

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



Name of the Local Plan to which this representation relates:

Cannock Chase Local Plan

Please return to:

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

Please return by:

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

Part A: Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)*
	*If an agent is appointed, please provide client Title, First Name, Last Name, Organisation (if applicable) and Post Town in column 1 and provide full contact details for the agent in column 2.	
Title		Mr
First Name		David
Last Name		Onions
Post Town		
Organisation (where relevant)	ETP Property Ltd.	Pegasus Group
Address Line 1		

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

Yes No

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

For Office Use	Part A Reference	
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Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

Part B: Representation Form

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

Part B: Representation

Name and Organisation:	ETP Property Ltd.
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Q1. To which document does this representation relate? (Please tick one box)

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

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

Para-graph:	5.17 – Spatial Strategy for Norton Canes	Policy:	Strategic Objective 4 S04.2 S07.7	Site:		Policies Map:	
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Do you consider the Cannock Chase Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:

**Cannock Chase Council:
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(Please tick as appropriate).



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

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

See attached accompanying representations.

(Please continue on a separate sheet if necessary)

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

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

See attached accompanying representations.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and

Cannock Chase Council: Cannock Chase Local Plan Representation Form



supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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

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

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

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

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

(Please tick one box)

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

Sufficient employment land should be planned for to meet the identified need for this within the district; as discussed and demonstrated in the accompanying representations, the 74-hectare target set out within draft Policy SO4.2 is insufficient given that it does not take losses into account, and additional land needs to be allocated for employment. There are clear exceptional circumstances based on the evidence available to release additional Green Belt sites to meet the district's employment requirements over the Plan period. Turf Field, Norton Canes provides the opportunity to deliver employment development in a good quality location through Green Belt release, which is available and deliverable.

(Please continue on a separate sheet if necessary)

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

Signature:	
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Date:	15/03/2024
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Local Plan Review 2018–2040

Cannock Chase District Council

Regulation 19 Pre–Submission Consultation

Turf Field, Watling Street, Norton Canes

Representations on behalf of ETP Property Limited.

Date: February 2024 | Pegasus Ref: P22–3009

Author: ARG/DO



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	January 2024	ARG	DO	-
2	February 2024	ARG	DO	Updated evidence base
3	February 2024	ARG	DO	Client comments



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1. INTRODUCTION

1.1. These representations are made by Pegasus Group on behalf of ETP Property Limited in response to Cannock Chase District Council's ("CCDC") Local Plan Review 2018-2040 Regulation 19 Pre-Submission consultation. The consultation runs between Monday 5th February and Monday 18th March 2024.

1.2. ETP Property Limited have freehold land interests to the south of Norton Canes, on a site known as Turf Field. The site totals 2.14 hectares, lying north of the A5 and immediately west of the Turf Lodge public house. The site is shown in Appendix 1.

Representations

1.3. These representations respond to the emerging policies contained within the Cannock Chase District Pre-Submission Plan, having regard to the national and local policy context. Paragraph 230 of the NPPF (published December 2023) states that pre-submission plans published prior to 19th March 2024 will need to be examined under the previous NPPF (September 2023), therefore it is this version of the Framework which is referred to in this document. The representations also provide comment in respect of the evidence base that underpins the Local Plan Review.

1.4. The representations are framed in the context of the requirements of local plans and spatial development strategies to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (September 2023) ("NPPF"), Paragraph 35. For a development plan to be sound it must be:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;



- **Effective** – deliverable over the plan period, and based on effective and joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

- 1.5. These representations have regard to the NPPF’s emphasis on the role of development plans in providing a framework for employment development alongside other economic, social and environmental priorities (Paragraph 15) and in supporting the Government’s objective of supporting economic growth and productivity (Paragraph 85) by ensuring that sufficient employment land is available in the right places (Paragraph 8).
- 1.6. They also have regard to the statutory duty for local planning authorities to co-operate with other Local Planning Authorities, county councils and prescribed bodies relating to strategic matters when preparing development plan documents.

2. BACKGROUND

The Local Plan Review Process

- 2.1. The Cannock Chase District Local Plan Review is intended to replace the adopted Cannock Chase Local Plan (Part 1), which was adopted in June 2014 and covers the period up to 2028. The period covered by the Regulation 19 Pre-Submission Local Plan is 2018 to 2040.
- 2.2. The Council's decision to review the Cannock Chase Local Plan is fully supported by ETP Property Limited to ensure that:
- planning policies and proposals are consistent with the updated NPPF;
 - the employment and economic development requirements and needs are aligned to the most up-to-date information, including economic projections and cross-boundary needs;
 - the need for employment land within the district is fully met; and
 - the local plan is up-to-date, reflecting Government guidance that plans should be regularly reviewed and the evidence base renewed to respond to changing needs.
- 2.3. A series of consultations to shape the new Local Plan have been held by CCDC to date. These consist of an initial Issues & Scope (Reg 18) consultation in July to August 2018, followed by an Issues & Options (Reg 18) consultation between May to July 2019. The most recent consultation to have taken place was the Preferred Options (Reg 18) in March to April 2021. Although the CCDC Cabinet resolved to proceed to consult on a pre-submission version of the plan (Reg 19) in August 2022, this never occurred due to the evidence base being incomplete.
- 2.4. The Council are now consulting on a revised pre-submission plan. This plan will be the version submitted to the Secretary of State and examined by an independent Inspector.

Turf Field Site

- 2.5. ETP Property Limited have land interests in a 2.14-hectare site located to the south of Norton Canes, which is currently in agricultural use. The site is sandwiched between the A5 (Watling Street) to the south and the M6 Toll to the north. It adjoins the Turf Lodge public house (Toby



Carvery), a children's entertainment centre (The Beach Hut) and associated surface level car parking.

- 2.6. Norton Canes is located to the north of the site, beyond the M6 Toll. There is a substantial amount of fairly recent residential development in the south of the village, some of which is still being built out, as well as a large area of existing employment land in the east and further north. Meanwhile, the M6 Toll Services are situated to the north east, and there is additional employment land to the south east, off Lime Lane, and in the east, at Watling Street Business Park.
- 2.7. The site falls within the West Midlands Green Belt, and is separated from the wider countryside (to the south, west, and south east) by the M6 Toll, A5, and B4154.
- 2.8. ETP Property Limited are promoting the site for employment use. In the first Preferred Options (Reg 18) version of the Draft Local Plan, Turf Field was identified as a full allocation under Policy SO4.2 (site reference **E10**). However, in the Pre-Submission version of the plan, the site is neither allocated nor safeguarded to meet the employment needs of the district.
- 2.9. Turf Field is exceptionally well located and is an optimal site for employment development. It is easily accessed from both the B4154 and the A5, which form part of the strategic highway network, and it is situated away from any sensitive uses. Being surrounded by the M6 Toll, A5, and B4154, it is segregated from the surrounding countryside, providing limited contributions towards the five purposes of the Green Belt. The site also benefits from being flat with a fairly uniform shape and falls within a single ownership. In addition, there is scope to use the land to the west, which is within the same ownership, for Green Belt compensation measures.
- 2.10. A promotional document for the site has been produced (Appendix 2), which includes a concept masterplan demonstrating how industrial units can be accommodated on the site, as well as landscaping and sustainable drainage features. The document provides more detail on the site's context and development potential.
- 2.11. Norton Canes Parish Council are in the process of preparing a Neighbourhood Plan. One of the issues this plan will consider is the local economy. The Parish Council's website encourages employment growth within the parish and offers support for the development of Turf Field.

3. REPRESENTATIONS ON THE CONTENTS OF THE PRE-SUBMISSION 19 PLAN

- 3.1. Having reviewed the Pre-Submission Plan, representations are provided on the policies most relevant to the Turf Field Site.

The Spatial Strategy for Norton Canes

- 3.2. In the introduction of the Local Plan, the spatial strategies for the district's settlements are outlined. For Norton Canes, there is little reference to employment, which is a notable omission in light of the fact that the draft plan contains a Strategic Objective related to this (commented on below), and there is an emphasis within the NPPF to support economic growth and productivity. Reference is made to prioritising residential and commercial development, yet the strategy also notes that the settlement has already seen "*significant growth*" over the previous plan period, with land for a further 66 dwellings allocated in the draft plan. Paragraph 93 of the NPPF emphasises the need for an integrated approach with regards to the location of housing and economic uses, thus, to ensure consistency with this national policy and soundness, there is an opportunity to make reference to providing high-quality employment land within and around the settlement to maintain a balanced community with local jobs. There are clear locational advantages to doing so, given the proximity and excellent links to the A5 and M6 Toll, which form part of the strategic road network. Indeed, with the village's growing population, employment development here can help to provide local jobs for new residents. Without a spatial strategy which includes a meaningful reference to the economy in Norton Canes, the Local Plan does not provide a suitable framework to deliver sustainable development for the settlement of Norton Canes, one of the most important settlements in the district.

Strategic Objective 4 (Encouraging a Vibrant Local Economy and Workforce)

- 3.3. This overarching policy on the economy is supported. In particular, the inclusion of the need to provide "*a range of sizes and types of employment sites to meet modern business needs*" and "*employment opportunities in locations which best respond to market demands and which will attract inward investment*". These are essential in order for the plan to be consistent with national policy, namely Paragraphs 81 – 85 of the NPPF (September 2023).

3.4. The types of sites to be provided should align with the need identified in the evidence base. The Economic Development Needs Assessment (EDNA) (2019), at Paragraph 6.94, recommends that 75% of employment land provided should be for industrial/warehousing units (specifically Use Classes B1c/B2/B8). This figure has since increased to 85%, as set out at Paragraph 4.115 of the 2024 update to the EDNA, signifying that the need for this type of employment land is increasing relative to office space. The sites proposed to be allocated under Policy SO4.2 are mostly B2 and/or B8 with some office space, with only one allocation solely for offices (site ref E6). This is consistent with the evidence.

Policy SO4.2 (Provision for New Employment Sites)

3.5. This policy sets out the proposed strategic employment allocations and details on the amount of employment land to be delivered.

3.6. The policy states that up to **74 hectares** of employment land is to be provided¹ over the plan period, which is greater than the previous target of 66 hectares and is in line with the most recent update to the EDNA (dated 8 January 2024), which identifies a need of 43–74 net hectares of employment land between 2018 and 2040. However, the policy does not make clear whether the 74-hectare target is the net figure, as per the EDNA, or a gross figure, as implied in the Employment Topic Paper², and it is unclear, within the evidence base, as to what precisely is meant by net and gross in this context. This must be clarified within the policy to ensure that it is justified and positively prepared.

3.7. The 74-hectare figure is derived from an analysis in the EDNA relating to future growth conditions. Due to forecasted job growth being within sectors that specifically require more employment land – such as logistics and storage – the EDNA identifies a figure that will allow anticipated needs to be met. However, as mentioned in paragraph 4.107 of the EDNA, the 74-hectare net figure in the EDNA does not include an allowance for the replacement of losses.

¹ It is noted that there are contradictions in the amount of employment land which is to be provided. The spatial strategy in the Pre-Submission Plan states that up to 69 hectares of employment land is to be delivered (page 35). This is also the figure in the non-technical summary (paragraph 1.8) and is also referred to as the final target in the report to Cabinet dated 14th December 2023 (paragraph 5.2.1). However, Policy SO4.2 identifies the target as 74 hectares instead, as does the Employment Topic Paper dated December 2023. For the purpose of these representations, it is assumed that 74 hectares as the correct figure given its inclusion within the policy itself. The Council should review this to ensure consistency across the document for soundness.

These currently average 1 hectare per year, and the Council, in the Employment Topic Paper, suggest that this rate may increase (paragraph 5.1, sixth bullet point). When considering this, as much as 94 hectares (gross) of employment land needs to be planned for, as recommended in the EDNA. Therefore, the evidence base suggests that up to 20 additional hectares may need to be identified due to anticipated losses. For the Local Plan to be effective, it is imperative for the Council to plan for sufficient employment land, to meet its estimated requirement.

- 3.8. Therefore, ETP Property Limited object to Policy SO4.2 on the basis that the target of 74 hectares is insufficient as it excludes an adjustment for losses. It is unclear within the policy as to whether or not 74 hectares is a net figure, as in the EDNA, or gross, as in the Employment Topic Paper, and indeed how these are defined within the evidence base. Clarity and consistency on this point within the policy is essential. The **94-hectare gross** figure in the EDNA should be planned for instead to allow for maximum flexibility given that the Council warn there could be an even greater loss of stock (over and above the current 1ha per annum). This will ensure that the policy is positively prepared, fully justified, and sound which, at present, is not the case.
- 3.9. The Council have identified an employment land supply of **73.34 hectares** to meet the need for this type of land over the plan period. The Employment Topic Paper (December 2023) indicates that the Council are reliant on sites which have been completed since 2018 (16.59 ha), which fall within the plan period, those under construction (3.43 ha), sites with planning permission (9.35 ha), and the intensification of existing sites (15.91 ha). In addition, the West Midlands Strategic Rail Freight Interchange (WMSRFI), in South Staffordshire, will contribute 10ha towards employment land need. The WMSRFI Employment Issues Response Paper – ‘Whose Needs will the SFRI Serve?’ (dated February 2021) identifies, in Table 5, that Cannock Chase are entitled to this 10-hectare land share. Without double-counting allocated sites which are already have planning permission, there will be a shortfall of approximately 0.66 hectares against Policy SO4.2’s 74-hectare target based on the Council’s calculations.
- 3.10. The Employment Topic Paper, in Table 6, identifies the specific sites which are to be intensified. However, a review of the Economic Land Availability Assessment (ELAA) 2023 reveals that a number of these sites are, in fact, not readily available. This means that they are not suitable or available for development. These consist of Ridings Park (site CE3), the Former Hawkins Works (CE7f), Gestamp (CE61), Former JCB, Rugeley (RE30), the Former

Porcelain Works (CE15b), the former ATOS origin site (CE42), Northwood Court (CE62), Unit 12 Conduit Road (NE7), and the Yates Bros Sports and Social Club (NE17). These sites have expired planning permissions, previously refused or withdrawn applications, areas of land already lost to other uses, and/or are situated close to air quality management areas. As they are not readily available, these sites – amounting to **11.19 hectares** – should be discounted from the supply.

3.11. The ELAA does, however, identify a number of readily available sites – which are suitable and available in the short to medium term – in Table 3.1, totaling **17.83 hectares**. These include some of the sites with planning permission and a selection of those identified for intensification. However, several of these should also be discounted, as detailed in Table 1 below.

Site	Area to Discount	Reasoning
CE63 (Former Rumer Hill Industrial Estate)	2.83	This is now being promoted for residential use, rather than employment, with its planning permission for employment having now expired (CH/19/280).
RE24 (Rugeley Power Station)	1.5	The area identified for employment within the outline application (CH/19/201), is cross-boundary, with only 3.5 hectares falling within the district, meaning that the published 5-hectare figure should be reduced accordingly.
RE27 (Land at Power Station Road)	1.8	Site has extant planning permission for a retail foodstore (CH/20/306), which is not an employment use, and it is therefore not readily available for this purpose
Site RE29 (Land at the Academy Early Years Childcare)	0.14	Being considered for a children’s care home rather than employment.
NE1 (land off Norton Green Lane)	0.56	Indefinitely unavailable for further development as it is in use as a construction training site

3.12. Taken together, these sites amount to **6.83 hectares**. Therefore, with these deductions, we consider the total of genuinely readily available sites to be as low as **11 hectares**.

- 3.13. Furthermore, it is evident that other previously identified sites which the Council thought could be used for employment are now undeliverable. Two of these, on Power Station Road, are recognised as such by CCDC in the Cabinet report at paragraph 5.37 (site references RE7 and RE8), and they have been removed from the plan as a result, having previously been draft employment allocations. For clarity, these sites are also not on the list for those which will be intensified (Table 6 of the Employment Topic Paper). Furthermore, other sites the Council have earmarked for employment in the past may also not be coming forward for this purpose. For example, Phases 5 and 6 at Norton Hall Lane are now being developed for housing rather than employment as initially approved under CH/10/O294 and are no longer identified within the supply as a result.
- 3.14. The focus on (intensifying) existing locations – ‘churn sites’ – aligns with CCDC’s adopted policy position to encourage and support the redevelopment of current employment land (Policy CP8). The ELAA confirms that there is a reliance on average quality locations for employment, as this is where the supply is available; it is limited in very good/good quality locations. Indeed, it is considered that some of those identified in Table 6 of the Employment Topic Paper are located in such areas, such as those in Rugeley, which are peripheral within the district. Sites need to be located in the most accessible locations to be attractive to the market, to encourage investment and growth in line with Paragraph 81 of the NPPF (September 2023). Otherwise, if they lack appeal, they may not be (re)developed for employment uses at all and would therefore need to be discounted from the supply. As a result of this, the LPA’s reliance on the redevelopment of existing sites in less attractive locations is high risk as it may not deliver.
- 3.15. The Authority Monitoring Report, on page 22, sets out the employment land completions. Whilst this has averaged 4.8 hectares between 2006 and 2022, only 1.79 hectares were completed in 2021/22 – almost two thirds less than the annual average. According to the ELAA, recent completions have been at Norton Canes Business Park (Site NE13), Tower Business Park, Rugeley (Site RE2a), and numerous in Cannock, Hednesford, and Heath Hayes (sites CE59, CE67, CE68, CE4a, CE78, CE77, CE79, and CE80). These schemes mostly consist of the redevelopment or extension of existing employment sites.
- 3.16. With regards to the inclusion of 10 hectares of land from the West Midlands SRFI, as discussed above the Employment Issues Response Paper – Whose Needs will the SRFI Serve?’ (dated February 2021) establishes, within Table 5, that Cannock Chase are entitled to this 10-hectare



land share. As such, the inclusion of this within Cannock's employment land supply is not disputed.

- 3.17. The Council allocate seven sites for employment within Policy SO4.2. Since the previous version of the last plan, the Watling Street Business Park Extension has been upgraded from a safeguarded employment site (ref SE2) to a strategic employment allocation. Despite this, a review of Table F within the draft policy – which sets out the employment allocations, including the newly added SE2 – indicates that the allocations only amount to **22.81 hectares** of employment land. This is only 0.81 hectares greater than the amount of site-specific allocations identified when the target was only 66 hectares in the previous iteration of the draft Local Plan.
- 3.18. In light of the above, and on the basis that the Council should be planning for 94 hectares to account for losses in employment land, the scale of undersupply is up to **38.68 hectares**, when taking into account of the sites discounted and the existing 0.66-hectare shortfall. Even if the 74-hectare target is to remain unchanged, there is still a shortfall of **18.68 hectares**. Given that the Council are relying on peripheral sites in average quality locations, a high-risk approach as they may not be delivered, it is difficult to see how the Local Plan as drafted can meet the identified need for employment land. This must be addressed to ensure a sound plan, as at present it appears this policy is unlikely to be deliverable, in which case it would fail to meet the 'effective' test of soundness.
- 3.19. The Council therefore need to take a different approach, starting with planning for the correct amount of employment land, preferably 94 hectares as per the EDNA, whilst making up the shortfall to the greatest extent possible to ensure that the employment needs of the district can be met over the plan period.
- 3.20. As discussed above, and through a review of the evidence base – namely the AMR and ELAA – it is apparent that there is no additional previously developed land for the Council to intensify and redevelop, with all such sites having been considered and identified in the ELAA and Employment Topic Paper. Therefore, there is a need to consider other ways through which the supply can be increased. Sites can be delivered in the Green Belt in good quality locations i.e. well-located, suitable for investment, and larger than 0.4 hectares, in order to help address the shortfall. Appendix F of the ELAA identifies all sites located along the A5 corridor as being of a good quality. Paragraph 8 of the NPPF highlights that employment sites



should be provided in the right places, and the A5 corridor is evidently an optimal location for these uses in the opinion of Cannock Chase District.

- 3.21. In summary, ETP Property Limited object to Policy SO4.2. Having reviewed the evidence base, a shortfall in available employment land of up to **38.68 hectares** has been identified. We contend that, with around circa 62.15 hectares to realistically rely on, the Local Plan will be unable to meet its employment land requirements, and this needs to be addressed within the policy, through the allocation of further sites in good quality locations in the Green Belt, given that there all previously developed land appears to have already been considered. This will ensure a sound policy that is positively prepared, effective, and consistent with national policies, including Paragraph 82 of the NPPF (September 2023) in providing sufficient land to enable investment and growth to successfully meet the identified need over the plan period.

Policy SO7.7 (Amendments to the Green Belt)

- 3.22. ETP Property Limited support the removal of sites from the Green Belt to accommodate requirements for growth, both during and beyond the next plan period. The need for employment land is increasing, evidence of which is provided by, for example, iterations of the EDNA, all of which demonstrate a need for higher targets in the draft Local Plan.
- 3.23. Turf Field is in a good quality location, on the A5 corridor, which is available and deliverable for employment. It was identified as a full employment allocation under draft Policy SO4.2 of the Reg 18 version of the Local Plan, and it is unclear as to why it has been removed. ETP Property Limited strongly affirm that Turf Field should be a full employment allocation, to contribute towards meeting the shortfall in employment supply over the plan period. It is able to be brought forward for this purpose in the short to medium term, and there is evidently a need for deliverable sites to meet the shortfall in employment land.
- 3.24. There is one less safeguarded site compared to the August 2022 Pre-Submission Local Plan, due to the Watling Street Business Park Extension having been upgraded to an allocation, with no replacement safeguarded site. Paragraph 143(c) of the NPPF requires the identification of safeguarded land to meet longer term development needs; as set out above, sufficient land has not been released from the Green Belt for employment to cover the plan period, let alone beyond this. As such, it is important to add additional safeguarded sites to ensure that future growth can be accommodated in the longer term. Providing sufficient safeguarded land will result in a policy which is consistent with national policies, and therefore



sound. If it is not a full allocation, Turf Field should at the very least be identified as a safeguarded site to help ensure this is the case.

3.25. The Cannock Chase Green Belt Harm Assessment (2021) scores parcels against their contribution towards meeting the five purposes of the Green Belt set out in Paragraph 138 of the NPPF (September 2023). Turf Fields falls within a wider parcel which performs moderately overall, with its contribution as follows:

- a) to check the unrestricted sprawl of large built-up areas – **weak/none**
- b) to prevent neighbouring towns merging into one another – **moderate**
- c) to assist in safeguarding the countryside from encroachment – **strong**
- d) to preserve the setting and special character of historic towns – **weak/none**
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land – **equal contribution across all parcels**

In terms of the specific Turf Field Parcel, it is important to note that it is segregated by from the rest of the countryside as it sits in between the M6 Toll, A5, and B4154. This affects its Green Belt functions, particularly in relation to openness and amenity value, as acknowledged on page 66 of the Green Belt Topic Paper (December 2023).

3.26. Turf Field is exceptionally well located for employment purposes, with easy access to major road networks. In addition, it is in close proximity to recent residential development to the north, for example off Rosefinch Drive and Hollybush Grove. As such, the development at Turf Field will allow for the creation of a sustainable community with employment able to be reached by foot. This aligns with Paragraph 93 of the NPPF, which encourages an integrated approach to the location of housing and employment. Turf Field is capable of accommodating a number of industrial units and would also complement existing employment areas in the area to the north, south east, and east. Appendix 2 includes a concept masterplan and more details on the development potential of the site.

3.27. Clearly, exceptional circumstances would need to exist in line with national policy to justify the removal of Turf Field from the Green Belt. The Green Belt Paper (2023) identifies exceptional circumstances which have justified the release of other sites in the Green Belt,



including the nearby Watling Street Business Park extension to the south east. It is considered that the circumstances listed are likewise applicable here:

- **Employment need** – given the shortfall, there is still a pressing need for additional employment land for growth over the plan period.
- **Deliverable and appropriate location** – industrial units capable of meeting modern requirements can likewise be located here; it is an appropriate site to do so given these uses are already in the immediate vicinity.
- **Access requirements** – Turf Field can also be accessed from the A5, has good links to strategic road network, and therefore is an optimal location for employment.
- **Specific locational requirement** – a logical extension to an existing business park.

3.28. Therefore, given that the same exceptional circumstances apply for Turf Field and a shortfall in employment land exists, the Council are encouraged to allocate Turf Field for employment, to better meet the district's needs over the plan period, or at the very least identify it as a safeguarded site.

3.29. Policy S07.7 also refers to the need to provide appropriate mitigation to compensate for the loss of Green Belt Land. ETP Property Limited support the inclusion of this within the policy. In the case of Turf Field, an area of land to the west of the site, within the same ownership, could be used for the for this purpose, to meet the requirements of the policy and provide a contribution towards enhancing the Green Belt. Therefore, the removal of Turf Field would provide two significant benefits, in helping to meet the need for employment and benefitting the Green Belt and local habitats. In any case, the Council are reminded that the compensation measures must be proportionate to the amount of land which is being removed from the Green Belt.

3.30. Overall, therefore, whilst the principles and components of the policy are supported, it is contended that Turf Field should be considered for a full employment allocation – it shares the same exceptional circumstances as sites which have been allocated – to meet employment land requirements during the plan period, or at the very least a safeguarded site for future growth. Indeed, with the loss of one safeguarded site, another should be allocated in its place, to ensure there is sufficient safeguarded land as per Paragraph 143c of the NPPF. It is considered that the policy is unsound until sufficient safeguarded land is included, as it



will not allow for longer term needs to be appropriately met, meaning that the policy is not currently positively prepared, effective, or consistent with national policy.

4. SUMMARY AND CONCLUSIONS

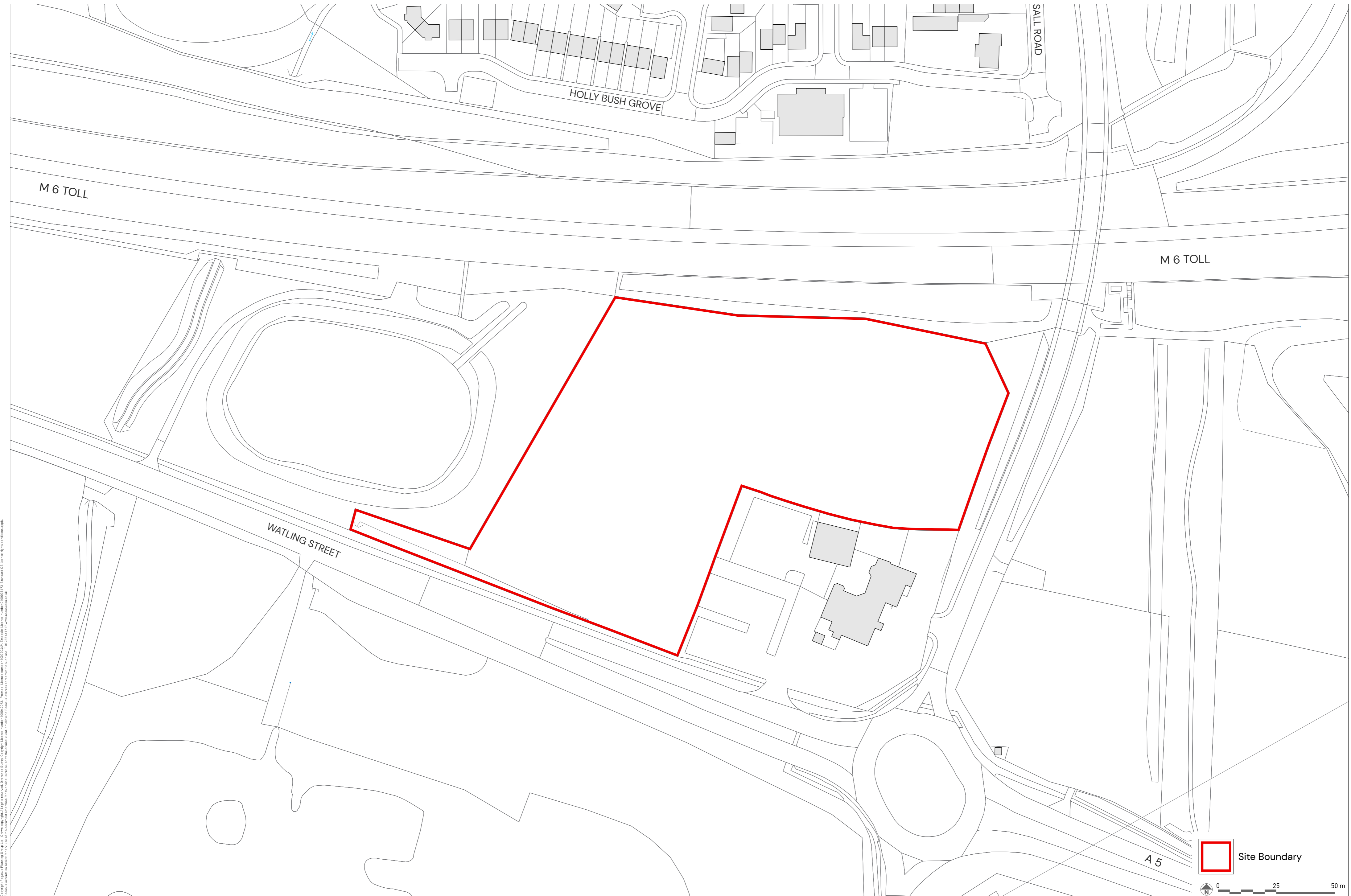
- 4.1. These representations have been prepared by Pegasus Group on behalf of ETP Property Limited.
- 4.2. The representations have contended that Policy SO4.2's 74-hectare target for employment land provision over the plan period, derived from the EDNA, will be insufficient as this does not take losses into account. The EDNA states that the requirement for employment land increases to as much as 94 hectares when this is done. The Council should plan for as much employment land as possible, preferably this higher figure, to ensure that the need for this land can be met.
- 4.3. Whilst a supply of 73.34 hectares has been identified – already a small shortfall of 0.66 hectares – several of the sites identified for intensification should be discounted as the ELAA notes that they not readily available. Overall, the scale of undersupply is as high as 38.68 hectares, when planning for 94 hectares. However, even if the 74-hectare target is to remain unchanged, there is still a shortfall of 18.68 hectares.
- 4.4. The Council are relying on peripheral sites in average quality locations, a high-risk approach as they may not be delivered, and it appears that all potential previously developed sites have already been considered. Therefore, the Council need to take a different approach, releasing land from the Green Belt in good quality locations for employment to address the shortfall in the supply.
- 4.5. Policy SO7.7 sets out the proposed amendments to the Green Belt. ETP Property Limited are promoting their freehold interest in Turf Field for employment purposes. This site was previously identified as a full employment allocation within draft Policy SO4.2 of the Reg 18 version of the Local Plan. It is unclear as to why the site is no longer allocated or even safeguarded, given its merits. Indeed, Turf Field benefits from being in a good quality location – which the AMR identifies are currently limited – with easy access to the strategic road network. It is available, suitable, and deliverable for employment. The development potential for the site is set out in more detail in Appendix 2. The site only performs a limited Green Belt function, particularly in terms of openness and amenity value, due to being segregated from the rest of the countryside by the A5 to the south, M6 Toll to the north, and B4154 to the east.



- 4.6. In addition, Turf Field shares the same exceptional circumstances which have been used to justify the removal from the Green Belt of the nearby Watling Street Business Park Extension site, and given the shortfall, the site should also be brought forward, in the context of a shortfall in supply and lack of previously developed land to remedy this. More Green Belt sites in good quality locations which are available and deliverable, such as Turf Field, are required to meet the need for employment land over the plan period.



APPENDIX 1: TURF FIELD SITE LOCATION PLAN



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Watling Street, Norton Canes, Staffordshire – Site Location Plan



APPENDIX 2: TURF FIELD PROMOTIONAL DOCUMENT



Turf Field

Watling Street, Norton Canes

Prepared by Pegasus Group on behalf of **ETP Property Ltd.**
Date: **March 2024** | Contact: **WB/ QH**
Document reference: **P22-1614_G001C**



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NOTE: THIS DOCUMENT IS DESIGNED TO BE VIEWED AS A4 DOUBLE SIDED

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2.	PLANNING POLICY	15
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1 Introduction & Site Context

- 1.1 INTRODUCTION
- 1.2 THE SITE
- 1.3 EXISTING CONTEXT
- 1.4 CONSTRAINTS & OPPORTUNITIES

1 Introduction



M6 Toll



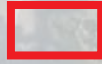
B4154

SERVICE AREA

Watling Street

A5

Location Plan

 Site Boundary (2.14 Ha)

1.1 INTRODUCTION

This Promotional Document has been prepared by Pegasus Group on behalf of ETP Property Ltd. in relation to their interest in the land north of Watling Street, falling within Cannock Chase District Council's administrative area, and known as Turf Field. The document assesses the potential for employment-led development on this site. The relevant existing and emerging planning policy framework is considered, and the site's strategic advantages are provided. An Indicative Masterplan was also produced to demonstrate how employment uses could be facilitated in this location.

This Promotional Document sets forth a summary of the site and its development opportunities, and the justification for the proposal in light of available evidence of economic development requirements in the area.

1.2 THE SITE

The site is an existing agricultural field in the south of Norton Canes, currently being used to graze livestock. It is situated north of Watling Street (A5) and west of the B4154 from which it is served, providing access to Cannock to the west and Burntwood to the east.

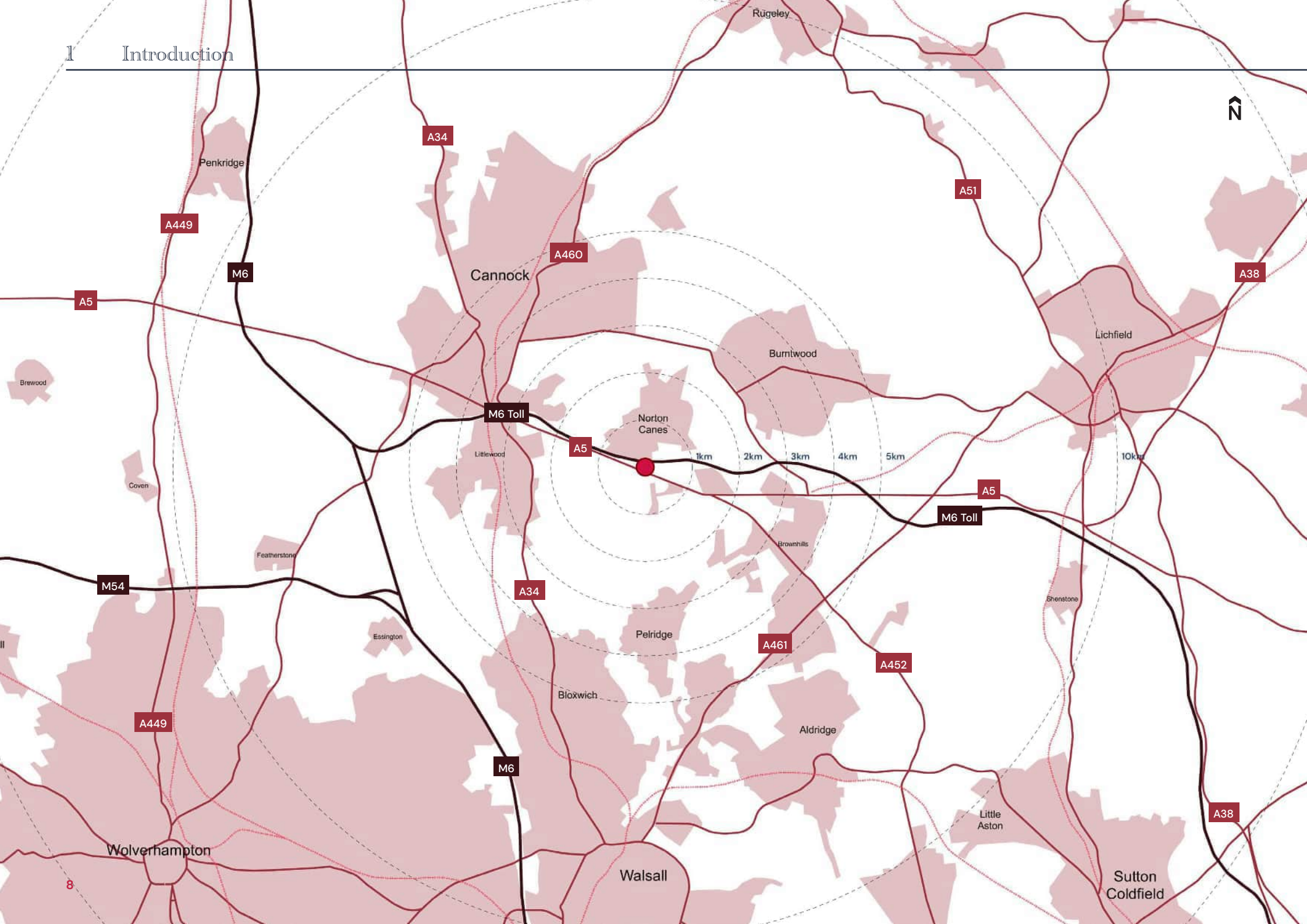
The site extends to some 2.14 hectares and the eastern and northern boundaries are delineated by the B4154 and the M6 Toll respectively. A balancing pond of circa 0.60 hectares is situated just west of the site; the south-eastern edges are delimited by existing planting and an existing development site, comprising of a children's amusement centre and a carvery restaurant.

The site slopes gently from the northern boundary in a south-westerly direction, culminating to the lowest point within the south-western corner.

The site (site reference: NE5) was identified as suitable for development in the Employment Land Availability (ELA) Assessment conducted by Cannock Chase Council in 2023.



1. View to the northern boundary of the site
2. View from Watling Road towards the site's southern boundary








1.3 EXISTING CONTEXT

The land north of Watling Street is under the administration of Cannock Chase District Council and within Norton Canes Parish Council.

The site has a rural setting but remains well connected to surrounding urban areas. It is located south of Norton Canes, and is accessible off the A5, which is part of the strategic highway network linking Tamworth to the east and Telford to the west, and Walsall Road (B4154). The site is also adjacent to the M6 Toll, which runs southerly towards Birmingham's periphery, and northerly towards Stoke-on-Trent. The plan opposite depicts the site within the context of the surrounding area.

The site is in close proximity to Watling Street Business Park and Norton Canes Business Park, making it a suitable and sustainable location for future employment expansion.

Site in Context

-  Site Location
-  Main A Roads
-  Urban Areas
-  Motorway
-  Railway Line

- 1. Watling Street Business Park
- 2. Norton Canes Business Park



1 Introduction

1. View across site to the north-western boundary
2. View of Watling Street
3. View towards the Beach Hut parking lot



4. View from Walsall Road (B4154) towards the roundabout
5. View across site to the western boundary
6. View across site to the north-western boundary.





- 8. View across site to the northern boundary.
- 9. View of Watling Street.
- 10. Agricultural access into site from Watling Street

- 11. Access to the adjacent balancing pond from Watling Street
- 12. View across site from the north-eastern boundary
- 13. View of the Toby Carvery parking lot.





1.4 CONSTRAINTS & OPPORTUNITIES

Technical work has been undertaken to demonstrate that the site is deliverable and that there are no constraints to prevent the allocation of the site as an employment site in the emerging Local Plan.

The Masterplan has been informed by a Preliminary Ecological Appraisal, a Geo-Environmental Assessment and a Highways Assessment to demonstrate that the quantum of development proposed can be successfully delivered.

A standout feature of the site analysis is the site's proximity to both Watling Street Business Park and Norton Canes Business Park, making it a logical location for the extension of the Council's employment demands.

The following points were made following an analysis of the site:

- Development to be accessed off of Watling Street and Walsall Road (B4154);
- The site is joined to an existing urban area with good vehicle connectivity to nearby towns and amenities;
- Opportunities to maintain and enhance the existing trees and vegetation, in particular the existing species-rich native hedgerows bordering the site boundaries;
- The land adjacent to the balancing pond is under the applicant's ownership and provides an opportunity to generate income regarding Biodiversity Net Gain (BNG);
- Existing employment use to the north and west of the site;
- The most elevated part of the site is to the north-west, resulting in any surface water flow to circulate towards the south-eastern boundaries and existing balancing pond;
- Two potential ecological constraints located on the northern boundary of the site need to be carefully considered; and
- The site currently sits within the extent of the green belt.

Constraints & Opportunities



Site Boundary



Site Contours



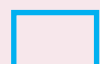
Species-rich Native Hedgerow with Trees



Existing Woodland



Proposed Site Access



Adjacent Land under Applicant's Ownership



Existing Ponds



Potential Ecological Constraints



Existing Vegetation



Key Views into Site

2 Planning Policy

- 2.1 PLANNING POLICY CONTEXT
- 2.2 ALLOCATION

2 Planning Policy

2.1 PLANNING CONTEXT

2.1.1 Adopted Policy

The development plan for the area is the Cannock Chase Local Plan (Part 1), which was adopted by Cannock Chase Council in June 2014. This sets out the core policies which guide development within the district.

Policy CP8 states that at least 88 hectares of new and redeveloped employment land will be provided over the plan period, which is 2006 – 2028. Key locations for growth are identified, but it is noted that other locations can also be considered for employment uses against other policies within the Local Plan, particularly the strategy for the district which is outlined within Policy CP1. This states that the Council will take a positive approach when considering proposals, reflecting the presumption in favour of sustainable development, in line with the National Planning Policy Framework (NPPF).

2.1.2 Emerging Policy

The Cannock Chase District Local Plan Review is intended to replace this plan and its strategic policies, extending the timeframe until 2040.

A series of consultations to shape the new Local Plan have been held by to date. These consist of an initial Issues & Scope consultation in July to August 2018, followed by an Issues & Options consultation between May to July 2019.

The most recent consultation to have taken place was the Preferred Options in March to April 2021. Although Cabinet resolved to proceed to consult on a pre-submission version of the plan in August 2022, this never occurred due to the evidence base being incomplete.

The Council are now consulting on a revised pre-submission plan. This will be the version submitted to the Secretary of State and examined by an independent Inspector.

Draft Policy SO4.2 states that provision will be made for 74 hectares of employment land. In order to meet this requirement, a number of sites have been allocated for employment, whilst others have been safeguarded for this purpose to meet a longer-term need. All these identified sites are proposed to be released from the Green Belt under draft Policy SO7.7.

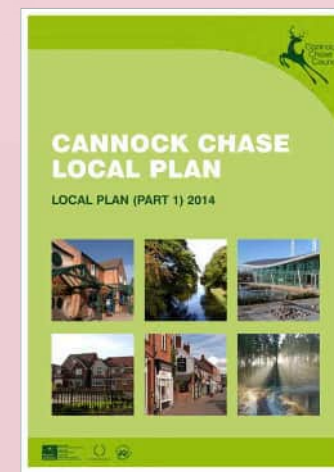
2.1.3 Norton Canes Neighbourhood Plan

In January 2018, Norton Canes Parish was designated as the Norton Canes Neighbourhood Area by Cannock Chase Council. The Parish is currently in the process of preparing a Neighbourhood Plan.

The matters the Neighbourhood Plan will cover are listed on the Parish Council's website. Among these is a desire to support the local economy and create new jobs. It is stated that "employment growth within the Parish should be welcomed". The website expresses an intention to support the development of the site between the Turf Inn and the M6 Toll.



[Right] Cannock Chase Council – Local Plan 2014
[Top] Norton Canes Parish Council – Neighbourhood Plan Campaign Graphics

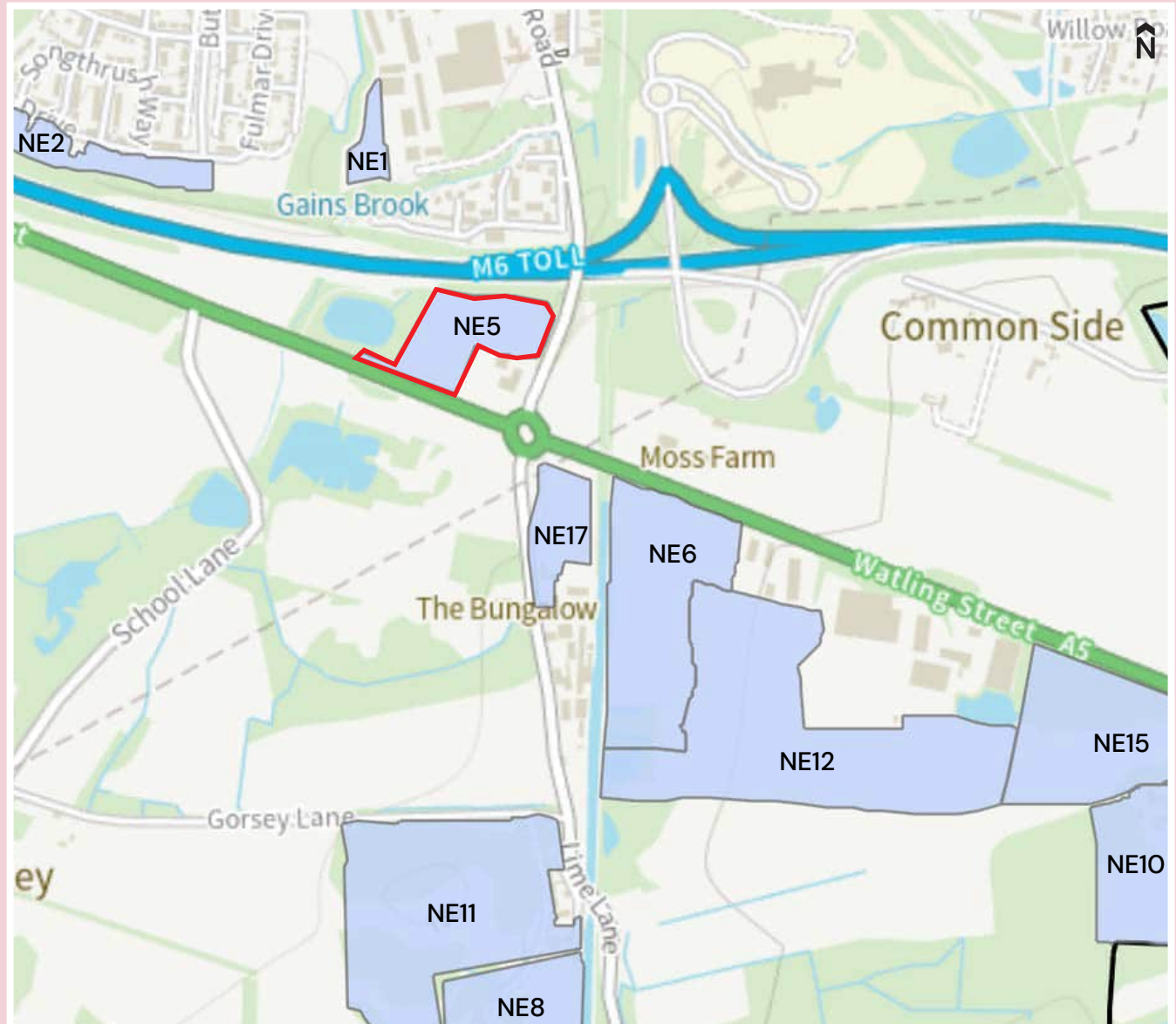


2.2 ALLOCATION

Turf Field was identified as a safeguarded site for employment, to be removed from the Green Belt, within the Regulation 18 Preferred Options Draft Local Plan. This is no longer the case.

Pegasus Group have submitted representations on behalf of ETP Property Ltd., highlighting the merits of the site and the reasons why it should be allocated or, at the very least, safeguarded, to allow the district to meet its identified employment need.

The site is exceptionally well located, with access via the B4154 and to the A5, which forms part of the strategic highway network. It is separated from the wider countryside by the M6 Toll, B4154 and A5, and is situated away from any sensitive uses. Furthermore, it is of a fairly uniform shape, flat, and within a single ownership. In addition, there is land to the west in the same ownership which can be used for Green Belt compensation, in line with the requirements of draft Policy SO7.7.



Cannock Chase Council Policies Map -
Employment Land Availability Assessment 2023

3 Development Potential

- 3.1 CONCEPT MASTERPLAN
- 3.2 A MIX OF USES

3 Development Potential



M6 TOLL



Walsall Road

Watling Street

B4154

Service Area

Service Area















3.1 CONCEPT MASTERPLAN

The promotional site is capable of accommodating a mix of employment and supporting uses, making best use of the site's wider connectivity and the surrounding context. In summary, the site is able to accommodate circa 5,000sqm of development.

The adjacent Concept Masterplan has been carefully designed, taking into account the site's constraints and opportunities and the following design principles:

- The development site is to be accessed from Watling Street (A5) and Walsall Road (B4154);
- Discrete car parking areas are proposed, with adequate space for service vehicles;
- Additional parking areas are proposed;
- Three medium-sized buildings are proposed, repeating similar built forms from surrounding employment developments;
- The proposed built form is located to the north, adjacent to the M6 toll;
- A pedestrian connection through the open space from the western boundary of the site through to Walsall Road (B4154) is proposed, allowing for foot connectivity to the existing PRoW to the north-western side of the development;
- Where possible, existing landscape will be retained;
- Where possible, existing landscape will be improved with enhanced soft landscaping;
- A drainage pond has been indicatively shown to the south-east of the site, to promote sustainable urban drainage.

Concept Masterplan

	Site Boundary		Service Road		Drainage		Existing Trees
	Built Form		On Plot Access		PRoW		Proposed Trees
	Access		Parking and Service Area		Pedestrian Link		Pedestrian Access



3.2 A MIX OF USES

The development proposals include the following:

3.2.1 Employment

The employment development has been limited to the northern and eastern boundaries of the site, across 0.35 hectares, with the proposed built form establishing circa 5,000sqm (this is based on single-storey development with a mezzanine).

3.2.2 Open Space & Green Infrastructure

The site seeks to retain existing trees and hedgerows; through the retaining of existing landscape features, the adjacent land use plan illustratively shows circa 1.00 hectares of open space and green infrastructure within the site. Additionally, the site adjacent to the balancing pond, which is under the applicant's ownership, provides a further 2.04 hectares of open space and green infrastructure that has the opportunity to be enhanced, contributing to the development's biodiversity net gain.

3.2.3 Drainage & Infrastructure

It is intended that Sustainable Urban Drainage (SuDs) features are integrated within the development to provide additional benefits such as visual amenity and enhanced biodiversity, whilst ensuring the surface water drainage is managed in a considered and sustainable manner. This initial strategy identified that the south-western corner of the site, along the site entrance, to be the appropriate location for a drainage pond of circa 0.27 hectares in response to the topography of the site.



4 Summary

4 Summary

This Promotional Document has outlined the opportunities for employment-related development on the land to the north of Watling Street, Norton Canes.

The site is strategically well located on the A5 corridor, and in very close proximity to the M6, offering a prime location for employment development to help meet Cannock Chase District Local Plan's future employment requirements.

The masterplan proposals detailed in the document have taken a landscape-led approach, demonstrating how development can proceed taking advantage of the strategically significant location on the A5 without causing undesirable harm on the surrounding landscape.

The proposals are a sustainable development solution that should be considered for allocation in the emerging Cannock Chase District Local Plan Review. ETP Property Ltd. is keen to work with Cannock Chase District Council and its Cannock Chase District Local Plan Review partners to bring forward the development proposals and is happy to meet with officers and members to discuss the proposals in more detail.





For more information on the services we offer, see our latest Expertise brochures:



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Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

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

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

Part A: Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)*
	*If an agent is appointed, please provide client Title, First Name, Last Name, Organisation (if applicable) and Post Town in column 1 and provide full contact details for the agent in column 2.	
Title		Mr
First Name		David
Last Name		Onions
Post Town		
Organisation (where relevant)	ETP Property Ltd.	Pegasus Group
Address Line 1		[REDACTED]
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]

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

Yes No

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

For Office Use	Part A Reference	
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**Cannock Chase Council:
Cannock Chase Local Plan
Representation Form**



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

Part B: Representation Form

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

Part B: Representation

Name and Organisation:	ETP Property Ltd.
------------------------	-------------------

Q1. To which document does this representation relate? (Please tick one box)

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

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

Para- graph:	5.17 – Spatial Strategy for Norton Canes	Policy:	Strategic Objective 4 S04.2 S07.7 SE2	Site:		Policies Map:	
-----------------	--	---------	--	-------	--	------------------	--

Do you consider the Cannock Chase Local Plan is:

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

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



For office use	Part B reference	
----------------	------------------	--

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

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

See attached accompanying representations.

(Please continue on a separate sheet if necessary)

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

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

See attached accompanying representations.

(Please continue on a separate sheet if necessary)

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

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



submissions.

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

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

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

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

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

(Please tick one box)

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

Sufficient employment land should be planned for to meet the identified need for this within the district; as discussed and demonstrated in the accompanying representations, the 74-hectare target set out within draft Policy SO4.2 is insufficient given that it does not take losses into account, and additional land needs to be allocated for employment. There are clear exceptional circumstances based on the evidence available to release additional Green Belt sites to meet the district's employment requirements over the Plan period. Jubilee Field, Norton Canes provides the opportunity to deliver employment development in a good quality location through Green Belt release, which is available and deliverable.

(Please continue on a separate sheet if necessary)

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

Signature:	
------------	--

Date:	15/03/2024
-------	------------

Local Plan Review 2018–2040

Cannock Chase District Council

Regulation 19 Pre–Submission Consultation

Jubilee Field, Watling Street, Norton Canes

Representations on behalf of ETP Property Limited.

Date: February 2024 | Pegasus Ref: P22–3010

Author: ARG/DO



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	January 2024	ARG	DO	-
2	February 2024	ARG	DO	Updated evidence
3	February 2024	ARG	DO	Client comments



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4. SUMMARY AND CONCLUSIONS	16

Appendix 1: Jubilee Field Site Location Plan

Appendix 2: Jubilee Field Promotional Document



1. INTRODUCTION

1.1. These representations are made by Pegasus Group on behalf of ETP Property Limited in response to Cannock Chase District Council's ("CCDC") Local Plan Review 2018-2040 Regulation 19 Pre-Submission consultation. The consultation runs between Monday 5th February and Monday 18th March 2024.

1.2. ETP Property Limited have freehold land interests to the south of Norton Canes, on a site known as Jubilee Field. The site totals 5.06 hectares, lying west of Watling Street Business Park. The site is shown in Appendix 1.

Representations

1.3. These representations respond to the emerging policies contained within the Cannock Chase District Pre-Submission Plan, having regard to the national and local policy context. Paragraph 230 of the NPPF (published December 2023) states that pre-submission plans published prior to 19th March 2024 will need to be examined under the previous NPPF (September 2023), therefore it is this version of the Framework which is referred to in this document. The representations also provide comment in respect of the evidence base that underpins the Local Plan Review.

1.4. The representations are framed in the context of the requirements of local plans and spatial development strategies to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (September 2023) ("NPPF"), Paragraph 35. For a development plan to be sound it must be:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;



- **Effective** – deliverable over the plan period, and based on effective and joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

- 1.5. These representations have regard to the NPPF’s emphasis on the role of development plans in providing a framework for employment development alongside other economic, social and environmental priorities (Paragraph 15) and in supporting the Government’s objective of supporting economic growth and productivity (Paragraph 81) by ensuring that sufficient employment land is available in the right places (Paragraph 8).
- 1.6. They also have regard to the statutory duty for local planning authorities to co-operate with other Local Planning Authorities, county councils and prescribed bodies relating to strategic matters when preparing development plan documents.



2. BACKGROUND

The Local Plan Review Process

- 2.1. The Cannock Chase District Local Plan Review is intended to replace the adopted Cannock Chase Local Plan (Part 1), which was adopted in June 2014 and covers the period up to 2028.
- 2.2. The Council's decision to review the Cannock Chase Local Plan is fully supported by ETP Property Limited to ensure that:
- planning policies and proposals are consistent with the updated NPPF;
 - the employment and economic development requirements and needs are aligned to the most up-to-date information, including economic projections and cross-boundary needs;
 - the need for employment land within the district is fully met; and
 - the local plan is up-to-date, reflecting Government guidance that plans should be regularly reviewed and the evidence base renewed to respond to changing needs.
- 2.3. A series of consultations to shape the new Local Plan have been held by CCDC to date. These consist of an initial Issues & Scope (Reg 18) consultation in July to August 2018, followed by an Issues & Options (Reg 18) consultation between May to July 2019. The most recent consultation to have taken place was the Preferred Options (Reg 18) in March to April 2021. Although the CCDC Cabinet resolved to proceed to consult on a pre-submission version of the plan (Reg 19) in August 2022, this never occurred due to the evidence base being incomplete.
- 2.4. The Council are now consulting on a revised pre-submission plan. This plan will be the version submitted to the Secretary of State and examined by an independent Inspector.

Jubilee Field Site

- 2.5. ETP Property Limited have freehold land interests in a 5.06-hectare site, known as Jubilee Field, located to the south of Norton Canes, which is currently in agricultural use. This is located within the West Midlands Green Belt. The site is bound by the Cannock Extension Canal to the west, and it adjoins a roadside service area to the east, which includes a filling



station, Starbucks, and Asda on the Go. Immediately to the east of this is an existing area of employment land, the Watling Street Business Park. There is a smaller area of industrial units to the west of the site, across the canal, accessed from Lime Lane. There is open countryside to the south and south east of the site.

- 2.6. The M6 Toll is located north of the site, and Norton Canes is situated beyond this. There is a substantial amount of fairly recent residential development in the south of the village, some of which is still being built out, as well as a large area of existing employment land in the east and further north.
- 2.7. ETP Property Limited are promoting the Jubilee Field site for employment use. In the Pre-Submission Plan, it is identified as a safeguarded site which is to be released from the Green Belt (site reference **S4**), to accommodate further growth requirements beyond the plan period.
- 2.8. Jubilee Field is exceptionally well located and is an optimal site for employment development. It has easy access to the A5 the strategic highway network and would form a logical employment extension from the Watling Street Business Park, which is already allocated to be extended to the south and west (site ref SE2). Furthermore, it is flat and falls within a single ownership.
- 2.9. A promotional document for the site has been produced (Appendix 2), which includes a concept masterplan demonstrating how industrial units can be accommodated on the site, as well as landscaping, parking, and servicing areas. The document provides more detail on the site's context and development potential.
- 2.10. Norton Canes Parish Council are in the process of preparing a Neighbourhood Plan. One of the issues this plan will consider is the local economy. The Parish Council's website encourages employment growth within the parish and offers support for extensions to the Watling Street Business Park, south of the A5 (where Jubilee Field is located), for this purpose.

3. REPRESENTATIONS ON THE CONTENTS OF THE PRE-SUBMISSION 19 PLAN

- 3.1. Having reviewed the Pre-Submission Plan, representations are provided on the policies most relevant to the Jubilee Field Site.

The Spatial Strategy for Norton Canes

- 3.2. In the introduction of the Local Plan, the spatial strategies for the district's settlements are outlined. For Norton Canes, there is little reference to employment, which is a notable omission in light of the fact that the draft plan contains a Strategic Objective related to this (commented on below), and there is an emphasis within the NPPF to support economic growth and productivity. Reference is made to prioritising residential and commercial development, yet the strategy also notes that the settlement has already seen "significant growth" over the previous plan period, with land for a further 66 dwellings allocated in the draft plan. Paragraph 93 of the NPPF emphasises the need for an integrated approach with regards to the location of housing and economic uses, thus, to ensure consistency with this national policy and soundness, there is an opportunity to make reference to providing high-quality employment land within and around the settlement to maintain a balanced community with local jobs. There are clear locational advantages to doing so, given the proximity and excellent links to the A5 and M6 Toll, which form part of the strategic road network. Indeed, with the village's growing population, employment development here can help to provide local jobs for new residents. Without a spatial strategy which includes a meaningful reference to the economy in Norton Canes, the Local Plan does not provide a suitable framework to deliver sustainable development for the settlement of Norton Canes, one of the most important settlements in the district.

Strategic Objective 4 (Encouraging a Vibrant Local Economy and Workforce)

- 3.3. This overarching policy on the economy is supported. In particular, the inclusion of the need to provide "*a range of sizes and types of employment sites to meet modern business needs*" and "*employment opportunities in locations which best respond to market demands and which will attract inward investment*". These are essential in order for the plan to be consistent with national policy, namely Paragraphs 81 – 83 of the NPPF.

3.4. The types of sites to be provided should align with the need identified in the evidence base. The Economic Development Needs Assessment (EDNA) (2019), at Paragraph 6.94, recommends that 75% of employment land provided should be for industrial/warehousing units (specifically Use Classes B1c/B2/B8). This figure has since increased to 85%, as set out at Paragraph 4.115 of the 2024 update to the EDNA, signifying that the need for this type of employment land is increasing relative to office space. The sites proposed to be allocated under Policy SO4.2 are mostly B2 and/or B8 with some office space, with only one allocation solely for offices (site ref E6). This is consistent with the evidence.

Policy SO4.2 (Provision for New Employment Sites)

3.5. This policy sets out the proposed strategic employment allocations and details on the amount of employment land to be delivered.

3.6. The policy states that up to **74 hectares** of employment land is to be provided¹ over the plan period, which is greater than the previous target of 66 hectares and is in line with the most recent update to the EDNA (dated 8 January 2024), which identifies a need of 43–74 net hectares of employment land between 2018 and 2040. However, the policy does not make clear whether the 74-hectare target is the net figure, as per the EDNA, or a gross figure, as implied in the Employment Topic Paper², and it is unclear, within the evidence base, as to what precisely is meant by net and gross in this context. This must be clarified within the policy to ensure that it is justified and positively prepared.

3.7. The 74-hectare figure is derived from an analysis in the EDNA relating to future growth conditions. Due to forecasted job growth being within sectors that specifically require more employment land – such as logistics and storage – the EDNA identifies a figure that will allow anticipated needs to be met. However, as mentioned in paragraph 4.107 of the EDNA, the 74-hectare net figure in the EDNA does not include an allowance for the replacement of losses.

¹ It is noted that there are contradictions in the amount of employment land which is to be provided. The spatial strategy in the Pre-Submission Plan states that up to 69 hectares of employment land is to be delivered (page 35). This is also the figure in the non-technical summary (paragraph 1.8) and is also referred to as the final target in the report to Cabinet dated 14th December 2023 (paragraph 5.2.1). However, Policy SO4.2 identifies the target as 74 hectares instead, as does the Employment Topic Paper dated December 2023. For the purpose of these representations, it is assumed that 74 hectares as the correct figure given its inclusion within the policy itself. The Council should review this to ensure consistency across the document for soundness.

These currently average 1 hectare per year, and the Council, in the Employment Topic Paper, suggest that this rate may increase (paragraph 5.1, sixth bullet point). When considering this, as much as 94 hectares (gross) of employment land needs to be planned for, as recommended in the EDNA. Therefore, the evidence base suggests that up to 20 additional hectares may need to be identified due to anticipated losses. For the Local Plan to be effective, it is imperative for the Council to plan for sufficient employment land, to meet its estimated requirement.

- 3.8. Therefore, ETP Property Limited object to Policy SO4.2 on the basis that the target of 74 hectares is insufficient as it excludes an adjustment for losses. It is unclear within the policy as to whether or not 74 hectares is a net figure, as in the EDNA, or gross, as in the Employment Topic Paper, and indeed how these are defined within the evidence base. Clarity and consistency on this point within the policy is essential. The **94-hectare gross** figure in the EDNA should be planned for instead to allow for maximum flexibility given that the Council warn there could be an even greater loss of stock (over and above the current 1ha per annum). This will ensure that the policy is positively prepared, fully justified, and sound which, at present, is not the case.
- 3.9. The Council have identified an employment land supply of **73.34 hectares** to meet the need for this type of land over the plan period. The Employment Topic Paper (December 2023) indicates that the Council are reliant on sites which have been completed since 2018 (16.59 ha), which fall within the plan period, those under construction (3.43 ha), sites with planning permission (9.35 ha), and the intensification of existing sites (15.91 ha). In addition, the West Midlands Strategic Rail Freight Interchange (WMSRFI), in South Staffordshire, will contribute 10ha towards employment land need. The WMSRFI Employment Issues Response Paper – ‘Whose Needs will the SFRI Serve?’ (dated February 2021) identifies, in Table 5, that Cannock Chase are entitled to this 10-hectare land share. Without double-counting allocated sites which are already have planning permission, there will be a shortfall of approximately 0.66 hectares against Policy SO4.2’s 74-hectare target based on the Council’s calculations.
- 3.10. The Employment Topic Paper, in Table 6, identifies the specific sites which are to be intensified. However, a review of the Economic Land Availability Assessment (ELAA) 2023 reveals that a number of these sites are, in fact, not readily available. This means that they are not suitable or available for development. These consist of Ridings Park (site CE3), the Former Hawkins Works (CE7f), Gestamp (CE61), Former JCB, Rugeley (RE30), the Former

Porcelain Works (CE15b), the former ATOS origin site (CE42), Northwood Court (CE62), Unit 12 Conduit Road (NE7), and the Yates Bros Sports and Social Club (NE17). These sites have expired planning permissions, previously refused or withdrawn applications, areas of land already lost to other uses, and/or are situated close to air quality management areas. As they are not readily available, these sites – amounting to **11.19 hectares** – should be discounted from the supply.

3.11. The ELAA does, however, identify a number of readily available sites – which are suitable and available in the short to medium term – in Table 3.1, totaling **17.83 hectares**. These include some of the sites with planning permission and a selection of those identified for intensification. However, several of these should also be discounted, as detailed in Table 1 below.

Site	Area to Discount	Reasoning
CE63 (Former Rumer Hill Industrial Estate)	2.83	This is now being promoted for residential use, rather than employment, with its planning permission for employment having now expired (CH/19/280).
RE24 (Rugeley Power Station)	1.5	The area identified for employment within the outline application (CH/19/201), is cross-boundary, with only 3.5 hectares falling within the district, meaning that the published 5-hectare figure should be reduced accordingly.
RE27 (Land at Power Station Road)	1.8	Site has extant planning permission for a retail foodstore (CH/20/306), which is not an employment use, and it is therefore not readily available for this purpose
Site RE29 (Land at the Academy Early Years Childcare)	0.14	Being considered for a children’s care home rather than employment.
NE1 (land off Norton Green Lane)	0.56	Indefinitely unavailable for further development as it is in use as a construction training site

3.12. Taken together, these sites amount to **6.83 hectares**. Therefore, with these deductions, we consider the total of genuinely readily available sites to be as low as **11 hectares**.

- 3.13. Furthermore, it is evident that other previously identified sites which the Council thought could be used for employment are now undeliverable. Two of these, on Power Station Road, are recognised as such by CCDC in the Cabinet report at paragraph 5.37 (site references RE7 and RE8), and they have been removed from the plan as a result, having previously been draft employment allocations. For clarity, these sites are also not on the list for those which will be intensified (Table 6 of the Employment Topic Paper). Furthermore, other sites the Council have earmarked for employment in the past may also not be coming forward for this purpose. For example, Phases 5 and 6 at Norton Hall Lane are now being developed for housing rather than employment as initially approved under CH/10/O294 and are no longer identified within the supply as a result.
- 3.14. The focus on (intensifying) existing locations – ‘churn sites’ – aligns with CCDC’s adopted policy position to encourage and support the redevelopment of current employment land (Policy CP8). The ELAA confirms that there is a reliance on average quality locations for employment, as this is where the supply is available; it is limited in very good/good quality locations. Indeed, it is considered that some of those identified in Table 6 of the Employment Topic Paper are located in such areas, such as those in Rugeley, which are peripheral within the district. Sites need to be located in the most accessible locations to be attractive to the market, to encourage investment and growth in line with Paragraph 81 of the NPPF. Otherwise, if they lack appeal, they may not be (re)developed for employment uses at all and would therefore need to be discounted from the supply. As a result of this, the LPA’s reliance on the redevelopment of existing sites in less attractive locations is high risk as it may not deliver.
- 3.15. The Authority Monitoring Report, on page 22, sets out the employment land completions. Whilst this has averaged 4.8 hectares between 2006 and 2022, only 1.79 hectares were completed in 2021/22 – almost two thirds less than the annual average. According to the ELAA, recent completions have been at Norton Canes Business Park (Site NE13), Tower Business Park, Rugeley (Site RE2a), and numerous in Cannock, Hednesford, and Heath Hayes (sites CE59, CE67, CE68, CE4a, CE78, CE77, CE79, and CE80). These schemes mostly consist of the redevelopment or extension of existing employment sites.
- 3.16. With regards to the inclusion of 10 hectares of land from the West Midlands SRFI, as discussed above the Employment Issues Response Paper – ‘Whose Needs will the SRFI Serve?’ (dated February 2021) establishes, within Table 5, that Cannock Chase are entitled to this 10-hectare



land share. As such, the inclusion of this within Cannock's employment land supply is not disputed.

- 3.17. The Council allocate seven sites for employment within Policy SO4.2. Since the previous version of the last plan, the Watling Street Business Park Extension has been upgraded from a safeguarded employment site (ref SE2) to a strategic employment allocation. Despite this, a review of Table F within the draft policy – which sets out the employment allocations, including the newly added SE2 – indicates that the allocations only amount to **22.81 hectares** of employment land. This is only 0.81 hectares greater than the amount of site-specific allocations identified when the target was only 66 hectares in the previous iteration of the draft Local Plan.
- 3.18. In light of the above, and on the basis that the Council should be planning for 94 hectares to account for losses in employment land, the scale of undersupply is up to **38.68 hectares**, when taking into account of the sites discounted and the existing 0.66-hectare shortfall. Even if the 74-hectare target is to remain unchanged, there is still a shortfall of **18.68 hectares**. Given that the Council are relying on peripheral sites in average quality locations, a high-risk approach as they may not be delivered, it is difficult to see how the Local Plan as drafted can meet the identified need for employment land. This must be addressed to ensure a sound plan, as at present it appears this policy is unlikely to be deliverable, in which case it would fail to meet the 'effective' test of soundness.
- 3.19. The Council therefore need to take a different approach, starting with planning for the correct amount of employment land, preferably 94 hectares as per the EDNA, whilst making up the shortfall to the greatest extent possible to ensure that the employment needs of the district can be met over the plan period.
- 3.20. As discussed above, and through a review of the evidence base – namely the AMR and ELAA – it is apparent that there is no additional previously developed land for the Council to intensify and redevelop, with all such sites having been considered and identified in the ELAA and Employment Topic Paper. Therefore, there is a need to consider other ways through which the supply can be increased. Sites can be delivered in the Green Belt in good quality locations i.e. well-located, suitable for investment, and larger than 0.4 hectares, in order to help address the shortfall. Appendix F of the ELAA identifies all sites located along the A5 corridor as being of a good quality. Paragraph 8 of the NPPF highlights that employment sites



should be provided in the right places, and the A5 corridor is evidently an optimal location for these uses in the opinion of Cannock Chase District.

- 3.21. In summary, ETP Property Limited object to Policy SO4.2. Having reviewed the evidence base, a shortfall in available employment land of up to **38.68 hectares** has been identified. We contend that, with around circa 62.15 hectares to realistically rely on, the Local Plan will be unable to meet its employment land requirements, and this needs to be addressed within the policy, through the allocation of further sites in good quality locations in the Green Belt, given that there all previously developed land appears to have already been considered. This will ensure a sound policy that is positively prepared, effective, and consistent with national policies, including Paragraph 86 of the NPPF in providing sufficient land to enable investment and growth to successfully meet the identified need over the plan period.

Policy SO7.7 (Amendments to the Green Belt)

- 3.22. ETP Property Limited support the removal of sites from the Green Belt to accommodate requirements for growth, both during and beyond the next plan period. The need for employment land is increasing, evidence of which is provided by, for example, iterations of the EDNA, all of which demonstrate a need for higher targets in the draft Local Plan.
- 3.23. Jubilee Field is in a good quality location, on the A5 corridor, which is available and deliverable for employment. Whilst support is offered for the removal of Jubilee Field from the Green Belt and its inclusion as a safeguarded site, ETP Property Limited strongly affirm that it should instead be a full employment allocation under Policy SO4.2, to contribute towards meeting the shortfall in employment supply over the plan period. It is able to be brought forward for this purpose in the short to medium term, and there is evidently a need for deliverable sites to meet the shortfall in employment land.
- 3.24. There is one less safeguarded site compared to the August 2022 Pre-Submission Local Plan, due to the Watling Street Business Park Extension having been upgraded to a strategic employment allocation, with no replacement safeguarded site. Paragraph 143(c) of the NPPF requires the identification of safeguarded land to meet longer term development needs; as set out above, sufficient land has not been released from the Green Belt for employment to cover the plan period, let alone beyond this. As such, it is important to add additional safeguarded sites to ensure that future growth can be accommodated in the longer term. Providing sufficient safeguarded land will result in a policy which is consistent with national

policies, and therefore sound. If not upgraded to a full allocation as a further extension to Watling Street Business Park, Jubilee Field should at the very least retain its draft safeguarded allocation to help ensure this is the case.

3.25. The Cannock Chase Green Belt Harm Assessment (2021) scores parcels against their contribution towards meeting the five purposes of the Green Belt set out in Paragraph 143 of the NPPF. Jubilee Field falls within a much wider area of land, with its contribution as follows:

- a) to check the unrestricted sprawl of large built-up areas – **weak/none**
- b) to prevent neighbouring towns merging into one another – **moderate**
- c) to assist in safeguarding the countryside from encroachment – **strong**
- d) to preserve the setting and special character of historic towns – **weak/none**
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land – **equal contribution across all parcels**

In terms of the specific Jubilee Field parcel, it is important to note that it is mostly segregated from the rest of the countryside by the A5 to the north, and existing development to the west and east. As a result, this affects its Green Belt functions, particularly in relation to openness and amenity value, as acknowledged on page 66 of the Green Belt Topic Paper (December 2023).

3.26. Jubilee Field is exceptionally well located for employment purposes, with easy access to major road networks. In addition, it is in close proximity to recent residential development to the north, for example off Rosefinch Drive and Hollybush Grove. As such, the development at Jubilee Field will allow for the creation of a sustainable community with employment able to be reached by foot. This aligns with Paragraph 93 of the NPPF, which encourages an integrated approach to the location of housing and employment. Jubilee Field is capable of accommodating a number of industrial units and would also complement existing employment areas in the area to the north, south east, and east. Appendix B includes a concept masterplan and more details on the development potential of the site.

3.27. Clearly, exceptional circumstances need to exist in line with national policy to justify the removal of Jubilee Field from the Green Belt. However, these are not identified in the Green Belt Topic Paper (2023). This does, however, set out the exceptional circumstances

underpinning their decision to release the Watling Street Business Park Extension as a full allocation, and we contend that these circumstances apply to the Jubilee Field site as well, as outlined below:

- **Employment need** – given the shortfall, there is still a pressing need for additional employment land for growth over the plan period.
- **Deliverable and appropriate location** – industrial units capable of meeting modern requirements can likewise be located here; it is an appropriate site to do so given these uses are already in the immediate vicinity.
- **Access requirements** – Jubilee Field can also be accessed from the A5, has good links to strategic road network, and therefore is an optimal location for employment. This is acknowledged on page 66.
- **Specific locational requirement** – a logical extension to an existing business park, which is a key reason why Jubilee Field is considered suitable for employment, as mentioned elsewhere in the Green Belt Topic Paper.

3.28. Therefore, given that the same exceptional circumstances apply for Jubilee Field and a shortfall in employment land exists, the Council are encouraged to upgrade Jubilee Field to a full employment allocation to be brought forward alongside the extension to the Watling Street Business Park, to better meet the district’s needs over the plan period.

3.29. The supporting text of the policy discusses the Jubilee Fields site, at paragraph 6.334. It emphasises that it is capable of “*delivering sustainable employment development*”, whilst noting its potential to improve connectivity and provide enhancements to biodiversity and strategic green infrastructure. This is endorsed; Jubilee Fields is a highly sustainable and suitable site on which to accommodate growth, which is, at the same time, capable of providing wider benefits for the local area beyond simply helping to meet the need for employment.

3.30. Policy S07.7 also refers to the need to provide appropriate mitigation to compensate for the loss of Green Belt Land. ETP Property Limited support the inclusion of this within the policy. In the case of Jubilee Field, the Pre-Submission Plan identifies its potential to deliver the required compensation to mitigate the impacts of its removal from the Green Belt – through improvements to biodiversity and green infrastructure links, including to the Cannock

Extension Canal SAC and Wyreley Common. These are the same areas identified for biodiversity improvements for the Watling Street Business Park extension in the Green Belt Topic Paper. Therefore, it would make sense for the sites to be allocated together so that these improvements can be delivered in an integrated manner at the same time to cover both sites. In any case, the Council are reminded that the compensation measures must be proportionate to the amount of land which is being removed from the Green Belt, and there may be issues over control of land falling within different ownerships and thus whether compensation, in the locations described, is deliverable as a result – this is not addressed within the policy or its supporting text.

- 3.31. Overall, therefore, whilst the principles and components of the policy are supported, it is contended that Jubilee Field should first be considered for a full employment allocation – able to be brought forward alongside the Watling Street Business Park Extension, with which it shares the same exceptional circumstances – to meet employment land requirements during the plan period, rather than a safeguarded site for future growth. In any case, with the loss of one safeguarded site, another should be allocated in its place, to ensure there is sufficient safeguarded land as per Paragraph 143c of the NPPF. It is considered that the policy is unsound until sufficient safeguarded land is included, as it will not allow for longer term needs to be appropriately met, meaning that the policy is not currently positively prepared, effective, or consistent with national policy.

Policy SE2 (Watling Street Business Park Extension)

- 3.32. This inclusion of the Watling Street Business Park Extension in the Pre-Submission Plan as a strategic allocation is supported by ETP Property Limited. It is an appropriate and well-connected location for expansion, to meet the demand for employment land over the plan period. However, as argued above, it is considered that the Jubilee Fields site should be allocated and brought forward alongside this. It is situated in close proximity to the business park, and once extended it will adjoin it. As such, and as discussed in the Green Belt Topic Paper, it would deliver a further logical extension to the employment site, and a combined approach could potentially be taken in terms of Green Belt compensation and mitigation measures, as well as improvements to connectivity and recreation. Given that Jubilee Field is already identified as a safeguarded site in any case, explicit reference could at least be made to it within the policy as an opportunity for additional growth during the plan period, or in the longer term.



3.33. It is important to again note that the circumstances that support the SE2 allocation also apply to the Jubilee Field site, and therefore there is no reason why it should not likewise be upgraded to a full employment allocation given that there is a still a shortfall in the provision of employment land against the 74-hectare target. For example, both sites are capable of being accessed from the A5, are good quality employment locations given their position on this corridor and are identified as being able to provide pedestrian and cycle routes. Given their proximity and similarities, these sites should be allocated and delivered in tandem to provide more employment land within the plan period in an integrated fashion.



4. SUMMARY AND CONCLUSIONS

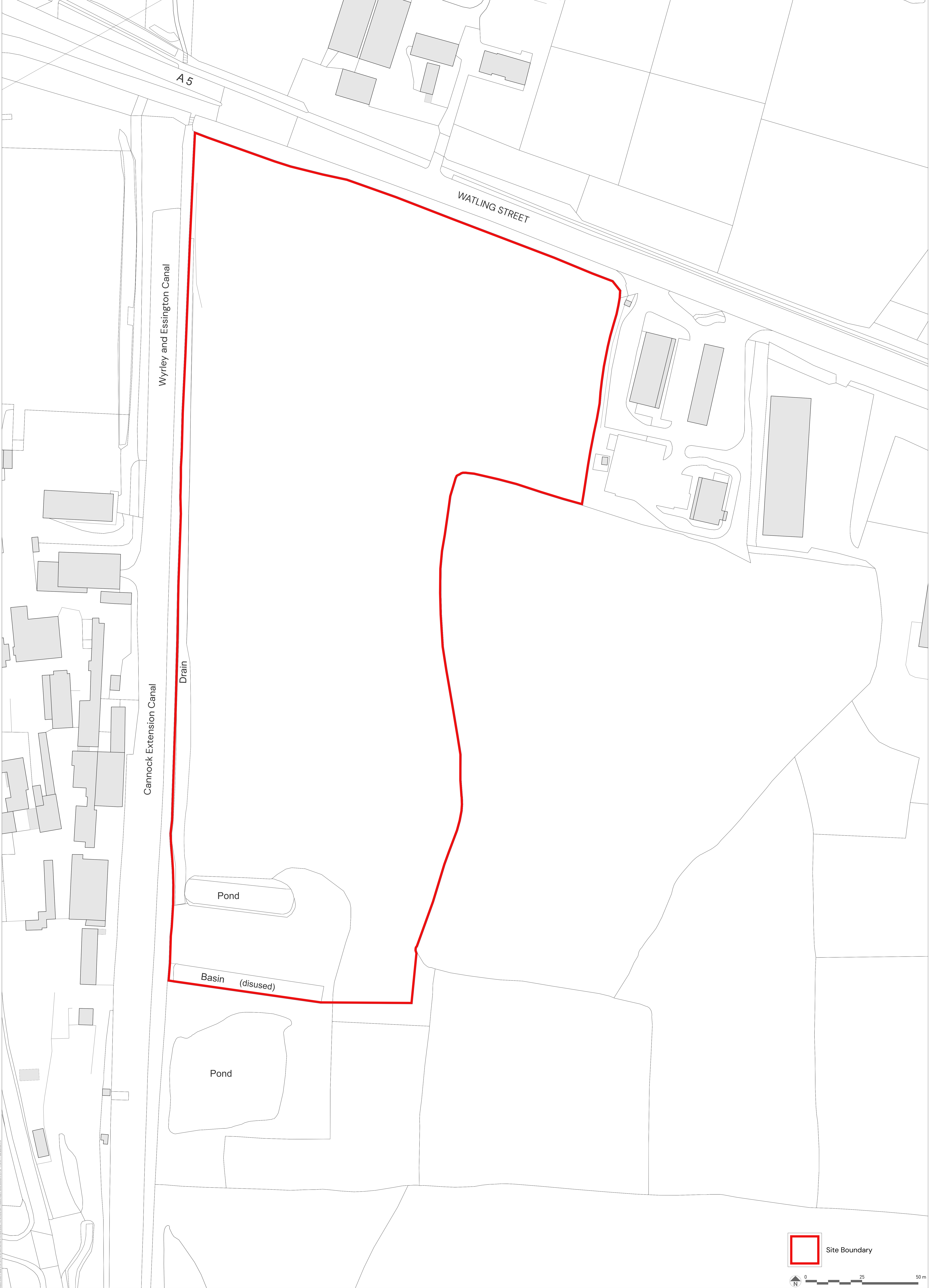
- 4.1. These representations have been prepared by Pegasus Group on behalf of ETP Property Limited.
- 4.2. The representations have contended that Policy SO4.2's 74-hectare target for employment land provision over the plan period, derived from the EDNA, will be insufficient as this does not take losses into account. The EDNA states that the requirement for employment land increases to as much as 94 hectares when this is done. The Council should plan for as much employment land as possible, preferably this higher figure, to ensure that the need for this land can be met.
- 4.3. Whilst a supply of 73.34 hectares has been identified – already a small shortfall of 0.66 hectares – several of the sites identified for intensification should be discounted as the ELAA notes that they not readily available. Overall, the scale of undersupply is as high as 38.68 hectares, when planning for 94 hectares. However, even if the 74-hectare target is to remain unchanged, there is still a shortfall of 18.68 hectares.
- 4.4. The Council are relying on peripheral sites in average quality locations, a high-risk approach as they may not be delivered, and it appears that all potential previously developed sites have already been considered. Therefore, the Council need to take a different approach, releasing land from the Green Belt in good quality locations for employment to address the shortfall in the supply.
- 4.5. Policy SO7.7 sets out the proposed amendments to the Green Belt, and one of the sites proposed to be removed and safeguarded to meet longer term needs is Jubilee Field.
- 4.6. ETP Property Limited are promoting their freehold interest in Jubilee Field for employment purposes. The site benefits from being in a good quality location – which the AMR identifies are currently limited – with easy access to the strategic road network. It is available, suitable, and deliverable for employment. The development potential for the site is set out in more detail in Appendix 2. The site only performs a limited Green Belt function, particularly in terms of openness and amenity value, due to being segregated from the rest of the countryside by the A5 to the north, and existing development to the west and east. This is acknowledged in the Green Belt Topic Paper.



- 4.7. In addition, Jubilee Field shares the same exceptional circumstances which have been used to justify the removal from the Green Belt of the Watling Street Business Park Extension site, and given their similarities and the shortfall, it makes sense for the sites to be brought forward together as full employment allocations for the coming plan period, in the context of a shortfall in supply and lack of previously developed land to remedy this, meaning that more Green Belt sites in good quality locations which are available and deliverable, such as Jubilee Field, are required to meet the need for employment land over the plan period.



APPENDIX 1: JUBILEE FIELD SITE LOCATION PLAN



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WATLING STREET

Wyrley and Essington Canal

Cannock Extension Canal

Drain

Pond

Basin (disused)

Pond

Site Boundary





APPENDIX 2: JUBILEE FIELD PROMOTIONAL DOCUMENT

Jubilee Field

Watling Street, Norton Canes

Prepared by Pegasus Group on behalf of **ETP Property Ltd.**
Date: **March 2024** | Contact: **WB/ QH**
Document reference: **P22-3010_G001C**



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I Introduction & Site Context

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- 1.2 THE SITE
- 1.3 EXISTING CONTEXT
- 1.4 CONSTRAINTS & OPPORTUNITIES

1 Introduction



Location Plan



1.1 INTRODUCTION

This Promotional Document has been prepared by Pegasus Group on behalf of ETP Property Ltd. in relation to their interest in the land south of Watling Street, which falls within Cannock Chase District Council's administrative area. The document considers the potential for employment-led development on the land south of Watling Street. The relevant current and emerging planning policy context is considered, and the strategic advantages of the site are outlined. An Indicative Masterplan has also been prepared to show how employment uses could be accommodated in this location.

This Promotional Document summarises the site and its development potential, as well as the rationale for the scheme in the context of available evidence of economic development requirements in the area.

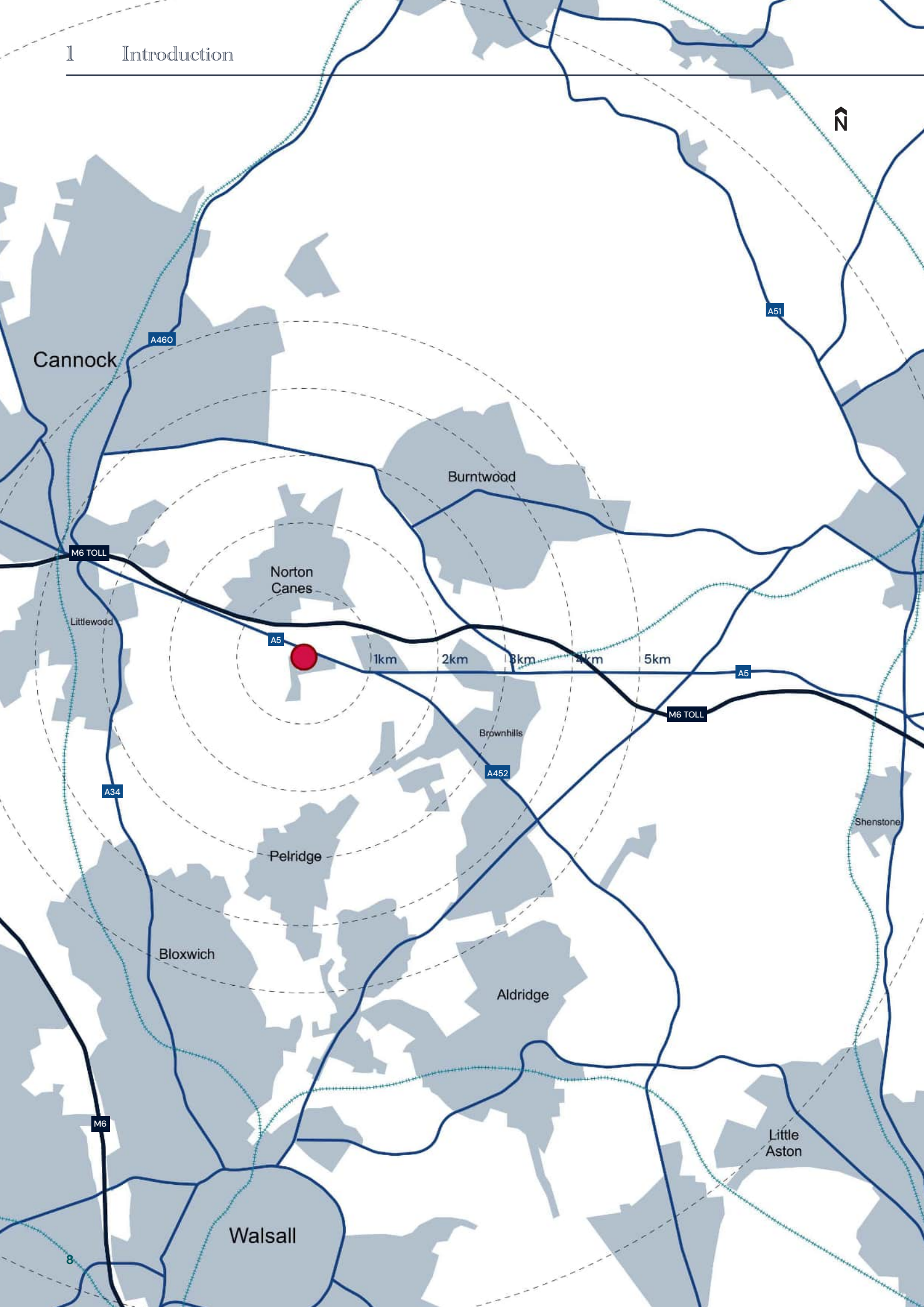
1.2 THE SITE

The site is an existing agricultural field in the south of Norton Canes, situated south of Watling Street (A5) and the M6, and east of Lime Lane, and extending to some 5.07 hectares. Cannock Extension Canal defines the site's eastern edge; the western boundary is delimited by an agricultural field and existing employment buildings, including a petrol station, a Starbucks and a recycling centre.

The site (site reference: NE6) was identified as suitable for development in the Employment Land Availability (ELA) Assessment conducted by Cannock Chase Council in 2023.



1. View to the site's north-western boundary.
2. View to the site's north-eastern boundary.
3. View to the site's south-eastern boundary.



1.3 EXISTING CONTEXT

The land south of Watling Street lies within the jurisdiction of Cannock Chase District Council and within Norton Canes Parish Council.

The site has a rural setting but is well connected to nearby urban areas. It is located in the south of Norton Canes, and is served off the A5 (Watling Street), which is part of the strategic highway network connecting Tamworth to the east and Telford to the west. The site is also in close proximity to the M6 that extends to the south to Birmingham's periphery, and to the north to Stoke-on-Trent. The plan opposite highlights the site within the context of the local area.

The site neighbours existing commercial buildings, including a petrol station, and Watling Street Business Park, making it a logical location for future employment expansion.



1



2



3

Site in Context

- Site Location
- Main A Roads
- Motorway Roads
- Urban Areas
- Railway Line

1. Toby Carvery Norton Canes.
2. Starbucks Coffee Shop.
3. Esso Petrol Station.

1 Introduction

1. Watling Street (A5).

2. Cannock Extension Canal.

3. Petrol Station (Esso) bordering the A5.

4. Current agricultural access to Jubilee Field.

5. Hedgerows and trees on the northern site boundary bordering the A5.

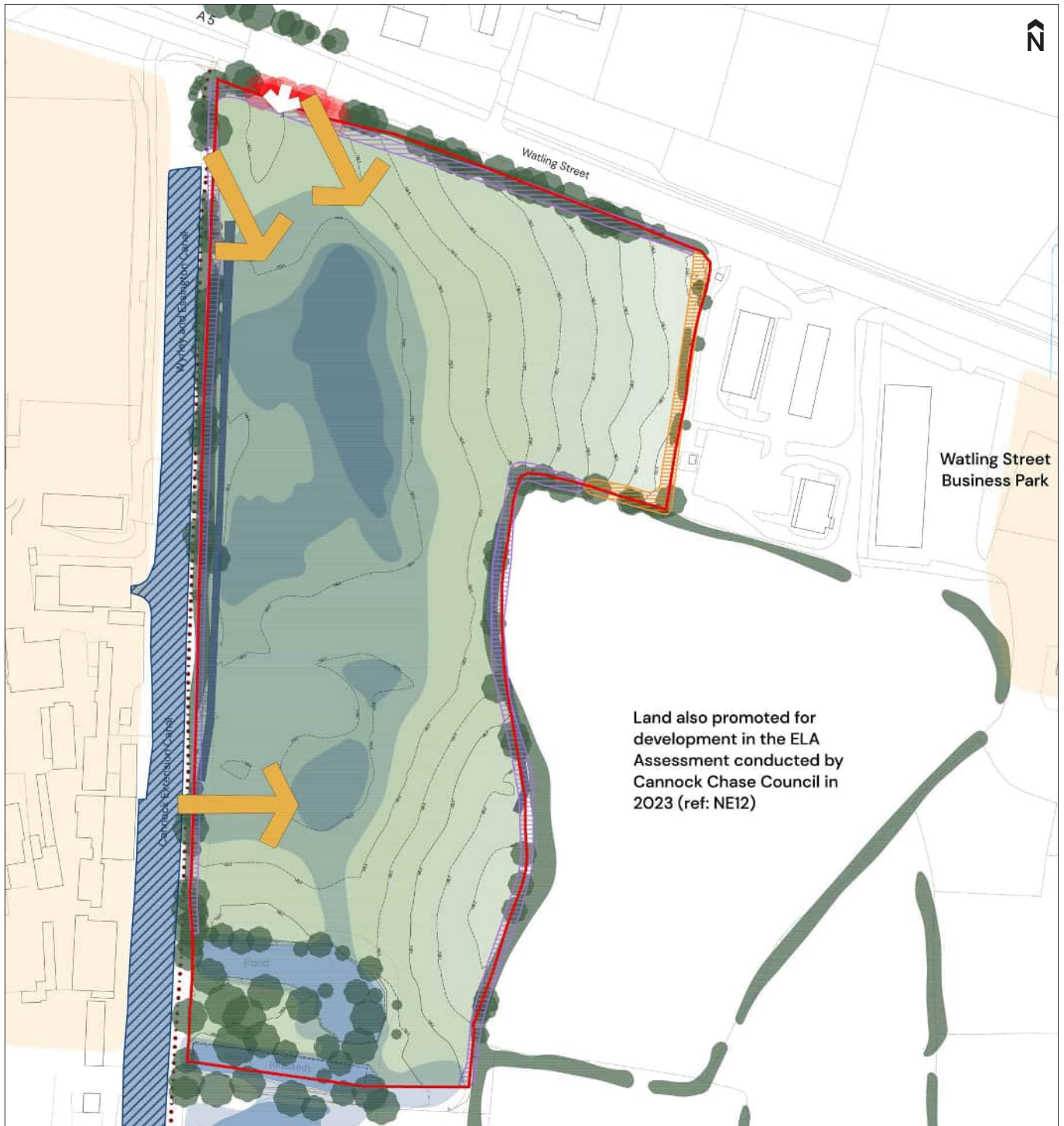
6. Commercial buildings along the A5.



- 7. View of site, facing the south-western boundary.
- 8. Existing pond to the south of the site.
- 9. View across the site from adjacent field.

- 10. View across the site, facing the canal.
- 11. View facing the northern site boundary.
- 12. Existing pond to the south of the site.





Constraints & Opportunities

	Site Boundary		Drains		Species-rich Native Hedgerow with Trees		Site Access
	Public Footpath		Existing Ponds		Historical Landfills		Key Views into Site
	Site Contours		SSSI & SAC*		Existing Vegetation		
	Extent of Flooding (Surface Water)		Non-native and Ornamental Hedgerow		Trees for Removal		*Sites of Special Scientific Interest (England) & Special Area of Conservation (England)

1.4 CONSTRAINTS & OPPORTUNITIES

Technical work has been undertaken to demonstrate that the site is deliverable and that there are no constraints to prevent the allocation of the site as an employment site in the emerging Local Plan.

The Masterplan has been informed by a Preliminary Ecological Appraisal, a Geo-Environmental Assessment and a Highways Assessment to demonstrate that the quantum of development proposed can be successfully delivered.

The site's proximity to the existing Watling Street Business Park makes it a logical direction of growth to meet the Council's employment needs in a sustainable manner.

The following points were made following an analysis of the site:

- Development to be accessed off of Watling Road;
- The site neighbours Watling Street Business Park, which is also being promoted for expansion;
- Existing commercial use to the east and west of the site;
- The site is joined to an existing urban area with good connectivity to nearby towns and amenities;
- Opportunities to maintain and enhance the existing trees and vegetation, in particular the existing species-rich native hedgerows bordering the site boundaries;
- Opportunities to provide a biodiversity net gain;
- The most elevated part of the site is to the north-east, resulting in any surface water flow to circulate towards the south-western boundaries and existing ponds.
- The site is currently within the extent of the green belt.

1. View of adjacent NE12 allocated site
2. Cannock Extension Canal to the immediate west of the site



2

Planning Policy

- 2.1 PLANNING POLICY CONTEXT
- 2.2 ALLOCATION

2 Planning Policy

2.1 PLANNING POLICY CONTEXT

2.1.1 Adopted Policy

The development plan for the area is the Cannock Chase Local Plan (Part 1), which was adopted by Cannock Chase Council in June 2014. This sets out the core policies which guide development within the district.

Policy CP8 states that at least 88 hectares of new and redeveloped employment land will be provided over the plan period, which is 2006 – 2028. Key locations for growth are identified, but it is noted that other locations can also be considered for employment uses against other policies within the Local Plan, particularly the strategy for the district which is outlined within Policy CP1. This states that the Council will take a positive approach when considering proposals, reflecting the presumption in favour of sustainable development, in line with the National Planning Policy Framework (NPPF).

2.1.2 Emerging Policy

The Cannock Chase District Local Plan Review is intended to replace this plan and its strategic policies, extending the timeframe until 2040.

A series of consultations to shape the new Local Plan have been held by to date. These consist of an initial Issues & Scope consultation in July to August 2018, followed by an Issues & Options consultation between May to July 2019. The most recent consultation to have taken place was the Preferred Options in March to April 2021. Although Cabinet resolved to proceed to consult on a pre-submission version of the plan in August 2022, this never occurred due to the evidence base being incomplete.

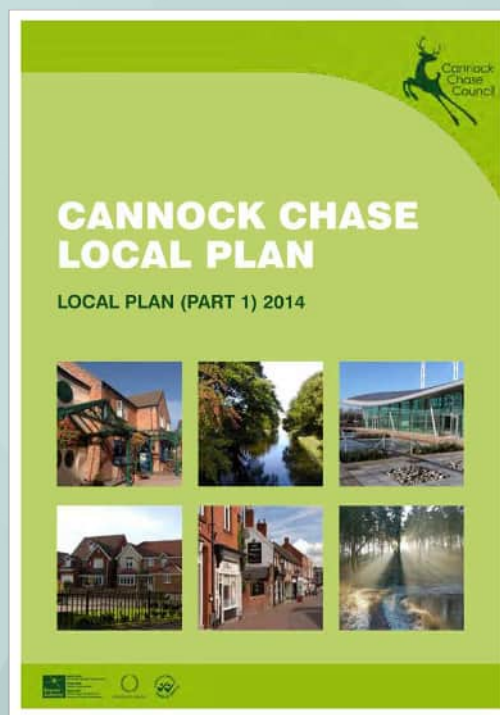
The Council are now consulting on a revised pre-submission plan. This will be the version submitted to the Secretary of State and examined by an independent Inspector.

Draft Policy SO4.2 states that provision will be made for 74 hectares of employment land. In order to meet this requirement, a number of sites have been allocated for employment, whilst others have been safeguarded for this purpose to meet a longer-term need. All these identified sites are proposed to be released from the Green Belt under draft Policy SO7.7.

2.1.3 Norton Canes Neighbourhood Plan

In January 2018, Norton Canes Parish was designated as the Norton Canes Neighbourhood Area by Cannock Chase Council. The Parish is currently in the process of preparing a Neighbourhood Plan.

The matters the Neighbourhood Plan will cover are listed on the Parish Council's website. Among these is a desire to support the local economy and create new jobs. It is stated that "employment growth within the Parish should be welcomed". The website expresses an intention to support the extension to the Watling Street Business Park south of the A5.



[Top] Cannock Chase Council – Local Plan 2014
[Bottom] Norton Canes Parish Council – Neighbourhood Plan Campaign Graphics

2.2 ALLOCATION

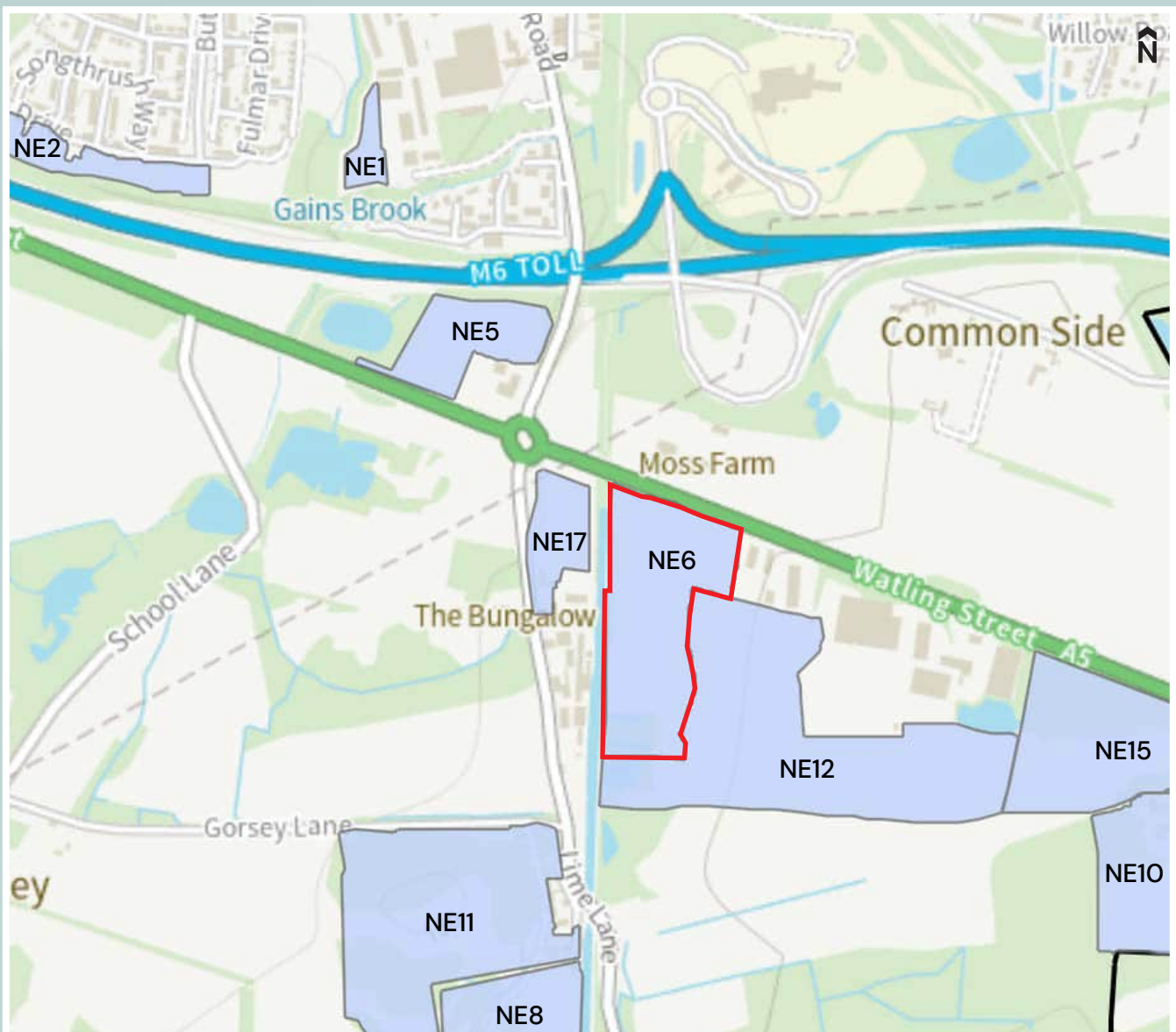
In the Regulation 19 pre-submission plan, Jubilee Field is allocated as a safeguarded site (ref. S4) to meet longer term employment requirements beyond the plan period. As the result, the District Council has recognised that the site does not fulfil one of the key purposes of land within Green Belt that would require its retention as land which would must be permanently open.

Pegasus Group have submitted representations on behalf of ETP Property Ltd., highlighting the merits of the site and the reasons why it should be allocated to allow the district to meet its identified employment need for 2040 as an employment allocation under draft Policy SO4.2.

This document provides further technical support to demonstrate that the site is both suitable and deliverable for new employment related development.

The site is exceptionally well located, with easy access to the A5 and strategic highway network. Furthermore, it is flat and falls within a single ownership. It would form a logical employment extension from Watling Street Business Park, which is already allocated to be extended to the south and west (site ref NE12).

Cannock Chase Council Policies Map –
Employment Land Availability Assessment 2023



3 Development Potential

- 3.1 CONCEPT MASTERPLAN
- 3.2 A MIX OF USES



A5

Watling Street














3.1 CONCEPT MASTERPLAN

The promotional site is capable of accommodating a mix of employment and supporting uses, making best use of the site's wider connectivity and surrounding context. In summary, the site is able to accommodate circa 12,450sqm of development.

The adjacent Concept Masterplan has been carefully designed, taking into account the site's constraints and opportunities and the following design principles:







- The development parcel is to be accessed from Watling Street (A5);
- The development was set back from the edges of the site to allow retention of existing planting, in particular species-rich hedgerows and trees;
- The built form is located along the northern boundaries of the site, leaving circa 60% of land undeveloped to allow for the required net gain for habitats and hegerows;
- Medium-sized employment units are proposed, aside for a larger unit along the western boundary that repeats the adjacent employment site to the east;
- A tree lined avenue is proposed, directing traffic into the site and creating a landscape buffer from the eastern boundary which adjoins the existing footpath to the edge of the canal;
- Servicing and parking areas are proposed for the usage of each employment building;
- Land is to be reprofiled to remove it from the floodzone;
- Where possible, existing landscape will be retained and improved with enhanced soft landscaping.
- Drainage has been indicatively shown to respond to the site's topography.

Concept Masterplan

	Site Boundary		Parking & Service Area		Parking & Servicing Access		Indicative Removed Landscape
	Site Access		Primary Access Road		Existing Undefined Footpath		Proposed Landscaping
	Indicative Built Form		Potential Access to Future Development		Existing Landscape		



Land Uses

 Employment Development	 POS	 Proposed SuDs
 Road Infrastructure	 Existing Vegetation	 Existing Watercourse

3.2 A MIX OF USES

The development proposals include the following:

3.2.1 Employment

The employment development has been limited to the north of the site, across 2.753 hectares, with the proposed built form establishing circa 12,450sqm (this is based on single-storey development with a mezzanine). This is to ensure that the remainder of the site can incorporate the required Net Gain for habitats and hedgerows.

3.2.2 Public Open Space & Green Infrastructure

The site seeks to retain existing trees and hedgerows; through the retaining of existing landscape features, the adjacent land use plan illustratively shows circa 2.305 hectares of open space and green infrastructure. The proposals highlights the potential for walking routes and enhanced public open spaces that include new planting, contributing to the site’s Biodiversity Net Gain.

3.2.3 Drainage & Infrastructure

It is intended that Sustainable Urban Drainage (SuDs) features are integrated within the development to provide additional benefits such as visual amenity and enhanced biodiversity. Surface water disposal will be designed to mimic the existing drainage and provide the necessary water quality and runoff control to meet national and local policy requirements. This initial strategy identified the appropriate locations for the drainage ponds in response to the topography of the site.




4 Summary

4 Summary

This Promotional Document has outlined the opportunities for employment-related development on the land to the south of Watling Street, Norton Canes.

The site is strategically well located on the A5 corridor, and in very close proximity to the M6, offering a prime location for employment uses to help meet Cannock Chase District Local Plan's future employment requirements.

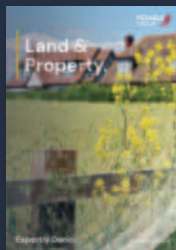
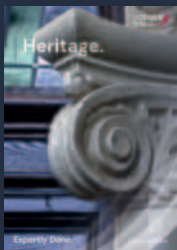
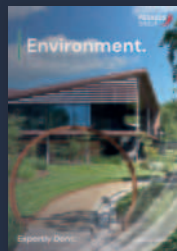
The masterplan proposals outlined in the document have taken a landscape-led approach, showing how development can come forward taking advantage of the strategically important location on the A5 without resulting in unacceptable impacts on the wider landscape.

The proposals represent a sustainable development option that should be considered for allocation in the emerging Cannock Chase District Local Plan Review. ETP Property Ltd. is keen to work with Cannock Chase District Council and its Cannock Chase District Local Plan Review partners to bring forward the development proposals and is happy to meet with officers and members to discuss the proposals in more detail.





For more information on the services we offer, see our latest Expertise brochures:



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