO173	Severn Trent		All strategic allocations should consider how they will dispose of surface water. The outputs from the recent Water Cycle Study should be utilised to identify sites where surface water disposal may be an issue. A holistic surface water strategy should be considered for the major allocations in this area to ensure they do not discharge surface water to the combined sewer network.
LPPO174	Taylor Wimpey (Land East of Wimblebury Rd)	RPS - P, Hill	Infrastructure Issues relating to SH2: RPS acknowledges that any new major residential development is likely to generate a need for additional infrastructure. Such provision should, in principle, meet Regulation 122 of the Community Infrastructure Levy Regulations 2020, which requires that any planning obligations must comply with the three relevant tests [...]. In relation to the highway impact of the land South of Lichfield Road and East Wimblebury Road, TW will aim to work closely with the highway authority to ensure an appropriate highway mitigation package is produced and delivered to address congestion issues at Five Ways island and the proportional impact from its proposals. In relation to the provision of a new primary school at SH2, RPS accepts that such provision could, in principle, meet the first two tests listed above as the new homes provided are likely to generate a demand for additional school places from school aged residents living at the development. RPS assumes that any new school would then be located on SH1. The provision of a new school on site SH2 would not be appropriate, given the delivery of 410 homes on the site. This is because the total expected delivery from both sites would total 1,285 dwellings but the majority would be located on SH1 (875 dwellings). The developable area of SH1 is estimated by the Council to be in the region of 25.5ha, more than double the equivalent area available at SH2 (11ha). On this basis, RPS contend that a fair and equitable solution would be to locate the new primary school on land at SH1, rather than at SH2. By doing so, this would provide the opportunity for the developer of SH2 to help fund the proposal for the new school through developer contributions secured via a section 106 agreement on approval of development at the site. This would, in RPS opinion, address all three tests under the CIL Regulations. Such an approach could also be written into the site-specific policy for the site (see response to q14 in chapter 5 of this submission). It is understood this is the intention for SH1, given the master planning proposals already presented by the promoter of SH1 for on-site provision at Land South of Lichfield Road. The policies for both sites therefore need to clarify this position and make it clear that delivery of a new school on SH1, should not prevent delivery of SH2 and in effect financial contribution from TW land interests if appropriate to address school capacity should only

			be held by the County until such a stage when delivery of the school on SH1 comes forward and this does not in any way hinder delivery of SH2.
			Question 13: Do you support the proposed allocations of the sites listed in Tables B and C?
LPPO175	L, Barratt		Why has site H30 been included in Table C page 78, 6 Local Planning Options, when it has been identified in Appendix 11 in the SHLAA, as restricted and unsuitable for development.
LPPO176	Archdiocese of Birmingham, Deacon P. O'Connor		As landowner of H53, I can confirm that the Archdiocese supports the allocation of Land of Lichfield Road, Rugeley for residential development. I can also confirm that the site will be available in the plan period as there is an intention to progress as soon as is practical. Noting the density, the final provision on-site will be influenced by conservation, design and viability requirements and therefore there may be some opportunity for a high density if the proposal satisfies Development Management requirements.
LPPO177	Inland Waterways Association, P, Sharpe		IWA notes that policy SO3.1 on new homes includes an allocation in Table C of site H49 for 40 houses. The road access over the canal bridge is narrow and steep with no footpath and poor sight lines. The bridge dating from 1770 is of considerable heritage value and in the Trent & Mersey Canal Conservation Area. Any development here should be low density, no more than 2 stories high, set well back from the canal to preserve as much as possible of the tree cover in

			order to help screen the industrial area from the canal, to limit its impact on the Conservation Area, and to limit additional traffic over the canal bridge.
LPPO178	A, Boot		I object to the fact that the Preferred Spatial Strategy doesn't include my land for the following reasons: 1) I have been approached by CCDC to apply for a Travellers Caravan Site on my land some five years ago or more, which would have included heavy machinery and HGV Vehicles using a very poor road surface. 2) Currently, Commonside, as a highway is very poorly maintained by CCDC. There are several potholes beyond repair throughout the length of the road that are constantly refilled to no avail (Photographs are available if required). This road would be properly resurfaced by any building scheme. 3) Part of the Land at 89 Commonside has already been developed to include three additional properties. 4) Part of the Land at 89 Commonside is licensed for HGV vehicles and is currently in full use. 5) Commonside has been 'land locked' since the commencement of the M6 Toll development and has therefore become detached from the Green Belt Area. In fact, a development almost identical to the one I propose (although somewhat smaller in size) has actually taken place on Land at Walsall Road, Norton Canes WS11 9PW under planning reference CH/18/176, some 67 dwellings. This land is situated on the other side of the M6 Toll (next to my land, Postcode WS11 9PY). 6) The Land at 89 Commonside is suitable for all types of housing, including affordable and I feel should be considered as part of the Preferred Spatial Strategy. In conclusion, I would like to point out that I have been approached by several large building consortiums. Any development of my land would assist your Core Housing Strategy and has the full support of all my neighbours.

LPPO179	St Modwen	RPS - P, Hill	<p>We have been instructed by St Modwen to submit these comments relating to Land West of Pye Green Road (the site). RPS is supportive of the decision to review the Local Plan, in particular to roll forward the time period until 2036 and retain the land West of Pye Green Road as a strategic allocation. As the Council is aware, the site measures over @60ha and is allocated as a Strategic Site under Policy CP6. For the reasons explained below St Modwen consider the site should continue to be recognised as a strategic site in the Local Plan Review and for the reasons explained below, the level of housing (as has always been maintained by St Modwen) suitable at the site is considerably in excess of 900 dwellings. The increased capacity has come about as a direct result of the approved reserved matters applications delivering housing development at a density significantly higher than was anticipated in the original outline consent, along with the original masterplan proposals for on-site sports pitches not being a requirement, due to the off-site 106 contribution in its place, in effect freeing up additional space on the site. As identified above, however, the true capacity for the site is in excess of the strategic allocation in the adopted plan, with additional areas of the site having been delivered or consented. As indicated in the table below, the additional areas of land (Areas E and I) will indicatively deliver an additional 129 dwellings (Area E is 51 dwellings and Area I is 78 dwellings) whilst retaining the existing level of SANGS/School/Local Centre. Overall, this would increase the site wide capacity to 1,000 dwellings. It should be observed that both sites at Area E and Area I at Pye Green are included under Section 6 at Table B under references H16 and H17. St Modwen supports the sites contained within Table B and C.</p>
LPPO180	Cannock Chase AONB Partnership		<p>The proposed allocation of site H30 for 60 houses, concerns the AONB. The SHLAA 2020 categorises this site under 'Greenbelt, AONB and Restricted Sites'. The site directly abuts the AONB boundary and forms an integral component of its setting. The site's sloping landform challenges potential development of 60 houses to be delivered in an appropriately sympathetic manner that responds to landform and can accommodate landscape structure that would assimilate the development into the landscape and deliver visual mitigation, so there is a high risk that development would have detrimental effects on the landscape and natural beauty of the AONB. The AONB requests this allocation is reconsidered. H47 - this site is in the immediate setting of the AONB, on previously developed land. Chetwynd Coppice Ancient Woodland lies less than 150m from the site boundary. This woodland is already detrimentally affected by disturbance and compaction due to user pressure. Should this site be allocated for housing, and to ensure preferred Policy SO7.1 is complied with, the AONB requests the Authority prepares a development brief setting out expectations for development that minimises impacts on the AONB and its setting, along with provision of high-quality green space on the site. The AONB would welcome measures to deliver enhancements to Chetwynd Coppice through developer contributions.</p>

LPPO181	Bromford Housing Group	PlanIt Planning and Development - J, Williams	<p>We support the identification of site H30, for residential development by the emerging Plan. The site is subject to a planning application submitted on 26/10/2020 (CH/20/381) by Bromford Housing Group. The Applicants are currently in discussions with the local authority and are working with Officers towards a positive determination of the application. It is anticipated by the time that the emerging Plan is at pre-submission consultation stage the application will have been approved. The site is approx. 2.3ha in size and triangular in shape. It is currently used as grazing and is relatively featureless. The proposal has a number of significant benefits including: - The site is in a sustainable location for development with access to public transport opportunities and to services and facilities within the local neighbourhood. - The proposal will make a positive contribution to the emerging Plan's housing requirement by developing a site which is in the main urban area of Cannock, as shown on the Policies Map of the adopted Cannock Chase Local Plan. - The site is an underused land resource comprising rough grazing land. - Significantly, all of the proposed dwellings will be affordable in accordance with the definition contained within the NPPF. The proposal will therefore make a significant contribution to the current affordable housing shortfall within the District. As referred to in our response to Policy SO3.1, the emerging Plan does not plan to meet the full affordable housing requirement. This emphasises the benefit of this site being brought forward for residential development.</p>
LPPO182	A, Barratt		<p>I am sure that you will be aware that site H30 is currently the subject of a planning application on behalf of Bromford Housing Association. There is considerable opposition to this proposal (approx. 130 objections) from local residents. The detail and range of objections can be viewed on your website. The objections range from the unsuitable nature of the site, i.e. the topography, the level and extent of earthworks necessary to form a platform for development which even when carried out would appear to provide poor access for people with disabilities. The visual impact on the adjoining AONB and the SSSI (Hednesford Hills), the traffic impact and the limited local facilities and amenities, doctors surgeries, shops etc. This development represents a scheme of 60 low spec affordable dwellings. The site is currently a valuable area of green space to the local residents which while it is not public open space its use as a paddock to graze horses enhances the local environment to the valued enjoyment of local people. It is considered that in Planning terms the development of this land for affordable social housing is clearly at odds with good Planning aims and objectives. Immediately adjacent to the proposed site is the Eastgate/Westgate estate and opposite the site are a range of terraced houses all of which represent social and affordable homes. How can the proposal to construct a further 60 affordable homes in this area represent an integrated approach in Planning terms to include house types and sizes reflecting the social and economic spectrum of a vibrant community.</p>

LPPO183	Historic England - E, Boden		Historic England's detailed comments on the proposed housing allocations assessed within the Council's HIA can be found at Appendix A to this letter. However, Historic England notes that there are a number of proposed housing allocations that have not been assessed, but which may have a impact on the significance of a heritage asset/s and therefore considers that these would benefit from such an assessment, prior to allocation. These include: H37, H48, H49, H51 and H53.
LPPO184	Hazel Slade & Rawnsley Community Association - D, Williams		Site reference H30 has already been subject to planning application refusal in 1999. A full application made in 2020 did not fulfil all the requirements that determine the suitability of development in this particularly sensitive location, and consequently may be subject to further unwelcome consideration by the Planning Committee. We do not support site H30 and cannot sensibly comment on other sites identified.
LPPO185	Natural England- G, Driver		We provide the following advice on the proposed allocations listed in Tables B and C. Table B: All the sites will have potential for recreational impacts Cannock Chase SAC/SSSI and potentially air quality impacts on the Cannock Chase SAC/SSSI, Cannock Extension Canal SAC and West Midland Mosses SAC. The sites below have the following additional potential impacts listed below: H16/H17 - very close proximity to Cannock Chase AONB. Table C: All the sites will have potential recreational impacts Cannock Chase SAC/SSSI and potentially air quality impacts on the Cannock Chase SAC/SSSI, Cannock Extension Canal SAC and West Midland Mosses SAC. The sites below have the following additional potential impacts listed below: SH2 (part) Land to the East of Wimblebury Road, Heath Hayes • Close to Chasewater and Southern Staffordshire Coalfield Heaths SSSI-significant recreational impact, potential water quality/quantity and air quality impacts. • Hydrological linked to Chasewater and Southern Staffordshire Coalfield Heaths SSSI (unit 13) and consequently Cannock Extension Canal SAC. • Site is adjacent to priority habitat- deciduous woodland. H30: • Significant recreational impact on Cannock Chase SAC and Hednesford Hills (Chasewater and Southern Staffordshire Coalfield Heaths SSSI which is part of the functional connectivity of Cannock Chase SAC). • Significant landscape/visual impacts on the setting of the AONB. • Loss of priority habitat -lowland acidic grassland. • See NE's response to the current planning application CH/20/381 for further details. H29, H44 and H47: • See NE's response to the current planning application CH/20/381 for further details. We advise you to look at the Cannock Chase AONB Views and Setting Guidance to help understand and assess potential impacts on the AONB from the proposed allocations.
LPPO186	Sport England - R, Bahey		In viewing the interactive proposal plan it is noted that SH1, H35 and H50 are proposed allocations. The sites are either active or lapsed sports and recreation sites and the loss of provision should be replaced where appropriate in line with the requirements of NPPF para 97 or in the case of lapsed sites contributions towards enhancement to existing sports sites could be sought to address shortfalls identified within the Council's Playing Pitch Strategy. Sport England would welcome further discussions regarding this matter.

LPPO187	Lichfield District Council - S, Stray		LDC note the cross boundary planning application for the Power Station site that gained outline planning permission on 8th April 2021 with the Reserved Matters planning application forthcoming and also the sites allocation with the PO document for 1,000 dwellings (H20: Table B) and employment land identified within Table F of Policy SO4.2. We note that the split of uses and dwellings will be based on the administrative boundaries between the two authorities with the larger proportion of homes being located within Lichfield District.
LPPO188	Severn Trent		The following table summarises some of the sites where we envisage potential risk to the sewerage network depending on how they come forward. These risks are not confirmed nor are they "show stoppers" they are purely an indication of sites which are in a location or of a size where there may be an impact to the sewerage network which requires infrastructure capacity work. The surface water risk indicates that a site may not have a sustainable surface water disposal option from the drainage hierarchy and could end up discharge flows to the combined network.
LPPO189	Home Builders Federation - S, Green		Policy SO3.1 allocates new housing sites within the existing urban areas and as sustainable urban expansions. There are 5 strategic housing allocations for approximately 1, 538 dwellings. Table B comprises of 12 sites for circa 1,432 dwellings. Table C comprises of 27 sites for circa 1,007 dwellings. The HBF have no comments on individual sites proposed for allocation but an accurate assessment of availability, suitability, deliverability, developability and viability should be undertaken. It is critical that the Council's assumptions on lead in times and delivery rates are correct and realistic, which should be supported by parties responsible for the delivery of housing on allocated sites. The Council's HLS should provide a sufficient supply of land to meet the housing requirement, to ensure the maintenance of a 5YHLS and to achieve HDT performance measures. The 2019 NPPF sets out that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and if appropriate to set out the anticipated rate of development for specific sites (para 73). Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies. There should be a short and long-term supply of sites on brownfield and greenfield land. The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides competition in the land market. A diversified portfolio of housing sites also offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. As set out in the 2019 NPPF at least 10% of the housing requirement should be accommodated on sites no larger than 1ha or else demonstrate strong reasons for not achieving this target (para 68a). For Cannock Chase, 10% of the housing requirement is approximately 600 dwellings. The Council should confirm that this national policy requirement will be achieved.

LPPO190	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The inclusion of land within Table C is queried. This includes numerous sites within the urban areas which are still fully operational and the likelihood of them becoming available for alternative housing development of the LP period is open to conjecture. As a result the overall provision of housing within the Plan, as it is reliant on Tables B and C, is questioned.
LPPO191	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The inclusion of land within Table C is queried. This includes numerous sites within the urban areas which are still fully operational and the likelihood of them becoming available for alternative housing development of the LP period is open to conjecture. As a result the overall provision of housing within the Plan, as it is reliant on Tables B and C, is questioned.
LPPO192	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The inclusion of land within Table C is queried. This includes numerous sites within the urban areas which are still fully operational and the likelihood of them becoming available for alternative housing development of the LP period is open to conjecture. As a result the overall provision of housing within the Plan, as it is reliant on Tables B and C, is questioned.
LPPO193	A, Newton	CT Planning - P, Kreuser	This representation is made on behalf of Mr Andrew Newton with respect to Land at UK Architectural Antiques, Hayfield Hill, Cannock Wood, Staff, WS15 4RU, shown marked red on the attached Location Plan 4721.77. Land at Hayfield Hill comprises some 0.6ha of previously developed land. Additional land in the ownership of Mr Newton is shown marked blue on the attached plan. Object to Policy SO3.1, and particularly Table C - Proposed Allocations. All the proposed 27 allocations in Table C are located within or adjacent to the urban areas of Cannock/Hednesford/Heath Hayes, Rugeley and Norton Canes. There are no allocations within the rural villages. The Spatial Strategy and consequently Table C should be amended to allocate appropriately sized housing allocations in the key rural villages. Such allocations will help support local housing and community needs. Land at UK Architectural Antiques, Hayfield Hill is located closed to the existing settlement boundary for Cannock Wood. The site comprises previously developed land. It is appropriately located as a housing allocation. The site is located in a sustainable location: Chaserider bus service 62 runs along Hayfield Hill adjacent to the site providing a service between Chase Terrace/Sankey's Corner and Cannock. Cannock Wood has a village hall and shop and a nearby primary school. Additional community services and facilities can be found at Sankey's Corner some 2km from Land at UK Architectural Antiques. There is a footpath along Hayfield Hill. It is submitted that the site should come forward for residential development for some 20 dwellings. Such new dwellings would serve a local need and would help maintain and enhance the vitality of the village. There is also sufficient land within the wider land holding to provide additional woodland planting and public access to offset the loss of Green Belt land as part of any compensatory improvements to local quality and accessibility in line with the requirements of paragraph 138 of the NPPF. The Settlement Boundary to the south of Cannock Wood should be extended to include Land at UK Architectural Antiques and the site allocated for residential development in Table C to Policy SO3.1.

LPPO194	Pentalver Cannock Limited	Tetra Tech Ltd - N, Abbott	<p>Our comments are in relation to the former Rumer Hill Industrial Estate to the south east of Cannock Town Centre which under the Preferred Options Local Plan is currently proposed to be allocated for employment purposes under site E3 in Table F (Employment Site Allocations). The allocation follows the grant of the March 2020 planning permission (CCDC ref: CH/19/280) for the expansion of the container storage depot. As a result both of the impacts of the pandemic and their operating requirements, the landowner, Pentalver Cannock Limited is no longer looking to implement the planning permission for the expansion land and consider, due to its location adjacent existing residential properties on Rumer Hill Road that the site is suitable for residential development and therefore request that the site is included as a residential allocation to be added to Table C. As the Council will know, back in 2020 the land was the subject of an outline application for residential development (CCDC ref: CH/10/0364) which was supported both by officers at the time and the members of the Planning Control Committee although ultimately that application was withdrawn. It is also noted that within the Council's Local Plan Preferred Options Development Capacity study which provides part of the Local Plan's evidence base, Section 6.3 identifies three sites including the former Rumer Hill Industrial Estate land which are stated may offer capacity for housing development in the longer term but are currently being used for, or in this case, were proposed for alternative uses i.e. employment use. The report then goes on to state that the sites will be monitored overtime to see if they could be included as part of the longer-term housing capacity. In light of the above and the current circumstances and objectives of Pentalver Cannock Limited., we would hope that the Council would agree to allocating this land for residential purposes. The western-most part of the former Rumer Hill Industrial Estate land is owned by the Coal Authority as a mine water lagoon and therefore is excluded from the land available for residential development. The land available for residential allocation is shown edged on the plan below and amounts to 2.38ha in area. Applying a notional 35 dwelling per hectare density assumption suggests that the land has capacity for up to 99 dwellings. Any future residential scheme will need to include suitable acoustic mitigation measures to ensure that the operation of the adjoining container terminal is not adversely impacted.</p>
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LPPO195	The Church Commissioners for England	Barton Willmore - A, Bird	<p>The proposed allocations listed in Tables B and C include a number of brownfield redevelopment sites within the urban areas. Whilst we are supportive of the principle of utilising brownfield redevelopment sites within the urban areas. Whilst we are supportive of the principle of utilising brownfield redevelopment sites as far as possible (in line with the NPPF, paragraph 137 and Chapter 11) in order for the housing strategy to be effective it should be ensured that the sites identified are capable of being delivered over the draft Plan period (as per the NPPF, paragraph 67). For instance, there are some proposed site allocations within town centre/existing urban areas may have more complex suitability and land availability considerations to factor in the SHLAA (2020). For example, proposed allocation M1 (Multi Storey Car Park, Market Hall and Retail Units, Cannock) for 40 dwellings, where the SHLAA (Site Reference states C504) states this is part of a wider redevelopment scheme and the site is located adjacent to a Conservation Area and a listed building. Former employment sites, such as proposed allocation H47 (Former Kodak and Milk Depot, Brereton) may have land contamination issues to address (as noted within the SHLAA, Site Reference R43 (a) (b)) and lie within existing industrial estates, giving rise to issues regarding amenity. By providing further flexibility within the housing land supply via additional allocations for sites which are suitable, available and achievable, the draft Plan would be able to better mitigate the risks associated with some of the proposed allocations and providing a greater 'contingency' in the event that their delivery is delayed, or they do not come forward. This would ensure the housing strategy is effective.</p>
LPPO196	Staffordshire County Council - J, Chadwick		<p>We have not reviewed each of these, but provisionally yes, so long as they have been assessed as part of the HIA exercise, and any potential harm can be mitigated as per the recommendations of that report. Further archaeological evaluation and recording works may be required as per NPPF 189 and 199 for specific applications.</p>

LPPO197	Taylor Wimpey (Land East of Wimblebury Rd)	RPS - P, Hill	<p>Proposed Site Allocation SH2: Policy SO3.1 of the CCLPR identifies a number of new proposed housing allocations, including SH2 East of Wimblebury Road, with a suggested capacity of approximately 410 dwellings. Site SH2 is listed in Table C of the CCLPR under this policy. [...]. The principle of this allocation is strongly supported. RPS notes that the Cabinet report seeking approval to undertake consultation upon the preferred options version refers to the site having capacity for 260 homes, while text in the preferred options version (at Table c) also refers to a capacity for 150 homes as identified through the Cannock Chase District Development Capacity Study 2021. It is understood that these figures relate to the additional capacity that would be created through the release of additional land from the Green Belt (under SHLAA ref C279), and the capacity of the current safeguarded area respectively (under ref C84). Together, these two figures sum to the 410 dwelling capacity stated in Policy SO3.1: Provision for New Homes. RPS supports the proposed allocation of Land East of Wimblebury Road, Cannock (SH2) for 410 dwellings in the CCLPR. The only policy constraint impacting on the site (C279) relates to the current Green Belt designation covering that portion of the site as a whole. The SHLAA 2020 (Appendix 10 and 11) identifies some potential constraints relating to sub-parcels, but these relate more to proximity to those constraints, rather than factors affecting the suitability of the site directly. As highlighted in the previous chapter, TW has commissioned new evidence, which will address all technical issues relating to the site and thus, will support the contention that site SH2 is suitable for residential development following the release of sub-parcel C279 from the Green Belt. Proposed Policy for Site SH2: It is acknowledged that the Regulation 19 Plan will contain policies for the individual allocations. Set out below is proposed wording for a site-specific allocation policy for Land East of Wimblebury Road (SH2). It draws on the overarching policy approach set out in Policy SO3.1 (Provision of New Homes) to inform the range of criteria that development at the Site should, reasonably, be expected to address. [See document for draft text].</p>
			<p>Question 14: In the next iteration of the Plan we will develop site specific allocation policies. Are there any local infrastructure requirements the sites in Tables B and C should address?</p>

LPPO198	D, Hughes		General comments about the CCLP for Brereton and specifically the proposals for housing for the sites marked as R43 (H47) which appears to be converting various business use sites to housing developments on Redbrook Lane. I believe there are opportunities to solve some traffic problems in the area. With large numbers of huge trucks running through the mainly residential areas of Ravenhill and Brereton down past the CO-OP to access the A460 Main Road, Brereton. These trucks have consistently intimidated local traffic and chewed up the road surfaces in these areas causing numerous potholes which tend not to get repaired. It seems there is an opportunity (when the residential developments go in at the R43 sites) to separate the industrial and business uses that are located up Redbrook Lane, The Levels and Kimberley Way and closing that access from the business area. Instead forcing commercial traffic out via Colliery Road and discouraging them from cutting through the narrow roads of the residential areas. If heavy business traffic is not going to be tracking through the adjacent residential areas on a regular basis in the future, perhaps the severe traffic calming measure in these areas (Redbrook Lane, Birch Lane, Talbot Road and others) could be lowered so as to reduce the damage to normal cars.
LPPO199	Archdiocese of Birmingham, Deacon P. O'Connor		H53 - Given that this is a brownfield site, there are no infrastructure blockages to development, there should be no concern regarding the final total of dwellings.
LPPO200	St Modwen	RPS - P, Hill	Specifically in relation to infrastructure requirements associated with Areas E and I (H16 and H17), the Council will be aware that the proposals themselves contain both on site infrastructure (SuDS/Access etc) and additional off-site infrastructure through the provisions with the Section 106 for each site which have now reached an advanced stage and contain proposals for additional infrastructure proposals which fully mitigate the impacts of both developments. In addition to which both parcels are CIL liable. Therefore, no additional infrastructure proposals are required, beyond those already committed in respect of the Land West of Pye Green Road site.
LPPO201	Hazel Slade & Rawnsley Community Association - D, Williams		We would not wish to see site H30 incorporated in any plan. There are already significant infrastructure deficiencies. E.G. high speed broadband, footpath between Rawnsley Road and Rugeley Road.
LPPO202	Severn Trent		For the sites in the above table that have a "surface water constraints" as medium or high; these sites may benefit from some form of policy around how they manage surface water to ensure they can come forward sustainably.
LPPO203	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Any infrastructural requirements should be proportionate and reasonable in the same way that infrastructure requirement for the larger strategic allocations must also be. They must also be subject to detailed viability appraisal.

LPPO204	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Any infrastructural requirements should be proportionate and reasonable in the same way that infrastructure requirement for the larger strategic allocations must also be. They must also be subject to detailed viability appraisal.
LPPO205	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Any infrastructural requirements should be proportionate and reasonable in the same way that infrastructure requirement for the larger strategic allocations must also be. They must also be subject to detailed viability appraisal.
LPPO206			In response to Question 13, specialist accommodation for older people should be located in a variety of spatial forms to provide the greatest choice for future residents. Sites should be allocated for specialist accommodation with evidenced housing targets produced for this use. A needs assessment should be produced to determine the current and anticipated provision of housing for older persons in all tenure types. Many Councils argue that older persons accommodation should be provided through windfall sites alone. The provision of specialist housing for this population through windfall sites alone is not sufficient. In combination, the allocation of sites through strategic housing areas, windfall sites, and specific specialist accommodation allocations will allow CCDC to set targets for the number of specialist housing for older people with a more targeted approach to the provision of housing for this growing population. Finally, I would also draw your attention to the NPPG Paragraph 4 (Ref ID: 63-004-20190626) which states that the future needs for specialist accommodation for older people should broken down by tenure and type. The sites proposed for allocation in tables B and C do not explicitly state whether any such strategic or other site allocations will include the requirement for housing for older people, despite this being a supported by the majority of representations to the previous consultation on the Reg 18 Issues and Options consultation (para 6.203). Further, we direct the Council to the enclosed document titled 'Representation by Inspired Villages' (9 November 2020), recommendations one, two, three and four in particular.
			SO3.2: Housing Choice
			Question 15: Do you support the level of provision of affordable dwellings?
LPPO207	Walsall Council - N, Ball		Given that some of the housing proposed will meet needs arising from the Black Country, it is important that this includes a good proportion of affordable housing. Paragraph 6.206 of the Plan states that the Local Housing Need Assessment calculated that 37% of the new housing proposed should be affordable dwellings. However, the proposed policy direction only states that at least 20% of dwellings should be affordable (and this policy will only apply for developments above 10 homes). The proposed policy is ambiguous in respect of whether it applies to sites of above 10 homes or 10 homes or more.

LPPO208	Bromford Housing Group	PlanIt Planning and Development - J, Williams	Objective 3 of the emerging Plan states that developments of 10 dwellings or more should provide at least 20% of the total number of houses as affordable properties. We fully support the provision of affordable housing. It is a clear aspiration of the Framework to ensure that affordable housing is provided where it is needed. However, 20% affordable housing provision is insufficient to meet the affordable housing requirements of the District. As referred to in our representations to Policy SO3.1 , approximately 40% of the total housing requirement would need to be delivered as affordable dwellings to meet the identified affordable housing need. This is not, however, possible, due to viability constraints and as such it is not possible or appropriate to increase the percentage level of provision further. It is, therefore, our view that it would be beneficial for the Plan to make it clear that significant weight will be afforded to development proposals that provides in excess of 20% affordable housing. This will assist the local authority in delivering much needed affordable homes.
LPPO209	Norton Canes Parish Council		Policy SO3.2 concerning affordable housing and housing standards this is broadly supported. However given the support at National policy level, clear evidence of need and the fact that other Local Plans include such a policy, it is wished to see a requirement for a percentage of small bungalows designed for the elderly on major new housing development sites to be a requirement.

LPPO210	West Midlands Housing Association Planning Consortium	Tetlow King Planning - L, Stoate	<p>The Council should set the affordable housing requirement at a level which viably maximises delivery on all sites, enabling delivery in a wide range of circumstances. The preferred policy direction states that the Council will be looking to set a threshold at of at least 20% affordable housing on sites for major applications. We encourage the Council to be ambitious in setting its affordable housing thresholds, particularly as the preferred options document states at paragraph 6.206 that 37% of new housing proposed should be affordable dwellings, and that “the need for affordable dwellings across the district will not be met in entirety by this plan” (Paragraph 6.213). The Council should seek to maximise on-site delivery of affordable housing where this will meet needs, and consider off-site financial contributions as an exception, in line with the revised NPPF expectation for viability discussions to become truly exceptional. We see that the policy direction also outlines the Council’s preferred affordable tenure split as “80% for rent and 20% for intermediate housing or other routes to affordable home ownership”. The Council will need to clarify if this is social or affordable rent and will need to justify this tenure split with robust evidence that takes into consideration of all of the affordable housing tenures available on the market following the revisions to the NPPF affordable housing definition in 2019. The HAPC recognises that the government intends to introduce First Homes as an alternative affordable home ownership product, which will require local planning authorities to secure First Homes as 25% of the affordable housing contribution. The exact detail is yet to be confirmed in a forthcoming Written Ministerial Statement, but we are concerned that the First Homes requirement will squeeze out shared ownership as alternative affordable homeownership tenure. Notwithstanding the requirement for First Homes, we hope that Cannock Chase will continue to support shared ownership as an affordable homeownership tenure which is a well-recognised and enables many to access the property ladder. Clearly the requirement for First Homes is another considering in determining the appropriate tenure splits for the district and therefore 80% rent does seem too high. It remains appropriate for the Council to set a district-wide policy of encouraging development to deliver a sufficient mix of house types, tenures, and restrictions to meet specific needs where these occur, and as viable. The Local Housing Needs Assessment (LHNA) (2019) reveals an annual need of 110 affordable dwellings between 2018 and 2038, of which, 11% are needed to be one bed, 65% two bed, 16% 3 bed and 8% 4+ bed. The preferred housing mix at Table D on page 79 aligns with these findings. Policy on housing mix should reference not only the most up to date evidence base but allow developers to demonstrate how proposals will meet local needs in accordance with any other up to date evidence, such as housing need surveys, the housing register, and reference to existing stock. We are therefore pleased to see that the tenure mix and type of affordable provision will be agreed with the Council’s housing manager on a site by site basis and secured through an appropriate legal agreement. We note at paragraph 6.210 that S106 agreements will be expected to ensure that affordable housing remains at an affordable price in perpetuity. While it is true that the NPPF</p>
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			<p>requires provisions for affordable rented properties to remain at an affordable price for future eligible households, it does not remove the right for housing associations to sell their affordable housing on non-rural exception sites. The NPPF's sole reference to retaining affordable housing in perpetuity is in Annex 2 where this is sought for affordable housing delivered on rural exception sites only. This principle is appropriate and supported by our Members as this helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported. We are therefore pleased to see that the Council will support the delivery of affordable housing on rural exception sites in line with draft policy SO3.1.</p>
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LPPO211	Home Builders Federation - S, Green		<p>The Council's preferred policy approach on sites of 10 or more dwellings is for at least 20% of dwellings to be affordable housing, with 80% for rent and 20% for intermediate housing or other routes to affordable home ownership. The Council should viability test the provision of at least 20% affordable housing. At Examination, viability will be a key issue in determining the soundness of the Local Plan. In plan-making, viability will be a key issue in determining the soundness of the Local Plan. In plan-making, viability is inseparable from the deliverability of development. Therefore, the viability of individual developments and plan policies should be tested at the plan making stage, Without a robust approach to viability assessment, land will be withheld from the market and housing delivery will be threatened. Viability assessment should not be conducted on the margins of viability. The Council's proposed affordable housing tenure mix is inconsistent with national policy. The 2019 NPPF promotes affordable home ownership by requiring at least 10% of new dwellings built to be available for this tenure leaving only the remained for other affordable housing tenures (para 64). The Government's Changes to the Current Planning System (ended on 1st October 2020) and The Government's consultation on Draft Revisions to the NPPF (ended on 27th March 2021) also propose further changes to facilitate the delivery of First Homes. The Council's proposed affordable housing tenure mix should be amended to accord with national policy.</p>
LPPO212	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	<p>The proportion of affordable dwellings is identified at 20% with 80% of this for rent and 20% for intermediate housing or other routes to affordable home ownership. The Government have identified in the NPPF (para 64) that they are seeking to provide 10% of all new units across the board as available for affordable home ownership. The approach set out in the Preferred Policy Direction in the LP would not deliver this requirement. The Policy Direction identifies that 20% of the total would be affordable and of this one fifth would fall within the intermediate housing bracket which would include routes to affordable home ownership. Rather than delivering 10% of the total this would deliver only 2% falling within the intermediate bracket and even if this was given entirely over towards the Government's proposed requirement for affordable home ownership would not deliver 10%. The Government's Changes to the Current Planning System (ended on 1st October 2020) and the Government's consultation on Draft Revisions to the NPPF (ended on 27th March 2021) also propose further changes to facilitate the delivery of First Homes. The Council's proposed affordable housing tenure mix should be amended to accord with national policy.</p>

LPPO213	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The proportion of affordable dwellings is identified at 20% with 80% of this for rent and 20% for intermediate housing or other routes to affordable home ownership. The Government have identified in the NPPF (para 64) that they are seeking to provide 10% of all new units across the board as available for affordable home ownership. The approach set out in the Preferred Policy Direction in the LP would not deliver this requirement. The Policy Direction identifies that 20% of the total would be affordable and of this one fifth would fall within the intermediate housing bracket which would include routes to affordable home ownership. Rather than delivering 10% of the total this would deliver only 2% falling within the intermediate bracket and even if this was given entirely over towards the Government's proposed requirement for affordable home ownership would not deliver 10%. The Government's Changes to the Current Planning System (ended on 1st October 2020) and the Government's consultation on Draft Revisions to the NPPF (ended on 27th March 2021) also propose further changes to facilitate the delivery of First Homes. The Council's proposed affordable housing tenure mix should be amended to accord with national policy.
LPPO214	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The proportion of affordable dwellings is identified at 20% with 80% of this for rent and 20% for intermediate housing or other routes to affordable home ownership. The Government have identified in the NPPF (para 64) that they are seeking to provide 10% of all new units across the board as available for affordable home ownership. The approach set out in the Preferred Policy Direction in the LP would not deliver this requirement. The Policy Direction identifies that 20% of the total would be affordable and of this one fifth would fall within the intermediate housing bracket which would include routes to affordable home ownership. Rather than delivering 10% of the total this would deliver only 2% falling within the intermediate bracket and even if this was given entirely over towards the Government's proposed requirement for affordable home ownership would not deliver 10%. The Government's Changes to the Current Planning System (ended on 1st October 2020) and the Government's consultation on Draft Revisions to the NPPF (ended on 27th March 2021) also propose further changes to facilitate the delivery of First Homes. The Council's proposed affordable housing tenure mix should be amended to accord with national policy.

LPPO215	Friel Homes Ltd	CT Planning - P, Kreuser	<p>[...]. Support the inclusion of Policy SO3.2 Housing Choice and Housing Mix Table D in the Local Plan Preferred Options. Indicative Site Layout (ALR-001 Rev B) submitted with this representation demonstrates that the site SH4 can deliver the 33 dwellings as required in Policy SO3.1. The housing mix on the Indicative Layout comprises some 1, 2 and 3no. bedroomed properties and is broadly broadly compliant with the Local Plan preferred Housing Mix set out at Table D on page 79 of the Preferred Options document. (see document for housing mix proposed for SH4). The indicative Layout includes for some 11 of 33 dwellings to be provided as bungalows. The provision of a high proportion of bungalows on the site will assist housing choice in the local area. There is a demand, and an increasing future demand for single storey living by the elderly and those living with limiting long term illness; a matter recognised and sought to be addressed in Policy SO3.3 (Delivery High Quality Housing). Cannock Chase District is expected to experience an increase of 41% i n the population of 65years and over during the period of the Local Plan. The Local Authority has a requirement to provide for the needs of different groups in society. The provision of Affordable Housing on the site will assist Cannock Chase District Council in achieving their obligation.</p>
LPPO216	ENGIE - D, Sager	Barton Willmore - J, Bonner	<p>The draft Plan sets out that for developments above 10 homes, at least 20% of the total number of dwellings should be affordable housing with 80% for rent and 20% for intermediate housing or other routes to affordable home ownership. We note that the draft Plan is not yet supported by an up-to-date Viability Assessment and therefore this policy should be kept under review in light of the emerging evidence base. This approach is in accordance with the NPPF (paragraph 34) which states that policies setting out the levels and types of affordable housing provision required, should not undermine the deliverability of the Plan. In principle we have no issues with the affordable housing targets and we support the aims, subject to ensuring there is evidence to support it. The draft policy provides detail on housing mix, stating that: "a mix of housing sizes, types and tenure appropriate to the area and as supported by local evidence should be provided...". "The size, type and tenure of homes on sites of 15 or more units (including conversions) will be specified in the site allocation policy or where not specified will be in accordance with Table D below or its subsequent revisions. The housing mix in Table D will not be applied to developments falling within Class C2 of the Use Classes Order." This approach is generally supported, but we would encourage an emphasis on flexibility given the length of the Plan period and changing evidence on housing need. We would suggest that the overall policy wording could be clarified further state that where a housing mix is broadly in line with the requirements set out in Table D (or Site Allocation Policy) it will be considered acceptable. The policy should recognise that the requirements set out in Table D cannot be applied as a blanket approach. It needs to be applied flexibly to reflect the individual characteristics of the site. For example, delivering at higher densities in sustainable locations may necessitate the delivery of flats on part of a site, which may affect the ability to deliver the desired mix. We would also note</p>

			that site specific matters may require alternative approaches that may not be apparent at the point of the mix being determined at the allocation or planning permission stage, and so the policy should acknowledge this need for flexibility to assist with delivery.
LPPO217	The Church Commissioners for England	Barton Willmore - A, Bird	The principle of these draft Policies to address the specific local housing needs of the District is supported. Nevertheless, in line with the NPPF (paragraph 34) and PPG ('Viability' see Paragraph 001 Reference ID: 10-001-20190509 and Paragraph 002 Reference ID: 10-002-20190509) the requirements should be fully evidence by supporting assessment work, including a Viability Assessment. This should ensure the cumulative requirements of the draft Plan policies do not undermine the deliverability of the plan overall. We note that the draft Plan is not yet supported by an up-to-date Viability Assessment and therefore this policy should be kept under review in light of the emerging evidence base. In accordance with the PPG (Paragraph: 010 Reference ID: 10-010-20180724) as part of the Viability Assessment and therefore this policy should be kept under review in light of the emerging evidence base. In accordance with the PPG (Paragraph: 010 Reference ID: 10-010-20180724) as part the Viability Assessment the Council should look to engage with key stakeholders as part of the process including developers and landowners.
			Question 16: Do you support the approach to encouraging home working?
LPPO218	Together Active - J, Brennan		Yes, I support his for work life balance and climate change reasons

LPPO219	Home Builders Federation - S, Green		<p>The Council's preferred policy approach proposed that on sites of 15 or more dwellings, housing mix will be specified in the site allocation policy or where not specified will be in accordance with Table D - Housing Mix or its subsequent revisions. Where market housing is supported by connection to superfast broadband, a flexibility of 4% will be permitted across the dwelling sizes to facilitate homeworking. All households should have access to different types of dwellings to meet their housing needs. As set out in 2019 NPPF, the housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (para 61&62). All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The Councils should recognise that market signals are important in determining the size and type of housing needed. An overly prescriptive policy approach on housing mix is inappropriate. The Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households rather than prescribing specific housing mixes for individual sites. The Local Plan should ensure that suitable sites are available for a wide range of different types of development across a wide choice of appropriate locations. The Council should consider allocating sites for older persons and other specialist housing subject to criteria such as the proximity of sites public transport, local amenities, health services and town centres. If Table D is retained, additional flexibility should be provided by setting out ranges of percentages.</p>
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LPPO220	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	<p>The approach to homeworking seems to consist of a flexibility of 4% in regard to market housing size restrictions if superfast broadband connections are provided. This would allow 76% of the total market housing to be within the three-bedroomed sector rather than the 72% prescribed in Table D. As set out above the whole approach to prescribing the size of market housing is flawed and this minor amendment is unlikely to foster provision of superfast broadband. Policy SO3.3 sets out the Council's approach for delivering high quality housing. The Council's approach has been to target larger homes consistent with the Nationally Prescribed Space Standards and to require developers to provide for households with health problems or disabilities. The Council's jurisdiction derives from the Local Housing Needs Assessment that states that 60% of all new housing should be suitable for the needs of households with health problems or disabilities. The Council goes on to state that this could be through the provision of single level accommodation such as bungalows and ground floor flats or through the provision of dwellings which comply with Part M4(2) or Part M4(3) of the Building Regulations or can be easily adapted to meet these standards. The explanatory text goes on to indicate that the 60% provision of new housing to meet the needs or households with health problems or disabilities reflect future forecasts and deficiencies in the existing housing stock. It also supports the need for a target of 13% of all housing to meet M4(3) Category 3 requirements and a 47% of all housing to meet M4(2) Category 2 requirements. The explanatory text also requires that the Nationally Prescribed Space Standards will assist the Authority in attracting greater numbers of people to work from home which will assist the Council in achieving its zero carbon ambitions. Richborough Estates supports the objective of delivering high quality design and resilience and providing adequate space to achieve good living standards. However, objection is raised to providing a minimum of 60% of new homes to be suitable for households with health problems or disabilities. The justification to the Policy refers to the SHMA and the need to remedy deficiencies in the existing housing stock. This suggests that households not suffering from health problems/disabilities will need to utilise existing housing stock whilst 60% of new stock is designed for people who have health problems. The policy is also unclear as, whilst the policy text itself refers to 60% of the total number of units being suitable for households with health problems/disabilities, it is supporting text which provides clarity of what this actually means and is defined as being 13% of all housing meeting M4(3) Category 3 housing and 47% M4(2) Category 2 housing. The Local Plan Preferred Options has made reference to the need for viability assessment to take place through the plan making process. However, no information is currently available which has assessed the potential impact of the requirement of Policy SO3.3 on viability.</p>
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LPPO221	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	<p>The approach to homeworking seems to consist of a flexibility of 4% in regard to market housing size restrictions if superfast broadband connections are provided. This would allow 76% of the total market housing to be within the three-bedroomed sector rather than the 72% prescribed in Table D. As set out above the whole approach to prescribing the size of market housing is flawed and this minor amendment is unlikely to foster provision of superfast broadband. Policy SO3.3 sets out the Council's approach for delivering high quality housing. The Council's approach has been to target larger homes consistent with the Nationally Prescribed Space Standards and to require developers to provide for households with health problems or disabilities. The Council's jurisdiction derives from the Local Housing Needs Assessment that states that 60% of all new housing should be suitable for the needs of households with health problems or disabilities. The Council goes on to state that this could be through the provision of single level accommodation such as bungalows and ground floor flats or through the provision of dwellings which comply with Part M4(2) or Part M4(3) of the Building Regulations or can be easily adapted to meet these standards. The explanatory text goes on to indicate that the 60% provision of new housing to meet the needs or households with health problems or disabilities reflect future forecasts and deficiencies in the existing housing stock. It also supports the need for a target of 13% of all housing to meet M4(3) Category 3 requirements and a 47% of all housing to meet M4(2) Category 2 requirements. The explanatory text also requires that the Nationally Prescribed Space Standards will assist the Authority in attracting greater numbers of people to work from home which will assist the Council in achieving its zero carbon ambitions. Richborough Estates supports the objective of delivering high quality design and resilience and providing adequate space to achieve good living standards. However, objection is raised to providing a minimum of 60% of new homes to be suitable for households with health problems or disabilities. The justification to the Policy refers to the SHMA and the need to remedy deficiencies in the existing housing stock. This suggests that households not suffering from health problems/disabilities will need to utilise existing housing stock whilst 60% of new stock is designed for people who have health problems. The policy is also unclear as, whilst the policy text itself refers to 60% of the total number of units being suitable for households with health problems/disabilities, it is supporting text which provides clarity of what this actually means and is defined as being 13% of all housing meeting M4(3) Category 3 housing and 47% M4(2) Category 2 housing. The Local Plan Preferred Options has made reference to the need for viability assessment to take place through the plan making process. However, no information is currently available which has assessed the potential impact of the requirement of Policy SO3.3 on viability.</p>
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LPPO222	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	<p>The approach to homeworking seems to consist of a flexibility of 4% in regard to market housing size restrictions if superfast broadband connections are provided. This would allow 76% of the total market housing to be within the three-bedroomed sector rather than the 72% prescribed in Table D. As set out above the whole approach to prescribing the size of market housing is flawed and this minor amendment is unlikely to foster provision of superfast broadband. Policy SO3.3 sets out the Council's approach for delivering high quality housing. The Council's approach has been to target larger homes consistent with the Nationally Prescribed Space Standards and to require developers to provide for households with health problems or disabilities. The Council's jurisdiction derives from the Local Housing Needs Assessment that states that 60% of all new housing should be suitable for the needs of households with health problems or disabilities. The Council goes on to state that this could be through the provision of single level accommodation such as bungalows and ground floor flats or through the provision of dwellings which comply with Part M4(2) or Part M4(3) of the Building Regulations or can be easily adapted to meet these standards. The explanatory text goes on to indicate that the 60% provision of new housing to meet the needs or households with health problems or disabilities reflect future forecasts and deficiencies in the existing housing stock. It also supports the need for a target of 13% of all housing to meet M4(3) Category 3 requirements and a 47% of all housing to meet M4(2) Category 2 requirements. The explanatory text also requires that the Nationally Prescribed Space Standards will assist the Authority in attracting greater numbers of people to work from home which will assist the Council in achieving its zero carbon ambitions. Richborough Estates supports the objective of delivering high quality design and resilience and providing adequate space to achieve good living standards. However, objection is raised to providing a minimum of 60% of new homes to be suitable for households with health problems or disabilities. The justification to the Policy refers to the SHMA and the need to remedy deficiencies in the existing housing stock. This suggests that households not suffering from health problems/disabilities will need to utilise existing housing stock whilst 60% of new stock is designed for people who have health problems. The policy is also unclear as, whilst the policy text itself refers to 60% of the total number of units being suitable for households with health problems/disabilities, it is supporting text which provides clarity of what this actually means and is defined as being 13% of all housing meeting M4(3) Category 3 housing and 47% M4(2) Category 2 housing. The Local Plan Preferred Options has made reference to the need for viability assessment to take place through the plan making process. However, no information is currently available which has assessed the potential impact of the requirement of Policy SO3.3 on viability.</p>
LPPO223	Wyrley Estates	Fisher German LLP - N, Borsey	<p>The estate does support the approach to encourage home working, however the policy SO4.4 needs to expand further, in particular the support for live/work housing types to be in identified suitable locations. Currently the policy is very broad.</p>

SO3.3: Delivering High Quality Housing			
Question 17: Do you support the preferred policy direction for delivering high quality housing?			
LPPO224	West Midlands Housing Association Planning Consortium	Tetlow King Planning - L, Stoate	<p>We agree with the council that new housing development should be of a high quality in terms of its design and resilience, and provide adequate space to achieve good living standards, as required by the NPPF. We accept that there is a growing need for properties which comply with Part M(2) or Part M(3) of the current Building Regulations and so we support this policy direction, although we would like to remind the Council how the increased delivery of such properties may affect viability and overall affordable housing delivery in Cannock Chase. It appears that the Council is looking to require that all new residential development adheres to the Nationally Described Space Standard (NDSS). If the Council seeks to require NDSS across all residential development, it must be demonstrated that it is being done to address a clearly evidenced need, as set out in Planning Practice Guidance (Paragraph: 002 Reference ID: 56-002-20160519). In the absence of this evidence, a blanket application of NDSS may undermine the viability of development schemes and through viability testing of application proposals, will result in fewer affordable homes being delivered across Cannock Chase. The NDSS is not a building regulation and remains solely within the planning system as a form of technical planning standard. It is not therefore essential for all dwellings to achieve the standard in order to provide good quality living. For affordable housing in particular, there may be instances where achieving NDSS is impractical and unnecessary. We recommend that the Council reviews the local plan viability assessments with regard to these matters in accordance with the PPG tests which require that where a need for the standards is identified, local planning authorities should justify inclusion of a policy, taking account of need, viability and timing:</p> <ul style="list-style-type: none"> • “need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. • viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. • timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.” (Paragraph: 020 Reference ID: 56-020-20150327)
LPPO225	Together Active - J, Brennan		Yes, but also where possible homes should have adequate access and spaces for secure cycle storage.

LPPO226	Home Builders Federation - S, Green	<p>If the Council wishes to apply the optional NDSS to new homes, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46). Footnote 46 states that "policies may also make use of the NDSS where the need for an internal space standard can be justified." As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out that "where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing". Before adopting the NDSS, the Council should provide a local assessment evidencing the case of Cannock Chase. The NDSS should only be introduced on a "need to have" rather than a "nice to have" basis. Need is generally defined as "requiring something because it is essential or very important rather than just desirable". If it had been the Government's intention that generic statements simply stating in some cases the NDSS had not been met justified adoption of the NDSS then the standard would have been incorporated as mandatory in Building Regulations, which is not the case. There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The Council's policy approach should not compromise the viability of development. NDSS compliant house typologies should be tested in the Council's viability assessment. The Council should recognise that customers have different budgets and aspirations. The introduction of the NDSS for all new homes may lead to customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs causing the unintended consequence of potentially increasing overcrowding and reducing the quality of their living environment. Smaller dwellings may be required to ensure that those on lower incomes can afford a property, which meets their bedroom requirements. An inflexible policy approach to NDSS for new homes may also impact on affordability and effect customer choice for First Homes and other affordable homeownership products, which may affect delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be determined by market affordability at relevant price points of dwellings and maximising absorption rates. A worsening of affordability may translate into reduced or slower delivery rates. If the proposed requirement for NDSS is carried forward, the Council should put forward proposals for transitional arrangements.</p>
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		<p>Land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approach prior to a specified date. Furthermore, under Preferred Policy SO3.3, developments providing a minimum of 60% of dwellings as suitable for households with health problems or disabilities will be supported. This provision could be provided as bungalows and ground floor flats or dwellings, which comply with Part M(2) or Part M(3) of the current Building Regulations (as a minimum) or can be easily adapted to meet these standards. As set out in the 2019 NPPF for effectiveness, a policy should be clearly written and unambiguous (para 16d). The Council's preferred policy approach should be clearer so both applicants and decision makers know what is required. However, if the Government implements proposed changes to Part M of the Building Regulations as set out in the "Raising Accessibility Standards for New Homes" consultation, which closed on 1 December 2020, the Council's proposed policy approach will be unnecessary. In the meantime, if the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46) and the NPPG. Footnote 46 states "that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties." As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focus focussed tightly on supporting and justifying the policies concerned (para 31). Therefore, a policy requirement for M4(2) dwellings must be justified by credible and robust evidence. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG. The Council's policy approach should not compromise the viability of development. Therefore, additional costs associated with M4(2) and M4(3) compliant dwellings should be included in the Council's viability assessment. The Government's consultation "Raising Accessibility Standards for New Homes" (ended 1st December 2020) estimates the additional cost per new dwelling is approximately £1,400 for dwellings, which would not already meet M4(2). The extra costs for M4(3) are much higher. In September 2014 during the Government's Housing Standards Review, EC Harris estimated the cost impact of M4(3) per dwelling as £15,691 for apartments and £26,816 for houses. These costs should be applied plus inflationary cost increases since 2014. M4(2) and M4(3) compliant dwellings are also larger than NDSS (see DCLG Housing Standards Review Illustrative Technical Standards Developed by the Working Groups August 2013), therefore larger sizes should be used when calculating additional build costs for M4(2) and M4(3) and any other input based on square meterage. Moreover, these enlarged sizes are unlikely to generate additional value.</p>
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LPPO227	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates support the principle of delivering high quality housing however some of the approach set out in Policy SO3.3. can have potentially significant implications. The requirements to meet with M4(2) Category 2 requirements and M4(3) Category requirements of the Building Regulations may have implications for the viability of some developments. This does not appear to have been assessed. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in NPPG (ID 56-005-20150327 to 56-011-20150327). It is also worth noting that have a development made up of 60% bungalows and flats would very likely not deliver a high-quality scheme based on design best practice.
LPPO228	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates support the principle of delivering high quality housing however some of the approach set out in Policy SO3.3. can have potentially significant implications. The requirements to meet with M4(2) Category 2 requirements and M4(3) Category requirements of the Building Regulations may have implications for the viability of some developments. This does not appear to have been assessed. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in NPPG (ID 56-005-20150327 to 56-011-20150327). It is also worth noting that have a development made up of 60% bungalows and flats would very likely not deliver a high-quality scheme based on design best practice.
LPPO229	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates support the principle of delivering high quality housing however some of the approach set out in Policy SO3.3. can have potentially significant implications. The requirements to meet with M4(2) Category 2 requirements and M4(3) Category requirements of the Building Regulations may have implications for the viability of some developments. This does not appear to have been assessed. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in NPPG (ID 56-005-20150327 to 56-011-20150327). It is also worth noting that have a development made up of 60% bungalows and flats would very likely not deliver a high-quality scheme based on design best practice.

LPPO230	ENGIE - D, Sager	Barton Willmore - J, Bonner	<p>Preferred Policy SO3.3: Delivering High Quality Housing requires new dwellings to meet Nationally Described Space Standards. We note that Footnote 46 of the NPPF advises that policies may make use of the nationally described space standard, "where the need for an internal standard can be justified". As set out in the NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate, and focussed tightly on supporting and justifying the policies concerned (paragraph 31). The PPG (Reference ID: 56-020-20150327) identifies that "where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing." The Council should therefore ensure the supporting evidence base to the draft Plan is available and reflects the PPG requirements. We also consider that the policy should exclude this requirement for sites which already have outline planning permissions which predates adoption of the draft Plan, as retrospectively applying the policy on reserved matters may affect deliverability. In respect of the need for developments to provide housing that is suitable for households with health problems or disabilities, the policy is unclear what the target requirement is (with 60% being supported, not required). This should be clarified and supported by evidence around deliverability. NPPF (Footnote 46) States that "planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties." The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG (Reference ID: 56-005-20150327 to 56-011-20150327). Again, as with minimum space standards it may be appropriate to exclude sites with extant outline planning permission.</p>
General Housing Site Allocation Responses			
LPPO231	R, Elphick		<p>SH1 (C116a) - From the plan, it is clear that the only access to the area would be from two new islands on the A5190. With some estimated 700 dwellings, a school and country park this would without a doubt create an enormous amount of increased traffic on the Cannock Road. Over the last 20years, there has been a very significant rise in the volume of vehicles including HGVs using this road. Another most important point definitely worth noting, is with the Designer Outlet due to open shortly, this will without question, contribute even more towards the problem. Finally the subject, of air pollution is a most serious factor also to be considered. Apparently the Monitoring Unit which is sited near Five Ways Island reveals a reading above the national acceptable limit.</p>

LPPO232	L, Guy		<p>I strongly oppose all of the housing developments planned for our area. I personally feel the area is built up enough already. We have issues with traffic for the tip, which causes the traffic to build up and can cause frustration, road rage and dangerous driving this would surely only increase. Traffic along Cannock Road is getting worse. Schools are already to capacity, where will all these new children go? The better facilities for out door activities are always over populated when the weather is nice, like Hednesford Park and the one near the SNAP centre. What other amenities are being proposed for older children/teenagers? It is near impossible to get an appointment with the doctors due to them having none left, what will be done about this? Have these all been thought about? As I feel it is more about making money, and not about maintaining a nice area for people who live here already. Why do we need to keep developing on our green spaces? If there is space for development why can't something be put there to benefit people who already live here like a new park. Putting a tiny little park with barely any equipment on it in a new development like it has been done in Hednesford and Burntwood is of no benefit to anyone.</p>
LPPO233	O, Lakin		<p>I write to express my utter disbelief that I have seen plans to build new houses on the beautiful green land in front of our homes! The very small amount of green land left in Heath Hayes, may I add compared to surrounding areas! The damaging affect of the McArthur Glen is enough on the noise, traffic and air pollution to our homes facing this main road without a new build estate being built outside our windows. We are all feeling overwhelmed with the unwanted traffic and noise from a massive designer outlet shopping centre being build, without 100s of new homes. This is making our lives hell! It's an invasion on our houses facing the fields. It's destroying the homes of so many woodland animals. Deer are on those fields every day! It's yet again, on top of the outlet adding more noise pollution to out lives. Those fields and the fair garden we have created in that woodland has been our only happiness and escape the last year! We will not have that taken away from us.</p>
LPPO234		Croft Development Consultancy UK Ltd - N, Bubalo	<p>Policy SO3.1 is also supported and specifically SH3 and inclusion on the Policies Map. Whilst we acknowledge that there is a nominal capacity against delivery of the site we would ask that this is regarded as a minimum and that the planning application should dictate the precise numbers of units that can be accommodated on the site. Whilst we acknowledge that the Local Plan can only deal with issues and allocations within the Administrative Boundary of Cannock Chase DC, Land referenced as SH3 which is within a single ownership straddles the administrative boundary between the District and South Staffs DC, with the majority of the site sitting in Cannock. In terms of future delivery of the site the whole will need to be considered for development. We would support the Council through Duty to Cooperate to seek the release of that part of the site sitting in South Staffs for development.</p>

LPPO235	Beau Desert Golf Club - P, Benbow		<p>BDGC recognise the pressures that the demands for new housing place on available land within the Council's area. Given then location of the golf course is the heart of the AONB our commitment to the environment and the landscape that we have inherited is absolute. Adjoining the course, but also in the ownership of BDGC is 22ha of landfill land that had previously been worked out as a sand and gravel quarry. The land (HE15 in the Green Belt Assessment) is now scrubland (not grassland as indicated in the assessment) and is capable of "enhancement"...by the introduction of a new native broadleaf wood leaved varieties of trees , in accordance with landscape strategies set out in the Landscape Character Assessment for Cannock Chase and the AONB Landscape Character Framework". BDGS strongly endorse this ambition. To achieve an appropriate economic balance that also enables essential landscaping and other supporting infrastructure, re-forestation would need to be undertaken in concern with much needed additional housing land adjacent to Rugeley Road. No more than 15% of the total site (includes HE15, 16 & 17) area would be affected by housing development. Integrating both Objective 3 and Objective 7 sensitively in a location that provides safe access for leisure in one direction, and easy access to essential transport links, and also within walking distance of the town centre would be the outcome.</p>
LPPO236	A&B, Highman		<p>We would particularly like to object to 410 dwellings on land East of Wimblebury Road for the following reasons: - Wimblebury Road is a busy main road with Heath Hayes Academy School located exactly opposite where the dwellings would be built. As local residents and also parents of two pupils at Heath Hayes Academy we would be extremely concerned as to the increase in traffic and pollution at this site, both as a result of the build and as a result of the 410 families who would then additionally move into the area. There is not another road which could be used as an alternative to the development. Heath Hayes Academy has been completing a pollution study over recent months/years and the current level of pollution at pick up drop off times is already a known health concern. A development of 410 dwellings would no doubt put our children at risk both in terms of the traffic increase, but also in terms of the pollution. - Wimblebury Road is a main feeder road to Five Ways Island. It is a busy road with a 30mph limit and speed humps (which need repairing). We believe there is a weight limit on the road but we often experience lorries using the road, and traffic rarely abiding to the 30mph limit. Five Ways Island is already extremely congested for the majority of the day and we have personally witnessed many near-miss accidents at this spot. We would be extremely concerned that a development of this size would be 'an accident waiting to happen'. - The area of land which is proposed to be used is surrounded by 'Wimblebury Mound', allotments, Heath Hayes park and forest. The area is a beautiful spot which attracts an abundance of wildlife and, particularly during the last 12months, has seen an increase in local people using the area for recreational facilities such as jogging, dog walking and bird watching. The local nursery also uses these facilities once a week as an outdoor learning space for its pupils. We would be extremely concerned as to the long term impact on</p>

			<p>wildlife, and also to the mental health of local residents who now enjoy using the spot. The NPPF makes clear that changes should only be made to the Green Belt in exceptional circumstances and they should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Compensatory arrangements would not solve this issues and this is certainly not an exceptional circumstance when other sites are available.</p>
			<p>- As a resident of Wimblebury Road who only moved to the property earlier this year, we are disappointed with Cannock Chase Council's advertisement of the Local Plan Consultation, particularly with the short time scale given for comments when it is such a lengthy document. As a resident who would be directly affected by this proposal, we have had no direct information 'leaflet-dropped' through our door - We have only discovered the information through joining a local Facebook group and then researching myself from your website. Several months ago we emailed Cannock Chase Council planning office and Lichfield District Council planning office to ascertain whether there were proposals for this land. The reply was that there were no proposed developments for this site - we are now aware that this site was touted was a proposed location three years ago in the original consultation and we feel let down by the planning office in respect of the reply we were given. We understand the need for further housing in the area but the plan for 410 dwellings East of Wimblebury Road, 875 dwellings South of Lichfield Road and 175 dwellings on land west of Hednesford Road, Norton Canes, would mean an increase of 1460 dwellings (potentially 3000 vehicles) within a half mile radius. We feel developments of this size would mean Norton Canes and Heath Hayes losing their own identities and our current infrastructure would certainly not support this change (e.g. roads, schools; recreational facilities). We do not feel new housing planned for this area is proportionate - 1460 dwellings in this small area compared to 45 dwellings at Longford House and 33 in Armitage Lane. Additionally, our</p>

			<p>home suffered subsidence around 50years ago. Due to the historical mining links and the extremely close location to the former pit entrance, can the Council be sure that any of these proposed developments on the land discussed will not cause further subsidence/further issues to current properties, particularly due to the likelihood of unknown shafts?</p>
LPPO237	Historic England - E, Boden		<p>Historic England notes that two of the five proposed strategic housing allocations have not been included for assessment within the HIA, due to there being no heritage assets on/near to these sites. With regard to the assessment of proposed sites SH1, SDH3 and SH5, historic England's detailed comments can be found at Appendix A to this letter.</p>

LPPO238	S, Ballance		<p>I have recently been made aware of the preferred options for future development of the Cannock Area, in particular the proposal for 410 dwellings on the land to the east of Wimblebury Road. I wish to place on record my objection to this development on the following grounds: 1. As a resident of Cannock and Hednesford all of my life (65years), I have seen a gradual depletion of open land. The areas between Cannock and Hednesford, Heath Hayes and Norton Canes. Hednesford and Heath Hayes which were previously farm land or open space for leisure and wildlife have all but disappeared and the whole area has become one large conglomeration, devoid of individual identity. Nature has suffered a massive decline in the area and open space for leisure activities has perished so that it is now a rare resource. Parks and manicured gardens cannot replace farmland and wild spaces for the biodiversity that they offer. As an example, skylarks and lapwings, which are species of birds massively in decline nationally, are often seen in the area to the east of Wimblebury Road. Additional housing in this area will impact massively on such species. Wildlife such as bats, butterflies, newts, foxes, badgers and even Red Deer in the wooded area directly adjacent to the development would also be affected. There are attractive trails that are used by walkers, cyclists, nature lovers etc. This is a vital resource that is sadly lacking in today's towns. At a time when mental health is a national concern such a facility is valuable to the community. 2. Approximately 40 years ago plans were passed for opencast mining on land adjacent to the east of the proposed development. This was immensely disruptive for local residents who had to endure noise, pollution and traffic problems for many years. Now that this has ceased it is incredibly unfair for the local population to again face destruction of their local environment. 3. If the proposal goes ahead there will inevitably be greater traffic problems. An increase in the local population of approximately 1,000 people will cause problems on roads that already struggle to operate at peak times. Five Ways island, in particular, is a hot spot for traffic queues and parked cars on Wimblebury Road itself consistently cause delays. Any further housing will inevitably exacerbate this. Wimblebury Road is already subject to considerable traffic, including heavy lorries, travelling to and from a dept in Wimblebury. 4. A primary school and nursery in Wimblebury Road has monitored pollution levels in the past and found them to be worryingly high. How much worse will they become if a further five or six hundred cars are travelling backwards and forwards along this road each day? The additional traffic will also inevitably raise the risk to the children of road traffic accidents. 5. Older residents will recall that Wimblebury Road was subject to subsidence some years ago. Any significant development could possibly cause further land movement. 6. The local infrastructure will face enormous pressure if this and associated plans involving land to the south of Lichfield Road go ahead. Schools, health centres, policing, leisure facilities etc. would encounter difficulties unless significant resources were provided to expand these services. I understand that the Local Authority have an obligation to provide additional housing. However, brownfield sites should be a first priority and green belt only used when really necessary. I urge CCDC to reject the proposal.</p>
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LPPO239	Norton Canes Parish Council		<p>Inevitably this is the most controversial policy topic with a widely held view in the village supported by the Parish Council that Norton Canes has had more than its fair share of major housing developments taking account of the size of the village and that the necessary infrastructure to support these developments has not been provided. It is factually correct to say that none of the major items of infrastructure for which funding has been obtained from major housing developments has yet been delivered. This comprises new and improved off-site sport and recreation facilities, additional primary school capacity and improved bus services. So this is why the Parish Council is seeking delay in any additional housing allocations for general market housing on releases of new land around the village until the infrastructure proposed to be delivered has at least been committed but preferably delivered. The only exception to this is seeking a potential site for specialist housing for the elderly, which, if a suitable site can be found, the Parish would consider promoting via a Neighbourhood Development Order to be brought forward alongside the Neighbourhood Plan. Other key issues relating to housing which are proposed to be brought forward in the NP are: - Seeking policy support requiring a proportion of small bungalows aimed at catering for the elderly wishing to downsize to be included in future housing allocations and identified on small sites within the village. - Support for the provision of Gypsy and Traveller sites in association with new development in the Green Belt specifically to provide replacement accommodation for the unauthorised encampments on Stokes Lane and Long Lane. - Support housing plus a retail convenience store on land between the M6 Toll and the current housing development site off Norton Hall Lane (ref N13a) as an alternative to employment use. - Prior to the start of the consultation on Local Plan Preferred Options the Parish Council had assumed that some releases of Green Belt would be likely to be required to enable the District to meet its local need plus a contribution to the wider housing market. It was intending to consult the community on sites contained in the SHLAA considering their suitability alongside potential local gains or benefits which might be achievable. This was also in the context of seeking to influence the District to reduce the growth in Norton Canes in the next plan period to 8% of the District wide total which is more in line with the village's proportion of the overall population of the District. Given the wide choice of potential sites in the SHLAA it was proposed to indicate as a guide that this process may favour land west of Norton Hall Lane (ref N66 and part of N52), land west of Hednesford Road (ref N33) and the site south of the Willow Road estate and north of the M6 Toll (ref. N51) and the site south of Cannock Road A5190 (ref. C116a). In light of the two sites proposed in Norton Canes Parish in PO Policy SO3.1, comprising SH1 land south of Cannock Road A5190 (part of SHLAA site C116) with a capacity of approximately 875 units including provision of a primary school and creation of a country park south of Newlands Lane and SH5 west of Hednesford Road (SHLAA Site N33) with a capacity of 175 units the Parish Council may wish to review its intention to carry out a wider consultation on the other SHLAA sites. In relation to SH1 the Parish Council would wish to be assured that the inclusion of a</p>
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			<p>primary school would mean no additional pressure on existing village primary schools; that wider environmental and countryside access improvements will be included extending beyond the proposed country park to benefit the wider community of Norton Canes; and that the development would contribute to the list of "asks" addressing needs identified for the Norton Canes Community set out in the Parish Council's letter dated 25/01/2021. In addition, the Parish Council would wish to be assured that a deliverable solution to congestion at Five Ways Island can be found. Unless and until these assurances are given the Parish Council maintains a holding objection to the inclusion of this site. In relation to SH5 the Parish would wish to see the feasibility of inclusion of specialist housing for the elderly included as part of the development, or such development being enabled on a site closer to the village centre.</p>
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LPPO240	C, Wilkinson (Cllr)		<p>I write in full support of the response sent to you by David Williams, Chair of Hazel Slade & Rawnsley Community Association in reference to site H30, land off Rawnsley Road. The association are fortunate to have members whose areas of professional knowledge enable them to write a succinct and thorough response to the plan, which I have full confidence in. I, along with many other Rawnsley residents, strongly oppose any housing development on this site and seek to protect this land from any further planning applications given its location between Cannock Chase AONB and Hednesford Hills SSSI. Dedicated residents have worked tirelessly to campaigning to preserve this land for future generations.</p>
LPPO241	R, White		<p>Specific reference to Green Belt Land in Rugeley/Slitting Mill area. I have grave concern that the Council would ever consider destroying the Green Belt in this area, particularly as we are faced with a massive development of the Power Station Site. I have concerns with the possible development of areas: RU1 RU2 RU3 RU4 RU5 RU6 RU11 RU12 RU15 RU14 RU21 RU10 RU7 RU21 RU22 RU18 RU19 RU20. All of these areas make a huge contribution to the health and well-being of local residents. Of PARTICULAR importance is the enabling of wildlife diversity in our areas. The areas RU22 RU24 RU21 RU20 RU18 and RU19 which border the Slitting Mill village is of natural and historic significance. I have observed deer, bats, owls, foxes, badgers, skylarks, woodpeckers, a variety of species of bee and other pollinating insects, hedgehogs and numerous birds in this area. Any development either in or around would bring noise, light and air pollution. EVEN MORE litter, anti-social behaviour from young people gathering to drink, take drugs and basically trash the area. Members of my family regularly clean up the litter in this area. Roads-as Rugeley is situated in a barley pollution would be a major issue. This would be totally unacceptable in Sherbrook Valley. Rugeley roads are already heavy with traffic, we do not have good infrastructure now, situation would be worse. Loss of prime grade A agricultural-land where will crops be frown/animals grazed. Climate Change- we need MORE trees and hedgerows not less. The surrounding area will be losing a lot of woods/trees/meadows etc. to the building of HS2. Preserve what we have, add to it but please do not destroy it. Once our Green belt is gone it can never be replaced. Since lockdown many people have discovered the beauty of this area. Let's keep it that way for future generations.</p>

LPPO242	Cannock Chase Independents Group - P, Woodhead (Cllr)		<p>The quantum of new build dwellings is excessive towards the available land within the District and no additional need should be accepted from the Greater Birmingham Housing Need Assessment. This report clearly shows many other areas which are much more suitable to cover the wider need for housing and Cannock Chase does not need to take this quantum in to the calculations. It is disappointing that the Local Plan presents the development in Greenbelt land ahead of exhausting brownfield development as its strategic housing sites and this should be reconsidered. The continued expansion from Norton Canes to Heath Hayes and now in the other direction is not supported by social infrastructure, including roads, and not fit for purpose. Within the Tables are areas of land identified for development as a preference of the Council in the Local Plan there are a number of these which we do not support owing to their erosion of the Green Space Network in its many guises. In particular to mention two sites; the land identified as H30. This is an important nature corridor and must be maintained to link Hednesford Hills SSSI through to the Cannock Chase AONB. The land identified as SH2. This creates an extensive new building line which encroaches in to the wider green space network needed to maintain the existing village structures which are already eroded with the conjoining Heath Hayes and Wimblebury and should be maintained as Green Belt. There are other locations which could be considered ahead of any consideration of green belt development. The maintenance of nature corridors and routes should be a major priority of any development plans. The housing choice needs greater emphasis on single living either as people owning their first home, working age people living alone or older residents needing a range of single living accommodation options. We have more rooms per head of population than any time in our history but have a poverty emergency and homelessness crisis. Any development should acknowledge these conditions and preference addressing this social and economic inequality.</p>
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LPPO243	Norton Canes Councillors as at March/April 2021	<p>With respect to housing, we are all of the belief that following the last Local Plan period Norton Canes has provided more than its fair share of housing and strongly agree with the Parish Council's argument that no new development in Norton Canes should be permitted until the infrastructure investment that will come from the existing developments is provided; this is a sentiment very much felt by the vast majority of residents in the village who are already experiencing the consequences of infrastructure pressures despite hundreds of homes still to be built. We feel that this time to allow for infrastructure investment to be made is not unreasonable considering Norton Canes has provided just under a quarter of all new housing in the district despite its population constituting less than 10% of the district's. We welcome the rejection of so many greenbelt sites within Norton Canes for consideration for housing. As recognised in the spatial strategy, Norton Canes's identity as a separate settlement will be safeguarded and enhanced. Nevertheless, we are concerned with the proposed housing land allocations, particularly with regards to the long term future of Five Ways Island. The Local Plan rightly points out that this junction needs to be comprehensively redeveloped but should this fail to materialise, it would make the suggested sites east of Wimblebury Road and south of Cannock Road unviable. Our concern is what this would mean for the previously rejected sites in Norton Canes. Should the county council not come forward with an appropriately ambitious scheme for Five Ways Island, we would recommend that attention move to a discrete site that can accommodate a larger number of houses along with the necessary infrastructure incorporated within the development, as opposed to the approach of adding smaller sites to the urban area of Norton Canes where spending on infrastructure will come at a later date, exacerbating existing pressures in our village. We believe that the District Council has already identified alternative sites which could fulfil this criteria and do not lie within Norton Canes. We would also echo the Parish Council's assertion that thought needs to be given to the provision of specialist housing for the elderly and more bungalows in Norton Canes. We are aware of many elderly residents in our community who would like to downsize but also wish to remain in our village, meaning they must stay in homes too large for them which could benefit a young family. We feel this is a niche housing issue which should be addressed by the Local Plan.</p>
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LPPO244	Messrs. Dean and Weldon, owners of The Coppice Colliery Football Ground	S.P.Faizey Chartered Architects - S, Faizey	I am commenting on behalf of the owners of the Coppice Colliery Football Ground. The owners fully support the recommendation for the release of the site from the Green Belt (SH1). It should be noted that this land is in separate ownership from other land shown further north on Lichfield Road within SH1. There is no link between the sites and we assume that they have been combined within the same zone purely as an administrative procedure by the Council and the sites would be developed independently. In this respect it would be preferable for the sites to be identified as separate entities. Our assessment of the Coppice Colliery Football Ground site is that c45 homes could be accommodated with a mix of 1, 2 and 3bed houses aimed at the affordable housing sector in a sustainable location close to Heath Hayes village centre. The intention would be to relocate the football teams to a new pitch and facilities on land within or adjacent to the recreation area in Heath Hayes Park or Wimblebury to the north of Five Ways Island. This would have the potential for providing facilities for use by the local community.
LPPO245	C & P, Wolfenden		Armitage Lane in Brereton is a no through road, this road was shut when the bypass was built and one of the reasons for not opening it again to traffic was due to the school and the danger to the children. The impact of building 33 houses behind the school with access of Armitage Lane will have a significant effect on the road. If the access is on Armitage Lane we will have probably 66 more vehicles trying to manoeuvre around the Lane at the time when most parents are dropping children to school. At the moment we have parents parking on both sides of the road and it is already a difficult task to exit the Lane. It is the access to this parcel of land that we are more concerned about than anything. The access off Armitage Lane is not suitable for a large number of additional vehicles. We also feel that the houses, as they are being nominated is on a hill, will have views into residents properties (especially those on the same side of the street), this is unfair on the residents. The additional houses will also have a large impact on a very crowded school who has already had to extend to accommodate additional pupils from the Pippins estate and who will no doubt also have to absorb children from other estates. We are surprised that this quiet, green area has been proposed when the power station is due to be demolished this year and so many houses will be erected in its place.
LPPO246	D, Todd (Cllr)		I would like to raise concerns about all of the sites located in Heath Hayes especially off Cannock Road and Wimblebury Road in Heath Hayes which have been put forward for consideration. I would like the land to remain in the Greenbelt. We have wonderful wildlife habituating and we need to keep our green buffers. Five Ways Island is a major issue too. We already have congestions and high pollution. We have a monitor already to look at pollution, only 1 of 3 in the District. There has just been the first case of a child dying of pollution and yet it is being considered to have more housing in a high pollution area. There is a back up site which may be more suitable. Please consider what the many residents have said keep Green Belt and remove these sites from the local plan.

LPPO247	Freil Homes - C, Lynch		<p>We have reviewed these well thought out documents and, whilst we do not have any further comments, we hoped that you may be able to provide some clarification on the preferred option for our site off Armitage Lane Brereton. I have taken a screen grab which shows our site on the Preferred Options Policies Map as a Residential Strategic Site with Greenbelt Amendments. However, the site description in the Preferred Options Consultation Document and other supporting documents lists this site as is "SH4 Land East of The Meadows and land to the north of Armitage Lane Brereton approx. 33 dwellings". We believe this relates to our site as the details match up but note that our site is located to the south of Armitage Lane rather than the north, as you can see from the image. In the SHLAA we believe our site is listed as "R32 Land East of The Meadows, Armitage Lane, Brereton" The details in the SHLAA are a correct description of our site so we just thought it was worth getting in touch to ensure we have the correct understanding of the implications for our site.</p>
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LLPO248	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	<p>Housing Supply (2018-2038) The Council's approach is to utilise the standard method to calculate its minimum housing requirement which comprises of 275.7dpa. The Council then identified the breakdown of its outstanding housing supply as follows:</p> <ul style="list-style-type: none"> • The standard method provides a requirement of 5,516 dwellings over the period • Between 2018-2020 1,124 dwellings have been completed therefore reducing the requirement to 4,392 dwellings • The SHLAA identifies a further 1,359 dwellings which with adjustments relative to the Council's five-year housing land supply position (including windfalls of 54 dwellings and non-implementation discount of 28 dwellings) would provide 1,385 dwellings. This reduces the requirement to 3,007 dwellings • The SHLAA identifies further major and minor sites which could deliver a further 1,623 dwellings during the plan period. This reduces the requirement from 3,007 dwellings to 1,384 dwellings. <p>The supporting text within the Preferred Option document references the contributions which are proposed to be made by South Staffordshire District Council (4,500 dwellings) and Lichfield District Council (2,665 dwellings) towards the shortfall in the GBBCHMA. The supporting text also notes that the ABCA are preparing a Joint Local Plan and have identified a shortfall of 29, 260 dwellings between 2019-2038. Finally, the supporting text acknowledges that in order to contribute towards this shortfall in the wider housing market area both South Staffordshire District Council and Lichfield District Council will need to utilise Green Belt sites. Policy SO3.1 identifies that a minimum of 5,516 dwellings will be provided for within the Plan (276dpa) with a further 500 dwellings to meet the unmet needs of neighbouring areas. It indicates new housing allocations are concentrated within the existing urban areas or within planned expansion to the urban areas in accessible and sustainable locations. The Policy goes on to identify strategic housing allocations. As set out in Chapter 5 of this representation, it is submitted that Land off Brownhills Road, Norton Canes, is suitable for residential development and should accordingly form part of this Policy list.</p> <p>Preferred Policy - Housing Choice The Local Plan Preferred Options identifies that the most favoured option relative to housing mix was to retain the flexible approach currently being utilised by the Council but was not overly prescriptive. However, the Preferred Policy Direction as set out in the Preferred Options sets out a prescribed mix for market housing, affordable housing and affordable housing/home ownership (including those aspiring to home ownership). This runs counter to those responses made in the previous consultation exercise nor is evidence provided to substantiate that the previous approach resulted in housing which did not meet established needs. In addition, the Preferred Policy Direction identified within Table D provides prescriptive framework for each of the separate housing tenures. For affordable housing (rented and shared ownership) it identifies 8% provision within four plus bedroom accommodation and 5% for affordable housing/home ownership, however for market housing it identifies that there is no requirement at all for dwellings of four or more bedrooms. The justification for this is in a single sentence set out in paragraph 6.207. This is not sufficient to provide the prescriptive breakdown in size relative to each tenure sector. In particular, there can be no circumstances</p>
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			<p>whereby there is no demand at all for market housing of four or more bedrooms. In addition, by only permitting new private housing in smaller dwellings will mean a significant proportion of the housing market (larger family homes) will not be met at all. This could have ramifications for the demographic make up of the District, resulting in a further increase in the proportion of the community who are, for instance elderly, as they require smaller housing and the policy focuses on providing these.</p>
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LPPO249	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	<p>Land off Brownhills Road, Norton Canes: The site comprises approx. 6.68ha of land, located to the west of Brownhills Road and north of the M6 Toll. The site is located immediately south of a development of 130 new homes known as 'Chasewater Grange', developed by Taylor Wimpey in 2015. The site is made up of two agricultural fields, separated by a hedgerow, with further trees and hedgerows comprising the wider side boundaries. An electricity pylon is located to the north-western section of the site. Whilst the site is located within the West Midlands green belt, it is not subject to any other environmental or historical designations. Chasewater and the Southern Staffordshire Coalfield Heaths SSSI is located approx. 199m east of the site, across Brownhills Road. There are no listed buildings located in the vicinity of the site. The site is located within Flood Zone 1, the area at least risk from flooding. Illustrative Proposal: An Indicative Masterplan has also been prepared and is included at Appendix 2 to this representation. This has been prepared having regard to existing constraints, the guidance set out in the Design SPD adopted in April 2016; and standards that are established through the LPP1 and the Developer Contributions and Housing Choices SPD. The indicative masterplan identifies the following key features: • 140 dwellings proposed at an average density of 35 dwellings per hectare (net); • Access utilised from the existing roundabout on Brownhills Road; • Attenuation ponds positioned on western boundary as part of a SuDS scheme; • 40m acoustic offset incorporated between the proposed homes and the carriageway of the M6 toll road; • 30m offset incorporated for on-site overhead power cables; • 15m odour offset allowed around pumping station located on the adjacent Chasewater Grange development; and • On-site pond retained with a 15m ecology offset provided. In respect of standards, the proposed masterplan provides a network of open space that complements provision currently being delivered within the Chasewater Grange development to the north. The amount of open space indicated results in a level of provision that exceeds the Council's OSSR standards for amenity greenspace and provision for young people. In addition, the indicative plan demonstrates how a mix of properties can be delivered to assist in the achievement of a balanced housing market. This includes the provision of smaller dwellings suited to younger people and larger three and four-bedroom houses to meet aspirational needs. The delivery of 20% affordable provision has been assumed within the scheme to meet the requirements set out in Policy CP7. It is recognised that there may be a requirement for appropriate financial contributions to be made in respect of the proposal to mitigate impact of development, including a financial contribution in respect of Cannock Chase SAC. Green Belt: The site is considered within the Council's 2021 Green Belt study, referred to as Parcel NC8. The Green Belt Study provides the following conclusion in respect of the parcel: Parcel NC8 makes a relatively strong contribution to preventing encroachment on the countryside, and a moderate contribution to preventing neighbouring towns merging into one another, and the additional impact of its release on the adjacent Green Belt would be moderate.</p>
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		<p>Therefore the harm resulting from its release, as an expansion of Norton Canes would be high. Harm could potentially be reduced by the introduction of new woodland belts and or small woodlands within NC8 to the east. This would form a strong Green Belt boundary and would help reduce the urbanising visual influence of the development and the perceived impact on the gap between Cannock and Brownhills/Burntwood. This would also help enhance the planned coalfield farmlands landscape character, in accordance with landscape strategies set out in the Landscape Character Assessment for Cannock Chase (2016). Whilst Richborough Estates is not in control of land to the west of site (that which comprises green belt parcel NC8). However, the illustrative Site Layout included at Appendix 2 to this representation demonstrates how a green belt buffer can be provided within the site which would form a defensible boundary in this location. It is important to note that the site is identified as making only a moderate contribution to both preventing neighbouring towns merging into one another and its impact upon the wider greenbelt. Indeed, the release of this site from the Green Belt would not result in sprawl, as it is contained by a number of barriers, including the M6 toll to the south. It is therefore submitted that the site performs a reduced function in green belt terms than other sites of a similar size and it is therefore considered that the site should be released from the green belt for development. Suitability: The indicative masterplan demonstrates how a scheme for approximately 140 dwellings can be achieved having regard to development design guidelines and development standards currently utilised by the Council. The proposal is sustainable and represents a logical expansion to the settlement of Norton Canes without undermining the purpose of the Green Belt in this location. Deliverability: There is an agreement in place between the landowner and Richborough estates to facilitate the development of the site. Further technical work will be commissioned to further demonstrate the deliverability of this site. However, high level technical work undertaken to date confirms there are no constraints likely to render the site undeliverable in the Plan period. The site is available now. There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the impacts identified by the Council through the initial sustainability appraisal of the site can be mitigated and, in many cases, a positive outcome can be achieved. The site is deliverable and immediately available and, subject to allocation, could deliver homes and associated community benefits within the next 5 years. Richborough Estates was involved in bringing forward development to the north of this site, on the former greyhound track, which was constructed by Taylor Wimpey (Chasewater Grange), demonstrating a market interest in this location. Availability: Richborough Estates has a legal agreement in place with the landowners and are in a position to progress with the promotion of the site for residential led development. If the site is to be successfully allocated for development and removed from the Green Belt, Richborough estates would seek to develop the site immediately, which would contribute considerably to the District's housing supply. By way of a recent example, Richborough promoted two Green Belt allocations through the South</p>
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			Staffordshire Site Allocations Plan and both were granted outline permission shortly after that plan was adopted and the sites removed from the Green Belt
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		<p>Key Benefits: Development of the site will contribute to building a strong, responsive and competitive economy. In particular, the delivery of new homes at the site will bring economic benefits during the construction, operational and commercial stages. The proposal would assist in the delivery of supporting infrastructure and also provide on-site open space and two community orchards. Overall, the provision of much needed additional open market and affordable homes in the District will contribute to building a strong, responsive and competitive economy in line with the objectives of the NPPF. Conclusion: Richborough Estates is supportive of the Local Plan Preferred Options document in the main, subject to a number of amendments and clarifications set out within this Representation. However, Richborough Estates submits that Land off Brownhills Road, Norton Canes should be allocated for residential development. This site is sustainable located adjacent to the existing urban area of Norton Canes which is identified as the one of the main areas for development within the Local Plan Review. This site is available and deliverable, as identified through the submission of the Illustrative Layout Plan at Appendix 2 to this representation. Exceptional circumstances exist to justify the release of appropriate and sustainable sites located within the Green Belt. These circumstances include the significant unmet housing need arising from both within Cannock Chase District and the GBHMA, combined with the fact that around 60% of the District lies within the West Midlands Green Belt and around 30% lies within the Cannock Chase AONB. Furthermore, it has been recognised through the recent examination of a number of Local Plans that Green Belt release should not be avoided at the overall detriment to sustainability, resulting in an a less sustainable distribution of development as required by the overarching vision for the Local Plan, as well as the NPPF.</p>
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LPPO250	Richborough Estates (Land South of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	<p>Housing Supply (2018-2038) The Council's approach is to utilise the standard method to calculate its minimum housing requirement which comprises of 275.7dpa. The Council then identified the breakdown of its outstanding housing supply as follows:</p> <ul style="list-style-type: none"> • The standard method provides a requirement of 5,516 dwellings over the period • Between 2018-2020 1,124 dwellings have been completed therefore reducing the requirement to 4,392 dwellings • The SHLAA identifies a further 1,359 dwellings which with adjustments relative to the Council's five-year housing land supply position (including windfalls of 54 dwellings and non-implementation discount of 28 dwellings) would provide 1,385 dwellings. This reduces the requirement to 3,007 dwellings • The SHLAA identifies further major and minor sites which could deliver a further 1,623 dwellings during the plan period. This reduces the requirement from 3,007 dwellings to 1,384 dwellings. <p>The supporting text within the Preferred Option document references the contributions which are proposed to be made by South Staffordshire District Council (4,500 dwellings) and Lichfield District Council (2,665 dwellings) towards the shortfall in the GBBCHMA. The supporting text also notes that the ABCA are preparing a Joint Local Plan and have identified a shortfall of 29, 260 dwellings between 2019-2038. Finally, the supporting text acknowledges that in order to contribute towards this shortfall in the wider housing market area both South Staffordshire District Council and Lichfield District Council will need to utilise Green Belt sites. Policy SO3.1 identifies that a minimum of 5,516 dwellings will be provided for within the Plan (276dpa) with a further 500 dwellings to meet the unmet needs of neighbouring areas. It indicates new housing allocations are concentrated within the existing urban areas or within planned expansion to the urban areas in accessible and sustainable locations. The Policy goes on to identify strategic housing allocations. As set out in Chapter 5 of this representation, it is submitted that Land off Brownhills Road, Norton Canes, is suitable for residential development and should accordingly form part of this Policy list.</p> <p>Preferred Policy - Housing Choice The Local Plan Preferred Options identifies that the most favoured option relative to housing mix was to retain the flexible approach currently being utilised by the Council but was not overly prescriptive. However, the Preferred Policy Direction as set out in the Preferred Options sets out a prescribed mix for market housing, affordable housing and affordable housing/home ownership (including those aspiring to home ownership). This runs counter to those responses made in the previous consultation exercise nor is evidence provided to substantiate that the previous approach resulted in housing which did not meet established needs. In addition, the Preferred Policy Direction identified within Table D provides prescriptive framework for each of the separate housing tenures. For affordable housing (rented and shared ownership) it identifies 8% provision within four plus bedroom accommodation and 5% for affordable housing/home ownership, however for market housing it identifies that there is no requirement at all for dwellings of four or more bedrooms. The justification for this is in a single sentence set out in paragraph 6.207. This is not sufficient to provide the prescriptive breakdown in size relative to each tenure sector. In particular, there can be no circumstances</p>
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			<p>whereby there is no demand at all for market housing of four or more bedrooms. In addition, by only permitting new private housing in smaller dwellings will mean a significant proportion of the housing market (larger family homes) will not be met at all. This could have ramifications for the demographic make up of the District. resulting in a further increase in the proportion of the community who are, for instance elderly, as they require smaller housing and the policy focuses on providing these.</p>
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LPPO251	Richborough Estates (Land South of Cannock Road, Heath Hayes)		<p>Land South of Cannock Road, Heath Hayes: Promoting as a residential led scheme with the potential to deliver a new primary school. In addition, land to the south of Newlands Lane is identified as a new Country Park, Richborough Estates supports that the site identified as a draft allocation in the Preferred Options consultation document and supports the release of the site from the Green Belt to the south of Cannock Road to allow for delivery of the site. The site being proposed for allocation is split into two parts, The first part of the site, approx. 32.45ha in size, is being proposed for a residential-led scheme/ It lies south of Cannock Road, Heath Hayes, and is bounded by Newlands Lane to the south, and existing woodland areas to the east and west. The second part of the site lies to the south of Newlands Lane and is being proposed as a country park to be delivered alongside the residential development. This comprises approx. 14.81ha. The site currently comprises pastoral farmland with some areas used for seasonal crop production. It is not considered to represent best or most versatile agricultural land, however further detail can be provided if required. The land is interspersed with connecting native hedgerows and bounded by mixed species woodland blocks. The landform of the site gently falls from north to south with a topographical range of approx. 171 AOD (Above Ordnance Datum i.e. height relative to the average sea level). The site boundaries and immediate surroundings comprise:</p> <ul style="list-style-type: none"> • To the north, the site adjoins the existing residential edge associated with Cannock Road (A5150), including the Severn Trent compound to the north-east • To the east – the boundary is well defined by a mixed woodland block, a Public Right of Way and the north – south route of Newlands Brook • To the south – the site adjoins the vegetated Newlands Lane which has been closed to traffic • To the west – the boundary is formed by a mixed woodland block with Newlands Lane beyond. <p>Promotional Document: The promotional document attached at Appendix 2 sets out the following details:</p> <ul style="list-style-type: none"> • Planning Policy context including demonstration of the Exceptional Circumstances required to release the site from the Green Belt • Sustainability credentials of the site • Local facilities, amenities and services • Access and sustainable transport • Heritage and Archaeology • Landscape and Visual • Ecology • Air quality • Odour • Indicative masterplan and design principles. <p>Deliverability: The site is a suitable area for housing as there are no physical, technical or environmental constraints preventing its development. The Framework requires LPAs to maintain delivery of housing land to meet their housing targets. To be considered deliverable, a site should be:</p> <ul style="list-style-type: none"> • Available. A site is considered available when there is confidence that there are no legal or ownership problems. • Suitable. A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities; and • Achievable. A site is considered achievable for development where there is a reasonable prospect that housing will be delivered on the site within five years, and in particular, development of the site is viable. <p>Availability: Richborough Estates have a legal agreement in place with the landowners and are in a position to progress with the promotion of the site for residential led development. If the site is to be successfully allocated for development</p>
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			and removed from the Green Belt, Richborough Estates would seek to develop the site immediately, which would contribute considerably to the District's housing supply.
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		<p>By way of a recent example, Richborough estates promoted two Green Belt allocations through the South Staffordshire Site Allocations Plan and both were granted outline permission shortly after the plan was adopted and the sites removed from the Green Belt. With its extensive highway frontage there is the ability to have at least two housebuilder outlets running at the same time, thus increasing the delivery of plots and at the same time increasing housing choice for purchasers. Suitability: The site is suitable for residential development for the following reasons: • It offers a suitable location for development and can be brought forward immediately following an allocation; • It would form a natural extension to the established area of Heath Hayes; Achievability: The site has been fully assessed in terms of its environmental considerations and it has been demonstrated that the delivery of the site is achievable and deliverable, and a team of technical consultants has been appointed to support the delivery of this site moving forward. Where technical constraints are identified, Richborough Estates will provide appropriate mitigation and invest in the site to ensure delivery. Richborough Estates has reviewed the economic viability of the proposals in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Cannock. These considerations have been analysed alongside cost factors associated with the site, including site preparation costs and site constraints. Richborough Estates can therefore confirm that the site is economically viable and therefore achievable. Key Benefits: Development of the site will contribute to building a strong, responsive and competitive economy, as well as providing social and environmental benefits. In particular, the delivery of new homes at the site will bring the following benefits: • Much needed affordable housing. • Introducing new housing choice. • New school. • Additional spend in the local economy. • Direct construction jobs and indirect related construction jobs. • New recreation opportunity via the Country Park opening up private land for public use by existing and new residents, as an alternative to using Cannock Chase. • Biodiversity net gain. Conclusion: Richborough Estates is supportive of the LPPO document in the main, subject to a number of amendments and clarifications set out within this Representation. Richborough Estates is also supportive of the allocation of land south of Cannock Road, Heath Hayes for residential-led development. The site is sustainably located adjacent to the existing urban area of Cannock/Hednesford/Heath Hayes which is identified as the main focus for development within the adopted Local Plan Part 1. This site is available and deliverable, as identified through the submission of the Promotional Document at Appendix 2 to this Representation. Exceptional circumstances exist to justify the release of appropriate and sustainable sites located within the Green Belt. These circumstances include the significant un-met housing need arising from both within Cannock Chase District and the GBBCHMA, combined with the fact that around 60% of the District lies within the West Midlands Green Belt and around 30% lies within the Cannock Chase AONB. Furthermore, it is recognised through the recent examination of a number of Local Plans that Green Belt release should not be avoided at the overall detriment to sustainability, resulting in</p>
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			an a less sustainable distribution of development as required by the overarching vision for the Local Plan, as well as the NPPF.
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LPPO252	Ricborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	<p>Housing Supply (2018-2038) The Council's approach is to utilise the standard method to calculate its minimum housing requirement which comprises of 275.7dpa. The Council then identified the breakdown of its outstanding housing supply as follows:</p> <ul style="list-style-type: none"> • The standard method provides a requirement of 5,516 dwellings over the period • Between 2018-2020 1,124 dwellings have been completed therefore reducing the requirement to 4,392 dwellings • The SHLAA identifies a further 1,359 dwellings which with adjustments relative to the Council's five-year housing land supply position (including windfalls of 54 dwellings and non-implementation discount of 28 dwellings) would provide 1,385 dwellings. This reduces the requirement to 3,007 dwellings • The SHLAA identifies further major and minor sites which could deliver a further 1,623 dwellings during the plan period. This reduces the requirement from 3,007 dwellings to 1,384 dwellings. <p>The supporting text within the Preferred Option document references the contributions which are proposed to be made by South Staffordshire District Council (4,500 dwellings) and Lichfield District Council (2,665 dwellings) towards the shortfall in the GBBCHMA. The supporting text also notes that the ABCA are preparing a Joint Local Plan and have identified a shortfall of 29, 260 dwellings between 2019-2038. Finally, the supporting text acknowledges that in order to contribute towards this shortfall in the wider housing market area both South Staffordshire District Council and Lichfield District Council will need to utilise Green Belt sites. Policy SO3.1 identifies that a minimum of 5,516 dwellings will be provided for within the Plan (276dpa) with a further 500 dwellings to meet the unmet needs of neighbouring areas. It indicates new housing allocations are concentrated within the existing urban areas or within planned expansion to the urban areas in accessible and sustainable locations. The Policy goes on to identify strategic housing allocations. As set out in Chapter 5 of this representation, it is submitted that Land off Brownhills Road, Norton Canes, is suitable for residential development and should accordingly form part of this Policy list.</p> <p>Preferred Policy - Housing Choice The Local Plan Preferred Options identifies that the most favoured option relative to housing mix was to retain the flexible approach currently being utilised by the Council but was not overly prescriptive. However, the Preferred Policy Direction as set out in the Preferred Options sets out a prescribed mix for market housing, affordable housing and affordable housing/home ownership (including those aspiring to home ownership). This runs counter to those responses made in the previous consultation exercise nor is evidence provided to substantiate that the previous approach resulted in housing which did not meet established needs. In addition, the Preferred Policy Direction identified within Table D provides prescriptive framework for each of the separate housing tenures. For affordable housing (rented and shared ownership) it identifies 8% provision within four plus bedroom accommodation and 5% for affordable housing/home ownership, however for market housing it identifies that there is no requirement at all for dwellings of four or more bedrooms. The justification for this is in a single sentence set out in paragraph 6.207. This is not sufficient to provide the prescriptive breakdown in size relative to each tenure sector. In particular, there can be no circumstances</p>
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			<p>whereby there is no demand at all for market housing of four or more bedrooms. In addition, by only permitting new private housing in smaller dwellings will mean a significant proportion of the housing market (larger family homes) will not be met at all. This could have ramifications for the demographic make up of the District resulting in a further increase in the proportion of the community who are, for instance elderly, as they require smaller housing and the policy focuses on providing these.</p>
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LPPO253	St Modwens (Land off Main Road, Brereton)	RPS - P, Hill	<p>Land off Main Road, Brereton: Richborough Estates is promoting land off Main Road, Brereton for residential development, including public open space and new community orchards. Site Description: The site comprises approx. 13.68ha of land, located to the south of Main Road and south-east of Wattfield Close, Brereton, Rugeley. The site is located opposite Land east of the Meadows, which is identified through Policy SO3.1 of the LPPO document as a draft housing allocation (ref: SH4) for 33 dwellings. Land east of The Meadows is to be released from the green belt to facilitate the delivery of that site. The site is made up of several agricultural fields, separated by hedgerows with a number of individual trees dispersed among them. The site also includes a small number of agricultural buildings associated with the current use of the land. Whilst the site is located within the West Midlands green belt, it is not subject to any other environmental or historical designations. There exist several Grade II Listed Buildings some 150m to the north-west of the site, in addition to Brereton Hall, a Grade II* Listed Building. However, these Listed Buildings are set in the context of existing built form and it is not considered that the site comprises part of the setting of these buildings. The site is located in Flood Zone 1, the area at least risk from flooding. Illustrative Proposal: The Illustrative Masterplan included at Appendix 2 illustrates how the site may come forward for 204 dwellings, including 20% affordable homes, at an average density of 34dph. Given the size of the site, there is no reason why a policy compliant housing mix and that relevant guidance regarding separation distances and garden sizes cannot be achieved. The proposed street layout is underpinned by a central-north tree lined avenue, which delivers a looped route and a new means of access from main Road and Batesway. An emergency vehicle access is proposed via Coalpit Lane, subject to vehicle tracking. The proposed streets are aligned to existing contours within the site and the layout retains all existing rights of way and the existing track which crosses the southern area of the site. Development cells are interspersed with structural landscape layers to address soft rising views of the development and to maintain a green backdrop to views from Batesway. Lastly, a substantial development offset allows for the strengthening of landscape along the eastern edge to form a new and enduring green belt boundary. Green Belt: The site is considered within the Council's 2021 Green Belt Study, covered by land parcels RU37 and RU38, although it should be noted that parcel RU38 also extends beyond the site boundary to both the south and east. The Illustrative Site Layout included at Appendix 2 to this Representation demonstrates how a green belt buffer can be provided along the southern and eastern boundaries, which would form a strong and defensible boundary in this location. It is important to note that parcel RU37 in particular identified as making a relatively weak contribution to preventing neighbouring towns merging into one another and the additional impact of its release on the adjacent Green Belt would only be minor-moderate. It is therefore submitted that the site performs a reduced function in green belt terms than other sites of a similar size and it is therefore considered that the site should be released from the green belt for development. Deliverability: The site is a suitable area</p>
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			for housing as there are no physical, technical or environmental constraints preventing its development.
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		<p>The Framework requires LPAs to maintain delivery of housing land to meet their housing targets. Availability: Richborough Estates have a legal agreement in place with the landowners and are in a position to progress with the promotion of the site for residential development. If the site is to be successfully allocated for development and removed from the Green Belt, Richborough Estates would seek to develop the site immediately, which would contribute considerably to the District's housing supply/ By way of a recent example, Richborough promoted to Green Belt allocations through the South Staffordshire Allocations Plan and both were granted outline permission shortly after that plan was adopted and the sites removed from the Green Belt. Suitability: The site is suitable for residential development for the following reasons: • It offers a suitable location for development and can be brought forward immediately following an allocation; • It would form a natural extension to Brereton; Achievability: The site has been fully assessed in terms of its environmental considerations and it has been demonstrated that the delivery of the site is achievable and deliverable, and a team of technical consultants has been appointed to support the delivery of this site moving forward. Where technical constraints are identified, Richborough Estates will provide appropriate mitigation and invest in the site to ensure delivery. Key Benefits: Development of the site will contribute to building a strong, responsive and competitive economy. In particular, the delivery of new homes at the site will bring economic benefits during the construction, operational and commercial stages. The proposal would assist in the delivery of supporting infrastructure and also provide on-site open space and two community orchards. Overall, the provision of much needed additional open market and affordable homes in the District will contribute to building a strong, responsive and competitive economy in line with the objectives of the NPPF. We have made the case in these representations that greater consideration must be given to providing more than 500 dwellings for neighbouring authorities. An increase in housing numbers would necessitate further site allocations and land off Main Road is a site and should be one of those additional allocations. Richborough Estates is supportive of the LP document in the main, subject to a number of amendments and clarifications set out within this representation. However, Richborough Estates submits that land off Main Road, Brereton should be allocated for residential development. The site is sustainably located adjacent to the existing urban area of Brereton which is identified as the one of the main areas for development within the Local Plan Review. The site is available and deliverable, as identified through the submission of the Illustrative Layout Plan at Appendix 2. Exceptional circumstances exist to justify the release of appropriate and sustainable sites located within the Green Belt. These circumstances include the significant un-met housing need arising from both within Cannock Chase District and the GBHMA, combined with the fact that around 60% of the District lies within the West Midlands Green Belt and around 30% lies within the Cannock Chase AONB. Furthermore, it is recognised through the recent examination of a number of Local Plans that Green Belt release should not be avoided at</p>
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			the overall detriment to sustainability, resulting in a less sustainable distribution of development as required by the overarching vision for the Local Plan, as well as the NPPF.
LPPO254	St Modwens (Land at York's Bridge, Pelsall)	RPS - P, Hill	The land at York's Bridge, Pelsall is a cross boundary site which St Modwen are promoting through the BCP Review and the Cannock Chase Local Plan Review. The site is sustainably located on the edge of Pelsall and would provide a logical extension to the village. The release of the site from the Green Belt would not compromise the five purposes of the Green Belt as demonstrated in the site-specific assessment which has been undertaken. The land within Cannock Chase provides an opportunity for District Council to include a policy mechanism within the Local Plan for the whole site to come forward and realise its full potential for residential development. The Cannock Chase parcel of land would provide 60 dwellings which would assist in meeting the unmet housing needs of neighbouring authorities, and therefore demonstrating that the District Council are meeting its commitment to the Duty to Cooperate. We have recommended

			two policy mechanisms for the land at York's Bridge to come forward through the Local Plan or through a Local Plan Review once the BCP is adopted and kindly request that these given due consideration.
LPPO255	Friel Homes Ltd	CT Planning - P, Kreuser	<p>This representation is made on behalf of Friel Homes Lt with regards to Land South of Armitage Lane, Brereton, WS15 1ED (SHLAA ref R32). Support the inclusion of the site identified as proposed "Strategic Housing Allocation SH4 Land East of the Meadows and land to the north of Armitage Lane Brereton" in Policy SO3.1 for housing development for up to 33 dwellings in the Preferred Option Local Plan. However, a formal request is made for the site to be renamed as Land South of Armitage Lane. As a matter of fact the site does not lie to the east of the street known as The Meadows, or indeed to the north of Armitage Lane. The site is located to the south of Armitage Lane and to the east of Hob Hill Primary School, and is shown marked red on the attached Location Plan 4934.99. Land to the South of Armitage Lane comprises some 1.7ha of grazing land and is within the Green Belt. The western boundary is adjacent to the Rugeley Settlement Boundary on the Proposals Map to the adopted Cannock Chase Local Plan. The site is broadly rectangular in shape and is enclosed on all four sides. To the north is Armitage Lane, to the east the site is bound by the planted bund to the A51 and to the south by A460 Brereton Hill. To the west the site is bound by the Hob Hill Primary School and by the rear garden of a couple of frontage properties along Armitage Lane. The site is undulating. There is an existing access to the site from Armitage Lane. The majority of the boundaries are marked by hedgerow or tree planting, and there are a number of mature oak trees within the site. The site is well related in scale and size to the existing built-up area of Brereton/Rugeley and is well contained by existing physical features. The site can come forward as a discrete development without encroachment on the wider countryside and Green Belt. The site is located in a highly sustainable location and evidently suitable as a new housing allocation. The nearest bus stop is some 450m from the site along Main Road Brereton opposite Coalpit Lane, providing bus services to Stafford, Rugeley and Lichfield, including Rugeley Town Railway Station. Local services and facilities including a GP surgery, pharmacy, takeaways/restaurants and a convenience store are within easy walking and cycling distance of the site. The site is some 2.5km from Rugeley Town Centre where further services and community facilities can be reached. Primary and secondary schools are within easy reach of the site, including the proposed new All Through School to be built on the former</p>

			<p>Rugeley Power Station site within 1km of the site. Local employment opportunities can also be reached on the nearby Towers Business Park. Future residents of the site can attend their daily needs by foot or bicycle, where there is a need to travel further afield, sustainable travel alternatives to the private motorcar are available within easy reach of the site. Attached to the submission is an Indicative Site Layout (ALR-001 Rev B). (see document for housing types and numbers). The Indicative Site Layout demonstrates that the site is in conformity with the Policy Proposals of SO3.1, and can deliver some 33 dwellings on the site. Specialist surveys of the site have previously been commissioned by Friel Homes Ltd and submitted to Cannock Chase Council. These include a Transport Appraisal, Phase 1 Ecology Assessment, Desk-based Heritage Appraisal, Flood Risk Assessment and Drainage and Arboricultural Survey. These surveys demonstrate that there are no major constraints to the development of the site for housing.</p>
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		<p>The primary access to the site will be taken from Armitage Lane. A vehicular access will be provided at the current access to the site. A footpath access will be provided at the south of the site onto Brereton Hill. In terms of other infrastructure requirements Severn Trent has acknowledged that foul and surface water can be adequately disposed of, any other infrastructure requirements would be met through the appropriate CIL/S106 mechanisms. Biodiversity net gain would be provided on the site including the enhancement of the existing mature trees with additional native tree planting to provide areas of natural open space. Footpath and cycleway provision through the site will create an attractive route for local residents. Sustainable design and construction methods would be incorporated where possible to assist in the Local Plan's aspiration to support a greener future. The site is owned by Friel Homes Ltd who have a track record in delivering high quality homes. Friel Homes have the ability and the interest to deliver the site early in the Plan period. The site is developable and deliverable. Development of the site meets the requirements of Strategic Objective 3 of the Cannock Chase Local Plan Preferred Option: Providing for Housing Choice, namely, facilitating sustainable housing provision, assisting in the delivery of housing to meet the District's needs, helping to meet local needs for affordable housing, providing housing choice for an ageing population and catering for the needs of different groups in society. Land South of Armitage Lane is therefore appropriately allocated as strategic housing allocation SH4 in Policy SO3.1.</p>
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LPPO256	Bloor Homes Ltd	Define Planning & Design Ltd - M, Rose	<p>Land West of Hednesford Road, Norton Canes (SHLAA Sites N24, N33 and N64): BHL welcome the inclusion of 'Land West of Hednesford Road, Norton Canes' (SHLAA Site Ref. N33) as a strategic housing allocation for the delivery of approximately 175 dwellings under reference SH5. Indeed, that proposed allocation reflects that the site is located in an entirely suitable location for growth and is not subject to any insurmountable technical or environmental constraints, as demonstrated through the site's favourable Sustainability Appraisal scoring. However, BHL are of the view, as set out above, that the adjacent land (SHLAA Parcels N24 and N64) to the south-west of that proposed allocation should also be allocated or safeguarded for residential development in order to ensure that CCDC have taken sufficient land out of the Green Belt to meet its own housing need (with sufficient flexibility) and that it has sufficiently planned for its longer-term needs (in accordance with NPPF paragraph 139), plus a sufficient contribution to the unmet needs of the wider HMA. The allocation of those additional parcels (SHLAA Parcels N24 and N64) would reflect their suitability as demonstrated within both the SHLAA and SA. Indeed, the SHLAA assessment of those omitted parcels are largely similar to the conclusions for the allocated N33; besides noting the presence of historic landfill and coal mining activity, which have been sensitively dealt with in the submitted Masterplan for the 'wider site' (Drawing Ref. DE.387 Repts Plan 2 RevA). Furthermore, the SA assessments of the omitted parcels (N24 and N64) are almost identical to the conclusions for N33 (the allocated parcel). Rather, the SA finds that Parcels N24 and N64 would have a less significant negative impact in terms of pollution and the historic Environment in comparison to Parcel N33. As such, the residual land under BHL's control performs similarly to the proposed allocation site, and therefore can only be seen as being suitable for residential development. The site is an entirely appropriate location for sustainable development in terms of its relationship with the settlement, with its location less than 350m from the local centre ensuring that it benefits from a full range of local services and facilities. Indeed, the settlement and surrounding area benefits from a full range of local services and facilities. Indeed, the settlement and surrounding area benefits from community facilities including a nursery, primary and secondary schools, a community library, churches, a pharmacy, and a doctor's surgery, retail facilities including a chain convenience store and smaller convenience stores, restaurants and takeaways, a bakery, and public houses, and recreational and sport facilities including public open spaces and the playing fields at the rear of the Norton Canes Community Centre. Furthermore, Norton Canes also contains significant employment areas, including the expansive Norton Canes Industrial Park 600m to the south of the site. In addition, the settlement's excellent connectivity with Cannock allows easy access to the Orbital Retail Park, Kingswood Lakeside Employment Park, the Longford Industrial Estate and Cedars Business Centre. Furthermore, the site and settlement benefit from excellent public transport links. A number of bus routes run along Hednesford Road adjacent to the site and along Church Road/Chapel Street, with the 60/60A services providing access to Cannock, Burntwood and</p>
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			<p>Lichfield, and the 3/3A services providing access to Cannock and Walsall, via the villages of Brownhills, Pelsall and Rushall. The site also benefits from excellent pedestrian connectivity via the adjacent road network, and the Public Right of Way network in the surrounding area. Those active travel links will be enhanced through the provision of a pedestrian/cycle route through the site as a result of the site's development, which will tie in efficiently with the existing and proposed recreational routes surrounding the site to promote active movement between the site, the local centre, and the proposed recreation area to the north-west. In addition, the technical and environmental assessments carried out for the wider site to date have indicated that there are no insurmountable technical or environmental constraints.</p>
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		<p>An Access Feasibility Report has identified that site access from Hednesford Road is feasible, and consultation is underway with Staffordshire County Council Highways to detail a scheme of improvements to the nearby Five Ways Roundabout to address congestion and air quality matters in accordance with Policy SO8.5. A drainage strategy that incorporates SUDS features and takes advantage of the site's natural fall to the south is evolving that will provide surface water attenuation at the site's south-west corner, and also provides the opportunity for ecological enhancement in that area. Meanwhile, the gas pipeline that travels broadly north-east to south-west through the site does not constrain development, and will be sensitively incorporated within an open space corridor. Furthermore, the proposed development is considered unlikely to have a significant impact on the wider historic Environment as assessed by the 2009 Historic Environment Character Assessment, and the potential for the re-use of the non-designated heritage asset of Norton Lodge Farm (if feasible) and the retention of the historic field boundaries will be considered throughout the master planning process, and have been incorporated into the proposed scheme as described below. Meanwhile, the site and its immediate surrounds are not subject to any ecological designations, and the opportunity to contribute to the enhancement of an ecological and recreational east-west corridor/network to the north of the site will be realised through the connectivity that the site will provide. In relation to the landscape and visual impact of the scheme, it is noted that the site is not considered to be a valued landscape due to the heavy influence of surrounding detractors (pylons, overhead power lines, infrastructure, industrial buildings) but that the proposed layout will seek to retain attractive features such as the landscape structure/hedgerow patterns, and that the site is well-contained to views within 1km of the site, where the site would be seen in the context of the built development. In terms of Green Belt impact, whilst the site will inevitably result in the growth of Norton Canes and some encroachment into the countryside, the nature of the site, its relationship with the existing urban form, the robust landscape structure in the wider area, and notably the defensible Green Belt boundary that will be provided along Long Lane, mean that the degree of harm arising from the release of the land for development would be limited. Rather, the proposed development of the wider site presents an opportunity for CCDC to meet its development needs in a manner that creates a long-term robust and defensible Green Belt boundary to the north and west of Norton Canes. Indeed, the identification of the residual (N24 and N64), be that through an allocation for the upcoming plan period or safeguarding of the site to meet future needs, would establish a new Green Belt boundary at Long Lane, whereby the extent to the urban area and the countryside to the west would be clearly marked by the well-vegetated Long Lane.</p>
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		<p>Public Right of Way. Thus, the development of the entirety of this land would actually benefit the wider Green Belt by creating a 'readily recognisable' and 'permanent' Green Belt boundary that would strengthen the function of Green Belt parcels to the west of footpath in accordance with NPPF paragraph 139f. The Proposed Scheme: The substantive benefits of the site's comprehensive development with Strategic Housing Allocation SH5 on this relatively unconstrained site are clear, and are realised through the emerging Masterplan that has been submitted alongside these representations. That Masterplan provides for the delivery of approx. 168 units within the proposed allocation site, and a further c. 164 dwellings in the adjacent land. The emerging Masterplan for the site's development demonstrates how a well-designed site that relates well with the existing built form will be delivered to provide much needed housing in a sustainable location, with residents having direct access to, and providing support for, the range of local facilities and services within Norton Canes. The development proposals seek to create and nurture a happy, healthy, resilient and sustainable community. The Masterplan for the site's development outlines the delivery of a well-designed scheme that will relate well with the existing settlement, and benefit from excellent accessibility to the services and facilities therein. Specifically in relation to Policy SO1.2, the proposed development constitutes a sensible planned extension to the settlement that will effectively 'round-off' the built form in a manner that will have a limited impact on the surrounding landscape and the experience of the surrounding Green Belt. It will achieve this through the provision of a landscape-led development that responds sensitively to the surrounding landscape, sitting comfortably in the wider landscape structure by retaining and enhancing key features of vegetation. The response to existing residential areas adjacent to the site is similarly sympathetic and will respect both their residential amenity and enhance the existing townscape in accordance with Policy SO1.2; by effectively opening up to the cul-de-sacs of Norton Terrace and Chasewater Way through the provision of a significant area of community/open space at the eastern boundary. That approach, and the manner in which the internal development blocks are orientated to respond to the generous corridor of accessible and attractive green space (which travels from the north-east to the south-west of the site) will ensure that natural passive surveillance is achieved to deter crime and the fear of crime in accordance with Policy SO1.3. The emerging Masterplan also seeks to sensitively respond to the non-designated heritage assets within the site in accordance with Policy SO1.1, which CCDC's HIA defines as being the historic field boundaries of SHLAA Parcel N24. In that light, the emerging Masterplan seeks to retain the existing historic field boundaries (save for the small areas of removal required to accommodate the internal road layout) and enhance some boundaries with additional tree planting to strengthen their structure. In addition to that and given that the HIA notes the potential archaeological significance of these features, further archaeological assessment of the hedgerows will be undertaken prior to the site's construction.</p>
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		<p>That approach, and the potential conversion of Norton Lodge Farm in the adjacent proposed allocation site (if feasible), is therefore in accordance with Policy SO1.1 in that regard. Alongside that, the development scheme provides a generous quantum of accessible, attractive and safe open space, with the Masterplan incorporating a significant north-east to south-west corridor open space corridor, within which lies a community space/play area at the south/south-east of the site (within SHLAA Parcel N64) to serve existing and new residents. That open space corridor would align with the linear corridor that follows the route of the existing gas pipeline within the adjacent proposed allocation site and would be supplemented by smaller areas of open space located near to the north-western and western boundaries of the adjacent proposed allocation; with those areas of open space to be connected by green corridors focused on the existing hedgerows that will support ecological connectivity along the site's boundaries. As such, the comprehensive development of the entirety of BHL's land ownership (i.e. N24, N33, and N64) would provide a network of accessible and attractive open community space that would deliver significant enhancements to the wellbeing of its residents, and the residents of the settlement more widely, and promote a healthy and active environment for existing and future residents, in accordance with Policies SO2.2. and SO2.4. The scale and typology of that open space will seek to respond to the open space standards that are anticipated in the next iteration of the Plan and will also take into consideration the potential to address the shortfall in allotment/community food growing facilities within Norton Canes, in accordance with Policy SO2.5. The Masterplan also proposes the provision of footpath/cycle links that will maximise the potential of the site's well-connected location and enhance active travel networks between the site and its surrounding uses, including the excellent range of services and facilities within the local centre. It proposes the provision of pedestrian/cycle links with Hednesford Road to the site's east which then travel through the site and link to the Long Lane Public Right of Way via three connections at various points on the site's western boundary, which in turn provides access both to Jerome Primary School and the wider settlement to the south, and the proposed recreational east-west footpath//cycle route (Policy SO5.60 that links Hednesford Road with the safeguarded Country Park location to the site's north/north-west. Effectively, therefore, the site's comprehensive development will accommodate the creation of a much enhanced wider active travel network that connects the local centre and its facilities, surrounding residential areas, Hednesford Road, the site and the attractive countryside and proposed recreational uses to the north. The benefits to enhancing healthy and active lifestyles in accordance with Policies SO2.2 and SO2.4 are clear in that regard and are a significant benefit of residential development in this location. In that context, suitable residential development in this location can play a key role in ensuring the long-term sustainability of the wider District's environment, and in particular the Cannock Chase AONB and other designated areas. Indeed, the incorporation of significant on-site open space and recreational areas within a connected green infrastructure network to meet the needs of existing and residents, and the</p>
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			<p>enhancements provided to the surrounding recreational routes and the manner in which they will increase connectivity with the proposed Country Park to the north, will help to minimise visitor pressure on more sensitive parts of the District in accordance with Policies SO4.3, SO7.1 and SO7.3. The Masterplan for the site's development also incorporates a sustainable drainage scheme at the site's south-west corner and therefore provides an opportunity for ecological enhancements.</p>
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		<p>That area will provide the opportunity for the natural Environment to thrive and for a net gain in biodiversity to be realised in accordance with Policies SO7.1 and SO7.2, and will tie in with the wider ecological and recreational green infrastructure network along Long Lane. Overall, therefore, the development proposals set out above will demonstrably provide appropriate mitigation to compensate for the loss of Green Belt land in accordance with Policy SO7.7, given the provision of new and enhanced green infrastructure, additional planting, improvements to biodiversity, habitat connectivity and natural capital, new and significantly enhanced walking and cycling routes, and improved access to recreational facilities. As such, the above analysis and development proposals clearly demonstrate the realisable opportunity to meet the short-term needs of the District through the development of this suitable, available and deliverable site, in a manner that would provide additional flexibility to reduce the risk present within the District's housing supply, and also provide a valuable contribution towards the longer-term needs of the District and wider HMA. In that context, the accompanying Masterplan clearly demonstrates that, whilst significant benefits can be unlocked through the delivery of Strategic Allocation SH5, they would be further enhanced through a comprehensive approach to developing the entirety of BHL's land ownership in order to maximise the potential of residential development in this location. As such, the proposed development would deliver significant socio-economic and environmental benefits and contribute to the realising of the LPPO's wider objectives for Norton Canes, including the enhancement of ecological and recreational networks. It would do so whilst also sustainably rounding-off the built form of Norton Canes through the provision of a new robust and defensible Green Belt boundary to the west and therefore is entirely suitable in that regard. As such, this site reflects an opportunity for CCDC to achieve a number of the wider objectives of the plan, in promoting a happy, healthy, and sustainable community.</p>
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LPPO257	The Church Commissioners for England	Barton Willmore - A, Bird	<p>Overview of Land to the east of Wimblebury Road, 'Bleak House': Bleak House is located adjacent to the urban edge of Cannock/Hednesford/Heath Hayes, approximately 2km east of Hednesford town centre and approximately 4km east of Cannock town centre. The site is bounded by residential development at the urban areas of Rawnsley and Wimblebury to the north and west respectively. A thicket of trees and Cannock Wood Road comprise the eastern boundary, with hedgerows and a PRow defining the southern boundary. The Commissioners also own a large parcel of land further south of Bleak House, which provides a significant spatial gap between the site, the Staffordshire Coalfield Heaths SSSI and Burntwood. For the avoidance of doubt, the Commissioners are not promoting the land to the south for development. However, as noted within the supporting Vision Document whilst release of Bleak House from the Green Belt does not depend upon this there is the potential for the land to the south to be made available as appropriate e.g. to provide environmental improvements. Bleak House is in a highly sustainable location, with two primary schools located within 0.8km of the site. There are also several employment opportunities, including Anglesey Business Park and Lower Keys Business Park, within 1.2km of Bleak House. Within approximately 0.6km of the site lie several existing areas of play areas and public open space. In addition to the PRow along the southern boundary, another PRow crosses the north western corner of the site. These PRows can provide leisure opportunities for pedestrians and sustainable access to surrounding development in the first four phases of development, as outlined in the accompanying Vision Document. In terms of transport connections, the site benefits from good transport connections with existing bus stops on Cannock Wood Road, John Street and Littleworth Road providing frequent services to Cannock and Lichfield. Bleak House is approximately 2km in walking distance from Hednesford Railway Station offering services to Birmingham and Walsall. Bleak House is located approximately 1.5km north of the A5190 (Cannock Road) which provides direct access westwards to Cannock, where onward connections can be made to the M6 and M6 Toll, and eastwards to Burntwood and Lichfield.</p>
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LPPO258	C. Elwell Transport (Repairs) Ltd	J, Heminsley	<p>The owner wishes to develop this site for housing purposes. The company are housebuilders. The site is reference R37 in the 2020 SHLAA and has an area of 2.32ha. The only constraint is the public footpath which crosses the site which links Hednesford Road with Coppice Lane. Taking account of the need to accommodate the footpath the estimated capacity of the site is 40 units. The site is on the edge of the built-area of Rugeley with well-defined boundaries. The location is a sustainable one in relation to good access to public transport, bus and rail, local shops, schools and health facilities all within easy walking distance. It is considered that the contribution to local housing need in Rugeley/Brereton from site within the urban area has been overestimated. Site H47 at Redbrook Lane with a potential capacity of 93 units is currently fully occupied by a major logistics company and the western edge of this site has an historic underground fire in a former railway embankment which would be extremely expensive to resolve and enable residential development to take place. Neither of the Rugeley town centre sites H23 Wellington Drive and H22 Rugeley Market Hall/Bus Station with a combined capacity of 80units have schemes which have been worked up and tested for viability. Site H49 at The Mossley with a potential capacity of 40units has major problems with achieving a suitable access. Site H48 the former Aelfgar School has planning permission for 58units not 85 as stated in table C. So it is considered that the contribution to housing need from these urban site has been overestimated. Development of the proposed site would not constitute a significant encroachment into open countryside with well-defined boundaries on the edge of the built up area and is in the most sustainable location of all the sites on the south-western edge of Rugeley in relation to access to services. It can make a useful contribution towards meeting Rugeley's future housing need and should be allocated for housing development.</p>
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LPPO259	Taylor Wimpey (Land East of Wimblebury Rd)	RPS - P, Hill	<p>Extent of Land: As the Council are aware, Taylor Wimpey (TW) are promoting the site which comprises the land proposed for allocation IN THE cclpr (sh2) 'Land East of Wimblebury Road' for 410 dwellings (the 'site'). TW is therefore committed to bringing forward the site through the planned process and is willing to work with the Council on preparing an appropriate policy framework that can guide development on the site. TW therefore welcomes the Council's decision to propose the allocation of the site in the CCLPR. The site allocation comprises land that was previously safeguarded in the 1997 Local Plan and which was also similarly identified in the Cannock Chase Core Strategy adopted in 2014 as safeguarded land, as well as additional parcel of land described as 'East of Wimblebury Road' which lies to the east of the safeguarded land. [...] [see document for plan]. The extent of land under TW control is far greater than that which relates to the site allocation alone. This is significant as it has implications for proposals set out later in this submission (see chapter 4) regarding proposals for potential additional safeguarded land adjacent to the site allocation which forms part of the land under their control. TW has also commissioned new evidence to inform a revised vision and masterplan for the site. As indicated above, this will comprise a Vision Document, which will provide greater detail on scale and nature of the proposals as well as address, as far as practicable, the known technical issues relating to the site. At this stage, an updated indicative masterplan for the site allocation, and adjacent land (proposed for safeguarding in the CCLPR) is set out below and attached as Appendix 2. [...].</p> <p>Promoting a Sustainable Development: The site is located on the edge of the District's largest urban area - Cannock/Hednesford/Heath Hayes. As the largest settlement in the District, there are several services and amenities in close proximity to the site. [...]. Public transport services are present along Wimblebury Road, Melbourne Road and Hobart Road (19, 20 and 61 services) to the west of the site, providing access to Cannock and Lichfield every 30-60minutes, Monday to Saturday. The majority of the site is within 400m of bust stops for these services and is therefore located within a suitable walking distance with a good level of services available. In addition, other services in the area include bus routes 3, 3A, 60, 61A and 835 providing twice hourly services to Walsall, Lichfield and daily rush hour service to and from Stafford. On this basis, the Site represents a sustainable location in accordance with the NPPF (paragraph 8).</p> <p>Site Deliverability: The site is wholly within the control of a national housebuilder, who has considerable experience of delivering houses within this area and the wider West Midlands. It is not subject to any significant technical or environmental constraints that will prevent it coming forward for housing. The site is considered suitable for residential development. In summary, the Site:</p> <ul style="list-style-type: none"> • Is in close proximity to a range of local services and facilities; • has no technical or environmental constraints that prevent delivery; and • has strong transport links locally and further afield. <p>TW can therefore confirm that development of the site is economically viable and is confident that residential development can be achieved within the first five years of the plan period. There is therefore an</p>
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			excellent prospect of the site being delivered in the short-term and could, if needed, be brought forward within the first five years of the plan period.
			SO3.4: Gypsies, Travellers and Travelling Show People
			Question 18: Will the proposed policy assist in meeting the needs arising for gypsy, traveller and travelling show people within the District?
LPPO260	Walsall Council - N, Ball		The Plan does not allocate additional sites for travellers, however it is noted that recent planning permissions have approved additional sites that may contribute to meeting the identified need, which is modest in any case. It is unclear how these relate to the need for a further 11 plots referred to in policy SO3.4. Some clarity of terminology should be made in this policy. The term 'plot' is normally used for a site for showpeople whereas the term 'pitch' is used for one for Gypsies and Travellers.

LPPO261	Historic England - E, Boden		Any sites identified for allocation to meet the needs of these groups would need to be accompanied by an appropriate heritage impact assessment.
LPPO262	Norton Canes Parish Council		In relation to Policy SO3.4 accommodation for Gypsies, Travellers and Travelling Showpeople the analysis of need is noted. However the proposed criteria based policy does not resolve the issue of the environmentally damaging encampments at Stokes Lane/Long Lane and the Parish Council would wish to see a policy giving priority to resolving the issue even if it involves a more appropriate site with suitable facilities sites in the Green Belt. The Parish would also wish to include providing a long term future for the Travelling Showpeople at Grove, who currently only benefit from a temporary planning permission, in the context of the masterplan for Heritage regeneration of the former colliery site.
LPPO263	Brindley Heath Parish Council		We note the need for gypsy and traveller sites but would stress that this must be a carefully considered plan for a Council run site. The present method of granting planning permission to illegal sites within the Green Belt must cease as it continues to encourage others to do exactly the same and there is no justification for such in planning terms.
			SO4.1: Safeguarding Existing Employment Areas for Employment Uses
			Question 19: Do you support the preferred policy direction to safeguard existing provision for employment use?
LPP0264	Walsall Council - N, Ball		Turning to employment land, the Plan is not explicit about what proportion if any of the additional 50ha of land would meet needs arising in the Black Country. We stated at the Issues and Options stage that Cannock Chase, Walsall and parts of South Staffordshire formed a 'core area' for employment needs, with a high level of inter-dependency between homes and jobs. However, this provision, although modest relative to the total needs of the Black Country, is welcome. The proposals include new site allocations alongside the M6 (toll) at Churchbridge and Norton Canes close to the Walsall boundary. The proposed policy SO4.1 to safeguard existing employment areas for employment uses is welcome. The policy includes a requirement that there is evidence of comprehensive marketing for of the site for at least 12 months. However, evidence from the Black Country is that this is not sufficient; a number of significant employment developments have taken place in recent years on sites in our area where the site was vacant for a decade or longer. A minimum period that relates to the length of an economic cycle is recommended instead.
LPPO265	Norton Canes Parish Council		Policy SO4.1 proposes to safeguard existing employment areas for employment uses whereby proposals for change of use from employment will only be permitted if there are overriding and demonstrable economic, regeneration and sustainable community benefits, demonstrable ongoing availability of employment land in other locations, comprehensive marketing for at least 12 months, demonstrable environmental benefits and no adverse impact on viability of adjoining businesses. This policy is proposed to be applied to the business areas in the village mentioned above together with Watling Street and Lime Lane Business areas and is supported.

LPPO266	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Policy SO4.1 seeks to safeguard existing employment areas for employment uses. It sets out a range of criteria which will be utilised when assessing whether an employment site could be lost to alternative uses. As drafted, it is unclear whether all of the seven criteria set out within Policy SO4.1 have to be met to allow employment land to be used for alternative purposes. This needs to be addressed. It is assumed that not all the criteria should be met, for instance Criterion 5, which states that there will be demonstrable benefits arising from the proposal including improvement to local residential and environmental amenity, could in its own right be a sufficient reason to allow the reuse of an employment site for other purposes. In terms of new employment provision, the EDNA (2019) recommend that a range of employment land between 46-66ha should be made available during the plan period. Policy SO4.2 has developed this further to indicate that the Council will provide for up to 50ha of employment land for new development during the LP period to 2038. The policy also identifies 27ha of land across 12 sites which would be protected for employment purposes.
LPPO267	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Policy SO4.1 seeks to safeguard existing employment areas for employment uses. It sets out a range of criteria which will be utilised when assessing whether an employment site could be lost to alternative uses. As drafted, it is unclear whether all of the seven criteria set out within Policy SO4.1 have to be met to allow employment land to be used for alternative purposes. This needs to be addressed. It is assumed that not all the criteria should be met, for instance Criterion 5, which states that there will be demonstrable benefits arising from the proposal including improvement to local residential and environmental amenity, could in its own right be a sufficient reason to allow the reuse of an employment site for other purposes. In terms of new employment provision, the EDNA (2019) recommend that a range of employment land between 46-66ha should be made available during the plan period. Policy SO4.2 has developed this further to indicate that the Council will provide for up to 50ha of employment land for new development during the LP period to 2038. The policy also identifies 27ha of land across 12 sites which would be protected for employment purposes.
LPPO268	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Policy SO4.1 seeks to safeguard existing employment areas for employment uses. It sets out a range of criteria which will be utilised when assessing whether an employment site could be lost to alternative uses. As drafted, it is unclear whether all of the seven criteria set out within Policy SO4.1 have to be met to allow employment land to be used for alternative purposes. This needs to be addressed. It is assumed that not all the criteria should be met, for instance Criterion 5, which states that there will be demonstrable benefits arising from the proposal including improvement to local residential and environmental amenity, could in its own right be a sufficient reason to allow the reuse of an employment site for other purposes. In terms of new employment provision, the EDNA (2019) recommend that a range of employment land between 46-66ha should be made available during the plan period. Policy SO4.2 has developed this further to indicate that the Council will provide for up to 50ha of employment land for new development

			during the LP period to 2038. The policy also identifies 27ha of land across 12 sites which would be protected for employment purposes.
LPPO269	Aldi Stores Ltd	Turley Associates - N, Denison	<p>We object to the wording of Policy SO4.1 as proposed. The policy as worded appears to set out a more stringent set of tests (in the form of criteria defining the exceptions) to be met than the existing equivalent policy in the adopted Local Plan Part 1 (LPP1). It is not clear whether it is the intention of the LPA to restrict the circumstances in which land in employment use can be used for other purposes. If that is the LPA's intention such an approach would have to be justified (in order to meet the tests of soundness set out at NPPF paragraph 35(b)). The LP's evidence base does not justify pursuing such a policy. The likely outcome of the current policy wording being adopted will be the future sterilisation of unviable employment sites from being put to more beneficial uses. The changes proposed on behalf of ALDI are designed to add clarity to the draft policy. The policy, as currently worded, seeks to 'safeguard' land and then provides a list of changes in which change from employment use may be permitted. It is clear that the intention of the policy is that a site should not be required to remain in employment use if a proposal comes within the exceptions set out later in the policy - that intention should be made explicit. The list of exceptions do not include the word 'and' or the word 'or'. It is not clear that whether the list is intended to be read conjunctively or if the exceptions are alternatives. It is clear that it would not be reasonable, or justified, to require a proposal to meet all the criteria listed in order to fall within the exception. In order to add clarity the word 'or' should be added as set out above. Reasoning for objection: The LPA's updated ELAA - Dec 2020 - contains evidence which underpins the emerging Local Plan policies. That document shows an improving picture in terms of available supply to meet assessed needs for employment land over the current LPP1 period to 2028 and over the new Local Plan period to 2038. That document shows that there is 28ha of readily employment available land within the District, which, coupled with completions of 73.45ha over the plan period to date, provides an overall supply of 96.45ha, which comfortably exceeds the current Local Plan requirement, set out in Policy CP8, of 88ha. Moreover, the ELAA indicates that there is a supply of a further 133ha of employment within the District which is not readily available, a proportion of which can be expected to come forward in the period to 2038. One of the key recommendations from the LPA'S EDNA - Covid 19 Update (Dec 2020) is that the</p>

			District's employment land Objectively Assessed Need (OAN) should comprise a range of between 48ha to 66ha between 2018 and 2038 with no allowance for lost employment land over that period, or between 63ha and 81ha if losses are to be taken into account (at a rate of 0.756ha/annum).
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		<p>The LPA indicate in draft Policy SO4.3 that the selected provision for the period to 2038 will be 50ha, with losses of employment land to be addressed through the use of criterion based policy (SO4.1). The EDNA provides evidence that the losses of employment land to alternative uses in the District is at a relatively low level - at an average of 0.756ha/annum over the period 2006/7 to 2019/20. This does not suggest that there is any urgent requirement to introduce a more stringent policy control over loss of employment land than that already in force in the LLP1. Draft Policy SO4.2 sets out the proposed provision for future employment land between 2018 and 2038. That provision is made up of the following components: • 27 ha from 'protected' allocated employment sites; • 16 ha from sites within "Existing Employment Areas" • Between 2018 and 2021 12.47 ha of employment land has been developed (completed). Those three elements amount to a supply of 55.47ha, compared to a required provision of 50ha over that period. Moreover para 6.281 of the Preferred Options document states that further land is likely to become available over the plan period (presumably reference to the 133ha of currently unavailable employment land identified in the ELAA). This indicates that there is no shortage of available employment land to meet the assessed OAN over the new Local Plan period to 2038. Finally, turning to the need to retain land within specific existing employment sites, we note that in respect of the Power Station Road Business Area, the Existing Employment Areas Study (2019 update) (EEAS) concludes at para 3.38 that [...]. Moreover, at Table 3.4 of that document it is recommended that within the wider designated area (of the Power Station Rd Business Area) this land should not be allocated, but retained in existing current use and monitored. Proposals for alternative use should be considered via a criteria-based policy. This site is likely to be a higher priority to consider for redevelopment for residential of opportunity arises in medium-long term. Moreover, para 3.49 recommends that within the Power Station Rd Business Area only the former JCB factory site should be retained for employment uses. It goes on to state that "a further 6 sites (including the remainder of the Power Station Rd Business Area) are considered to have potential to be more suitable for alternative uses in the future. Whilst alternative proposals should be considered against criteria-based policy, there should be no specific presumption in favour of their retention for B-class uses so that alternative uses can be considered in the future if their performance declines." In the light of those recommendations, we do not object to the principle of a criterion based policy to assess the merits of alternative use proposals within existing employment areas - we do, however, have serious concerns that the proposed criterion based policy as currently constructed (SO4.1) sets an almost impossibly high barrier for alternative proposed uses to clear, which will seriously reduce the prospects of such potentially beneficial uses obtaining planning permission. Policy SO4.1 runs counter to the recommendations of the EEAs by starting with a presumption that all land within existing employment areas should be retained for B-class use. It then sets out seven criteria which seemingly must all be met before planning permission for alternative use will be granted. The current adopted Policy CP8 is much more flexible in its approach, stating that [...].</p>
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			There are subsequently 3 key criteria set out to be addressed. Please see provided response for proposed alternative wording for Policy SO4.1.
LPPO270	St Modwen Industrial & Logistics	RPS - J, Bonehill	RPS welcome proposed policy SO4.1 and the associated identification of Watling Street Business Park as an area to be safeguarded for employment uses which recognise the contribution that the Site makes to providing much needed employment space within a highly accessible location. However, we suggest that in order to ensure that the Plan is positively prepared that it would be beneficial if the policy were revised to expressly indicate that redevelopment of safeguarded existing employment areas for employment uses will be supported. While this is implicitly indicated by the policy, we consider that revising the policy in this manner would be beneficial and provide additional certainty to the owners and operators of these existing employment areas.

			SO4.2: Provision for New Employment Uses
			Question 20: Do you the preferred policy direction to provide land for new employment uses?
LPPO271	Inland Waterways Association, P, Sharpe		IWA notes that policy SO4.1 on employment provision includes an allocation in Table F of site E12. Any improved road access to this site potentially conflicts with the safeguarded route for the Hatherton Canal Restoration Corridor policy SO5.5. It should be a development requirement that a bridge is provided over the canal route with the necessary headroom as indicated in the 2006 Arup Feasibility Report and drawings.
LPPO272	National Grid	Avison Young	Following a review of the DPD we have identified that one or more proposed development sites are crossed or in close proximity to National Grid Assets. Details of the sites affecting National Grid Assets are provided below. SO4.2 E12 (CE19) - a plan showing details of the site locations and details of National Grid's assets is attached - this plan is illustrative only. Guidance on development near National Grid assets is also provided.

LPPO273	Holford Farm Partnership - P, Holford	Hawksmoor - T, Bathurst	<p>My clients fully support the proposed allocation of Site Ref: E10. The site extends to approximately 2.12ha and will therefore provide a meaningful contribution towards the District's future employment land supply over the period up to 2038 and assist in creating a 'hub' of employment uses around the Turf Roundabout on the A5 to compliment existing commercial development. Benefitting from excellent access to the A5 and the M6 Toll Motorway, the site will allow for strong connectivity to surrounding transport networks. Notwithstanding the above, my clients consider that the Council should allocate additional land for employment use as part of the Local Plan Review process. Currently, Policy SO4.2 allows for the allocation of 27ha of employment land. However, it is noted at the first pullet point of paragraph 6.257 of the consultation document that the Association of Black Country Authorities (ABCA) may have a potential shortfall in employment land supply. Given the adjacency of Cannock Chase District to the Black Country, the District should explore options for assisting the Black Country in meeting at least part of the potential shortfall within the District's boundaries. We note from the current consultation at paragraph 6.276 that the EDNA (2020) recommends that " a range of employment land of 46-66ha (net) including flexibility is made available during the period 2018-2038". However, the EDNA (2020) document itself also states in its conclusions and recommendations section at paragraph 6.7 that: "The range [46-66ha(net)] makes no allowance for the replacement of losses. Council officers will need to take a decision regarding the extent to which additional provision should be planned for, over and above the net requirement. The range rises further - to between 63ha and 81ha - if losses are replaced at 0.756ha per annum" The 0.756ha/annum figure for employment land loss is taken as an average of the losses experienced in the District over the past 12years, Whilst the amount of employment land loss will vary year to year, it is no doubt a trend that will continue over time as alternative uses are sought for existing land and buildings. Preferred Options Draft Policy SO4.2 states that the Local Planning Authority will provide for up to 50ha of land for office, manufacturing and distribution employment development during the period to 2038. Given that, even at the lower end of the range provided in the EDNA for gross provision (allowing for the replacement of losses of existing employment land across the plan period) the figure is 63ha of supply, the Council's proposal for providing just 50ha if land appears to fall behind what is required to cover both future demand and also the replacement of loss to existing supply. Our clients also hold land at Jubilee Field, Watling Street located to the south east of the Turf Roundabout - please see attached plan. The site extends to approx. 5.08ha and also shares the benefits of excellent access to the A5 and the M6 Toll Motorway with Turf Field. Jubilee Field has been promoted simultaneously with Turf Field though the Council's previous 'Call for Sites' in January 2019 as part of the ELAA 2020 process (NE6) and also in response to the Local Plan Review Issues & Options Consultation in May 2019 The additional allocation of this land at Jubilee Field would further support an employment development 'hub' in this location and assist in bolstering the provision of land along the A5 corridor. Such an idea was</p>
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			<p>displayed on the diagrams at pages 82 and 83 of the previous 2019 Issues & Options Consultation document relating to Options C1&C2 of the 'Strategy for Meeting Overall Employment Needs'. Moreover, it will allow for a further 5.08ha of land supply to assist in meeting the gross employment land requirement of between 63ha and 81ha across the Plan period. Given the availability of this additional site, and the likely requirement for the Council to find additional employment sites to cover ongoing losses to additional supply, Jubilee Field should be allocated for development.</p>
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LPPO274	Walsall Council - N, Ball		<p>Proposed policy SO4.2 which identifies sites for new employment uses states that proposals for new employment development within Use Class E will be directed to the town centres. We would support this requirement. The Economic Development Needs Assessment (EDNA), which identifies strong labour market linkages with the Black Country and Walsall in particular, suggests that close co-operation on employment land supply balance is recommended going forward. The Black Country employment land requirement ranges between 592 ha (baseline growth) and 870 ha (aspirational growth based on West Midlands Combined Authority SEP). Our existing urban employment land supply (including recent completions) provides approximately 305 ha of land, leaving a shortfall of between 263 ha and 500 ha, depending on the growth scenarios applied. As is the case with our approach to housing land, we are considering all opportunities to bring forward additional employment land within the urban area, and land within the Green Belt, but this exercise will not make a significant impact upon addressing our unmet need. Contributions through the Duty to Cooperate are currently limited to 50ha in total (including 30ha in the Shropshire Local Plan), but this work is ongoing and will include a proportion of the consented West Midlands Interchange at Four Ashes in South Staffordshire.</p>
LPPO275	South Staffordshire Council - E, Fox		<p>We support the commitment within the Preferred Options Plan to providing a supply of 50ha of employment land during the plan period. This figure is within the range identified in the recently published Cannock Chase District EDNA 2020 study. It is considered that greater clarity would be provided by committing a sufficient supply of identified sites rather than the present approach which suggests that part of the requirement is 'likely to become available during the plan period'. We note your position on cross boundary employment needs set out at paragraph 4.10 of the Preferred Options document where you state: 'Discussions will continue with our Duty to Cooperate partners to ascertain potential assistance to meet unidentified need for employment land within the authorities which share our functional economic market area.' As an authority who shares a FEMA with Cannock Chase District, South Staffordshire Council fully support this commitment and look forward to continuing our close working relationship to explore how identified shortfall in employment land supply can be addressed. It is evident that the new Cannock Chase Local Plan will lead to new development in close proximity to communities in South Staffordshire. It is therefore essential that the impact of proposals in Cannock on local amenities and the surrounding road network, including in South Staffordshire, is fully considered through the plan-making process. It is anticipated that we continue an ongoing dialogue with Cannock Chase District Council to consider the implication of any cross-boundary issues including the potential impact of growth and air quality on designated sites of nature conservation value.</p>

LPPO276	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We note policy option SO4.2 regarding employment provision and in particular site E12 shown on Table 7. As this is in close proximity to the Safeguarded Route for the Hatherton Canal, particular attention will be necessary to ensure that access to the site does not compromise the canal restoration. The necessary road bridge over the canal should be part of, and funded from, the costs of the development.
LPPO277	Historic England - E, Boden		Historic England notes that most of the proposed Employment site allocations have no designated heritage assets on or near to these sites and therefore have not been included within the HIA for assessment. However, we recommend that proposed employment site allocation E6 should be included for assessment within the HIA prior to allocation and our detailed comments on this site can be found at Appendix A to this letter.
LPPO278	Norton Canes Parish Council		The Parish Council has indicated, subject to community consultation, that in order to provide a choice of future local job opportunities it would support extensions to Kingswood Lakeside employment site but not on any areas currently used for open space, some extension to Watling Street Business Park, in order to provide opportunities for local businesses to expand and a roadside business hub on the site between the Turf and M6 Toll. Any development on these Green Belt sites should be accompanied by appropriate financial or practical contributions to deliver net environmental gain and/or benefits to the local community. The NP would wish to support conversion/sub-division of large vacant units on existing industrial estates to provide space for small local businesses to become established and grow. Policy SO4.2 proposes a total of 10 sites of up to 55ha of new land for offices manufacturing and distribution to 2038 across the District of which 2 are proposed in Norton Canes - E10 Turf Field Watling Street 2.12ha (identified for consultation in the NP as suitable for roadside uses). - E12 land between M6 Toll and A5 and east of Churchbridge known as Streetway Farm. As noted above the NP is supporting E10 for roadside uses. No objection is raised to E12. In addition, the Parish would support an extension to Watling Street Business Park (part of CE20 on the 2018 ELAA Map) focused on small units for local businesses as there is very little available land within the existing Norton Canes business areas off Walsall Road, Betty's Lane, Conduit Road, Norton Green Lane and Lime Lane. This support is based on the proposition that a safe pedestrian crossing of the A5 can be provided. It is understood that further work is being carried out on potential extensions to Kingswood Lakes. If any proposals are brought forward in relation to this the Parish would expect there to be a further consultation.

LPPO279	Canal & River Trust - H, Smith		<p>A number of existing and allocated employment areas lie adjacent to the Trent and Mersey Canal in Rugeley, adjacent to the Hatherton Canal Restoration Route on land south of Bridgtown and adjacent to the Cannock Extension Canal. This includes the Rugeley and Brereton Safeguarded Employment Areas (Towers Business Area and Power Station Road Business Area). The ecological network provided by the canal should be considered an integral part of the design of such allocated sites, to secure measurable net gains for biodiversity and contribute to climate change resilience with air, water, soil, noise and light pollution avoided or mitigated, as per Objectives 7 and 8 of the Local Plan Policy Options document. We would not object to the release of Green Belt land to the south of Bridgtown, upon the route of the proposed Hatherton Canal Restoration to provide a new employment site, but policy SO4.2 does not refer to this matter as a consideration, nor its supporting text. Policy SO5.5 would be highly relevant to this new employment site, so should be cross referenced. We support the requirement for the safeguarding and enhancement of active travel and sustainable travel opportunities, and accessibility to the green space network within this policy which should include the Hatherton Canal Restoration route. Existing employment sites adjacent to the Cannock Canal Extension could impact adversely upon the setting of the canal, and could introduce additional air pollution, which could harm the SSSI. Whilst policy SO8.5 (and more locally policy SP7.3) would be highly relevant to the majority of new employment proposals these are not currently cross referenced.</p>
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LPPO280	Nurton Developments Ltd - R, Young	JLL - P, Leaver	<p>We do not support the preferred policy direction to provide land for new employment uses. The reasons why are set out below. Context: Policy SO4.2 – Provision for New Employment Uses – provides for up to 50 hectares of land for offices, manufacturing and distribution employment development during the period to 2038. It states further that: “This will provide for a range of sizes and types of employment to meet business needs and encourage inward investment, resilience and new investment, and create a balanced portfolio of employment land”. Paragraph 6.276 of the reasoned justification to Policy SO4.2 refers to the EDNA (2019) under the heading of New Evidence. It states that the EDNA “recommends that a range of employment land of 46 to 60 hectares (net) including flexibility is made available during the period 2018-38”. Policy SO4.2 allocates 10 sites totalling 27 hectares for employment use. Table F identifies the sites but does not provide the site areas. These are provided though in the Employment Land Availability Assessment (ELAA) 2020. According to the ELAA, the sites range from 0.05 hectares (110 Walsall Road, Cannock) to 9.4 hectares (site between A5 and M6 Toll, Norton Canes) in size and add up to 25.06 hectares. Paragraph 6.276 states that 12.47 hectares have been completed in the two years from 2018 (i.e. the start of the plan period). According to the ELAA, all these completions have been in Cannock. Table G identifies a further 16 sites in existing employment areas which are considered able to contribute to the employment land supply. As with Table F, no individual site areas are provided. However, the ELAA does provide details on most of these sites. They range in size from 0.07 hectares to 3.2 hectares. Paragraph 6.281 states that they total approximately 16 hectares. Together, the allocations, completions since 2018, and potential windfall sites in existing employment areas add up to 53.53 hectares. Policy SO4.2 of the Preferred Options reported to the Council’s Cabinet of 4 March 2021 provided up to 55 hectares for the plan period. In addition, it included a further site – E11 – Jubilee Fields, Lime Lane. This site – 5.08 hectares (according to the ELAA) – was removed prior to consultation of the Preferred Options. Critique: We consider the approach taken in determining the provision of employment land, and the identification of sites to meet this need, is deeply flawed. This is for the following principal reasons: - • The provision of a maximum of 50 hectares sits at the bottom of the range set by the EDNA, with no justification provided as to why. • No allowance is made by the Council for future losses of employment land, despite clear advice from the authors of the EDNA, Lichfields, to take this into account. • Taking this into account, the projected need would range from 63 hectares to 81 hectares. • The EDNA under-estimates the projected need based on completions, with this projection leading to significantly less development than previously experienced. • Policy SO4.2 makes no express provision for the logistics sector despite evidence provided by the EDNA and the guidance given in the Planning Practice Guidance (PPG) note. • New allocations and potential windfall sites give a very limited range of sites, with no sites greater than 10 hectares. • No allowance is made for the potential non-delivery of sites. • The largest allocation – Site E12 – is not considered to be viable by the ELAA due to a number of constraints.</p>
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		<p>These points are developed in greater detail below. There is no rhyme or reason as to why a maximum of 50 hectares has been chosen. It is only 4 hectares greater than the bottom range figure provided by the objectively assessed net employment land need of the December 2020 EDNA update. Moreover, and more importantly, it takes no account of the replacement of future losses of employment land. This is despite the guidance provided in the PPG on economic need and the advice contained in the EDNA. Paragraph 2a-026-20190202 of the PPG states that “The recent pattern of employment land supply and loss” (our emphasis) is a matter for assessment in preparing evidence on economic need. In addition, paragraph 2a-28-20192020 makes specific reference as to how local planning authorities can identify the existing stock of employment land and the recent pattern of supply and loss of employment land. Lichfields make an adjustment to the net figures to allow for replacement of projected losses. The rationale for this is given in Paragraph 5.80 of the EDNA. It is to ensure that sufficient space is re-provided and ensures some protection against the erosion of employment space over the plan period. It notes that: “This is a widely accepted approach in planning for future employment land needs”. Indeed, Lichfields took this approach with the Stafford HEDNA in January 2020, with a recommended range provided just in gross terms (i.e. taking into account future losses). Lichfields assess the potential loss of employment land over the plan period by three different methods – past losses, the SHLAA, and rate of churn based on various percentages of the built stock. These methods generate a 20 year allowance between 15.12 hectares and 95.70 hectares (Table 5.17 of the EDNA). Lichfields decided to adopt the lowest figure, although acknowledged in Paragraph 5.91 that “even this could be at the lower end of the scale given the amount of stock in the District”. By comparison, Lichfields allowed for 48.2 hectares for replacement of losses for Stafford Borough. Taking into account this modest provision for replacement for future losses, the gross need ranges between 63 hectares and 81 hectares. This is 13 hectares to 31 hectares greater than the provision of 50 hectares. The higher figure is based on medium term past take up rates (i.e. from 2006/2007 to 2019/2020). The longer term past take up figures (which go back to 1996) project a higher figure – 93 hectares. This is discounted on the basis that the take up figures since 2006 are more detailed and, therefore, more reliable. In addition, both medium and longer term take up rates have been manipulated in the EDNA. In both cases, the development of the 700,000 sq ft warehouse built by Gazeley in Rugeley, and subsequently occupied by Amazon, has been taken out of the computations as it is considered to be an anomaly. It is not clear why this is considered to be an anomaly as there have been several cases since of transactions greater than 500,000 sq ft in this part of the West Midlands. In Staffordshire, these include:</p> <ul style="list-style-type: none"> • Pets at Home – pre-let of 670,000 sq ft warehouse at land north of Redhill Business Park, Stafford. • JLR – 2 million sq ft manufacturing plant at i54, South Staffordshire. • Dunelm – 525,000 sq ft warehouse at Prologis Park, Sideway, Stoke-on-Trent. • Screwfix – extension to existing warehouse to create 630,000 sq ft distribution hub at Trentham Lakes, Stoke-on-Trent. • XPO Logistics – 645,000 sq ft occupation
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			of second-hand space at Tamworth 594, Tamworth. • Screwfix – 562,000 sq ft at Prologis Park, Fradley, Lichfield.
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		<p>In addition, recently Supermart, a Chinese online retailer, has taken 800,000 sq ft of floor space in four new units in Cannock (M6DC, Conneqt 128, Conneqt 153 and Jupiter). If the Amazon unit at Rugeley was added back, then the average medium take-up rate would be 4.88 hectares per annum. Allowing for a flexibility factor of 6 hectares (as per the EDNA), this would project a need of 103.6 hectares. Arguably, this is still an underestimation of true demand. Cannock has a limited reservoir of land and is restricted by the Green Belt. These two factors will have suppressed demand and constrained take-up over the last 15 to 20 years. As agents involved heavily in the logistics market, we can confirm that demand continues to outstrip supply. 2020 was a record year for take up. However, it is to be emphasised that the market has been strong for some time now and all the market signals – e.g. increasing rents and land values – provide clear evidence of an imbalance of demand over supply. This position was recognised by the West Midlands Strategic Employment Sites Study 2015, which was produced by JLL and PBA. This concluded that planned land supply fell severely short in the three areas of highest demand, with one of these areas being the Black Country and southern Staffordshire. Subsequent studies – West Midlands Land Commission Land Report 2017 and the draft West Midlands Strategic Employment Sites Study Stage 2 (2021), Avison Young and Arcadis – have reiterated the urgent need for additional sites to be brought forward to provide a deliverable pipeline of new sites. The assessment of need and allocation of space for logistics is now covered specifically by the PPG (Paragraph 2a-031-20190722). This acknowledges the critical role played by the logistics sector and its distinct locational requirements. It urges local planning authorities to collaborate with other authorities to identify the scale of need and then consider and identify the most appropriate locations to meet such needs. Despite this, Policy SO4.2 makes no such express provision. The allocated sites are generally smaller, fragmented and not suited to accommodate or attract logistics development. The same applies to potential windfall sites in existing employment areas, as listed by Table G. The largest site is Site E12 – Site between A5 and M6 Toll, Norton Canes. This site (Ref No: CE19 in the ELAA) is 9.4 hectares and is listed under a category referred to as “Restricted and Excluded Sites”. This indicates that this site does not pass the tests set out by the PPG on allocations of suitability, availability and achievability. Summary: Policy SO4.2 significantly underestimates the objectively assessed need for employment land for Cannock, with its approach not justified by the available evidence. It is clear that the objectively assessed need has been engineered to fit supply, rather than seek to accommodate and attract the quantity and quality of employment development likely to be demanded and/or required. In addition, it appears that the Council has not worked with other neighbouring local authorities, particularly the Black Country and South Staffordshire, which are located in the same Functional Economic Market Area, to assess and identify the needs of the logistics sector and how best to meet those needs. This approach is plainly unsound and needs to be revisited before the next stage of the development plan-making process.</p>
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LPPO281	Norton Canes Councillors as at March/April 2021		We recognise the need for land to be provided for the economic growth of the district and support the suggested areas to take forward for development. We would also like to concur with the Parish Council's suggestion of extending the Watling Street Business Park to enable development for small local businesses and start-ups. We would also like to see specific mention of the old Durapipe site off Walsall Road in the Local Plan; we also recommend this site for development for smaller business units. However, one point which we made in our last submission and will repeat is that if Norton Canes is expected to provide a large proportion of the growth in employment land in the district, as seems likely, we believe that the village should not be expected to also provide any significant housing growth within the Local Plan period. Employment land expansion may not have an impact on certain infrastructure, such as education or healthcare, but it does have an impact on highways capacity and therefore must be carefully balanced with housing growth.
LPPO282	Together Active - J, Brennan		I support the inclusion of active travel and access to green space, but it needs wording more strongly. Proposals for new employment development should safeguard and enhance active travel by prioritising active travel through safe, integrated walking and segregated cycling routes where possible and sustainable travel opportunities, and accessibility to the green space network. Workplaces should include cycle racks/cycle storage and changing/shower facilities (Planning and Healthy Weight TCPA & PHE 2014)
LPPO283	Natural England- G, Driver		We provide the following advice on the proposed allocations: All the sites will have potential for air quality impacts on the Cannock Chase SAC/SSSI, Cannock Extension Canal SAC and West Midland Mosses SAC. The sites below have the following additional potential impacts listed below: E10: • Potential impacts on Cannock Extension Canal SAC, Chasewater and Southern Staffordshire Coalfield Heaths SSSI, Stowe Pool And Walk Mill Clay Pit SSSI. E12: • Potential impacts on Stowe Pool And Walk Mill Clay Pit SSSI
LPPO284	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	In view of the supporting context for economic growth in the District, including the Council's own economic strategy, it is unclear why when the evidence base identifies a need for employment land between 46-66ha, the Council has sought to utilise only 50ha within Policy SO4.2. In addition, it is not clear why the policy is drafted to provide for "up to 50ha" as this would be seemingly provide a ceiling on new employment development. This would be inconsistent with the policy context. It is noted that Rugeley Power Station is included in employment site allocation E5 and this is supported. However, the approach has not identified land adjacent to the Lakeside employment area as a new employment location. This is a missed opportunity bearing in mind the success of the Lakeside development and its potential to support growth aspirations in the Plan and allow complementary development to deliver sustainable development. Policy SO4.3 deals with sustainable tourism and the rural economy. It sets out that support will be given to proposals in suitable locations within the rural areas of the District to support the rural economy and safeguard and enhance the character and openness of the rural area.

LPPO285	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	In view of the supporting context for economic growth in the District, including the Council's own economic strategy, it is unclear why when the evidence base identifies a need for employment land between 46-66ha, the Council has sought to utilise only 50ha within Policy SO4.2. In addition, it is not clear why the policy is drafted to provide for "up to 50ha" as this would be seemingly provide a ceiling on new employment development. This would be inconsistent with the policy context. It is noted that Rugeley Power Station is included in employment site allocation E5 and this is supported. However, the approach has not identified land adjacent to the Lakeside employment area as a new employment location. This is a missed opportunity bearing in mind the success of the Lakeside development and its potential to support growth aspirations in the Plan and allow complementary development to deliver sustainable development. Policy SO4.3 deals with sustainable tourism and the rural economy. It sets out that support will be given to proposals in suitable locations within the rural areas of the District to support the rural economy and safeguard and enhance the character and openness of the rural area.
LPPO286	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	In view of the supporting context for economic growth in the District, including the Council's own economic strategy, it is unclear why when the evidence base identifies a need for employment land between 46-66ha, the Council has sought to utilise only 50ha within Policy SO4.2. In addition, it is not clear why the policy is drafted to provide for "up to 50ha" as this would be seemingly provide a ceiling on new employment development. This would be inconsistent with the policy context. It is noted that Rugeley Power Station is included in employment site allocation E5 and this is supported. However, the approach has not identified land adjacent to the Lakeside employment area as a new employment location. This is a missed opportunity bearing in mind the success of the Lakeside development and its potential to support growth aspirations in the Plan and allow complementary development to deliver sustainable development. Policy SO4.3 deals with sustainable tourism and the rural economy. It sets out that support will be given to proposals in suitable locations within the rural areas of the District to support the rural economy and safeguard and enhance the character and openness of the rural area.
LPPO287	Wyrley Estates	Fisher German LLP - N, Borseley	Policy SO4.2 is supported to provide land for new employment uses. The policy is very heavy towards identifying new parcels of employment development land and focussing on town centre retail. In addition, the policy should include the provision for live/work development in suitable locations, the use of specialist housing units has been mentioned in earlier policies, and therefore seems right to include it within an employment policy. Recognition should be given to employment development in the rural area also, of which policy SO4.2 fails to mention. This will further help achieve the overarching aims of sustainable development. The Estate has other land which remains potentially available for new employment development, of which may help to achieve sustainable development, especially in those rural areas.

LPPO288	ENGIE - D, Sager	Barton Willmore - J, Bonner	We generally support the approach of the policy and the allocation of the employment land within the Power Station site (subject to an amendment of the boundary for consistency with the outline parameter plans - see below). However, we object to the allocation of Site E4 (Former Power Station off A51 (adjacent to Towers Business Park), specifically for employment purposes. We consider that residential would be more appropriate and sympathetic to the extant outline application on the former Power Station Site. areas.
LPPO289	Pentalver Cannock Limited		Our comments are in relation to the former Rumer Hill Industrial estate to the south east of Cannock town centre which under the Preferred Options Local Plan is currently proposed to be allocated for employment purposes under site E3 in Table F (Employment Site Allocations). The allocation follows the grant of the March 2020 planning permission (CCDC ref: CH/19/280) for the expansion of the adjoining existing container storage depot in conjunction with the provision of a railhead. As a result both of the impacts of the pandemic and their operating requirements, the landowner, Pentalver Cannock Limited is no longer looking to implement the planning permission for the expansion land and consider, due to its location adjacent to the existing residential development and therefore request that the site is included as a residential allocation to be added to Table C - this is subject to a separate representation in response to Question 13. The Council will be aware that notwithstanding the historic employment use of the site, given the access to the land is via Rumer Hill Road which is a residential road, this makes it less than ideal for access for larger commercial vehicles. Indeed the arrangements for the scheme granted planning permission under CH/19/280 were that HGVs could only access the parking areas within the former Rumer Hill Industrial site by coming through from the existing container terminal to the south and not via the Rumer Hill Road entrance which was to be limited to staff and lorry driver parking and delivery vans to the proposed office only. We therefore request that the Former Rumer Hill Industrial Estate allocation currently included as site ref E3 in Table F is deleted on the assumption that the site is allocated for residential purposes in accordance with our other representations submitted.

LPPO290	St Modwen Industrial & Logistics	RPS - J, Bonehill	<p>Supporting these representations is Appendix A which consists of a technical note that reviews the approach taken by the Cannock Chase EDNA 2018 and the 2020 update, both prepared by Lichfields, to assessing the employment land requirement for the Plan against the PPG. A number of concerns are identified, namely: • A lack of assessment of the locational and premises requirements of particular types of businesses contrary to paragraph 026 of the PPG (reference ID: 2a-026-20190220); • Failure to provide evidence of engaging adequately with developers in assessing market demand contrary to paragraph 026 of the PPG (reference ID: 2a-026-20190220); • Failure to collaborate sufficiently with other authorities, infrastructure providers and other interests with regards to strategic logistics facilities contrary to paragraph 031 of the PPG 031 (Reference ID: 2a-031-20190722); and • Failure to assess the extent to which land and policy support is needed for other forms of industrial and logistics requirements, including the needs of SMEs and 'last mile' facilities contrary to paragraph 031 of the PPG 031 (Reference ID: 2a-031-20190722). Given the issues identified RPS content that the 2020 and 2018 EDNAs do not accord with the guidance in the PPG and so are not a complete evidence base for assessing the employment land requirement of the plan. Accordingly, the proposed employment land policies in the plan cannot be considered to be justified based on the currently available evidence, although RPS consider that this can be easily resolved through a further update to the EDNA. RPS also note that whilst some consideration has been given to market signals by the 2020 EDNA that the evidence presented on this point is relatively limited. To assist with this matter St. Modwen will instruct further work to specifically consider demand and market signals which will be provided to the Council as soon as it is available. General case for increased requirement at local level: Policy SO4.2 states that the Plan will provide for up to 50ha of land for office, manufacturing and distribution employment development during the period to 2038. Of this the policy identifies 10 employment sites to be allocated that amount to 27ha. Paragraph 6.281 states that sites are available within EEAs identified in table G which total approx. 16ha. paragraph 6.276 notes that the ELAA 2020 identifies that there have been 12.74ha of employment land completed since 2018. Although not explicitly stated anywhere in the Plan RPS assume that this means that collectively over the plan period to 2018-2038 provision is being made for 55.47ha of employment land, which is in excess of the up to 50ha requirement set out in policy SO4.2. Given that it appears that a supply of 55.47ha including completions has been identified the policy requirement should be updated to reflect this, although RPS recommend that in fact the Council should be [...] seeking to plan for at least the upper end of the requirement in relation to their own needs. The 2020 EDNA states that this is 66ha net between 2018 and 2038 (inc. flexibility) before consideration is given to adjustments for addressing losses and a contribution to meeting unmet need arising from the Black Country. [...] limited evidence of market demand has been considered by the 2020 in reaching this conclusion. Treatment of Losses: [...]. Given that the indicative FEMA</p>
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			includes part of the Black Country and overlaps with the Black Country FEMA it is clear that the Council should consider meeting unmet need arising from the Black Country. [...].
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		<p>As such RPS welcome the assessment in the 2020 EDNA of the potential amount of employment land that may be lost of the plan period. As paragraph 5.80 of the 2020 EDNA notes factoring in an allowance for the replacement of future losses of employment space to other uses over the plan period is a widely accepted approach to planning for future employment land needs. RPS strongly recommend (to avoid soundness issues) allowing for loss replacement in the employment land requirement. We also suggest that contrary to the advice in the 2020 EDNA, that a higher allowance for losses should be identified. While we note that factoring an element of future losses is not an exact science, as noted by paragraph 5.91 of the 2020 EDNA, we do not agree with the conclusion that the lowest estimate based on trends should be utilised given that the two other methods of assessing the scale of future losses based on sites identified in the SHLAA or the replacement of 0.5% of existing stock both result in higher and similar figures of 0.9ha per year and 0.9ha per year respectively. On the basis of the evidence provided RPS suggest that a higher figure is justified. RPS recommend that the upper figure of 0.96ha per annum is used which over the 20 year plan period equates to 19.2ha. RPS note that it is not apparent that the Council have chosen to incorporate a loss factor when proposing the employment land requirement in SO4.2, despite the advice in the 2020 EDNA. Should an allowance for the replacement of losses be made by the Council in identifying the employment land requirement for the Plan this should be set out clearly in the reasoned justification to ensure that the plan is justified and therefore sound. Unmet need from neighbouring authorities - Duty to Cooperate: RPS note that paragraph 4.10 of the Plan refers to working with neighbouring authorities in accordance with the Duty to Cooperate in relation to the cross-boundary issue of unmet employment need. However, the wording of this statement appears to indicate that the Council are seeking to export employment land need arising from Cannock Chase District to authorities within the FEMA rather than accommodate employment land need arising from these same authorities. [...]. This brings further into question how the 50ha employment land requirement identified in policy SO4.2 has been arrived at. It is unclear if the Council are proposing that the employment land requirement for the District is higher than 50ha and so they are seeking to request that authorities within the FEMA accommodate a quantity above this and if so what this quantity is. Alternatively this statement could be construed as the Council signalling that they may seek to export an element of the 50ha, although this is assumed to be unlikely given that the Plan identifies sites capable of meeting the 50ha within Cannock when post 2018 completions are taken into account. Fundamentally, however this demonstrates further that the approach to employment land has not been adequately justified and so the Plan as drafted is unsound. RPS suggest that instead of seeking to export an element of the District's employment land requirement, the Council should be considering opportunities to accommodate unmet employment land requirements arising from authorities within the FEMA. RPS note that paragraph 3.108 of the 2018 EDNA states that the Black Country have asked that the Cannock Chase Local</p>
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			<p>Plan considers opportunities to assist the Black Country in accommodating a proportion of their unmet need for employment land. [...]. Given the scale of unmet employment need anticipated to arise from the Black Country RPS suggest that it is unlikely that South Staffordshire will be able to accommodate all of this demand and that other authorities, including CCDC should make a contribution towards meeting the unmet demand. Market Context: [...].</p>
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		<p>Collectively this evidence suggests that the A5 corridor and the wider District benefits from excellent connectivity which makes it an attractive location for logistics and industrial occupiers. This is illustrated by the District's existing pattern of business activity and the sustained rapid growth of the local economy over recent years, outperforming both the West Midlands and England & Wales. Furthermore, the future opportunities for the local logistics market presented by major infrastructure investment including the West Midlands Interchange and the M6/M54/M6 Toll link road indicate that the district will continue to be an attractive location for occupiers. This indicates that the conditions are there to allow the District to capitalise on a number of the opportunities identified in the SEPs to develop a competitive advantage if an appropriate supply of employment land is readily available. [...]. There is a clear pressing need to identify new employment land across the region of all sizes and quality. RPS contends that Cannock Chase District is particularly well placed to contribute towards addressing this issue, due to the locational advantages that it has, and that there are substantial benefits on offer to the District if it is prepared to do so. However, to maximise the gains that can be realised from this opportunity the District will, in RPS's opinion, need to identify further employment land than is the case in the current version of the Plan. Failing to do so would mean that the Plan would not be positively prepared and so would be unsound. As noted above St Modwen will provided further evidence regarding demand and market signals in due course. RPS anticipate that this will demonstrate that the market recognises these locational advantages. Link between housing supply and employment land: RPS note that in of the future labour supply scenarios tested in the 2020 EDNA consider the implications of housing delivery over the plan period on the basis of the current methodology for the District plus a contribution of 500 dwellings towards meeting unmet needs arising from the Black County [...]. The 2020 EDNA equates to an employment land requirement of 53.99ha factoring in loss replacement of 0.756ha a year. We note that at paragraph 5.109 f the 2020 EDNA that Lichfields suggest that if the housing requirement is at or below the 7,020 net dwelling growth under labour scenario 5 [...] then this could have repercussions on the employment land target, which may have to be reduced as a consequence to ensure the two are not misaligned. RPS understand from discussions with officers of the Council that it is on this basis that the employment land requirement of the Plan is proposed to be set at 50ha. RPS note that a consistent Labour Force Ratio was applied by Lichfield's in calculating the labour supply scenarios which assumes the net outward commuting patterns will persist over the plan period. RPS question this assumption as we understand that the Council are rightly seeking to reduce net outward community for a number of reasons, not least of which is that reducing commuting is generally acknowledged as being more sustainable. If it is assumed that net out commuting reduces over the plan period, this means that the total labour supply in the district will be greater than forecasted in the 2020 EDNA. This would mean under a labour supply based approach the District's employment land requirement would be higher than suggested in the 2020 EDNA. RPS</p>
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			<p>also note that increasing the supply of employment land above the labour supply restricted requirement could in fact contribute to reducing out commuting by providing greater opportunities for residents of the District for work within the District. While it is beyond the scope of these particular representations to suggest what the appropriate housing requirement for the Plan should be, RPS strongly encourage the Council to plan positively and not seek to restrict the economic opportunities on offer to the District through setting the housing requirement at a level that constrains economic growth through a lack of labour supply.</p>
			S04.3: Sustainable Tourism and the Rural Economy
			Question 21: Do you the preferred policy direction to develop sustainable tourism and the rural economy?
LPPO291	Inland Waterways Association, P, Sharpe		IWA supports policy SO3.4 on tourism, including use and safeguarding of the canal network and abandoned canals.

LPPO292	Cannock Chase AONB Partnership		The AONB seeks wording of this policy that development proposals should have no adverse effects on and would protect and enhance Cannock Chase AONB. The requirement for displaying educational material on respecting nature is welcomed which we trust includes measures to 'Leave no Trace'.
LPPO293	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We support policy option SO4.3 regarding sustainable tourism and the rural economy and particularly welcome the provisions to safeguard the existing canal network, and necessary space around it, to enable restoration.
LPPO294	Historic England - E, Boden		Although the policy direction requires tourism and visitor developments to display educational material about the history of the area as part of a mitigation package under the Habitats Regulations, we would be supportive of the inclusion of text referencing the important role of heritage/the heritage sector as supporting sustainable tourism and rural economy.
LPPO295	Norton Canes Parish Council		Policy SO4.3 relates to sustainable tourism and the rural economy supports development in suitable locations in rural areas which support the rural economy and or enhance the character and openness of a rural area, Appropriate and proportionate expansion of existing employment sites in order to support retention of existing employment opportunities is supported as is re-use of suitable buildings for employment use and tourist accommodation. Visitor and recreation facilities of an appropriate scale and nature which contribute to the long term sustainability and viability of the rural economy will be supported. The use of the local canal network and abandoned canal network to support economic growth that is proportionate to the needs and nature of their locations is also appropriate. It is noted that opportunities exist at the former Grove Colliery for long term restoration of landscapes and other historic assets through development of open recreation, leisure and tourism focused activities appropriate within the Green Belt. Whilst the general thrust of this policy is supported the Parish Council considers that in order to achieve as sustainable heritage-led regeneration at Grove, positive support for the principle of enabling development which would "trump" the more restrictive Green Belt policy should be specifically included as a policy statement as already mentioned in the section on the historic environment/heritage assets above.
LPPO296	Together Active - J, Brennan		Yes, but policy should include prioritising active travel through safe, integrated walking and cycling routes (SE Active Design) and follow DfT LTN 1/20 Cycle Infrastructure Design,
LPPO297	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	In general terms support is given to the approach set out in the Policy SO4.3 however clarity should be given within the Policy to make clear whether the appropriate and proportionate expansion of existing employment sites would be sufficient to outweigh other policy restrictions such as the Green Belt. As drafted the proposal would need to protect the Green Belt, which could run counter to the objective of allowing for the expansion of existing employment sites within the rural area. The policy should make clear which of these strands of policy takes

			precedent. Policy SO4.4 deals with live/work units. It states such development will be encouraged.
LPPO298	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	In general terms support is given to the approach set out in the Policy SO4.3 however clarity should be given within the Policy to make clear whether the appropriate and proportionate expansion of existing employment sites would be sufficient to outweigh other policy restrictions such as the Green Belt. As drafted the proposal would need to protect the Green Belt, which could run counter to the objective of allowing for the expansion of existing employment sites within the rural area. The policy should make clear which of these strands of policy takes precedent. Policy SO4.4 deals with live/work units. It states such development will be encouraged.
LPPO299	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	In general terms support is given to the approach set out in the Policy SO4.3 however clarity should be given within the Policy to make clear whether the appropriate and proportionate expansion of existing employment sites would be sufficient to outweigh other policy restrictions such as the Green Belt. As drafted the proposal would need to protect the Green Belt, which could run counter to the objective of allowing for the expansion of existing employment sites within the rural area. The policy should make clear which of these strands of policy takes precedent. Policy SO4.4 deals with live/work units. It states such development will be encouraged.
LPPO300	Wyrley Estates	Fisher German LLP - N, Borsey	The Estate supports the preferred policy direction to develop sustainable tourism and the rural economy, however, should go further to enable creation of new facilities in a sustainable manner. With particular reference to Cannock Extension Canal/Grove Colliery Site. Grove Colliery is the last remaining evidence of a former mining past for the District. The site offers a perfect opportunity for heritage-led regeneration to support a leisure and recreation use. Earlier in SO1.1. it was mentioned the Council is asked to reconsider and include an additional specific policy for the Grove Colliery Site. This policy would also link in here in aiding sustainable tourism and a rural economy.
LPPO301	Staffordshire County Council - J, Chadwick		The proposed use of the local canal network and the abandoned canal network to support economic growth is supported, as is the proposal to safeguard these, along with sufficient space, to enable the associated infrastructure to be reinstated so that the long term potential of these historic features can be realised.
SO4.4: Live Work Units			

			Question 22: Do you support the preferred policy direction to support the development of live/work units?
LPPO302	Norton Canes Parish Council		Policy SO4.4 promoting the benefits of live/work units and Policy SO4.5 requiring major developments creating over 50FTE jobs to be accompanied by employment and skills plans to demonstrate how development will contribute to training and employability of local people especially young people to be secured via legal agreements are both supported. The potential of live/work units as part of any Grove Colliery 'enabling development' would be supported by the NP.
LPPO303	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	No objection is raised to the approach but currently most dwellings can accommodate homeworking without the need for bespoke live/work units and therefore the benefits of the approach may be limited.
LPPO304	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	No objection is raised to the approach but currently most dwellings can accommodate homeworking without the need for bespoke live/work units and therefore the benefits of the approach may be limited.
LPPO305	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	No objection is raised to the approach but currently most dwellings can accommodate homeworking without the need for bespoke live/work units and therefore the benefits of the approach may be limited.
LPPO306	Wyrley Estates	Fisher German LLP - N, Borseley	The Estate definitely supports the policy direction in development of live/work units of SO4.4. However, the policy does not really provide specific detail or expand on suitable locations for this type of development. It is recognised live/work units could potentially play an important part in enabling important regeneration schemes across the district, including sites such as Grove Colliery site which regeneration could be facilitated through such a scheme. Live/work housing types are development which can take place in a sustainable manner and developed outside of settlement boundaries, and regeneration areas are not always found within settlements, so rural areas need to be considered in policy too.
			SO4.5: Provision for Local Employment and Skills?
			Question 23: Do you support the preferred policy direction to provide for local employment and skills?
LPPO307	Norton Canes Parish Council		Policy SO4.4 promoting the benefits of live/work units and Policy SO4.5 requiring major developments creating over 50FTE jobs to be accompanied by employment and skills plans to demonstrate how development will contribute to training and employability of local people especially young people to be secured via legal agreements are both supported. The potential of live/work units as part of any Grove Colliery 'enabling development' would be supported by the NP.

LPPO308	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	<p>Policy SO4.5 deals with the provision of local employment and skills. This states that major development, where over 50 full-time equivalent jobs would be created during the construction phase and/or by the proposed occupiers, will be accompanied by an Employment and Skills Plan. It states the Employment and Skills Plans will be secured through a legal agreement. The explanatory text indicates that one of the objectives of the policy is to support the contribution to achieving net zero carbon development by reducing the need to travel for employment during the construction and occupancy stage of the development. It is unclear how the policy approach will secure this objective bearing in mind that if local people were employed during the construction phase of the development, once the development was completed they would either have no further employment or would need to travel further afield to another construction site. As a result, the contribution of this approach to achieving a zero-carbon economy must be doubtful. Richborough estates support the general principal of securing opportunities for local people during the construction phase of development but this needs to be realistic and practical bearing in mind most of those engaged in construction have to travel from construction site to construction site.</p>
LPPO309	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	<p>Policy SO4.5 deals with the provision of local employment and skills. This states that major development, where over 50 full-time equivalent jobs would be created during the construction phase and/or by the proposed occupiers, will be accompanied by an Employment and Skills Plan. It states the Employment and Skills Plans will be secured through a legal agreement. The explanatory text indicates that one of the objectives of the policy is to support the contribution to achieving net zero carbon development by reducing the need to travel for employment during the construction and occupancy stage of the development. It is unclear how the policy approach will secure this objective bearing in mind that if local people were employed during the construction phase of the development, once the development was completed they would either have no further employment or would need to travel further afield to another construction site. As a result, the contribution of this approach to achieving a zero-carbon economy must be doubtful. Richborough estates support the general principal of securing opportunities for local people during the construction phase of development but this needs to be realistic and practical bearing in mind most of those engaged in construction have to travel from construction site to construction site.</p>

LPPO310	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	<p>Policy SO4.5 deals with the provision of local employment and skills. This states that major development, where over 50 full-time equivalent jobs would be created during the construction phase and/or by the proposed occupiers, will be accompanied by an Employment and Skills Plan. It states the Employment and Skills Plans will be secured through a legal agreement. The explanatory text indicates that one of the objectives of the policy is to support the contribution to achieving net zero carbon development by reducing the need to travel for employment during the construction and occupancy stage of the development. It is unclear how the policy approach will secure this objective bearing in mind that if local people were employed during the construction phase of the development, once the development was completed they would either have no further employment or would need to travel further afield to another construction site. As a result, the contribution of this approach to achieving a zero-carbon economy must be doubtful. Richborough estates support the general principal of securing opportunities for local people during the construction phase of development but this needs to be realistic and practical bearing in mind most of those engaged in construction have to travel from construction site to construction site.</p>
LPPO311	St Modwen Industrial & Logistics	RPS - J, Bonehill	<p>RPS note proposed policy SO4.5 and are broadly supportive of it. However, while we note that the qualifying criteria for the application of the policy is the creation of over 50 full time equivalent jobs either during the construction phase or by proposed occupiers of the development, it appears from the third paragraph of the proposed policy that the requirement will apply to both temporary and permanent jobs. It should be noted that in the case of speculative development, wherein a development is built prior to an occupier being secured, that a developer cannot reasonably enter into obligations on behalf of an unidentified occupier. Should the policy apply to speculative development it is likely to reduce the appetite of the market in undertaking such schemes as they would have to predict what obligations under an Employment and Skills Plan a potential occupier would be prepared to sign up to. This creates a risk of getting it wrong and so putting off potential occupiers. This would make the local economy more fragile as a lack of suitable available space may put off new investment from locating in the District and also may restrict the ability of local businesses to grow. Furthermore, different occupiers will have different approaches to training and development. Requiring them to meet requirements determined without their involvement may result in the best outcomes not being achieved, as the Employment and Skills Plans would not be bespoke to the occupier. RPS recommend that the policy is redrafted to make clear it will only be applied to the operational phase if the end occupier is known. RPS also note from experience that a number of authorities with similar policies secure the delivery of Employment and Skills Plans, or similar, both by way of planning condition and legal agreement. Generally, legal agreements are only required when there are other matters the require a legal agreement. This provides a more proportionate approach and means that the cost of preparing legal agreements is only incurred when it is necessary. Accordingly, RPS recommend that the policy is</p>

			redrafted to allow for Employment and Skills Plans to be secured by way of a planning condition where appropriate.
			SO5.1: Accessible Development
			Question 24: Do you support the preferred policy direction for Accessible Development?

LPPO312	Transport for West Midlands - H Davies		<p>Concerning this policy on accessibility development, we strong support it but make the following points: Stronger consideration of the role of buses: Around 75% of public transport is made up of bus travel. In light of the National Bus Strategy and our regions investment in buses, as highlighted in TfWM's Bus Vision document, we believe a high-quality bus network is essential for promoting sustainable travel patterns, with bus infrastructure (including bus priority measures), improved frequencies, good accessibility standard requirements and increased capacity being key considerations in development plans. We also welcome good inter-modal connectivity and interchange facilities to ensure all modes including cycling and walking networks, the rail network as well as the wider bus network are joined up to create seamless journeys. We also recommend further joined-up, cross-boundary partnerships to enhance bus services, to ensure increased transport demand can be fully met within the metropolitan area and beyond, especially where cross boundary bus routes are in operation. Stronger consideration of active travel: While we fully praise all the preferred policy direction within this objective, TfWM however feels this could be strengthened even further. Firstly, consideration of connectivity and integration between the different modes, along with public transport interchanges and use of mobility hubs needs further exploration in the plan. The importance of public realm is also a fundamental instrument in delivering sustainable transport and needs exploration. With many visitors coming into our wider region each day, ensuring that our public realm environment is fully considered in all new developments is essential. Enhancing the public realm to key transport nodes, such a interchanges and bus shelters is also fundamental to new development and should be captured, as part of wider accessibility measures for new developments. Consideration of freight: With the growth in on-line retailing and 'just in time' approaches to manufacturing, this has resulted in a sharp increase in the numbers of deliveries being undertaken regionally, particularly by vans - in turn contributing to congestion and pollution. Whilst the local plan makes reference to sustainable freight distribution, TfWM feels it needs to note the sharp increase in freight levels and explore ways land use planning can help minimise the adverse impacts freight can bring to communities. Exploring ways deliveries can be consolidated, the use of low and zero emission vehicles including electric vehicles, cargo/E-cargo bikes and avoiding the need for repeat delivery attempts should all be explored as potential policies in the local plan.</p>
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			<p>Consideration of the West Midlands Key Route Network: Through the creation of the WMCA in 2016, new powers and responsibilities were devolved to the Mayoral WMCA. These included responsibilities relating to monitoring traffic flows, congestion, permit schemes for road works, road safety and air quality and are to be acted on by the WMCA concurrently with Walsall and other constituent authorities. Sections of the West Midlands KRN may therefore need to be carefully assessed and mitigated at key junctions which are close to the Walsall and Cannock border, with detailed attention paid to the impacts of the existing public transport network. Henceforth, Cannock Chase should work closely with TfWM, to ensure any KRN route, close to the border is not subject to delays, and strategic movements are not significantly disrupted.</p> <p>Stronger links with WMRE: While the impact of Covid 19 on the rail industry has been dramatic with patronage dropping to as low as 5% of normal levels and income from fares declining as much as 91%, it is vital we support the rail industry and encourage public transport usage post Covid. We therefore strongly welcome reference made throughout the document concerning rail and the improvements made to the metropolitan region and beyond, and how recent rail services upgrades will help with the wider regeneration of Cannock Town Centre, especially in relation to the Cannock Station Upgrade project. Further improvements to Rugeley Train Station, Rugeley Trent Valley Train Station and its bus station will also bring benefits and we fully support these schemes. However, the local plan needs to acknowledge how the WMRE have been working in close collaboration with Cannock Chase and Staffordshire County Councils to develop such schemes, including the Cannock Station upgrade project, with this work due to progress into further design work shortly. In addition, the plan should highlight the impacts of the proposed new Walsall - Wolverhampton train service which will improve rail connectivity between Cannock Chase and Wolverhampton and provide direct train services from Wolverhampton to a range of regional and national destinations. Finally, projects connected to the wider Stations Alliance should also be noted in the plan.</p>
LPPO313	Brindley Heath Parish Council		<p>A sustainable transport plan is long overdue in the Rugeley and Chase area. It is little wonder that most residents take to their cars to go anywhere and there is such a great number of taxis operating in the area. Local bus services are almost non-existent and services to adjacent towns are very poor.</p>

LPPO314	Norton Canes Councillors as at March/April 2021		Norton Canes is the closest settlement to Chasewater out of all the communities which surround it and we feel that, although the site technically sits outside the District, more emphasis should be placed on its relationship to the village. There are issues with access to Chasewater from Norton Canes, particularly for the disabled, and we feel it would be remiss for the Local Plan not to acknowledge that more formal cross-authority work needs to take place for the benefit of the residents of the village. To the north of the village lies No Man's Bank which is a constituent part of the Chasewater and Southern Staffordshire Coalfields Heaths SSSI. We note that currently Natural England list the site condition as declining unfavourable and its Threat Risk as High. The consultation document states that as part of the spatial strategy for Norton Canes "the Local Plan supports the enhancement of the biodiversity link between Sutton Park and Cannock Chase as well as areas further afield." Our concern is that the draft Local Plan does not specify how it will support the enhancement of this biodiversity link for specific sites, of which No Man's Bank is one integral part. The Cannock Extension Canal SAC is mentioned in the document and we note that Strategic Objective 7 states "to protect and enhance the natural environment development will ... avoid any impact on the integrity of ... the Cannock Extension Canal SAC." We welcome the new specific reference to this SAC on page 151. Finally, we note the creation of a country park within Norton Canes south of the proposed housing developments on Cannock Road. Whilst we welcome this proposal we feel that there is potential to be much more ambitious with the land between the Cannock/Hednesford/Heath Hayes urban area and Norton Canes through the creation of a bigger country / urban park. This could be achieved through utilising a mix of private and urban land already designated as Sites of Biological Interest, the parkland north of Washbrook Lane and East of Blakeney Way and the Poplars landfill (post-operation). We appreciate that the landfill is still in operation, but reference should be made to its potential use after it ceases operation as this creates a further significant opportunity to enhance green space provision within the Norton Canes ward.
LPPO315	Together Active - J, Brennan		Yes, welcome this policy but also need to include that whenever possible cycling infrastructure should be segregated from the highway to increase safety and uptake of Active travel (following DfT LTN 1/20 Cycle Infrastructure Design Guidance)
LPPO316	Natural England- G, Driver		We note the emphases on sustainable travel and creation of green infrastructure which links to the wider Green Space Network and welcome this.
LPPO317	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The test contained within the policy that developments which individually or cumulatively cause an unacceptable impact on the highway network is not consistent with the approach set out in the NPPF. The NPPF test is a severe impact and that is the test that should be used in the policy. Policy SO5.2 deals with communication technologies and states that all major development proposals will demonstrate how they will deliver digital connectivity. The policy refers to measures such as facilitating technologically advanced methods of communication, providing and future proofing infrastructure that is required to enable access to high quality and resilient digital

			connectivity and increasing the use of technology to established integrated journey planning and travel information.
LPPO318	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The test contained within the policy that developments which individually or cumulatively cause an unacceptable impact on the highway network is not consistent with the approach set out in the NPPF. The NPPF test is a severe impact and that is the test that should be used in the policy. Policy SO5.2 deals with communication technologies and states that all major development proposals will demonstrate how they will deliver digital connectivity. The policy refers to measures such as facilitating technologically advanced methods of communication, providing and future proofing infrastructure that is required to enable access to high quality and resilient digital connectivity and increasing the use of technology to established integrated journey planning and travel information.
LPPO319	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The test contained within the policy that developments which individually or cumulatively cause an unacceptable impact on the highway network is not consistent with the approach set out in the NPPF. The NPPF test is a severe impact and that is the test that should be used in the policy. Policy SO5.2 deals with communication technologies and states that all major development proposals will demonstrate how they will deliver digital connectivity. The policy refers to measures such as facilitating technologically advanced methods of communication, providing and future proofing infrastructure that is required to enable access to high quality and resilient digital connectivity and increasing the use of technology to established integrated journey planning and travel information.
			SO5.2: Communication Technologies
			Question 25: Do you support the preferred policy direction to improve communications technologies?

LPPO320	Transport for West Midlands - H Davies		<p>Overall, we fully support this policy section in the local plan. The government's UK Digital Strategy sets out the importance of providing world class digital infrastructure, with £1 billion of investment planned to support the roll-out of next generation digital infrastructure. TfWM is benefitting from such investment, through being part of the Future Transport Zone, and is actively working with developers and transport providers to ensure that new developments are designed to enable the most up-to-date digital connectivity. We encourage reference to measures TfWM are undertaking in terms of transport schemes such as car clubs, shared taxi's, Demand Responsive Transport, and future micro mobility measures to aid such modes such as Mobility as a Service and mobility credits - all playing a key role and supporting enhanced connections into more traditional public transport routes. In addition, whilst the use of swift ticketing is used for some bus routes across Cannock Chase, a further roll out to other routes could be explored and we welcome further dialogue in this area. Access to TfWM's Transport Modelling and Data: TfWM are currently in the process of procuring transport ,modelling advisory services. As part of this process TfWM are beginning to explore how any new modelling and analytical tools could support the housing and growth agendas of its partners. As part of this process we would welcome continued engagement with both planning and transport authorities in order to understand where there are opportunities for further collaboration in this field.</p>
LPPO321	Together Active - J, Brennan		<p>Yes, and welcome use of technology to establish integrated journey planning</p>
LPPO322	Home Builders Federation - S, Green		<p>Under Policy SO5.2, all major development proposals will demonstrate delivery of digital connectivity by supporting the installation of new communications infrastructure that is required to serve the development at the point of first occupation and future proofing the infrastructure that is required to enable access to high quality resilient digital connectivity. The Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations. In the March 2020 Budget, the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The Government proposes to amend Part R "Physical Infrastructure for High-Speed Electronic Communications Networks" of the Building Regulations to place obligations on housing developers to work with network operators to install gigabit broadband, where this can be done within a commercial cost cap. The Department for Culture, Media and Sport (DCMS) has outlined its intentions on the practical workings of this policy, which will apply to all new builds. Any type of technology may be used, which is able to provide speeds of over 1000Mbps. All new build developments will be equipped with the physical infrastructure to support gigabit-capable connections from more than one network operator. Furthermore, the delivery of broadband service connections is reliant on a third-party contractor over which a developer is unlikely to have any control.</p>

LPPO323	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates endorse the general approach but question whether this is an area where land use planning can assist in promoting the use of new and emerging technologies. Whilst new housing developments will incorporate fibre broadband connectivity, it is difficult to envisage how developers and housebuilders in particular will provide many of the aspects of Policy SO5.2. In particular how the proposal will increase the use of technology to establish integrated journey planning is difficult to reconcile. Similarly, how development will facilitate technologically advanced methods of communication to allow remote working is also nebulous. Policy SO5.3 deals with low and zero carbon transport. It states all major development proposals will contribute to the reduction in the reliance of carbon intensive modes of transport by supporting the take up of ultra-low emission vehicles, hydrogen vehicles, developing electric vehicle charging networks, accelerating the uptake of low emission taxis and buses, investing in cycling and walking and moving freight from road to rail.
LPPO324	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates endorse the general approach but question whether this is an area where land use planning can assist in promoting the use of new and emerging technologies. Whilst new housing developments will incorporate fibre broadband connectivity, it is difficult to envisage how developers and housebuilders in particular will provide many of the aspects of Policy SO5.2. In particular how the proposal will increase the use of technology to establish integrated journey planning is difficult to reconcile. Similarly, how development will facilitate technologically advanced methods of communication to allow remote working is also nebulous. Policy SO5.3 deals with low and zero carbon transport. It states all major development proposals will contribute to the reduction in the reliance of carbon intensive modes of transport by supporting the take up of ultra-low emission vehicles, hydrogen vehicles, developing electric vehicle charging networks, accelerating the uptake of low emission taxis and buses, investing in cycling and walking and moving freight from road to rail.
LPPO325	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates endorse the general approach but question whether this is an area where land use planning can assist in promoting the use of new and emerging technologies. Whilst new housing developments will incorporate fibre broadband connectivity, it is difficult to envisage how developers and housebuilders in particular will provide many of the aspects of Policy SO5.2. In particular how the proposal will increase the use of technology to establish integrated journey planning is difficult to reconcile. Similarly, how development will facilitate technologically advanced methods of communication to allow remote working is also nebulous. Policy SO5.3 deals with low and zero carbon transport. It states all major development proposals will contribute to the reduction in the reliance of carbon intensive modes of transport by supporting the take up of ultra-low emission vehicles, hydrogen vehicles, developing electric vehicle charging networks, accelerating the uptake of low emission taxis and buses, investing in cycling and walking and moving freight from road to rail.

			SO5.3: Low and Zero Carbon Transport
			Question 26: Do you support the preferred policy direction to deliver low and zero carbon transport?
LPPO326	G, Green		In the next few years I will be considering whether to buy an electric car or to rely on public transport. At the present time, the inadequate bus service would make me decide to buy a car. As an example, to go to Hednesford, my wife would have to catch a bus to Cannock, then another bus to Hednesford, and then the reverse of that to come home, so we take the car. I do not want to see the same number of private cars on the road, when we've gone electric, as there are now. I hope to see people of all ages using buses regularly instead of cars.
LPPO327	Transport for West Midlands - H Davies		TfWM fully support this policy. In our five motives for change for our new local transport plan (which are discussed below in more detail), we explicitly focus on how the majority of carbon emissions in the West Midlands are attributed to transport; especially car usage. And while we have been making good progress with building much of the infrastructure needed for a decarbonised transport system; through supporting better public transport services, creating safer routes for active travel and enabling a shift to an ultra-low emission fleet, our existing policies may not deliver on the scale and pace of behaviour change now needed to address the climate emergency. Therefore rapid decarbonisation of transport carbon emissions is vital and this policy is strongly welcomed.
LPPO328	Together Active - J, Brennan		Yes, but segregated cycle routes should always be the preferred option to increase safety and uptake of active travel (following DfT LTN 1/20 Cycle infrastructure Design guidance) and also provision of safe cycle storage facilities.
LPPO329	Natural England- G, Driver		We welcome this policy direction and advise looking more broadly at how zero carbon can be achieved. For example, healthy ecosystems, particularly forests, take up and store significant amounts of carbon in soils and trees. One hectare of natural woodland can take up carbon dioxide roughly equivalent to an average person's carbon dioxide emissions over the course of a whole year. Natural England has produced the Climate Change Adaptation Manual - Evidence to support nature conservation in a changing climate to help to make informed decisions about adaptation.
LPPO330	Home Builders Federation - S, Green		Under Policy SO5.3, all major development proposals will contribute to the reduction of the reliance on carbon-intensive modes of transport by supporting the take-up of ultra-low emission vehicles and developing electric vehicle charging networks. All major developments will include the provision of electric vehicle charge points (EVCPs) and other infrastructure required for alternative low & zero carbon transport options and designate parking spaces for low emission vehicles.

LPPO331	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates supports the objective to reduce reliance on carbon intensive modes of transport however again it is difficult to foresee how a Local Plan document and its implementation through the development management process will ultimately support the take up of ultra-low emission vehicles as described in the Policy. Similarly, other vehicles, such as hydrogen vehicles, have yet to be demonstrated as viable and in particular it is not evident that hydrogen vehicles will be the most sustainable future replacement for carbon-based vehicles. Other elements of the policy refer to supporting changes to the road network where they are related to the reduction in environmental impacts and the enhancement of public transport. Whilst such changes can be supported, they can result in other adverse impacts such as an increase in congestion and other associated negative air quality impacts. The policy needs review to address this potential conflict. Policy SO5.4 deals with maintaining and improving the transport system. It sets out various measures which will be promoted to achieve improvements in the existing transport network. One of the items detailed is enabling demand responsive transport services such as taxis to provide mobility at times and locations where timetabled public transports services are not sustainable.
LPPO332	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates supports the objective to reduce reliance on carbon intensive modes of transport however again it is difficult to foresee how a Local Plan document and its implementation through the development management process will ultimately support the take up of ultra-low emission vehicles as described in the Policy. Similarly, other vehicles, such as hydrogen vehicles, have yet to be demonstrated as viable and in particular it is not evident that hydrogen vehicles will be the most sustainable future replacement for carbon-based vehicles. Other elements of the policy refer to supporting changes to the road network where they are related to the reduction in environmental impacts and the enhancement of public transport. Whilst such changes can be supported, they can result in other adverse impacts such as an increase in congestion and other associated negative air quality impacts. The policy needs review to address this potential conflict. Policy SO5.4 deals with maintaining and improving the transport system. It sets out various measures which will be promoted to achieve improvements in the existing transport network. One of the items detailed is enabling demand responsive transport services such as taxis to provide mobility at times and locations where timetabled public transports services are not sustainable.

LPPO333	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates supports the objective to reduce reliance on carbon intensive modes of transport however again it is difficult to foresee how a Local Plan document and its implementation through the development management process will ultimately support the take up of ultra-low emission vehicles as described in the Policy. Similarly, other vehicles, such as hydrogen vehicles, have yet to be demonstrated as viable and in particular it is not evident that hydrogen vehicles will be the most sustainable future replacement for carbon-based vehicles. Other elements of the policy refer to supporting changes to the road network where they are related to the reduction in environmental impacts and the enhancement of public transport. Whilst such changes can be supported, they can result in other adverse impacts such as an increase in congestion and other associated negative air quality impacts. The policy needs review to address this potential conflict. Policy SO5.4 deals with maintaining and improving the transport system. It sets out various measures which will be promoted to achieve improvements in the existing transport network. One of the items detailed is enabling demand responsive transport services such as taxis to provide mobility at times and locations where timetabled public transports services are not sustainable.
LPPO334	Cannock Designer Outlet (GP)Ltd o/b Cannock Designer Outlet Ltd Partnership	Carter Jonas - K, Gregson	Whilst we support the general principles of the Policy and the need to promote low and zero carbon transport, the provision of necessary infrastructure should be proportionate to the level and type of development. This will ensure development is not impacted upon in respect of either design or financial viability. We therefore suggest the following text is added to the draft policy (in bold): Subject to design and financial feasibility, all major developments will set out as part of the Design and Access Statement how they will: [...] • Include the provision of electric vehicle charge points, and other infrastructure proportionate to the type of development that may be required for alternative low and zero carbon transport options, designate parking spaces for low emission vehicles, and facilitate low emission bus service operations;
			SO5.4: Maintaining and Improving the Transport System
			Question 27: Do you support the preferred policy direction to maintain and improve to transport system?
LPPO335	Inland Waterways Association, P, Sharpe		IWA supports policy SO5.4 on the transport system, including increased use of the canal network and towpaths.
LPPO336	L, Guy		The train that runs through Hednesford, Cannock etc. to Birmingham and back has so few carriages that at times it's full to the extreme. I have seen people push into the smallest spaces, it's extremely dangerous! The more people that come to this area whether that's to live here or to the new shopping centre, the train situation needs to be addressed! It's such a massive issue and I can only see this getting worse. Why has this not been looked into and solved sooner? There's so much that could be done to make our area better with much needed improvements it doesn't

			make sense to add more houses when the area can barely cope with the capacity of people already living here.
LPPO337	Cannock Chase AONB Partnership		The AONB supports this policy direction and would welcome measures to enhance access to the AONB by cycleways and footpaths, and provision of public transport services serving AONB, to help reduce visitor reliance on their own vehicles.
LPPO338	G, Green		In the next few years I will be considering whether to buy an electric car or to rely on public transport. At the present time, the inadequate bus service would make me decide to buy a car. As an example, to go to Hednesford, my wife would have to catch a bus to Cannock, then another bus to Hednesford, and then the reverse of that to come home, so we take the car. I do not want to see the same number of private cars on the road, when we've gone electric, as there are now. I hope to see people of all ages using buses regularly instead of cars..
LPPO339	Transport for West Midlands - H Davies		TfWM are fully supportive of policy SO5.4, as these areas are all captured in our current development work of the West Midlands new statutory Local Transport Plan to create a fairer, healthier and greener West Midlands. We have adopted five 'Motives for Change' to both frame and set out a new direction for transport in the region, which covers decarbonising transport, equalising access to opportunities, supporting local communities, encouraging the uptake of more active travel options and ensuring transport plays a vital role in our region's wider economic recovery and rebalancing. These five motives for change include. 1. Tackling the Climate Emergency; 2. Creating a Fairer Society; 3. Supporting Local Communities and Places; 4. Becoming More Active; 5. Sustaining Economic Success. The WMCA has set ambitious aims to be carbon neutral by 2041. This will require significant shifts in travel patterns and behaviour. Post pandemic we will likely see some changes with increased levels of working from home. To release the reductions in transport's contributions we will need to see unprecedented changes to travel behaviours. The role of spatial planning and digital connectivity will be evermore important in helping to deliver accessibility in lieu of mobility. Therefore in Cannock Chases local plan, TfWM would welcome a link to the importance of wider regional partnerships, as set out in our 'motives for change' and how one voice on issues such as rail, bus and highways issues, across the wider region are important to securing key investment.
LPPO340	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We support policy option SO5.4 regarding sustainable transport, particularly in respect of the Hatherton canal and its towpath in the District.

LPPO341	Canal & River Trust - H, Smith		The policy is key to achieving the aims of Strategic Objective 5 and we support the inclusion of the canal network and towpaths as part of the integrated transport network.
LPPO342	Norton Canes Councillors as at March/April 2021		We welcome policy SO5.4 on public transport, particularly building strategic partnerships with bus companies to deliver high frequency bus services. We would like to stress, however, that our location on the border with the West Midlands means that more residents would prefer, or need to, travel to places like Brownhills and Walsall for shopping, hospital appointments, school and college and these proposed partnerships therefore would need to recognise that. There is also the need for £500,000 from the Norton Hall Meadow development to be spent by the county council on local bus services; this funding could be used to enhance existing routes serving the Church Road and Norton Hall Lane area, or on completely different options for vulnerable residents, such as dial-a-ride type of service.
LPPO343	Together Active - J, Brennan		6.34 Yes and support the amendment to support Building Better, Building Beautiful Commissions recommendations on encouraging walking and cycling. I would also like to see reference to segregated cycle ways where feasible to increase safety and uptake of Active Travel following DfT LTN 1/20 Cycle Infrastructure Design guidance -especially making use of the canal network.
LPPO344	Natural England- G, Driver		We welcome this policy direction and advise looking more broadly at how zero carbon can be achieved. For example, healthy ecosystems, particularly forests, take up and store significant amounts of carbon in soils and trees. One hectare of natural woodland can take up carbon dioxide roughly equivalent to an average person's carbon dioxide emissions over the course of a whole year. Natural England has produced the Climate Change Adaptation Manual - Evidence to support nature conservation in a changing climate to help to make informed decisions about adaptation.
LPPO345	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Generally Richborough Estates supports the approach set out in the policy however it should be noted that taxis already provide mobility in lieu of public transport services. That is the type of service that taxis provide. Policy SO5.6 refers to safeguarding recreational footpath and cycle routes. The policy protects those routes shown on the proposal map from development.
LPPO346	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Generally Richborough Estates supports the approach set out in the policy however it should be noted that taxis already provide mobility in lieu of public transport services. That is the type of service that taxis provide. Policy SO5.6 refers to safeguarding recreational footpath and cycle routes. The policy protects those routes shown on the proposal map from development.
LPPO347	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Generally Richborough Estates supports the approach set out in the policy however it should be noted that taxis already provide mobility in lieu of public transport services. That is the type of service that taxis provide. Policy SO5.6 refers to safeguarding recreational footpath and cycle routes. The policy protects those routes shown on the proposal map from development.

LPPO348	Cannock Designer Outlet (GP)Ltd o/b Cannock Designer Outlet Ltd Partnership	Carter Jonas - K, Gregson	We support the Council's preferred policy direction to maintain and improve the transport system. As mentioned in our response to 'Transport & Infrastructure' above, the upgrade of Cannock train station is vital to support MCDOWN - one of the Council's strategic objectives - and to ensure that it is as easy as possible for customers to visit MGDOWM by train.
			SO5.5 Hatherton Canal Restoration Corridor
			Question 28: Do you support the preferred policy direction to safeguard the route of the Hatherton Canal?
LPPO349	Inland Waterways Association, P, Sharpe		IWA supports policy SO5.5 Hatherton Canal Restoration Corridor. Although the greater part of the route lies in South Staffordshire, the continued safeguarding sections in Cannock Chase provides the essential continuity to allow this long-term restoration project to progress.
LPPO350	Walsall Council - N, Ball		We support proposed policy SO5.5 about the Hatherton Canal Restoration Corridor. The route extends into Walsall and would be supplied primarily by water from Chasewater through the Wyrley and Essington Canal. The policy wording needs to show that the implications the proposal could have on the Cannock Extension Canal SAC (see also question 42) have been addressed. The same approach to the route of the proposal should be taken as for Walsall, i.e. not joining into the Cannock Extension Canal and requirements for a HRA including in combination effects with any potential mineral workings. One option could be to include the wording use in policy ENV4(b) of Walsall's Site Allocation Document (see SAD Adoption January 2019 Final for Printing.pdf (walsall.gov.uk) which states: The project for the restoration of the Hatherton Canal will be required to demonstrate that it will have no adverse effects on the Cannock Extension Canal SAC/SSSI. A detailed Habitats Regulations Appropriate Assessment will be required to evaluate all relevant implications of the project for the site in view of its conservation objectives, to ascertain that the project would not adversely affect the integrity of the SAC contrary to the Habitats Regulations, and must also take into account in-combination effects. Proposals to designate the line of the restoration project as a heritage trail and /or green corridor will be supported provided that doing so would not preclude future proposals to restore the canal network.
LPPO351	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We support and welcome policy option SO5.5 to safeguard those sections of the proposed through-route for the restored Hatherton Canal which are within the District. Maintaining protection of the through route is vital for the continuation work to restore this canal for the benefit of the public.

LPPO352	Canal & River Trust		The Lichfield and Hatherton Canals Restoration Trust (LHCRT) is actively working towards the restoration of the former Lichfield Canal to navigable status. We are supportive of the work of the LHCRT in restoring the canal, which is likely to progress during the Local Plan Period. Canal restoration projects provide for a number of benefits for a local community and can be a catalyst for redevelopment and regeneration. In addition to environmental benefits canal restoration can also have positive economic and social impacts and the protection and enhancement required by this policy will aid in achieving other key objectives of the Plan.
LPPO353	Together Active - J, Brennan		Yes, I support the preferred policy direction including the emphasis on reducing fear of crime and good design for an attractive and safe environment to encourage more women, older people and vulnerable people to cycle and walk.
LPPO354	Natural England- G, Driver		We support the safeguarding of the canal as an opportunity area for wetland habitat as identified through the Cannock Chase District Nature Recovery Network Mapping Report.
LPPO355	Staffordshire County Council - J, Chadwick		Yes, this proposal is very much supported.
			SO5.6: Safeguarding Proposed Recreational Footpath and Cycle Routes
			Question 29: Do you support the preferred policy direction to safeguard the proposed routes of recreational footpath and cycleways?
LPPO356	G, Green		Many more people would take up cycling, not just as recreation but to get to work or to go to the shops but are put off by the perceived hazards of traffic. We need as many off-road cycle-ways as possible to give people confidence. I have visited our twin town of Datteln in Germany and was impressed to see that almost all high school children cycled to and from school, with the respect of car drivers. Parked cars in narrow roads are a danger for children which prevents regular cycling. Also, parking on footpaths is causing people with pushchairs and disabled buggies to pass in the roadway.
LPPO357	Together Active - J, Brennan		Yes . I support and welcome this preferred policy direction.
LPPO358	Natural England- G, Driver		This preferred policy is complimentary to the Cannock Chase Sac project and crosses over with it. Mitigation for the Cannock Chase SAC is interlinked with any work to deliver recreational cycling route and walking routes which relieve pressure on the SAC and encourage people away from the SAC.

LPPO359	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates generally support the approach taken to new footpath and cycle ways. Policy SO5.7 deals with parking provision. It states all major development proposals will make appropriate off-street parking in accordance with the relevant local design code and an assessment of the anticipated demand arising, scope for encouraging alternative means of travel, provision that will be made for private and public transport charging points, impact that parking might have on road safety and residential amenity and provision of adequate and conveniently placed for parking for people who have a disability or restricted mobility.
LPPO360	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates generally support the approach taken to new footpath and cycle ways. Policy SO5.7 deals with parking provision. It states all major development proposals will make appropriate off-street parking in accordance with the relevant local design code and an assessment of the anticipated demand arising, scope for encouraging alternative means of travel, provision that will be made for private and public transport charging points, impact that parking might have on road safety and residential amenity and provision of adequate and conveniently placed for parking for people who have a disability or restricted mobility.
LPPO361	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates generally support the approach taken to new footpath and cycle ways. Policy SO5.7 deals with parking provision. It states all major development proposals will make appropriate off-street parking in accordance with the relevant local design code and an assessment of the anticipated demand arising, scope for encouraging alternative means of travel, provision that will be made for private and public transport charging points, impact that parking might have on road safety and residential amenity and provision of adequate and conveniently placed for parking for people who have a disability or restricted mobility.
			SO5.7: Parking Provision
			Question 30: Do you support the preferred policy direction for parking provision?
LPPO362	G, Green		Many more people would take up cycling, not just as recreation but to get to work or to go to the shops but are put off by the perceived hazards of traffic. We need as many off-road cycle-ways as possible to give people confidence. I have visited our twin town of Datteln in Germany, and was impressed to see that almost all high school children cycled to and from school, with the respect of car drivers. Parked cars in narrow roads are a danger for children which prevents regular cycling. Also, parking on footpaths is causing people with push-chairs and disabled buggies to pass in the roadway.
LPPO363	Together Active - J, Brennan		Need to ensure that on street parking does not compromise safe walking and cycling networks and provide adequate access and spaces for secure cycle storage.

LPPO364	Home Builders Federation - S, Green	<p>Under Policy SO5.7, all major development proposals will make appropriate off-street parking in accordance with the relevant Local Design Code and an assessment of the provision that will be made for private and public EVCPs. The HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. As set out in the 2019 NPPF for effectiveness, a policy should be clearly written and unambiguous so it is evident how a decision maker should react to development proposals (para 16d). The Council's policy approach to the provision of EVCPs should be clear. The Council should specify if provision means a cable and duct approach or installation of active EVCPs. The Council should also clarify the requirement for the provision of public and private EVCPs and off-street as opposed to within the curtilage of individual dwellings. The HBF consider that the physical installation of active EVCPs is unnecessary. The evolution of automotive technology is moving quickly therefore a passive cable and duct approach is a more sensible and future proofed solution, which negates the potential for obsolete technology being experienced by householders. A passive cable and duct approach means that the householder can later arrange and install a physical EVCP suitable for their vehicle and in line with the latest technologies. The Council should also acknowledge that this policy approach may be superseded by the Government's proposals to change Building Regulations. The Department of Transport consultation of Electric Vehicle Charging in Residential & Non-Residential Buildings (ended 7th October 2019) set out the Government's preferred option to introduce a new requirement for EVCPs under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country. The Council's preferred policy approach should not compromise the viability of development. The HBF and its Members have serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard (see HBF answer to Question 49 below). These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated an installation cost of approximately £976 per EVCP plus any costs for upgrading local electricity networks, which under the Government's proposal automatically levies a capped figure of £3,600 on developers. These costs should be included in the Council's viability assessment.</p>
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LPPO365	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The approach in the Local Plan is not consistent within the NPPF in that, as proposed, the parking standards would not be contained within the Local Plan document and therefore would not be subject to examination. In addition, paragraphs 105 and 106 of the NPPF states that maximum parking standards should only be set where there is a clear justification that they are necessary for managing the road safety network. Evidence should be included that demonstrates that parking standards are necessary, and these should be included within the Local Plan to provide certainty to developers upfront. Any standards that are developed should be clear and not onerous.
LPPO366	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The approach in the Local Plan is not consistent within the NPPF in that, as proposed, the parking standards would not be contained within the Local Plan document and therefore would not be subject to examination. In addition, paragraphs 105 and 106 of the NPPF states that maximum parking standards should only be set where there is a clear justification that they are necessary for managing the road safety network. Evidence should be included that demonstrates that parking standards are necessary, and these should be included within the Local Plan to provide certainty to developers upfront. Any standards that are developed should be clear and not onerous.
LPPO367	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The approach in the Local Plan is not consistent within the NPPF in that, as proposed, the parking standards would not be contained within the Local Plan document and therefore would not be subject to examination. In addition, paragraphs 105 and 106 of the NPPF states that maximum parking standards should only be set where there is a clear justification that they are necessary for managing the road safety network. Evidence should be included that demonstrates that parking standards are necessary, and these should be included within the Local Plan to provide certainty to developers upfront. Any standards that are developed should be clear and not onerous.
LPPO368	Cannock Designer Outlet (GP)Ltd o/b Cannock Designer Outlet Ltd Partnership	Carter Jonas - K, Gregson	We support the provision of electric charging points / spaces reserved for low emission vehicles. As a general comment to Policy SO5.7, it is vital that development has the required and correct level of parking spaces. This will reduce queueing on the local highway network and ensure highway safety is not impacted. We support the principles of the Council's preferred policy direction for parking provision subject to comments in response to Policy SO5.7 above.
			SO6.1: Hierarchy of Town and Local Centres
			Question 31: Is the proposed hierarchy of centres appropriate, and do you support the range of uses described in the Policy for each tier within the hierarchy?

LPPO369	Aldi Stores Ltd	Turley Associates - N, Denison	<p>Proposed changes to the Rugeley Town Centre boundary: We object to the proposed changes to the Rugeley Town Centre Boundary, specifically the proposed shrinking of the extent of the boundary and the exclusion of the Tesco Store at Power Station Road from the town centre. Given that the Tesco store lies within the town centre as currently defined and is described in the Cannock Chase Retail and Town Centre Uses Study (Jan 2021) (Appendix G page 5) as being just outside the primary retail area, there would have to be some sound and clear cut reason to justify excluding the store from the defined town centre. The evidence based relied upon by the Council includes the Cannock Chase Retail & Town Centre Use Study (Jan 2021) (the study). We have therefore reviewed the study to assess whether the rationale for the proposed change is sound. The household shopping survey which underpins the Study findings, in respect of quantitative and qualitative need shows that the Tesco store at Power Station Rd is the most popular main and top up shopping destination in Rugeley. Questions in the survey seeing to determine why people visit the town centre reveal that the most common responses where shopping for food and comparison goods. While the town centre health check assessment for Rugeley, set out at Appendix G (vol 2) of the Study, opines that there is a barrier, in the form of the Forge Rd/Mill Lane/Bryant's Lane roundabout, which limits opportunities for easy access on foot between the Tesco store and the main shopping core, certain relatively simple and inexpensive solutions are suggested to enhance such linkages. It is noted at paragraph 7.5.5 of Vol 1 of the 2021 study) that linkages with ".....Tesco in the north of the town centre could be improved." The SWOT analysis for the town centre does not identify the current extent of the centre, incorporating Tesco, as either a threat or a weakness. As noted above (and as referred to at page 15 of Appendix G) it is indicated that connectivity could be improved. The Rugeley Town Centre strategy and recommendations set out at para 7.7 are silent on the matter of redrawing the centre boundaries/ The recommended boundaries for the various centres in the District are shown at Appendix J (vol 2) of the Study. No explanation is provided for the changes shown to the Rugeley Town Centre boundary in that appendix. At para 9.4.2 of the study it is stated that [...]. However, as indicated above, there is no evidence that the proposed changes are based on any analysis of the above factors. The Tesco store remains the most important store for main food shopping within the town centre and the store is configured so that there are plenty of available and accessible car parking spaces to enable store customers to make linked trips on foot to the rest of the centre on foot. The journey on foot from the Tesco store car park and the Primary Shopping Area is straight forward and safe. Whilst some modest improvements could be made to secure enhanced linkage, as suggested in the Study, this does not, in itself, justify taking the Tesco store and associated car park out of the defined town centre area. Indeed, if such improvements are to be made, there is considerable benefit in ensuring that the Tesco store is included in the town centre. It should be noted that the Tesco store development was identified in the Rugeley town Centre AAP as of of the key schemes to deliver identified regeneration benefits</p>
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			for the town centre. It would appear to us to be illogical to now exclude that implemented development from the town centre. We therefore recommend and request that the town centre boundary for Rugeley in the emerging Local Plan be reinstated to that shown on the Proposals Map of the LPP1.
			SO6.2: Provision of Main Town Centre Uses and Town Centre Services
			Question 32: Do you support the thresholds set within the policy?
LPPO370	G, Green		I have not been impressed with the design of recent retail area constructions with regard to environmental and sustainability issues. I would urge that there should be porous paving on car parking space, solar panels, wild flower planting, rainwater flushing in the buildings, and clearly signed disposal bins for recycling. I should not have to explain the various reasons why these features are important, and action to prevent climate change, loss of bio-diversity, and flooding is very urgent. There is a climate emergency which is more dangerous than Covid 19.
LPPO371	Historic England - E, Boden		Historic England notes that this policy direction is mainly focused on floorspace thresholds and impact tests for town centre services and suggests that the additional emphasis of the role of heritage assets in driving regeneration (as commented on previously) could also be included, so that local heritage opportunities to bring new life into towns centres and historic commercial buildings is supported.
LPPO372	Cannock Designer Outlet (GP)Ltd o/b Cannock Designer Outlet Ltd Partnership	Carter Jonas - K, Gregson	As written, the Policy will require impact assessments for development that creates new or additional floor space of 500sqm (gross) outside of the designated Primary Shopping Area within the Strategic Town Centre of Cannock and the Town Centres of Rugeley and Hednesford and development proposals creating new or additional floorspace greater than 200sqm (gross) outside of the Local Centres. MGDOWM functions as a specialist retailer - selling discounted comparison goods priced at least 30% below the normal price at which similar types of merchandise are or have been offered for sale at their usual place of sale. This is entirely different to the type of retail available in either the strategic town centre of Cannock and/or the town centres of Rugeley and Hednesford. Given the location of MGDOWM which is situated outside of the Local Centres, as drafted, there would be a requirement to undertake an impact assessment for any development (including the changes of use and variations of conditions) of more than 200sqm. Given the different retail offer, to ensure MGDOWM can respond the market conditions and remain attractive to leading brands that focus solely on retail outlets, we proposed that the larger threshold (500sqm) should be applicable and not the 200sqm threshold. We therefore proposed the following addition to Policy SO6.2 (in bold): [...] • Development proposals creating new or additional floorspace greater than 500 square metres (gross) outside of the designated Primary Shopping Areas within the Strategic Town Centre of Cannock and the Town Centres of Rugeley and Hednesford and within MGDOWM. [...].

			SO6.3: Safeguarding Existing Town Centre Services
			Question 33: Do you support the preferred policy direction safeguarding existing town centre services?
			SO6.4: Town Centre Design
LPPO373	Historic England - E, Boden		Historic England is supportive of this policy direction and welcomes the various references to the historic environment and heritage assets. However, we recommend that 'preserved' is amended to 'conserved' in the first bullet point.
			SO6.5: Cannock Town Centre Redevelopment Areas
			Question 34: Do you support the proposed redevelopment areas in Cannock Town Centre?
LPPO374	M, Stretton		I was impressed by the detail in the document, however, my only real concern is Cannock Town Centre. Now that major shopping has been transferred to out of town to the new complex, its time to renew the old town centre. In my view the centre is out of date, old fashioned and looks like a collection of Lego Bricks. all the character has been removed, its obvious shopping on a large scale has gone, therefore we need to make it more attractive. Lichfield has a Cathedral to attract people. We need a centre of entertainment, attractive buildings, cages, walk in shops for entertainment. Kids and families enjoying games. An up to date cinema and theatre. Pubs - it's a pity Weatherspoon's didn't by the old Council House over looking the bowling green., central play area in the centre for town kids. I'm not against monthly markets but we need better than a mini version of Penkrige. Converting some of the existing shops into housing accommodation guarantees people stay local.
LPPO375	Historic England - E, Boden		Historic England notes that through the Local Plan there are opportunities to enhance or better reveal the significance of heritage assets and Conservation Areas within the town centres of both Cannock and Rugeley. Historic England notes and welcomes that the majority of the proposed town centre/mixed-use allocations have been assessed within the HIA and our detailed comments on these sites can be found at Appendix A to this letter. However, we advise that proposed sites M4 and M8 should also be assessed for their potential impacts on the significance of nearby heritage assets, prior to their allocation.
LPPO376	Together Active - J, Brennan		Need to prioritise active travel through safe, integrated walking and cycling routes (SE Active Design) and follow DfT LTN 1/20 Cycle Infrastructure Design. Retailers report an increase in trade of 40% when places are made more attractive for walking (Planning and Healthy Weight TCPA & PHE 2014)

LPPO377	Staffordshire County Council - J, Chadwick		<p>The County Council is concerned that Policy SO6.5 Town Centre Redevelopment Areas includes a proposal to redevelop the Cannock bus station. However, no alternative well located site for this facility has been identified. • Bus Station (0.11ha) - hotel and conferencing facilities or residential uses and supporting an improved intermodal interchange. Site ref M2. There has been previous dialogue concerning this proposal and Consultants have looked at site options. Beecroft Road, church Street and reconfiguration of the existing bus station site to accommodate development but with less capacity for buses, were all considered but no suitable alternative option for the bus station emerged. SCC considered that reconfiguration would negatively affect capacity and therefore service provisions locally. The issue of layover was also a problem when considering alternative sites and reducing capacity at the current location. The suggestion of Church Street as an alternative location cannot be supported as the road isn't that wide; there is very little space for pedestrians let alone bus shelters and stops etc. There are currently 10 bus stands in the bus station, 4 or 5 maximum would only have been available with this option and no layover space. There are very few options in Cannock Town Centre otherwise, and there are no other stopping locations within the town centre, unlike Stafford for example, most passengers board/alight in Cannock bus station due to no other options.</p>
			<p>Question 35: Are there aspects of design you think should be included in a design guides/design code?</p>
LPPO378	Historic England - E, Boden		<p>Historic England is supportive of this policy direction which seeks to regenerate Cannock Town centre. We suggest that rather than just protecting the Conservation Areas from development, reference should be made to maximising opportunities to enhance and better reveal the significance of the Cannock Town Centre Conservation Area through the sites proposed as allocations.</p>
LPPO379	Natural England- G, Driver		<p>There is an opportunity to enhance and create green and blue infrastructure within town centres through retrofitting SuDS which can help with water management, planting trees which can provide shading and cooling - an important climate change adaptation and designing in green and blue infrastructure into redevelopment. For information opportunities please see below: Greening the Grey: a framework for integrated green grey infrastructure; Designing Blue Green Infrastructure (BGI) for water management, human health, and wellbeing: summary of evidence and principles for design; Introducing England's urban forests ; and Forest Research- Urban Tree Manual</p>

LPPO380	Severn Trent		<p>Our key focus/ask is around surface water management and we would really support any effort the local plan and its policies could make on this front. As we touched on in the section above "Strategic Objective 8: Supporting a Greener Future", adherence to the drainage hierarchy is a great step to helping drain new development sustainably. The use of SuDS does not negate the impact of making surface water connections to the combined sewerage system. Other design/policy ideas which may help to ensure surface water is managed sustainably:</p> <ul style="list-style-type: none"> ▪ Ensuring developments have sufficient onsite storage to accommodate run-off for rainfall events up to 100-year return period. ▪ Limiting the sites surface water discharge rate to greenfield run-off rates or lower. ▪ Utilising brownfield redevelopment as opportunity to reduce existing surface water discharge rates and storage provision, helping to add resilience to future climate change. <p>Ultimately the best way to manage surface water is upfront planning and not allocating sites which have a reduced number of sustainable options. Where allocated sites pose a surface water risk then site specific policy or master-planning will be beneficial and we are happy to consult with you on this.</p>
			SO6.6: Rugeley Town Centre Redevelopment Areas
			Question 36: Do you support the proposed Local Plan annotations of Renewal areas and Protection areas in Rugeley Town Centre? If not, what amendments would you like to see?
LPPO381	Inland Waterways Association, P, Sharpe		IWA supports policy SO6.6, in particular for the mixed use development site ref M8, including repair and re-use of the Steam Mill as identified in the HIA (RE18).
LPPO382	Historic England - E, Boden		Historic England is supportive of this policy direction which seeks to regenerate Rugeley Town Centre. We suggest that rather than just protecting the Conservation Area from development, reference should be made to maximising opportunities to enhance and better reveal the significance of the Rugeley Town Centre Conservation Area through the sites proposed as allocations.
LPPO383	Historic England - E, Boden		Historic England notes that through the Local Plan there are opportunities to enhance or better reveal the significance of heritage assets and Conservation Areas within the town centres of both Cannock and Rugeley. Historic England notes and welcomes that the majority of the proposed town centre/mixed-use allocations have been assessed within the HIA and our detailed comments on these sites can be found at Appendix A to this letter. However, we advise that proposed sites M4 and M8 should also be assessed for their potential impacts on the significance of nearby heritage assets, prior to their allocation.

LPPO384	Canal & River Trust - H, Smith		The Trust recognises that the towpath north of Leathermill Lane requires improvement in order to secure its long term ability to handle pedestrian and cycle traffic. This would include works to improve the mooring facilities. Subject to funding, this scheme of improvements would likely occur during the Local Plan period. The total works would likely cost up to £500,000. When complete, this would allow for improved facilities for boaters to visit the area, and improve access to the Haywood and Shugborough Estate, with benefits for both tourism and for wellbeing (by promoting walking and cycling). We request that improvements to the towpath north of Leathermill Lane (to Etchinghill) should be included in the Infrastructure Delivery Plan so that these improvements can be actively planned for during the Plan Period. We would welcome the potential to discuss any issues with the Local Authority, and the ability to comment on any updates to the Infrastructure Delivery Plan. We believe that one-to-one meetings offer the most appropriate route of engagement, as it would allow both parties to talk about specific matters related to our infrastructure.
LPPO385	Bridley Heath Parish Council		These plans must be given top priority in any final plan. Cannock is looking poorer but Rugeley, after Covid, is like a ghost town and urgently needs upgrading and a serious injection of funding. Incentives to attract new businesses to the town and surrounding areas.
LPPO386	Together Active - J, Brennan		Agree the Conservation Areas and important green spaces within Rugeley Town Centre need to be protected from redevelopment. Active travel needs more than promotion it needs to be prioritise through safe, integrated walking and cycling routes (SE Active Design) and follow DfT TLN 1/20 Cycle Infrastructure Design utilising segregated cycle routes to increase the uptake of active travel.
			Question 37: Are there aspects of design you think should be included in a design guides/design code?
LPPO387	Together Active - J, Brennan		Design codes should incorporate SE Active Design Principles
LPPO388	Natural England- G, Driver		There is an opportunity to enhance and create green and blue infrastructure within town centres through retrofitting SuDS which can help with water management, planting trees which can provide shading and cooling - an important climate change adaptation and designing in green and blue infrastructure into redevelopment. For information opportunities please see below: Greening the Grey: a framework for integrated green grey infrastructure; Designing Blue Green Infrastructure (BGI) for water management, human health, and wellbeing; summary of evidence and principles for design; Introducing England's urban forests ; and Forest Research- Urban Tree Manual
			SO6.7: Hednesford Town Centre Redevelopment Areas

			Question 38: Do you support the proposed redevelopment areas in Hednesford Town Centre? If not, what amendments would you like to see?
LPPO389	Beau Desert Golf Club - P, Benbow		BDGC strongly approve of development in the vicinity of Hednesford Town Centre, being an essential element of a flourishing town.
LPPO390	Historic England - E, Boden		Historic England is supportive of this policy direction which seeks to regenerate Hednesford Town Centre. We suggest that reference should be made within the policy to conserving and enhancing heritage assets within the town centre through the sites proposed as allocations.
LPPO391	Hazel Slade & Rawnsley Community Association - D, Williams		Development in and around Hednesford Town Centre is an essential element of a thriving town, and it is supported.
LPPO392	Together Active - J, Brennan		Agree with this and support it especially that the important green spaces within Hednesford Town Centre will be protected from redevelopment.
			Question 39: Are there aspects of design you think should be included in a design guides/design code?
LPPO393	Together Active - J, Brennan		Design codes should incorporate SE Active Design Principles
LPPO394	Natural England- G, Driver		There is an opportunity to enhance and create green and blue infrastructure within town centres through retrofitting SuDS which can help with water management, planting trees which can provide shading and cooling - an important climate change adaptation and designing in green and blue infrastructure into redevelopment. For information opportunities please see below: Greening the Grey: a framework for integrated green grey infrastructure; Designing Blue Green Infrastructure (BGI) for water management, human health, and wellbeing: summary of evidence and principles for design; Introducing England's urban forests ; and Forest Research- Urban Tree Manual
LPPO395	Severn Trent		Our key focus/ask is around surface water management and we would really support any effort the local plan and its policies could make on this front. As we touched on in the section above "Strategic Objective 8: Supporting a Greener Future", adherence to the drainage hierarchy is a great step to helping drain new development sustainably. The use of SuDS does not negate the impact of making surface water connections to the combined sewerage system. Other design/policy ideas which may help to ensure surface water is managed sustainably: <ul style="list-style-type: none"> ▪ Ensuring developments have sufficient onsite storage to accommodate run-off for rainfall events up to 100-year return period. ▪ Limiting the sites surface water discharge rate to greenfield run-off rates or lower. ▪ Utilising brownfield redevelopment as opportunity to reduce existing surface water discharge rates and storage provision, helping to add resilience to future climate change. Ultimately the best way to manage surface water is upfront planning and not allocating sites which

			have a reduced number of sustainable options. Where allocated sites pose a surface water risk then site specific policy or master-planning will be beneficial and we are happy to consult with you on this.
			SO7.1: Protecting, Conserving and Enhancing Biodiversity and Geodiversity
			Question 40: Do you support the preferred policy direction to protect, conserve and enhance biodiversity and geodiversity?
LPPO396	Cannock Chase AONB Partnership		These preferred policies are warmly welcomed. Cannock Chase SAC is an integral part of the AONB's special qualities and natural beauty, therefore policy to ensure its conservation along with that of ancient woodland and veteran trees is essential. The requirements for restoration and creation of wildlife corridors is also welcomed to enhance habitat connectivity across the wider landscape.
LPPO397	G, Green		I have known a local hedgerow in Brickworks Rd Heath Hayes, since the 1970s, before the road and houses were built. After their construction, the hedge still had a variety of species and was a continuous corridor for hedgehogs, squirrels and birds. The footpath/bridleway ran close beside it. Some householders have built a wall or fence outside the hedge, enclosing it in their garden, and then demolished it to increase the size of their garden. One property owner at the junction of Wimblebury Road removed all trace of the hedge and replaced it with 'neat and tidy' laurel. At around the same time, I discovered a heap of almost tree-sized pieces of hawthorn obstructing a local footpath. This I cleared myself with difficulty. I have great concerns for the preservation of small pockets of 'wild' corridors for wildlife. I am active in keeping open local footpaths and maintaining a local nature reserve, as I want as many people as possible to enjoy and be 'recreated' by enjoying wildlife within walking distance of home, as I do; to see and hear wild creatures without having to drive anywhere. Many people are not as mobile as I am, and they need 'Nature' as much as I do. It is not just Green Belt that must be protected, but also small pockets of 'wild' and the old hedgerows which help maintain biodiversity and human health.

LPPO398	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We are pleased to note the inclusion, within policy option SO7.1, of reference to the creation and restoration of wildlife corridors being beneficial for biodiversity. The restored Hatherton Canal and its towpath will provide such valuable connectivity for wildlife.
LPPO399	Natural England- G, Driver		We have some concerns regarding the wording in this preferred policy. We would remind you of the hierarchy of designated sites and in particular NPPF paragraph 171. We would advise that the order of the list of designated sites is changed, so that SSSIs come before ancient woodland. We have concerns regarding the following paragraph: "Development which results in loss of harm to SAC, Ancient Woodland, Ancient Trees or Veteran trees will need to demonstrate there are 'imperative reasons for overriding public interest'." This oversimplifies the issues and we would advise that you review and check your wording. Footnote 58 of the NPPF on ancient woodlands expands on the "wholly exceptional reasons" test and mentions "public benefit" but it is not the same as the Habitats Regulations article 6(4) derogation Test 2(IROPI - imperative reasons of overriding public interest). We welcome the commitment to biodiversity net gain but would advise that the last paragraph on net gains should be revised to reflect the preference for on-site habitat provision/enhancement first wherever practicable followed by offsite where not.
LPPO400	Severn Trent		We support this policy and wish to be approached by yourselves or partners for discussions on potential biodiversity enhancement or green infrastructure projects. This could be tree planting initiatives, sustainable urban drainage schemes or urban greening and regeneration, we would love to hear from you. We believe that through collaboration there may be opportunities to maximise wider benefits. Please see our website for more information on "Our Great Big Nature Boost" or feel free to get in touch.
LPPO401	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough estates supports the general principles set out in Policy SO7.1. However, there is a typographical error in defining "imperative reason for of overriding public interest". In addition, the approach of utilising "imperative reasons of overriding public interest" is inconsistent with the guidance in the NPPF. Para 172 of the NPPF sets out this test against conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs. It does not extend to veteran and ancient trees on sites located beyond these areas. It is unreasonable to conclude that the removal of, for instance, a single veteran tree would potentially need to be supported by the same evidence as requirement to maintain the nation's healthy, safety, education or environment or to be associated with the economic or social benefits on a nationally significant infrastructure project. This approach is disproportionate. The Local Plan should be amended accordingly. Policy SO7.2 deals with biodiversity net gain. It states that major development proposals will provide a net gain in biodiversity, the net gains in biodiversity will be designed to support the delivery of a district wide biodiversity network and the level of biodiversity net gain will be proportionate to the type, scale and impact of development.

LPPO402	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough estates supports the general principles set out in Policy SO7.1. However, there is a typographical error in defining "imperative reason for of overriding public interest". In addition, the approach of utilising "imperative reasons of overriding public interest" is inconsistent with the guidance in the NPPF. Para 172 of the NPPF sets out this test against conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs. It does not extend to veteran and ancient trees on sites located beyond these areas. It is unreasonable to conclude that the removal of, for instance, a single veteran tree would potentially need to be supported by the same evidence as requirement to maintain the nation's healthy, safety, education or environment or to be associated with the economic or social benefits on a nationally significant infrastructure project. This approach is disproportionate. The Local Plan should be amended accordingly. Policy SO7.2 deals with biodiversity net gain. It states that major development proposals will provide a net gain in biodiversity, the net gains in biodiversity will be designed to support the delivery of a district wide biodiversity network and the level of biodiversity net gain will be proportionate to the type, scale and impact of development.
LPPO403	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough estates supports the general principles set out in Policy SO7.1. However, there is a typographical error in defining "imperative reason for of overriding public interest". In addition, the approach of utilising "imperative reasons of overriding public interest" is inconsistent with the guidance in the NPPF. Para 172 of the NPPF sets out this test against conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs. It does not extend to veteran and ancient trees on sites located beyond these areas. It is unreasonable to conclude that the removal of, for instance, a single veteran tree would potentially need to be supported by the same evidence as requirement to maintain the nation's healthy, safety, education or environment or to be associated with the economic or social benefits on a nationally significant infrastructure project. This approach is disproportionate. The Local Plan should be amended accordingly. Policy SO7.2 deals with biodiversity net gain. It states that major development proposals will provide a net gain in biodiversity, the net gains in biodiversity will be designed to support the delivery of a district wide biodiversity network and the level of biodiversity net gain will be proportionate to the type, scale and impact of development.
LPPO404	Staffordshire County Council - J, Chadwick		Yes, this is welcomed. It may be that greater clarity around the avoid - mitigate - compensate hierarchy described in NPPF would be helpful here.
SO7.2: Biodiversity Net Gain			
Question 41: Do you support the preferred policy direction to achieve net gains in biodiversity through development?			

LPPO405	G, Green		I have known a local hedgerow in Brickworks Rd Heath Hayes, since the 1970s, before the road and houses were built. After their construction, the hedge still had a variety of species and was a continuous corridor for hedgehogs, squirrels and birds. The footpath/bridleway ran close beside it. Some householders have built a wall or fence outside the hedge, enclosing it in their garden, and then demolished it to increase the size of their garden. One property owner at the junction of Wimblebury Road removed all trace of the hedge and replaced it with 'neat and tidy' laurel. At around the same time, I discovered a heap of almost tree-sized pieces of hawthorn obstructing a local footpath. This I cleared myself with difficulty. I have great concerns for the preservation of small pockets of 'wild' corridors for wildlife. I am active in keeping open local footpaths and maintaining a local nature reserve, as I want as many people as possible to enjoy and be 'recreated' by enjoying wildlife within walking distance of home, as I do; to see and hear wild creatures without having to drive anywhere. Many people are not as mobile as I am, and they need 'Nature' as much as I do. It is not just Green Belt that must be protected, but also small pockets of 'wild' and the old hedgerows which help maintain biodiversity and human health.
LPPO406	Bromford Housing Group	Plant Planning and Development - J, Williams	Policy SO7.2 - Biodiversity and Net Gain, is unnecessary, This matter is covered by the NPPF in more detail than the proposed policy and is soon to be enshrined in law. The policy in the Plan it is less specific than the actual biodiversity and net gain requirements set out in National Planning Policy and does not actually reflect the requirements of biodiversity net gain. The policy should be removed.
LPPO407	Hazel Slade & Rawnsley Community Association - D, Williams		We support the concept of net gains to biodiversity through development, but not at the expense of our visual landscape, which we regard as sacrosanct.
LPPO408	West Midlands Housing Association Planning Consortium	Tetlow King Planning - L, Stoate	We note that the policy direction states that the level of biodiversity net gain required by any one development will be proportionate to the type, scale and impact of that development. The requirement for 10% biodiversity net gain is expected to be a mandatory requirement once the Environment Bill is enacted. However, if the Council is looking to introduce a higher threshold than 10%, this must be robustly viability tested to show that it will be viable for applicants to provide such biodiversity net gains alongside development. Guidance must be provided (or signposted) on how to practically achieve a higher net gain in development. This would allow for net gain to be designed into processes at early stages and for any design issues to be detected and resolved without causing delay to development.

LPPO409	Natural England- G, Driver		<p>We welcome the preferred policy direction which encourages linkages with District wide ecological networks. We would advise that you define what is a major development. We would advise that the approach to biodiversity net gain should be in conformity with the mitigation hierarchy and this should be clear in the plan. We would expect the plan to either outline or direct to a SPD, the need for a quantitative approach and a consistent means of calculating gains. We would also advise that the plan should be clear about how management will be secured. CIRIA/CIEEM/IEMA have produced Biodiversity Net Gain: Good practice principles for development which the council might find helpful to refer to.</p>
LPPO410	Home Builders Federation - S, Green		<p>Under Policy SO7.2, major development proposals will provide a net gain in biodiversity, The delivery of net gains in biodiversity will be designed to support the delivery of a District-wide biodiversity network based on the designated biodiversity sites. The level of biodiversity net gain required will be proportionate to the type, scale and impact of development. Major development schemes will provide for the long-term management of biodiversity features retained and enhanced within the development site and of those features created off site to compensate for development impacts. The Council's policy approach to biodiversity net gain should not deviate from the Government's proposals as set out in the Environment Bill including transitional arrangement. The Government intends to make provision for a transition period of two years. The Government will work with stakeholders on the specifics of this transition period including accounting for sites with outline planning permission, and will provide clear and timely guidance on understanding what will be required and when. Furthermore, the Council's preferred policy approach should not compromise viability. There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that biodiversity net gain does not prevent, delay or reduce housing delivery. The DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies: Impact Assessment Table 14: Net Gain Delivery Costs (Residential) sets out regional costs (based on 2017 prices) in West Midlands of £18,527/ha of development based on a central estimate but there are significant increases in costs to £63, 725/ha for off-site delivery under Scenario C. There may also be an impact on the ratio of gross to net site acreage, which should be considered by the Council.</p>

LPPO411	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates supports the general principles set out in Policy SO7.2, however the policy refers to the level of net gain being proportionate to the type, scale and impact of the development. This approach is unsatisfactory in being too vague to provide developers with certainty as to what their proposal must deliver in regard to biodiversity. In particular, how each of the specified criteria (type, scale and impact) will influence the level of biodiversity net gain is unclear. Should the proposal have a significant impact on road congestion would it need to deliver a significant improvement in biodiversity. The policy is unclear as drafted and needs to be limited to the biodiversity net gains associated with the proposal. As drafted a proposal which, within extent of a site delivered biodiversity net gain would still have to contribute to other aspects of biodiversity which were off-site. The Council's policy approach to biodiversity net gain should not deviate from the Government's proposals as set out in the Environment Bill. Policy SO7.3 deals with SAC. It states development will not be permitted where it would lead directly or indirectly to an adverse impact upon a SAC and the effects should be mitigated. The policy goes on to indicate that to ensure that the Cannock Chase SAC is not harmed all development that results in a net increase in dwellings within a 15km radius must take all necessary steps to avoid or mitigate any adverse effects upon the SACs integrity.
LPPO412	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates supports the general principles set out in Policy SO7.2, however the policy refers to the level of net gain being proportionate to the type, scale and impact of the development. This approach is unsatisfactory in being too vague to provide developers with certainty as to what their proposal must deliver in regard to biodiversity. In particular, how each of the specified criteria (type, scale and impact) will influence the level of biodiversity net gain is unclear. Should the proposal have a significant impact on road congestion would it need to deliver a significant improvement in biodiversity. The policy is unclear as drafted and needs to be limited to the biodiversity net gains associated with the proposal. As drafted a proposal which, within extent of a site delivered biodiversity net gain would still have to contribute to other aspects of biodiversity which were off-site. The Council's policy approach to biodiversity net gain should not deviate from the Government's proposals as set out in the Environment Bill. Policy SO7.3 deals with SAC. It states development will not be permitted where it would lead directly or indirectly to an adverse impact upon a SAC and the effects should be mitigated. The policy goes on to indicate that to ensure that the Cannock Chase SAC is not harmed all development that results in a net increase in dwellings within a 15km radius must take all necessary steps to avoid or mitigate any adverse effects upon the SACs integrity.

LPPO413	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates supports the general principles set out in Policy SO7.2, however the policy refers to the level of net gain being proportionate to the type, scale and impact of the development. This approach is unsatisfactory in being too vague to provide developers with certainty as to what their proposal must deliver in regard to biodiversity. In particular, how each of the specified criteria (type, scale and impact) will influence the level of biodiversity net gain is unclear. Should the proposal have a significant impact on road congestion would it need to deliver a significant improvement in biodiversity. The policy is unclear as drafted and needs to be limited to the biodiversity net gains associated with the proposal. As drafted a proposal which, within extent of a site delivered biodiversity net gain would still have to contribute to other aspects of biodiversity which were off-site. The Council's policy approach to biodiversity net gain should not deviate from the Government's proposals as set out in the Environment Bill. Policy SO7.3 deals with SAC. It states development will not be permitted where it would lead directly or indirectly to an adverse impact upon a SAC and the effects should be mitigated. The policy goes on to indicate that to ensure that the Cannock Chase SAC is not harmed all development that results in a net increase in dwellings within a 15km radius must take all necessary steps to avoid or mitigate any adverse effects upon the SACs integrity.
LPPO414	Wyrley Estates	Fisher German LLP - N, Borsey	Recognition should be given to the role that sensitive development schemes, such as the Grove Colliery site have to play in supporting these aims to enhance the natural environment. The Estate supports Policies SO7.3, SO7.2 and SO7.1. The Estate is a significant landowner within the District, this would present an excellent opportunity to provide tangible benefits through development, which could also include upgrading and improving public access to areas such as Wyrley Common.
LPPO415	Staffordshire County Council - J, Chadwick		Yes, this is welcomed. It is noted that there is an intention to amend the Local Plan to conform with changes to NPPF (6.472). Review of the Local Plan is, however, a time-consuming task and it would be helpful if policy paved the way for likely forthcoming changes. The policy (and the one above) should refer to 'measurable net-gain', ideally with a specific requirement for 10% net gain as is becoming standard. The policy states that 'The level of biodiversity net gain required will be proportionate to the type scale and impact of development', however using a percentage ensures proportionality. The policy should also refer to the use of Defra metrics to demonstrate that gain can be achieved (a metric specifically for small sites expected soon to complement the current one which works better on areas that can be measured in units no smaller than 0.1ha.)
			SO7.3: Special Areas of Conservation
			Question 42: Do you support the preferred policy direction for the Special Areas of Conservation?

LPPO416	Cannock Chase AONB Partnership		<p>These preferred policies are warmly welcomed. Cannock Chase SAC is an integral part of the AONB's special qualities and natural beauty, therefore policy to ensure its conservation along with that of ancient woodland and veteran trees is essential. The requirements for restoration and creation of wildlife corridors is also welcomed to enhance habitat connectivity across the wider landscape.</p>
LPPO417	G, Green		<p>I have known a local hedgerow in Brickworks Rd Heath Hayes, since the 1970s, before the road and houses were built. After their construction, the hedge still had a variety of species and was a continuous corridor for hedgehogs, squirrels and birds. The footpath/bridleway ran close beside it. Some householders have built a wall or fence outside the hedge, enclosing it in their garden, and then demolished it to increase the size of their garden. One property owner at the junction of Wimblebury Road removed all trace of the hedge, and replaced it with 'neat and tidy' laurel. At around the same time, I discovered a heap of almost tree-sized pieces of hawthorn obstructing a local footpath. This I cleared myself with difficulty. I have great concerns for the preservation of small pockets of 'wild' corridors for wildlife. I am active in keeping open local footpaths and maintaining a local nature reserve, as I want as many people as possible to enjoy and be 'recreated' by enjoying wildlife within walking distance of home, as I do; to see and hear wild creatures without having to drive anywhere. Many people are not as mobile as I am, and they need 'Nature' as much as I do. It is not just Green Belt that must be protected, but also small pockets of 'wild' and the old hedgerows which help maintain biodiversity and human health.</p>
LPPO418	Walsall Council - N, Ball		<p>Policy SO7.3 refers to both Cannock Chase and Cannock Extension Canal SACs. Walsall and Wolverhampton officers are in ongoing discussions with Staffordshire officers and Natural England in relation to the former and possible mitigation measures that developments in the Black Country may be required to contribute towards, whilst the latter extends into Walsall. We would question the need for an explicit reference to a 15km radius of Cannock Chase SAC, given that the whole of Cannock Chase district lies within this and nearly all lies within an 8km zone. However, we support the statement that any subsequent distance may be agreed by the authorities. On this basis, we can support the policy. The policy refers to developments in the water catchment area of the Cannock Extension Canal. However, it is our understanding that the water supply to the canal comes entirely from Chasewater along the Wyrley and Essington Canal. The extent of the water catchment area referred to in the policy, or potential hydrological pathways, should therefore be clarified in the Plan's supporting text. The qualifying feature of the SAC is the floating water-plantain (<i>Luronium natans</i>) that the Canal supports. It is understood the main issue affecting the nature conservation value of the canal is related to the frequency of boat movements along it. The Natural England citation and supplementary note for the SAC advises that the low volume of boat traffic on this terminal branch of the Wyrley and Essington Canal has allowed open-water plants, including floating water-plantain, to flourish while depressing extensive reed swamp growth. However, poor water quality and inadequate quantities of water can</p>

			adversely affect the habitat on which the SAC features depend. The Cannock Chase Local Plan HRA Appropriate Assessment (March 2021) found that it is not currently possible to rule out adverse effects on the integrity of Cannock Extension Canal SAC from air pollution due to a lack of traffic and emissions data. Of particular concern will be the effects of atmospheric nitrogen deposition and ground level ozone on the SAC which the HRA process should consider when the assessment data becomes available.
LPPO419	Hazel Slade & Rawsley Community Association - D, Williams		We strongly support your proposals for protecting, conserving and enhancing biodiversity, and also the policies in regard to SACs. We would prefer to see the language of protection and conservation more robustly and unambiguously stated for the clearer understanding of what is and is not permissible for potential developers wherever that is possible.
LPPO420	Canal & River Trust - H, Smith		The Trust welcomes the inclusion of this policy regarding the Cannock Extension Canal. Please note that we have also commented on the Habitat Regulations Assessment Report (March 2021) regarding the lack of recognition that the Chasewater Reservoir SSSI is given as being integral to the water supply of the Cannock Extension Canal SAC.
LPPO421	Natural England- G, Driver		We would advise that this policy title and first paragraph should refer to European sites and Wetlands of International Importance ('Ramsar sites'), rather than solely SAC. We would advise that the paragraph on Cannock Chase SAC needs to be revised to be clear that there are other impacts other than recreational impacts for examples, air quality, water quality direct impacts. We would welcome a conversation with the LPA to understand their concerns about impacts from the water catchment area of Cannock Extension Canal SAC. Is there a particular ecological pathway of concern?
LPPO422	Lichfield District Council - S, Stray		Lichfield DC are broadly supportive of Policy SO7.3 and SO7.5 and their supporting text related to the CCSAC and AONB and acknowledge both authorities membership and commitment to the Partnerships of both organisations.

LPPO423	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	In general terms, the Richborough Estates support the general approach however recognition could be given within the policy to the mitigation measures which can be delivered through Local Plans proposals. Policy SO7.4 with protecting and enhancing landscape character by, amongst other things, protecting and conserving local distinctiveness, scenic qualities, rural openness and sense of place. It also refers to protecting, conserving and enhancing the Cannock Chase AONB and the Green Belt. The policy states all major development proposals must be supported by a landscape and visual assessment.
LPPO424	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	In general terms, the Richborough Estates support the general approach however recognition could be given within the policy to the mitigation measures which can be delivered through Local Plans proposals. Policy SO7.4 with protecting and enhancing landscape character by, amongst other things, protecting and conserving local distinctiveness, scenic qualities, rural openness and sense of place. It also refers to protecting, conserving and enhancing the Cannock Chase AONB and the Green Belt. The policy states all major development proposals must be supported by a landscape and visual assessment.
LPPO425	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	In general terms, the Richborough Estates support the general approach however recognition could be given within the policy to the mitigation measures which can be delivered through Local Plans proposals. Policy SO7.4 with protecting and enhancing landscape character by, amongst other things, protecting and conserving local distinctiveness, scenic qualities, rural openness and sense of place. It also refers to protecting, conserving and enhancing the Cannock Chase AONB and the Green Belt. The policy states all major development proposals must be supported by a landscape and visual assessment.
LPPO426	Wyrley Estates	Fisher German LLP - N, Borsey	Recognition should be given to the role that sensitive development schemes, such as the Grove Colliery site have to play in supporting these aims to enhance the natural environment. The Estate supports Policies SO7.3, SO7.2 and SO7.1. The Estate is a significant landowner within the District, this would present an excellent opportunity to provide tangible benefits through development, which could also include upgrading and improving public access to areas such as Wyrley Common.
LPPO427	Staffordshire County Council - J, Chadwick		Yes, this is welcomed. A minor point - in 6.489 industrial emissions are mentioned as a source of pollutants; agricultural emissions are also relevant. Specific allocations - section 6 at Norton Pools it should be noted that there is a Local Wildlife Site (LWS) which adjoins the northern edge of the housing site. Impacts (especially those from dog walking) on the LWS, which comprises heathland and grassland habitats, will therefore need to be carefully mitigated. They Pye Green Valley allocation is also in close proximity to a LWS and mitigation will need to be thought through if damage to the LWS is to be avoided. [See submission for maps].
SO7.4: Protecting, Conserving and Enhancing Landscape Character			

			Question 43: Do you support the preferred policy direction to protect, conserve and enhance landscape character?
LPPO428	Cannock Chase AONB Partnership		This policy is warmly welcomed. Reference within this overarching policy to conserving and enhancing the AONB, and respecting sensitive edges is supported. We also welcome reference to locating and designing development to avoid impacts on tranquillity and dark landscapes. Cannock Chase is the least dark of all 34 AONBs in England, in part due to light spillage from nearby towns. However, the central core of the Chase is still a relative oasis of darkness for people to enjoy compared to the surrounding conurbations. The AONB is engaged in a Dark Skies Project that seeks to foster a sense of responsibility towards protecting and enhancing dark skies and reducing light pollution in the area, the outcomes of which we hope will support this policy.
LPPO429	Historic England - E, Boden		Historic England welcomes the references in this policy direction to local distinctiveness and character and also suggest that the policy specifically references the historic environment.
LPPO430	Hazel Slade & Rawsley Community Association - D, Williams		It is clear that for any development proposal to respect the surrounding scenic quality of the AONB along its sensitive edges, there must be a vigorous defence of its value to the environment and the community. Dense development up to the boundary of the AONB does not meet this objective by some way. Minimal and transient tree screening does not deal with the visual imposition in any meaningful or permanent way. The wording of the constraints place on such development should be unambiguous and provide clear guidance and deterrence to any developer wishing to encroach on the margins of this protected landscape. The boundary of the AONB lies in the valley between the communities of Hazel Slade and Rawsley. The southern boundary of the AONB therefore represents a very visible and relevant connection to the rural environment that both communities cherish. We cannot support any development that seeks to minimise the significance of this important community and national asset by placing any further development (designated H30 in the draft LP) alongside its boundary. Screening is not the answer here. Redesignating the status of H30 to protect it for all time is the answer, and the Local Plan should seek to meet that need. A CCDC study of Green Belt areas in March 2021 identified the land adjacent to H30, designated HE19 and running down the right hand side of Rawsley Road toward Hednesford, as at "High" degree of environmental harm should any development be permitted. Although H30 was not included in the study protection from development of this land would be in agreement with the assessment of HE19. We whole heartedly support the preferred policy direction to protect, conserve and enhance landscape character. We hope and trust that the Council will defend this objective with rigor and determination.
LPPO431	C, Downes		I consider that site C64 admirably fulfils the criteria for inclusion in Policy SO7.4. It also meets the requirement of Cannock Chase AONB Management Plan 2019 section 4.14. Further cementing the argument for re-designation as permanent local green space.

LPPO432	Natural England- G, Driver		We support the direction of the preferred policy.
LPPO433	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates have no comment to make on this policy area. Policy SO7.6 deals with protecting, conserving and enhancing the Green Belt. It states that development will protect the character and openness of the Green Belt. It also states in association with the large strategic site allocations at south of Lichfield Road, Cannock, land indicated in the proposal map will be safeguarded to allow for the delivery of a country park.
LPPO434	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates have no comment to make on this policy area. Policy SO7.6 deals with protecting, conserving and enhancing the Green Belt. It states that development will protect the character and openness of the Green Belt. It also states in association with the large strategic site allocations at south of Lichfield Road, Cannock, land indicated in the proposal map will be safeguarded to allow for the delivery of a country park.
LPPO435	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates have no comment to make on this policy area. Policy SO7.6 deals with protecting, conserving and enhancing the Green Belt. It states that development will protect the character and openness of the Green Belt. It also states in association with the large strategic site allocations at south of Lichfield Road, Cannock, land indicated in the proposal map will be safeguarded to allow for the delivery of a country park.
LPPO436	Wyrley Estates	Fisher German LLP - N, Borseley	Recognition should be given to the role that sensitive development schemes, such as the Grove Colliery site have to play in supporting these aims to enhance the natural environment. The Estate supports Policies SO7.3, SO7.2 and SO7.1. The Estate is a significant landowner within the District, this would present an excellent opportunity to provide tangible benefits through development, which could also include upgrading and improving public access to areas such as Wyrley Common.
			SO7.5: Protecting, Conserving and Enhancing the Cannock Chase Area of Outstanding Natural Beauty
			Question 44: Do you support the preferred policy direction to protect, conserve and enhance the Cannock Chase Area of Outstanding Natural Beauty?

LPPO437	Cannock Chase AONB Partnership		<p>This policy is warmly welcomed. In addition to reference to Cannock Chase AONB Management Plan 2019-2024 the AONB would welcome reference to the recently published AONB Views and Setting Guide. This document will assist in informing landscape and visual impact assessments and provides advice to help ensure that the surroundings of the AONB are conserved and enhanced. Cannock Chase AONBs domed plateau landform has a strong influence on the landscape character and special qualities of the AONB due to its visual prominence and wide-ranging uninterrupted views outward, which are recognised in the AONB Management Plan. Views towards the distinctive profile of Cannock Chase are also an important attribute within the surrounding area. The AONB Views and Setting Guide describes representative views from and towards the AONB, and offers viewpoint specific advice and spatial advice to help ensure that the surroundings of the AONB are developed and managed in ways that conserve and enhance the AONBs significance and special qualities.</p>
LPPO438	Beau Desert Golf Club - P, Benbow		<p>BDGC strongly endorse the aims of the Local Plan in supporting the special natural characteristics that define the Green Belt and the Chase AONB in particular. Provision is made within the plan for enhancements to these protected areas where opportunity arises. BDGC see potential for the former quarry in Rugeley Road (C375) to be more effectively integrated into the AONB by careful blending of a peripheral development into a much larger area of land. In this way BDGC see access to the Chase through the recognised Bridleways to be more formally identified incorporating discrete areas of grassland within a largely deciduous area of reforested land. Development would be subject to rigorous viability tests from adjacent locations within and adjacent to the AONB.</p>
LPPO439	Historic England - E, Boden		<p>We welcome the inclusion of the historic environment and culture as considerations for development within the AONB. However, as we stated at the last consultation, we would be supportive of inclusion of text within this policy direction to reference the role of heritage within the AONB. Reference heritage such as the World War trenches and cemeteries, as well as research such as 'Chase Through Time', will assist in reflecting this important asset as a heritage landscape and we also recommend that links are made to the Cannock Chase AONB Management Plan, as reference earlier in this letter.</p>
LPPO440	Brindley Heath Parish Council		<p>The AONB is fast being destroyed by overuse and immediate action is required to save what is left. The Pandemic has seen the area swamped with visitors especially bike riders who have badly damaged most of the paths and much of the most sensitive areas of habitat. The area cannot support such large numbers and any thought of developing tourism in the area is nonsense. Residents have been plagued with inconvenient and dangerous parking and litter and worse - abuse. The Council must focus on providing alternative areas for recreation and pastimes such as mountain biking which could be located elsewhere in the County or adjacent Counties.</p>

LPPO441	Natural England- G, Driver		We support the direction of this policy. However, the beginning of the second paragraph needs rewording, we would suggest the following: "Development proposals within or on land forming the setting of the AONB will be expected to positively contribute to the special qualities of the AONB." We suggest that you make reference to the Cannock Chase AONB Design Guide within the plan.
LPPO442	Lichfield District Council - S, Stray		Lichfield DC are broadly supportive of Policy SO7.3 and SO7.5 and their supporting text related to the CCSAC and AONB and acknowledge both authorities membership and commitment to the Partnerships of both organisations.
			SO7.6: Protecting, Conserving and Enhancing the Green Belt
			Question 45: Do you support the preferred policy direction for protecting, conserving and enhancing the Green Belt?
LPPO443	S Grigg		Preserve the Green Belt, including the old mining land in Wimblebury across to Prospect village and to Norton Canes. We are losing so many green spaces and this area acts as a buffer zone surrounding Cannock Chase AONB.
LPPO444	Cannock Chase AONB Partnership		This policy and the proposed Green Belt amendments as shown on the proposed Policies Map are supported.
LPPO445	Severn Trent		We would encourage green belt protection and the re-use of brownfield wherever possible. Greenbelt development is by nature greenfield development and when land is newly designated for development is it imperative that a sustainable drainage option from the drainage hierarchy exists. Green belt development should not discharge surface water flows to the combined or foul sewerage network.
LPPO446	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates support the recognition of the country park associated with the site allocation of land south of Lichfield Road, Cannock. The policy should make clear that the country park will deliver significant benefits which will mitigate the impact resulting from the loss of Green Belt via the housing allocation.
LPPO447	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates support the recognition of the country park associated with the site allocation of land south of Lichfield Road, Cannock. The policy should make clear that the country park will deliver significant benefits which will mitigate the impact resulting from the loss of Green Belt via the housing allocation.
LPPO448	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates support the recognition of the country park associated with the site allocation of land south of Lichfield Road, Cannock. The policy should make clear that the country park will deliver significant benefits which will mitigate the impact resulting from the loss of Green Belt via the housing allocation.

LPPO449	St Modwens (Land at York's Bridge, Pelsall)	RPS - P, Hill	<p>The site is included within Green Belt Parcel OA14. The Assessment of OA14 is set out below at Fig 7. The site has not been subject to a site-specific assessment as part of the Green Belt Harm Assessment. We have however undertaken a site-specific review of the Site which includes a high-level consideration to the contribution of the Site against each of the NPPFs five purposes and its suitability for release from the Green Belt. This high-level consideration is set out below.</p> <p>To Check Unrestricted Sprawl: The principal consideration in respect of this objective is the sprawl of the existing settlement edge of Pelsall, Walsall. A key consideration is the strength and permanence of existing boundaries. The site is physically contained by Wyrley and Essington Canal to the south, Lime Lane to the West and Lichfield Road to the East. This existing settlement edge and a strong treelined hedgerow boundary to the north of the site creating a strong boundary which prevents the unrestricted sprawl of development into the Green Belt. This hedgerow will be retained, and further structured landscaping will enhance this buffer.</p> <p>To Prevent Neighbouring Towns from Merging into one Another: The principal consideration in respect of this objective is the potential for physical coalescence of towns. There are no settlements to the immediate north of the site. The existing built edge of Norton Canes lies approx. 2.5km to north of Pelsall, Walsall, with the Brownhills West 1.8km to the north. The A5 (and M6 Toll for Norton Canes) also exists within the intervening land with no intervisibility between the two areas due to the landform and existing substantial woodland to the south of Watling Street. The site is therefore physically and visually separated from settlements which prevents coalescence to the north.</p> <p>Safeguarding the Countryside from Encroachment: The physical and visual containment of the site limits the contribution that the land makes to safeguarding the effect of countryside encroachment.</p> <p>Preserve the Setting and Special Character of Historic Towns: The site does not fall within or adjacent to any Conservation Areas and does not have direct views into a historic town. As indicated in the heritage section of this Vision Document, Pelsall Bridge is a locally listed building, but the development is largely set in the context of modern housing development to its south and the visual influences of Coppice Industrial Estate to its North East. It therefore has very limited impact on the setting of any historic towns.</p> <p>To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict Land and other Urban Land: This objective will conflict with any green field site within the Green Belt and will need to be weighed up in the planning balance. To accommodate the intended level of housing growth, it has been acknowledged there exists a need to release Green Belt land within the local authority through the Joint Core Strategy Review process. Overall, as demonstrated in the site-specific assessment set out above, it is apparent that the release of the Site from Green Belt will not compromise the five purposes of the Green Belt and is entirely in accordance with the NPPF in relation to sustainable Green Belt land release. We request that Council take account of the site-specific assessment we have undertaken and include within the Local Plan evidence base.</p>
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LPPO450	Wyrley Estates	Fisher German LLP - N, Borseley	Broadly Policy SO7.6 states how the Green Belt will be protected, however the Green Belt is also there for enjoyment through appropriate uses which do not conflict Green Belt policy and principles. As stated earlier in Question 1, provision should be made for the enjoyment of leisure and recreational activities. The Grove Colliery site offers a perfect opportunity for a regeneration site; however, the policy does not go far enough in encouraging new facilities in the Green Belt which can be developed and enjoyed in a sustainable manner. The risk is that non-sympathetic uses creep into the area and confine the site to a future of making very little positive contribution to the Green Belt and failing to maximise the potential of heritage assets, such as Grove Colliery heritage. The policy is quite restrictive and needs to elaborate on wider principles which can provide appropriate opportunities within the Green Belt and avoid hampering the longer-term aspirations.
LPPO451	The Church Commissioners for England	Barton Willmore - A, Bird	We consider that preferred Policy SO7.6 largely repeats national planning policy on the Green Belt, which it is not necessary to duplicate within the draft Plan policies. Reference should instead be made to the NPPF and the application of national Green Belt policy in the local context in accordance with this. We note that this draft Policy identifies compensatory improvements to the Green Belt in association with the proposed strategic housing allocation South of Lichfield (SH1) only. It is noted that further mitigation and compensatory improvements are to be considered and included in the more detailed site policies for all of the proposed allocations (to be removed from the Green Belt) within the next iteration of the plan. We would welcome the opportunity to explore the potential for such compensatory improvements at our Client's site, recognising that the Commissioners also have wider landholdings within the vicinity of the Bleak House site that lie within the Green Belt.

LPPO452	St Modwen Industrial & Logistics	RPS - J, Bonehill	<p>RPS note the findings of the Cannock Chase Green Belt Harm Assessment February 2021 (the 2021 LUC Assessment). However, we strongly disagree with the inclusion of the site within OA14 for a number of reasons as set out in the Site Specific Green Belt Assessment (the Assessment) for the Site included as Appendix C. The Assessment has generally been undertaken in accordance with the methodology of the 2020 LUC assessment to aid the comparison of the results between the two. We have also drawn upon the findings of the Cannock Chase Green Belt Study (the 2016 LUC Assessment) as this did assess the undeveloped part of the Site in detail as part of a wider parcel. It should be noted that while we have followed the methodology of the 2021 LUC Assessment that this should not be interpreted as RPS endorsing this approach. In particular as noted in the Assessment there are aspects of the approach taken in the LUC 2021 Assessment which are inconsistent with RPS's considerable experience of Green Belt Assessments undertaken elsewhere. We also note that while this methodology has been utilised by LUC in undertaking assessments for other Local Authorities, we are not aware that this particular approach has yet been subject to examination and found as being robust. Distinction: As set out in paragraphs 3.2 to 3.8 of Appendix C RPS disagree that the features identified for parcel BW1 amount to a strong distinction from the urban area. In particular we note that linear tree cover is given as an example of a moderate boundary feature on page 53 of the 2021 LUC Assessment. We also note that washed-over development to the north and south of the parcel contribute to containment which reduces distinction as per paragraph 3.78 of the assessment. In relation to views paragraph 3.76 of the 2021 LUC Assessment states that caution should be used when considering views, on the basis that seasonal variations and boundary maintenance regimes can have a significant impact. Given this we question the degree to which the hedgerow structure within the parcel prevents views of the urban area and washed over development during the winter. Given the points above RPS consider that parcel BW1 to only be of moderate distinction between the parcel and urban area. Accordingly, parcels beyond this including the Site should not be considered as outer areas and should be subject to more detailed site specific assessment than was undertaken as part of the 2021 LUC Green Belt Assessment. Inspector's Letter to Welwyn Hatfield BC Dec 2019: Paragraphs 3.9 to 3.15 of Appendix C set out our concerns that the 2021 LUC Assessment does not follow the guidance set out in the Inspector's letter to Welwyn Hatfield BC (Dec 2017), despite referring to it. In summary we consider the assessment of outer areas to be subject to the same criticism that the Inspector raised of the phase 1 Welwyn Hatfield Green Belt Review, which is that the strategic assessment of large parcels cannot necessarily be relied upon to apply to smaller areas within large parcels. This indicates that the assessment of OA14, which was strategic in nature, should not be relied upon when considering the potential harm to the Green Belt of the release of the Site. Furthermore, RPS content that LUC have misinterpreted the Inspector's comments on the phase 2 Green Belt Review.</p>
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		<p>In particular we consider that the LUC 2021 Assessment, like the Welwyn Hatfield phase 2 Green Belt Review which the Inspector was commenting on, has failed to examine all of the potential development sites adjacent to the urban areas. We suggest that this is a result of LUC misinterpreting the meaning of urban areas to mean inset areas, rather than also considering urban areas that are currently washed over by the Green Belt, such as Watling Street Business Park. This is a fundamental point of principle. We also content that LUC appear to have interpreted this as meaning immediately adjacent when considering distinction. This would mean only development parcels separated from urban areas would be assessed. This would exclude parcels separated from urban areas by any features such as woodland, rivers, roads etc. which would be contrary to established practice. Furthermore, this is inconsistent with how adjacent is defined by paragraph 3.93 of the 2021 LUC Assessment which defines adjacent Green Belt land as the land that lies net to and/or in close proximity to land/parcels being assessed for potential release. This is contradictory to the approach taken to distinction wherein the 2021 LUC Assessment has used the presence of a parcel that they have assessed as being strongly distinct to mean that all parcels beyond this should not be assessed as more than a high level as an outer area. Parcels such as the Site can still be in close proximity to the urban areas while not being immediately next to said urban areas. As such RPS consider that the approach taken by LUC in the 2020 LUC Assessment does not reflect the approach advocated by the Inspector's Letter to Welwyn Hatfield BC (Dec 2017). RPS contend that to be in accordance with this approach the assessment should consider all potential development sites adjacent to urban areas, such as the Site. Site specific Green Belt Assessment: In undertaking the Assessment for the Site (Appendix C) we have subdivided the Site into two parcels based on clear differences in terms of land use and the presence of boundary features consistent with the approach taken in the LUC 2021 Assessment. The following sections summarise the findings for these two parcels. Business Park Parcel: [See Fig.1 in document] In coming to a conclusion on the assessment of harm of releasing the Business Park Parcel from the Green Belt the Assessment notes that all parcels considered by the 2021 LUC Assessment were considered to make a strong contribution to Purpose 5. Although it is not expressly stated in the 2021 LUC Assessment it is clear that the contribution made to Purpose 5 has not informed the final assessment of harm for the potential release of individual parcels. This is because the potential release of a number of parcels have been assessed as only resulting in levels of harm at the level of moderate - low harm which can only be achieved by the loss of a contribution assessed as being moderate or lower. RPS consider the Business Park Parcel to make no contributions to Purposes 1 to 4 of the Green Belt. Its release would constitute a negligible impact on adjacent Green Belt land therefore the level of harm that would be caused by its release is very low harm, as per the benchmarks set out on pages 79 to 80 of the 2021 LUC Assessment. It is considered that the Business Park Parcel makes a strong contribution to Purpose 5 and this is included in the assessment of harm, which is contrary to the</p>
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			<p>approach taken for a number of other sites, then at most the release of the Business Park Parcel would result in moderate harm. [See Table 4.1 in the document]. Expansion Land Parcel: [see Fig 4.2 in document]: As set out above in coming to a conclusion on the assessment of harm of releasing the Expansion Land Parcel from the Green Belt the Assessment notes that all parcels considered by the 2021 LUC Assessment were considered to make a strong contribution to Purpose 5.</p>
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			<p>Although it is not expressly stated in the 2021 LUC Assessment it is clear that the contribution made to Purpose 5 has not informed the final assessment of harm for the potential release of individual parcels. This is because the potential release of a number of parcels has been assessed as only resulting in levels of harm at the level of moderate - low harm which can only be achieved by the loss of a contribution assessed as being moderate or lower. RPS consider the Expansion Land Parcel to make a relatively weak contributions to Purpose 3 and no contribution to purposes 1, 2, and 4 of the Green Belt. Its release would constitute a negligible impact on adjacent Green Belt land therefore the level of harm that would be caused by its release is very low harm, as per the benchmarks set out on pages 79 to 80 of the 2021 LUC Assessment. As noted above RPS consider the Expansion Land Parcel to only make a weak contribution to Purpose 5. If Purpose 5 is considered as part of the assessment of harm then this would still result in an overall assessment of very low harm. It is considered that the Expansion Land Parcel makes a strong contribution to Purpose 5 and this is included in the assessment of harm, which is contrary to the approach taken for a number of other sites, then at most the release of the release of the Expansion Land Parcel would result in moderate harm. [See Table 4.2 in the document].</p> <p>Conclusions: The Assessment undertaken by RPS of the level of harm of the release of both the Business Park Parcel and Expansion Land Parcel would be very low harm. As such RPS consider that, in conjunction with the exceptional circumstances associated with the need to allocate sufficient employment land, the Site should be released from the Green Belt through the Cannock Chase Local Plan. RPS note that the Business Park Parcel makes no contribution to Purposes 1 to 4 of the Green Belt and only a very weak contribution to Purpose 5. On this basis even if the Expansion Land Parcel were not released from the Green Belt there is a compelling case to release the Business Park Parcel. RPS also note that site NE5 Turf Field is proposed for release from the Green Belt for development, although surrounding Green Belt land is not proposed for release. This would result in it forming an isolated employment development inset from the Green Belt. RPS consider that this provides further justification for the release of the already developed Business Park Parcel from the Green Belt.</p>
			S07.7: Amendments to the Green Belt
			Question 46: Do you support the preferred policy direction to amendments to the Green Belt?

LPPO453	Holford Farm Partnership - P, Holford	Hawksmoor - T, Bathurst	My clients fully support the removal of employment Land Site E10 from the Green Belt to enable it to come forward for development. Given the site's boundaries are closely formed by the A5 Watling Street, the M6 Toll Motorway, the B4154 Walsall Road and the Toby Carvery premises it contributes little in respect of the five Green Belt purposes cited at para.134 of the NPPF, namely the checking of the unrestricted sprawl of large built-up areas and prevention of neighbouring towns from merging into one another. Further to the above, my clients would also support further amendments to the Green Belt to provide for additional employment land supply to assist in meeting the potential shortfall from surrounding Black Country authorities, particularly in regard to the land at Jubilee Field, Watling Street.
LPPO454	West Midlands Housing Association Planning Consortium	Tetlow King Planning - L, Stoate	We support the Council's proposals to amend the Green Belt boundary through a formal review of the local plan policies or through a Neighbourhood plan, as permitted by the NPPF, in order to accommodate the growth requirements of the District. The NPPF states at paragraph 136 that Green Belt boundaries can be altered where exceptional circumstances are fully evidenced and justified. We understand that the Council has produced the Cannock Chase Green Belt Harm Assessment (2020), a detailed Green Belt study that was undertaken to inform the preparation of the Plan, and that a further Green Belt Part 2 Assessment study will also feed into the further development of Local Plan policy. We are pleased to see that the Council has approached the topic of the Green Belt with a balanced and objective perspective. While the Council recognise the important role of the Green Belt, it has also realised its restrictive characteristics when it comes to development. The Local Plan is to provide for a minimum of 5,516 dwellings to meet local housing needs, and an additional 500 dwellings to meet unmet needs of neighbouring areas. As mentioned in the preferred options document, 60% of the District is designated Green Belt. This presents a significant barrier with regard to identifying suitable sites for the delivery of much needed housing development in the authority area. Amending the Green Belt will help to ensure that a sufficient supply of deliverable and developable land is available.
LPPO455	Brindley Heath Parish Council		Too much of the Green Belt has already been developed and the Council must ask itself just how much more they are prepared to lose before there is no longer such a barrier. This is becoming a major problem in the West Midlands with Lichfield now only a field away from Shenstone and Cannock now joined to South Staffs, Walsall and thus Birmingham.
LPPO456	Severn Trent		Following comments above to question 45 we strongly discourage new development on the green belt should it entail disposing of surface water to the combined or foul sewerage network. Every opportunity to ensure greenbelt developments are to an exemplar environmental standard should be made. We recognise that the plan looks to offset and compensate any impact which we strongly support. Reiterating our comments to previous questions we wish to approachable for any collaboration projects involving green infrastructure and or biodiversity net gain.

LPPO457	Home Builders Federation - S, Green		<p>The HBF agree that as set out in Policy SO7.7, there is a need to amend Green Belt boundaries to accommodate growth in the District. As set out in 2019 NPPF, where fully evidenced and justified Green Belt boundaries can be altered in "exceptional circumstances" through the preparation or updating of Local Plans (para 136 & 137). The HBF would not wish to comment on the 7 sites selected for release from the Green Belt. The preferred policy approach does not demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period by the identification of 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 as set out in the 2019 NPPF (para 139c & 139e). The Council proposes that if required, further changes to the Green Belt boundary will be made through a formal review of the Local Plan policies, or through a Neighbourhood Plan, which potentially undermines the permanence of these boundaries in the long-term contrary to national policy.</p>
LPPO458	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	<p>The policy indicates that further amendments to the Green Belt could be required in the future and this would be achieved through another review of the Local Plan or through a neighbourhood plan. The NPPF establishes that Green Belt boundaries should only be altered in exceptional circumstances and that wherever a need for change to Green Belt boundaries has been established through strategic policies, detailed amendment to those boundaries may be made through non-strategic policies including neighbourhood plans. Reference has been made in these representations that there may be need for additional Green Belt boundary revision to accommodate the levels of growth commensurate with the District's position in the HMA and to meet enhanced levels of housing provision associated with additional growth in employment, should the aspirational strategies set out by the LEPs and the District Council's own employment strategy be fulfilled. On this basis Policy SO7.7 should include a strategic component to demonstrate that in certain key locations associated with the most sustainable settlements Green Belt, boundaries can be amended to allow for additional growth, such as at Brereton. In addition further consideration should be given to the Council's economic and employment objectives and whether further Green Belt release should be required to facilitate these aspirations. This could include land associated with the Lakeside employment area.</p>

LPPO459	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The policy indicates that further amendments to the Green Belt could be required in the future and this would be achieved through another review of the Local Plan or through a neighbourhood plan. The NPPF establishes that Green Belt boundaries should only be altered in exceptional circumstances and that wherever a need for change to Green Belt boundaries has been established through strategic policies, detailed amendment to those boundaries may be made through non-strategic policies including neighbourhood plans. Reference has been made in these representations that there may be need for additional Green Belt boundary revision to accommodate the levels of growth commensurate with the District's position in the HMA and to meet enhanced levels of housing provision associated with additional growth in employment, should the aspirational strategies set out by the LEPs and the District Council's own employment strategy be fulfilled. On this basis Policy SO7.7 should include a strategic component to demonstrate that in certain key locations associated with the most sustainable settlements Green Belt, boundaries can be amended to allow for additional growth, such as at Brereton. In addition further consideration should be given to the Council's economic and employment objectives and whether further Green Belt release should be required to facilitate these aspirations. This could include land associated with the Lakeside employment area.
LPPO460	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The policy indicates that further amendments to the Green Belt could be required in the future and this would be achieved through another review of the Local Plan or through a neighbourhood plan. The NPPF establishes that Green Belt boundaries should only be altered in exceptional circumstances and that wherever a need for change to Green Belt boundaries has been established through strategic policies, detailed amendment to those boundaries may be made through non-strategic policies including neighbourhood plans. Reference has been made in these representations that there may be need for additional Green Belt boundary revision to accommodate the levels of growth commensurate with the District's position in the HMA and to meet enhanced levels of housing provision associated with additional growth in employment, should the aspirational strategies set out by the LEPs and the District Council's own employment strategy be fulfilled. On this basis Policy SO7.7 should include a strategic component to demonstrate that in certain key locations associated with the most sustainable settlements Green Belt, boundaries can be amended to allow for additional growth, such as at Brereton. In addition further consideration should be given to the Council's economic and employment objectives and whether further Green Belt release should be required to facilitate these aspirations. This could include land associated with the Lakeside employment area.

LPPO461	Friel Homes Ltd	CT Planning - P, Kreuser	<p>[...]. Support the deletion of the site (SH4) from the Green Belt and the allocation of the site as Strategic Housing Allocation SH4 for some 33 dwellings at Policy SO3.1. Land South of Armitage Lane is well located in size and scale to the existing built form of Brereton/Rugeley. The site is contained by existing urban development and infrastructure. The site can come forward as a discrete development without encroachment on the wider countryside/Green Belt. The site evidently forms a stronger relationship with the urban area than it does with the wider Green Belt. The presence of the A51 and A460 in effect act as clearly defined boundaries, preventing the urban sprawl of Rugeley eastwards and any potential merging with Armitage and Upper Longdon. Land South of Armitage Lane can come forward for development whilst retaining the majority gap between settlements, and safeguarding the countryside from encroachment. The release of Land South of Armitage Lane would therefore adversely impact on the 5 purposes of including land in the Green Belt. The proximity of the A51 and the A460 to the site clearly comprises those physical features that area readily recognisable and permanent which are required to clearly define a new Green Belt boundary in this location, as set out at paragraph 139 of the NPPF. There is no necessity to keep Land at Armitage Lane permanently open; it does not contribute strongly to the function of the Green Belt in this location. This is confirmed in the Green Belt Study Report 2021 prepared by Land Use Consultants as part of the Evidence Base to the Local Plan Preferred Options. Land South of Armitage Lane forms the majority part of the study parcel RU40. [...]. The NPPF at paragraph 138 and Local Plan Preferred Policy SO7.7 require the impact of the loss of Green Belt land to be off-set through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. In this location SH4 is relatively small site which as a consequence of its topography requires careful consideration when designing a layout. Limited opportunities exist to provide for any large scale compensatory improvements on any remaining Green Belt land. In this location where the site SH4 is small and is constrained to the west by Hob Hill Primary School and to the east by the A51, there is little opportunity available to Friel Homes to provide compensatory improvements to any remaining nearby Green Belt land. This position is recognised in the LUC Report which states on this site RU40 [...]. However, enhancements appropriate to the size of the site would be provided on-site in terms of maximising biodiversity, access and sustainable design to assist in achieving the Local Plan's aims for a greener future.</p>
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LPPO462	The Church Commissioners for England	Barton Willmore - A, Bird	<p>Whilst we support the principle of Green Belt release within the District and consider this is justified in terms of 'exceptional circumstances' (as per the NPPF paragraphs 136-137) we do not fully support the preferred policy direction. We consider that further evidence should be provided to demonstrate the proposed amendments in terms of the individual site allocations are justified. We also consider further amendments to the Green Belt are necessary in order for the draft Plan to be justified, effective and consistent with national planning policy. In terms of individual site allocations within the Green Belt, we note that the draft Plan is not accompanied by an specific documentation related to the site selection methodology and how the proposed allocations have been selected. The Integrated Impact Assessment (Sustainability Appraisal) (at paragraph 2.32) refers to the use of the site selection methodology contained within the previous Issues and Options Local Plan (2019). The Issues and Options Local Plan proposed the use of a 'RAG' site assessment matrix, however no further documentation detailing how sites have been selected or rejected for allocation has been made available as part of the consultation, and there is no commentary within the supporting Sustainability Appraisal with regards to why individual sites have been selected or rejected for allocation. Without this it is difficult to judge how justified the preferred site allocations are and how they have been considered objectively against other site options, particularly in the case of sites which do not currently benefit from planning permission and are currently within the Green Belt. For instance, within the Green Belt Part 2 Assessment (February 2021) we note that the potential release of our Client's site (covered by parcels WI2 - WI19) from the Green Belt is assessed as having a range of 'very high' to 'moderate' harm to the Green Belt purposes. For the largest Green Belt preferred site allocation of SH1: South of Lichfield Road (parcels WI21-W123, CA3 and CA5) the level of harm for all pf the parcels is largely 'high', with one parcel of 'moderate' harm identified. We comment further on the appropriateness of the Council's assessment in relation to Bleak House below and within Section 4 of the Vision Document (Appendix 2) noting that the update contribution ratings (which inform the assessment of harm) are considered excessive and that the piecemeal assessment of individual parcels does not reflect the strategically master planned nature of the Site overall. As per the High Court judgement (Comptom Parish Council & Ors v Buildford Borough Council & Anor [2019] EWHC 3242 (Admin) (04 December 2019)) in relation to the Guildford Local Plan (2019) the case for exceptional circumstances for individual sites can take into account the degree of impact upon the Green Belt alongside sustainable development considerations (our emphasis). In terms of these wider sustainable development considerations, we note that our Client's site (site reference C264, and individual parcels of C264 (a-e)) scores the same as the largest Green Belt preferred site allocation of SH1: South of Lichfield Road, Cannock (which contains parcels site reference C116(a), C489 and C352) for the majority of the SA Objectives within the Sustainability Appraisal. Our Client's Site scores slightly less favourably in terms SA Objective 1: Biodiversity and Geodiversity due to proximity to the SSSI the north; SA Objective 6</p>
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			Landscape and Townscape due to its closer proximity to the AONB to the north; and SA Objective 8 Transport due to proximity to existing public transport services.
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		<p>However, site allocation SH1 scores less favourably than our Client's site in relation to SA Objective 17 Historic Environment due to the proximity of heritage assets. In relation to SA Objectives SA1 Biodiversity and Geodiversity and Objective 6 Landscape and Townscape, the negative scores for our Client's site are associated with purely distance measurements to the nearest designated sites (SSSI and AONB respectively) which do not necessarily take into account the individual characteristics of the site and the nature of the proposed development. The nearby preferred site allocation of SH2: East of Wimblebury Road also scores similarly to our Client's site due to distance from a SSSI, suggesting that the Council considers such effects can be satisfactorily mitigated. We would note that the Sustainability Appraisal assessment of site options does not take into account mitigation measures which can address the negative affects identified (as stated at paragraphs 4.5 - 4.6 of the Sustainability Appraisals) e.g. the provision of additional and improved public transport connections. Where mitigation measures are available to address issues identified these should be considered as part of the site allocation selection process. As identified within the Vision Document (Appendix 2) we consider that once the nature of the proposed development, including a comprehensive landscaping framework, is taken into account a fuller picture of the sustainability credentials of our Client's site is apparent. Policy SO7.7 'Amendments to the Green Belt' recognises that the proposed site allocations are likely to require mitigation measures stating that 'suitable mitigation and detailed boundaries will be identified in further stages of the plan in detailed site-specific policies and master plans.' However, as outline above without this detail and transparency on the decision-making process which has informed the site allocations it is difficult to assess whether they are fully justified. We also note that the draft allocations and their supporting policies will be the subject of further detailed work, particularly related to transport and viability assessments. This forthcoming evidence base work should consider all the reasonable alternative sites that have been considered for future development to date (including our Client's site) so that fully informed judgements can be made on the preferred site allocations based on the complete evidence base. Overall the basis of the evidence provided alongside the draft plan to date the reasoning for the selection of the preferred site allocations is not fully clear and transparent in terms of why these have been selected and other sites have been rejected. Further evidence in this regard should be provided to ensure the draft Plan is fully justified, as per the NPPF paragraph 35b. In our comments on the Visions and Objectives above, we noted that the draft Plan does not provide for development beyond the plan period. In line with the NPPF (paragraph 139(e)) the draft Plan should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period. In view of the geography of the District (where 60% is designated Green Belt) it is considered unrealistic to assume that further Green Belt release will not be necessary beyond the plan period. This is also relevant given the level of flexibility in the housing land supply currently identified (see our response to Questions 10., 11 and 13). The draft Plan should therefore also seek to identify</p>
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			safeguarded land in the context of ensuring longer-term development needs are met and that the Green Belt boundaries will not need to be altered at the end of the plan period.
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		<p>This safeguarded land in the context of ensuring longer-term development needs are met and that the Green Belt boundaries will not need to be altered at the end of the plan period. This safeguarded land should be identified in accordance with the spatial strategy. In the local context of 40% of the District being designated as an AONB (with the majority of this also lying within the Green Belt) and areas of the Green Belt also being covered by other designations (such as SACs and SSSIs) the availability of Green Belt sites which offer sustainable locations for development, free of significant landscape or environmental constraints is limited. We consider that our Client's site at Bleak House would represent a suitable site for a residential allocation (within and beyond the Plan Period) which can align with the spatial strategy for identifying sustainable extensions to the main urban area of Cannock/Hednesford/Heath Hayes. It is free from statutory and local designations, once the Green Belt boundary is amended and could assist the District in meeting its own and the wider GBBCHMA housing needs. The absence of any 'significant' constraints to the development of the site [see footnote 2] other than its Green Belt designation is reflected in the SHLAA commentary for the site (SHLAA Reference C264). Barton Willmore Landscape have undertaken a Landscape and Visual Appraisal and Green Belt Review (LVAGBR - enclosed at Appendix 3) of Bleak House to assess the site's contribution to the purposes of the Green Belt and any harm that may arise from future development of the site. The Vision Document (section 4) enclosed at Appendix 2 provides an update to the Green Belt review element of this work, reflecting the Council's updated evidence (Cannock Chase Green Belt Harm Assessment, prepared by LUC, February 2021). As detailed within the Vision Document (Section 4) the Green Belt Review has found that residential-led development at Bleak House, whilst resulting in loss of openness, would result in a limited perceived loss of countryside. This would only be perceived from the immediate vicinity due to the elevated landform and vegetation containing the Site which physically and visually separate its extent from the wider countryside and associate it closely with the existing urban area. Our review also identifies how the most recent Council assessment considers the parcels of land individually, rather than as a whole which would more accurately reflect the strategically and comprehensively master planned development of the site. As a result, the rating scores of the contribution to Green Belt purposes, and by consequence the degree of harm, are considered excessive for Bleak House. In terms of mitigating harm to the Green Belt, our review (as detailed at Section 4 of the Vision Document) identifies a series of measures that have the potential to be incorporated into the strategic design of the development, including tree planting, landscaping, density, building design and location, and improving access to open spaces and PRow. As a result of these mitigating factors, it is considered that there is potential for harm resulting from the release of the land from the Green Belt for development to be minimised.</p>
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		<p>As detailed within the Vision Document (Section 5) the Landscape and Visual Appraisal identified that Bleak House has medium landscape sensitivity and medium visual sensitivity which is influenced by the scale of existing residential development surrounding the site. It also identifies the potential of the site to successfully accommodate residential development set within a new robust landscape framework, due to its proximity to existing dwellings; exhibiting flatter landform contained by existing vegetation; and surrounding rising landform and the established defined edge of the disused railway line. paragraph 138 of the NPPF advises that sustainable patterns of development should be taken into account when drawing up or reviewing Green Belt boundaries and that first consideration should be given to land which has been previously development and/or is well-served by public transport. Bleak House is in a sustainable location and is well-served by public transport (with the potential to enhance these connections) as demonstrated in our appended Vision Document. In addition, Bleak House adjoins the largest urban area within the District (Cannock/Hednesford/Heath Hayes), which provides the largest range of facilities and services available for future residents to access. The range of facilities and services include two town centres at Cannock and Hednesford, a number of local centres (including nearby Heath Hayes local centre) offering further shopping and service provision such as leisure centres and schools. In promoting sustainable patterns of development, it is recognised that the housing needs of the District, like the other authorities within the GBBCHMA, should ideally be met as close to the source if those needs as possible. In coming to conclusions on the 'Recommended Areas of Search for Strategic Development', paragraph 9.70 of the Greater Birmingham HMA Strategic Growth Study (2018) outlines that the geographic relationship of the conurbation and distance of locations from this is an important consideration in assessing whether areas of search would have the ability to meet the unmet housing needs of the HMA. The location of Bleak House, adjacent the urban area of Cannock can contribute to both the local housing need and that of the GBBCHMA. paragraph 72 of the NPPF states that: [...]. It is considered that a sustainable urban extension at Bleak House is the most appropriate and sustainable proposition, considering the constrained nature of the District. As seen from the Vision Document, the proposal seeks to deliver residential development alongside a new primary school. a new local centre, shops and community services. This holistic approach supports the necessary infrastructure and facilities required for residential dwellings and in so doing, accords with paragraph 72 of the NPPF. Development of Bleak House will also deliver several benefits to the local community through the provision of green spaces an equipped play area, pedestrian and cycle links connecting neighbouring areas, substantial tree planting and heathland creation, increased recreation and access via new green infrastructure and improved habitat connectivity. Our development proposals demonstrate how Bleak House will be contained by hedgerows and the existing PRoW and track along the southern boundary, which offer permanence and a defensible boundary. It is important to note that future development of Bleak House will retain a significant spatial gap. It is</p>
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			<p>important to note that future development of Bleak House will retain a significant spatial gap between the existing settlements of Burntwood and Cannock/Hednesford/Heath Hayes. The Site Plan and Vision Document show that Bleak House is made up of five parcels of land and the Phasing Plan (at Figure 7) shows the four phases, which have the ability to deliver within the early part of the Plan period and be completed before the end of the Plan period. As shown on Figure 5: Concept Plan of the Vision Document, the Commissioners own additional land immediately north of Parcel 1A and west of Parcels 1B and 1C, which can be included as part of any allocation going forward.</p>
			S07.8: Protecting, Conserving and Enhancing the Green Space Network
			Question 47: Do you support the preferred policy direction to the Green Space Network?

LPPO463	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We support policy option SO7.8 in respect of the Green Space Network, particularly in respect of the restored Hatherton Canal and its towpath.
LPPO464	Canal & River Trust - H, Smith		As requested for inclusion within the Environment Section of the District Context we note that within this policy canals are referred to as Blue-Green Infrastructure. The Trust appreciate that this policy provides the necessary scope for works of repair to the network which may not be possible within the more restrictive Green Space Network Sites. It is important that policies do not restrict vital development that can be required to allow for safe navigation or water management along our network; giving suitable flexibility to allow for works to be designed that mitigate against any risk to biodiversity or water quality, whilst providing for the positive role our network can play as a resource for leisure, recreation, wellbeing and economic regeneration.
LPPO465	Together Active - J, Brennan		Yes, welcome this.
LPPO466	Natural England- G, Driver		We note that some development may be permitted in the green space network, we would advise that any development proposals that either directly or indirectly impact on a SSSI should be refused and that impacts on priority habitats should be avoided.
LPPO467	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates largely supports the strategy to provide for open space within the District however elements of the policy are not consistent with national policy and could hinder development opportunities. In particular, the policy suggests as a principle that new homes should contribute to the delivery of sports, physical activity and leisure. This blanket requirement is not supported in national policy where development proposals should only contribute towards improvements to green infrastructure and other sports related facilities if there is a lack of capacity to adequately cater for the demand resulting from the proposed development. The policy requires amendment to make clear that such contributions would only be necessary where justified and will be proportionate and reasonable in all respects. In addition, there may be occasions when development proposals are in locations some distance from the nearest part of the Green Space Network. In such circumstances contributions towards enhancements of a facility which would be a significant distance from the nearest part of the Green Space Network. In such circumstances contributions towards enhancements of a facility which would be a significant distance away from the development site, may be deemed to lack the direct relationship with the development proposed and therefore would fail the requirements of the CIL Regulations. Finally, the suggestion that new homes should contribute towards the delivery of sports, physical activity and leisure does not directly relate to the Green Space Network, as these elements could be indoor facilities. This requirement should be amended to make clear what contributions have been sought and the necessary caveats to them.

LPPO468	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates largely supports the strategy to provide for open space within the District however elements of the policy are not consistent with national policy and could hinder development opportunities. In particular, the policy suggests as a principle that new homes should contribute to the delivery of sports, physical activity and leisure. This blanket requirement is not supported in national policy where development proposals should only contribute towards improvements to green infrastructure and other sports related facilities if there is a lack of capacity to adequately cater for the demand resulting from the proposed development. The policy requires amendment to make clear that such contributions would only be necessary where justified and will be proportionate and reasonable in all respects. In addition, there may be occasions when development proposals are in locations some distance from the nearest part of the Green Space Network. In such circumstances contributions towards enhancements of a facility which would be a significant distance from the nearest part of the Green Space Network. In such circumstances contributions towards enhancements of a facility which would be a significant distance away from the development site, may be deemed to lack the direct relationship with the development proposed and therefore would fail the requirements of the CIL Regulations. Finally, the suggestion that new homes should contribute towards the delivery of sports, physical activity and leisure does not directly relate to the Green Space Network, as these elements could be indoor facilities. This requirement should be amended to make clear what contributions have been sought and the necessary caveats to them.
LPPO469	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates largely supports the strategy to provide for open space within the District however elements of the policy are not consistent with national policy and could hinder development opportunities. In particular, the policy suggests as a principle that new homes should contribute to the delivery of sports, physical activity and leisure. This blanket requirement is not supported in national policy where development proposals should only contribute towards improvements to green infrastructure and other sports related facilities if there is a lack of capacity to adequately cater for the demand resulting from the proposed development. The policy requires amendment to make clear that such contributions would only be necessary where justified and will be proportionate and reasonable in all respects. In addition, there may be occasions when development proposals are in locations some distance from the nearest part of the Green Space Network. In such circumstances contributions towards enhancements of a facility which would be a significant distance from the nearest part of the Green Space Network. In such circumstances contributions towards enhancements of a facility which would be a significant distance away from the development site, may be deemed to lack the direct relationship with the development proposed and therefore would fail the requirements of the CIL Regulations. Finally, the suggestion that new homes should contribute towards the delivery of sports, physical activity and leisure does not directly relate to the Green Space Network, as these elements could be indoor facilities.

			This requirement should be amended to make clear what contributions have been sought and the necessary caveats to them.
LPPO470	Staffordshire County Council - J, Chadwick		SCC supports the integration of both cycling and walking within the Green Space Network. At the last Local Plan consultation we advise that there is an existing shortage of lorry parking in Staffordshire as identified by DfT National Survey of Lorry Parking 2017, with existing facilities concentrated around the A5 and M6. The West Midlands region also has critically high usage of lorry parking facilities, but we note none are propose din the Plan. In addition we recommended that any new development that would increase road-based freight should consider where vehicles will park overnight and provide suitable facilities to accommodate deliveries and distribution vehicles. However, no such provision has been made in the Plan for promoters of such sites to consider this issue.
			SO8.1: Low and Zero Carbon Energy and Heat Production
			Question 48: Do you support the preferred policy direction to low and zero carbon energy and heat production?
LPPO471	G, Green		The processing of water to the standard of drinking water takes a lot of energy. New buildings should be required to have rainwater flushing of toilets.
LPPO472	Historic England - E, Boden		Historic England supports the policy direction in seeking to achieve low and zero carbon emissions from energy generation and heat production. We welcome the reference to the requirement for the assessment of impacts on heritage assets and suggest that this should also reference the setting of heritage assets. We refer you to Historic England's Advice Note 15 (Feb 2021): Commercial Renewable Energy Development and the Historic Environment.

LPPO473	Canal & River Trust - H, Smith		The Trust wish to highlight the potential of the canal for heating & cooling for district heat network or individual schemes such as at allocated sites. The water flowing through our waterways contains enough thermal energy to produce approximately 640 MW of energy. Our waterway network is included in the National Heat Map produced by the Department of Energy & Climate Change (now Department for Business, Energy & Industrial Strategy). It provides an overview of the opportunity that exists across the country. We consider that heating and cooling schemes can be delivered without any adverse impact on biodiversity. As a low-cost energy source, utilising the heat from the canal could help with building resilience with other low carbon technologies such as CHP (combined heat and power) plants. If an energy centre is proposed, then utilising heat pump technology could supply building such as civic, educational or health care facilities where heat load demands are high. We believe that the Local Plan should include reference to the potential of the canal network and other waterbodies to contribute to low carbon technologies.
LPPO474	Natural England- G, Driver		We support and note the Council's ambition to be net zero carbon by 2030 and that this is reflected in the policies in the preferred options. A more robust response to climate change is to also look at ways to adapt and mitigate for the consequences of climate change. We note in the evidence base reports by Staffordshire County Council on Climate Change Adaptation & Mitigation and the Staffordshire Wildlife Trust Cannock Chase District Nature Recovery Network Mapping report and welcome this work. Natural England has been working on developing resources to help with climate change adaption and mitigation.
LPPO475	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates have no objection to the policy approach, but it should be noted that whilst the supporting text refers to the County Council's proposal to adopt a presumption in favour of low and zero carbon technologies, the policy introduces a number of tests which would potentially inhibit the delivery of such renewable energy facilities.
LPPO476	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates have no objection to the policy approach, but it should be noted that whilst the supporting text refers to the County Council's proposal to adopt a presumption in favour of low and zero carbon technologies, the policy introduces a number of tests which would potentially inhibit the delivery of such renewable energy facilities.
LPPO477	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates have no objection to the policy approach, but it should be noted that whilst the supporting text refers to the County Council's proposal to adopt a presumption in favour of low and zero carbon technologies, the policy introduces a number of tests which would potentially inhibit the delivery of such renewable energy facilities.
SO8.2: Achieving Net Zero Carbon Development			
Question 49: Do you support the preferred policy direction to achieve net-zero carbon development?			

LPPO478	Historic England - E, Boden		Policy SO8.2 and SO8.3: Historic England supports these policy directions and is committed to the achievement of net zero carbon emissions from development. We recommend that a sustainable approach to climate change mitigation measures should aim to secure a balance between the benefits such development delivers and the environmental costs it incurs. The policies should seek to limit and mitigate any such cost to the historic environment and when considering energy efficiency measures and the benefits of alternative options should be weighed against the impact upon historic assets and their setting. Historic England have produced a list of technical guidance on energy efficiency and sustainable design, including research reports which could form a useful part of the plan's evidence base. These can be found in our publication directory.
LPPO479	West Midlands Housing Association Planning Consortium	Tetlow King Planning - L, Stoate	Mitigating and adapting to climate change is referred to by the NPPF in its key environmental objective to achieving sustainable development. It also mentions at paragraph 149 that plans should take a proactive approach to mitigating and adapting to climate change. The Council has announced its commitment to be carbon neutral by 2030, a goal that the HAPC fully supports. The HAPC recognises the critical role that housing associations each play in ensuring that residents have safe, secure and efficient homes that are future proof. Promoting sustainable development is the core objective of the plan system and it is important that all new developments continue to support this aim. We therefore support the Council's preferred policy direction for net-zero carbon development, although we ask that the Council be wary of the ways in which such policies could impact development viability which may restrict the provision of affordable housing in Cannock Chase.
LPPO480	Natural England- G, Driver		We support and note the Council's ambition to be net zero carbon by 2030 and that this is reflected in the policies in the preferred options. A more robust response to climate change is to also look at ways to adapt and mitigate for the consequences of climate change. We note in the evidence base reports by Staffordshire County Council on Climate Change Adaptation & Mitigation and the Staffordshire Wildlife Trust Cannock Chase District Nature Recovery Network Mapping report and welcome this work. Natural England has been working on developing resources to help with climate change adaption and mitigation.

LPPO481	Home Builders Federation - S, Green	<p>Under SO8.2, all development proposals should strive to achieve the highest level of building performance standards for energy use and achieve the lowest carbon emissions that can practically and viably be achieved. All major development proposals will deliver, in priority order: zero carbon emission development; low carbon emission development with on-site mitigation to achieve net-zero carbon emissions; low carbon emission development with off-site mitigation to achieve net-zero carbon emissions; low carbon emission development with compensatory contributions to an appropriate carbon offsetting fund to achieve net-zero carbon emissions. All major development proposals will include evidence in a sustainability Statement (part of the Design and Access Statement) that the development has achieved the lowest carbon emissions that can practically and viably be achieved. Today's new homes are already very energy efficient with lower heating bills for residents in comparison to older existing homes. Energy performance data has shown that 8 out of 10 new build buyer in England and Wales saves £442.32 every year on heating costs compared to owners of existing dwellings. Nevertheless, the HBF recognise the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. The Government Response to The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings dated January 2021 provides an implementation roadmap, the Government's aim is for the interim Part L , Part F & Overheating Regulations to be regulated for in late 2021 and to come into effect in 2022. The 2021 interim uplift will deliver homes that are expected to produce 31% less CO2 emissions compared to current standards. To ensure as many homes as possible are built in line with new energy efficiency standards. To ensure as many homes as possible are built in line with new energy efficiency standards, transitional arrangements will apply to individual homes rather than an entire development and the transitional period will be one year. This approach will support successful implementation of the 2021 interim uplift and the wider implementation timeline for the Future Homes Standard from 2025. The Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions that one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.</p>
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		<p>The HBF support the Government's approach to the Future Homes Standards but there are difficulties and risks to housing delivery given the immaturity of the supply chain for the production/installation of heat pumps and the additional load that would be placed on local electricity networks in combination with Government proposals for the installation of EVCPs in new homes (see HBF answer to Question 30 above). In autumn 2020, the HBF established a Future Homes Task Force to develop workable solutions for the delivery of the home building industry's contribution to meeting national environmental targets and objectives on Net Zero. Early collaborative work is focussed on tackling the challenges of implementing the 2021 and 2025 changes to Building Regulations successfully and as cost-effectively as possible, in particular providing information, advice and support for SME developers and putting the customer at the centre of our thinking. The HBF note that for the moment in its Response to the Future Homes Standard consultation, the Government has confirmed that the Planning and Energy Act 2008 will not be amended, therefore the Council will retain powers to set local energy efficiency standards for new homes. However, the Government's Planning for the Future White Paper sets out that a simpler planning process improves certainty. The Government acknowledge the need to clarify the role of LPAs in setting energy efficiency requirements for new homes that go beyond the mandatory standards set out in the Building Regulations. The Housing, Communities & Local Government Committee have opened a new inquiry into Local Government and the path to net zero. The aim of the inquiry is to scrutinise the Government's plans to make all new homes "zero carbon ready" by 2025, through the introduction of the Future Homes Standard, and to explore how Local Government can help the UK to reduce its carbon emissions to "net zero" by 2050. This inquiry is currently accepting evidence on what role should LPAs play in determining local energy efficiency standards? The deadline for submissions is the 30th April 2021. The HBF consider that the Council should comply with the Government's intention of setting standards for energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Councils should not need to set local energy efficiency standards in order to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes proposed in the 2020 Part L uplift and the Future Homes Standard 2025. There are significant additional costs associated with the Council's preferred policy approach, which should be fully accounted for in the Council's viability assessment. Government's estimated cost of £4,847 per dwelling set out in The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings. The Council's preferred policy approach will have higher additional costs, which should be viability tested.</p>
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LPPO482	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The policy as drafted seeks to achieve zero carbon emissions in all major developments. This goes beyond any requirement set out in the NPPF or any other relevant policy guidance. There is no evidence that this approach has been subject to any form of viability appraisal and it could be a significant overwhelming burden to the delivery of development aspirations also set out in the plan. There is limited, if any, evidential basis that the circumstances in Cannock Chase District require all new developments to be carbon zero. On this basis the policy is objected to and should be deleted.
LPPO483	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The policy as drafted seeks to achieve zero carbon emissions in all major developments. This goes beyond any requirement set out in the NPPF or any other relevant policy guidance. There is no evidence that this approach has been subject to any form of viability appraisal and it could be a significant overwhelming burden to the delivery of development aspirations also set out in the plan. There is limited, if any, evidential basis that the circumstances in Cannock Chase District require all new developments to be carbon zero. On this basis the policy is objected to and should be deleted.
LPPO484	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The policy as drafted seeks to achieve zero carbon emissions in all major developments. This goes beyond any requirement set out in the NPPF or any other relevant policy guidance. There is no evidence that this approach has been subject to any form of viability appraisal and it could be a significant overwhelming burden to the delivery of development aspirations also set out in the plan. There is limited, if any, evidential basis that the circumstances in Cannock Chase District require all new developments to be carbon zero. On this basis the policy is objected to and should be deleted.
LPPO485	ENGIE - D, Sager	Barton Willmore - J, Bonner	The draft policy sets out that all development proposals should strive to achieve the highest level of building performance standards for energy use and achieve the lowest carbon emissions that can practically and viably be achieved. The principle of the policy to address climate change via developments striving to achieve reduced carbon emissions is supported. Our client is keen to support the move towards low and zero carbon development. However in line with the NPPF (paragraph 34) and PPG ('Viability' Reference ID: 10-001-20190509 and 10-002-20190509) the requirements should be fully evidenced by supporting assessment work, including a Viability Assessment. The viability of achieving any standards that may be over and above Building Regulation requirements should be taken into consideration. This should also reflect the most up to date position in relation to Building Regulation requirements, which are the subject of a current consultation (The Future Homes Standard: changes to Part L and Part F of the Building Regulations for new dwellings (MHCLG, 2021)). In addition, the Council should not require all residential development proposals to meet or exceed the standards set out by the Home Quality Mark, or equivalent. This is because the Home Quality Mark is an example of a best practice guide and should not therefore become a statutory policy requirement through the adoption of the Local Plan. It is not reasonable or justified for residential development proposals to be required to

			meet or exceed these standards. We also consider that the requirements of SO8.2 and SO8.3 should not be required retrospectively for outline planning permissions that pre-date adoption of the draft Plan as the measures may affect deliverability.
LPPO486	The Church Commissioners for England	Barton Willmore - A, Bird	The principle of the policy to address climate change via developments striving to achieve reduced carbon emissions is supported. Nevertheless, in line with the NPPF (paragraph 34) and PPG ('Viability' see Paragraph 001 Reference ID: 10-001-20190509 and Paragraph 002 Reference ID: 10-002-20190509) the requirements should be fully evidence by supporting assessment work, including a Viability assessment. This should ensure the cumulative requirements of the draft Plan policies do not undermine the deliverability of the plan overall. We note that the draft Plan is not yet supported by an up-to-date Viability Assessment and therefore this policy should be kept under review in light of the emerging evidence base. In accordance with the PPG (paragraph: 010 Reference ID: 10-010-20180724) as part of the Viability Assessment the Council should look to engage with key stakeholders as part of the process, including developers and landowners.
			SO8.3: Sustainable Design
			Question 50: Do you support the preferred policy direction to secure Sustainable Design Development?
LPPO487	G, Green		The processing of water to the standard of drinking water takes a lot of energy. New buildings should be required to have rainwater flushing of toilets.
LPPO488	Together Active - J, Brennan		Yes, and particularly welcome "Protect, improve and enhance existing woodlands and habitats, and integrate new green and blue infrastructure with SuDS and pedestrian and cycle routes; and provide a contribution to the creation of urban forests, woodlands and street trees as an integral part of the development or as part of a linked off-site scheme."

LPPO489	Natural England- G, Driver		We support the policy direction with specific references to links to the natural environment with particular reference to the creation of urban forest, woodlands and street trees.
LPPO490	Home Builders Federation - S, Green		The HBF do not support the preferred policy direction set out in Policy SO8.3 (See HBF Answers to Questions 26, 30 and 49 above). Moreover, the Council should not require all residential development proposals to meet or exceed the standards set out by the Home Quality Mark, or equivalent. The Home Quality Mark has no status other than as an example of a best practice guide. The HBF is supportive of the use of best practice guidance however, the use of such guidance should remain voluntary rather than becoming a mandatory policy requirement, which would oblige developers to use this tool as a pre-condition for support from the Council. The reference to the Home Quality Mark in policy wording should not convey development plan status to a document, which has not been subject to the same process of preparation, consultation and Examination as the Local Plan. It is not reasonable or justified for residential development proposals to be required to meet or exceed these standards.
LPPO491	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The policy goes beyond any national or other relevant policy objective and is not supported by evidence. Reference to all development meeting the requirements of Policy SO8.2 is objected to. There is no evidence that the policy has been subject to any form of viability assessment to establish what impact it would have on potential development. As drafted the policy requires contributions which may not be justified such as providing contributions to the creation of urban forests, woodlands and street trees when a development may be providing elements on site. It includes reference to making effective use of previously developed land when not all sites will involve in previously developed land. As drafted the policy is unjustified, not supported by national or local policy and not supported by any evidence base.
LPPO492	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The policy goes beyond any national or other relevant policy objective and is not supported by evidence. Reference to all development meeting the requirements of Policy SO8.2 is objected to. There is no evidence that the policy has been subject to any form of viability assessment to establish what impact it would have on potential development. As drafted the policy requires contributions which may not be justified such as providing contributions to the creation of urban forests, woodlands and street trees when a development may be providing elements on site. It includes reference to making effective use of previously developed land when not all sites will involve in previously developed land. As drafted the policy is unjustified, not supported by national or local policy and not supported by any evidence base.

LPPO493	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The policy goes beyond any national or other relevant policy objective and is not supported by evidence. Reference to all development meeting the requirements of Policy SO8.2 is objected to. There is no evidence that the policy has been subject to any form of viability assessment to establish what impact it would have on potential development. As drafted the policy requires contributions which may not be justified such as providing contributions to the creation of urban forests, woodlands and street trees when a development may be providing elements on site. It includes reference to making effective use of previously developed land when not all sites will involve in previously developed land. As drafted the policy is unjustified, not supported by national or local policy and not supported by any evidence base.
LPPO494	Wyrley Estates	Fisher German LLP - N, Borseley	All future developments will be required to meet the requirements in Policy of achieving Net Zero development. Policy SO8.3 contains a number of aspirations to enable achievement of sustainable design. One of these is to make use of previously developed land, existing buildings, and infrastructure. The Grove Colliery site can help deliver an aspiration such as this, not only the brownfield element, but a redevelopment scheme could help to deliver a number of other policy aspirations to create sustainable design and help towards achieving Net Zero by 2050.
			SO8.4: Managing Flood Risk
			Question 51: Do you support the preferred policy direction to managing flood risk and water quality impacts?
LPPO495	G, Green		Management of flood risk must include firm planning or bylaws which prevent the excessive, or total paving of the front gardens of properties, and ensure the use of porous pavement wherever possible. I have seen new paving of the whole frontage of homes at a rate of almost one per week during the last few months.
LPPO496	Lichfield & Hatherton Canals Restoration Trust - L, Walker		We note policy option SO8.4 and would mention there may be opportunities for the restored Hatherton Canal to play a part in managing flood risk in the District.
LPPO497	Canal & River Trust - H, Smith		The policy refers to “integrating new green and blue infrastructure with sustainable drainage systems (SuDS)”, but does not reference the existing canal network and other water bodies. We wish to highlight the potential for SuDS surface water drainage disposal to the canal network which could also be referenced in revised Policies.
LPPO498	Natural England- G, Driver		We support the policy direction in respect of the creation of green and blue infrastructure and their role in supporting and enhancing ecological networks. Features that reduce flood risk should share possible link in to the existing ecological networks.

LPPO499	Severn Trent		We are supportive of policy SO8.4 however feel it could be improved. In line with our comments above to Question 35.27.29; ▪ The use of SuDS does not negate the importance of the drainage hierarchy. ▪ Sites allocated that have limited surface water disposal options should be accompanied with site specific policy to reduce their impact. ▪ Sites should ensure that they provide sufficient storage for runoff up to a 100-year rainfall event. ▪ Surface water discharge rates should be limited to greenfield runoff rate or lower. ▪ Brownfield redevelopment should look to provide betterment on surface water management to help provide resilience to the impact from future climate change.
LPPO500	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates have no further comment to make on this issue.
LPPO501	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates have no further comment to make on this issue.
LPPO502	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates have no further comment to make on this issue.
SO8.5: Avoiding Air, Water, Soil, Noise and Light Pollution			
Question 52: Do you support the preferred policy direction to avoid air, water, soil, noise and light pollution?			
LPPO503	Together Active - J, Brennan		I understand and support the need to reduce light pollution, but I have concerns where limiting public lighting may make places less safe or perceived as less safe for cycling and walking especially for women and vulnerable groups. I support air quality mitigation through supporting local and walking cycling initiatives, but this will only be achieved through good quality safe integrated and segregated walking and cycling routes using DfT LTN 1/20 Cycle Infrastructure Design.

LPPO504	Natural England- G, Driver		<p>We support the direction of this policy, advise that some aspects need revising or clarifying. • We would advise that you define what is a major development. • Some developments that may not come under the definition of major can still cause pollution for example intensive pig and poultry units and we would advise that you may wish to consider whether you wish to address this within this policy. • Air Pollution. In the explanatory text , some possible air quality mitigation is noted. We would advise that electric vehicles will still emit particulate matter and therefore may still cause some air pollution. Furthermore petrol cars and therefore petrol hybrid cars will produce ammonia as well as nitrogen oxides and particulate matter, all of which can impact the natural environment. • The soils paragraph requires further work. > Soil is a finite resource, and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important soils are protected and used sustainably. Development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. We advise that the policy wording should be revised to ensure that soil is managed in a sustainable way. We advise that policies refer to the Defra's Code of practice for the sustainable use of soils on construction sites. It provides advice on the use and protection of soil in construction projects. > Best and most versatile (BMV) land is Grades 1, 2 and 3a in the Agricultural Land Classification and we would advise that this is clarified in the policy. Development can have irreversible adverse (cumulative) impact on the finite national and local stock of BMV land. Avoiding loss of BMV land is the priority as mitigation is rarely possible. Retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services. In the longer term, protection of BMV land may also reduce pressure for intensification of other land. We would advise that the plan include reference to the Guide to assessing development proposals on agricultural land.</p>
LPPO505	Severn Trent		<p>We are supportive of the policy SO8.5, in particular the effort protects water quality and to ensure there is sufficient water treatment capacity before permitting new development. Whilst we have an obligation to provide or increase capacity to meet demand from new development, doing so can be a complex, costly and lengthy process and may take some time to deliver. The most efficient way forward is to allocate development where the most capacity exists utilising the outputs from the recent Water Cycle Study delivered in partnership with JBA Consulting. Ensuring developments use SuDS within a management train as opposed to "pipe to pond" will help ensure that the system can maximise its pollutant ability.</p>

LPPO506	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	The policy approach refers to development proposals which will cause unacceptable on-site or off-site risk or harm to human health or the natural environment, not being permitted. This requirement is difficult to establish. Any proposal can have some impact on the natural environment and the scale of this impact should be assessed rather than a blanket requirement that states any unacceptable impact will result in refusal. Provision of water and waste water facilities is subject to a separate legal framework and there is no need for the policy to refer to improved sewage and waste water treatment facilities.
LPPO507	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	The policy approach refers to development proposals which will cause unacceptable on-site or off-site risk or harm to human health or the natural environment, not being permitted. This requirement is difficult to establish. Any proposal can have some impact on the natural environment and the scale of this impact should be assessed rather than a blanket requirement that states any unacceptable impact will result in refusal. Provision of water and waste water facilities is subject to a separate legal framework and there is no need for the policy to refer to improved sewage and waste water treatment facilities.
LPPO508	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	The policy approach refers to development proposals which will cause unacceptable on-site or off-site risk or harm to human health or the natural environment, not being permitted. This requirement is difficult to establish. Any proposal can have some impact on the natural environment and the scale of this impact should be assessed rather than a blanket requirement that states any unacceptable impact will result in refusal. Provision of water and waste water facilities is subject to a separate legal framework and there is no need for the policy to refer to improved sewage and waste water treatment facilities.
			SO8.6: Brownfield and Despoiled Land and Under-Utilised Buildings
			Question 53: Do you support the preferred policy direction to brownfield and despoiled land and under-utilised buildings?
LPPO509	Cannock Chase AONB Partnership		This policy is warmly welcomed. Reference within this overarching policy to conserving and enhancing the AONB, and respecting sensitive edges is supported. We also welcome reference to locating and designing development to avoid impacts on tranquillity and dark landscapes. Cannock Chase is the least dark of all 34 AONBs in England, in part due to light spillage from nearby towns. However, the central core of the Chase is still a relative oasis of darkness for people to enjoy compared to the surrounding conurbations. The AONB is engaged in a Dark Skies Project that seeks to foster a sense of responsibility towards protecting and enhancing dark skies and reducing light pollution in the area, the outcomes of which we hope will support this policy.

LPPO510	Historic England - E, Boden		Historic England supports this policy direction and suggests that the policy makes specific reference to historic buildings, as they represent a significant investment of expended energy. Demolishing and replacing them requires a major reinvestment of embodied energy and other resources. The policy direction should therefore encourage & recognise the benefits of sympathetic restoration and retention of historic buildings, rather than their demolition and replacement.
LPPO511	Natural England- G, Driver		We support this policy but would advise that brownfield sites can have high ecological value, providing habitats for protected or priority species and other environmental and amenity benefits. When allocating land for development the biodiversity or geodiversity value of the land and its environmental sensitivity will need to be taken into account so that any harm can be avoided, mitigated or compensated for in a way which is appropriate given the site's identified value. Further guidance on the ecological value of brownfield land is listed.
LPPO512	Severn Trent		Redeveloping brownfield land is an approach we fully support. We see this as a fantastic opportunity to provide some betterment and help provide local resilience to the impacts of climate change. It would be great if some form of policy could secure this in practice. Requiring brownfield sites to achieve surface water disposal rates at or below those of greenfield runoff is one approach. Asking brownfield development to revisit drainage hierarchy options for a more sustainable solution could be another. Note that where new development utilises contaminated land that onsite surface water should be managed carefully as to ensure it does not spread pollutants beyond the site or leach into groundwater.
LPPO513	Richborough Estates (Land off Brownhills Road, Norton Canes)	Pegasus Group - B, Cook	Richborough Estates supports the use of brownfield land however the policy should be amended to make clear that it relates to developments of such sites and should not be applied against greenfield sites, whereby contributions could be sought to deliver improvements to other PDL sites. As drafted the policy could potentially be applied to any proposal rather than specifically applied to proposals involving the reuse of previously developed land.
LPPO514	Richborough Estates (Land south of Cannock Road, Heath Hayes)	Pegasus Group - B, Cook	Richborough Estates supports the use of brownfield land however the policy should be amended to make clear that it relates to developments of such sites and should not be applied against greenfield sites, whereby contributions could be sought to deliver improvements to other PDL sites. As drafted the policy could potentially be applied to any proposal rather than specifically applied to proposals involving the reuse of previously developed land.
LPPO515	Richborough Estates (Land off Main Road, Brereton)	Pegasus Group - B, Cook	Richborough Estates supports the use of brownfield land however the policy should be amended to make clear that it relates to developments of such sites and should not be applied against greenfield sites, whereby contributions could be sought to deliver improvements to other PDL sites. As drafted the policy could potentially be applied to any proposal rather than specifically applied to proposals involving the reuse of previously developed land.

LPPO516	Wyrley Estates	Fisher German LLP - N, Borseley	The Grove Colliery site fits well within Policy SO8.6 and The Estate actively encourages suitable brownfield land and buildings should be redeveloped and re-used for homes and other uses. However, the policy does state to make effective use of under-utilised land and buildings, particularly within designated settlement boundaries. The policy should expand further to encourage suitable previously developed land and buildings in rural areas to be included in the Policy. Especially when Green Belt allows re-use and redevelopment of brownfield sites, why should this policy not consider the wider rural area. There are many lost opportunities which the council could be disregarding by not including the rural area and therefore detracting away from sustainable development.
LPPO517	Staffordshire County Council - J, Chadwick		Yes, but with a reminder that an awareness needs to be had that brownfield sites can often retain evidence of historic industry above and below ground. Further archaeological evaluation and recording works may be required as per NPPF 189 and 199 for specific applications.
			SO8.7: Safeguarding Mineral Reserves
			Question 54: Do you support the preferred policy direction to safeguarding mineral reserves?
			SO8.8: Managing Waste
			Question 55: Do you support the preferred policy direction to manage waste?
LPPO518	G, Green		Large retail areas of 'outlets' must be required to provide a good number of differentiated waste bins for recyclable and other waste.