

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:	Mrs P Kreuser, CT Planning on behalf of Mr W Friel, Friel Homes
------------------------	--------------------------------------------------------------------

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:	6.404	Policy:	Chapter 6 Page 157	Site:		Policies Map:	
-----------------	-------	---------	-----------------------	-------	--	------------------	--

Q3. Do you consider the Cannock Chase Local Plan is:

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

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

Cannock Chase Council: Cannock Chase Local Plan Representation Form



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.

This submission is made on behalf of Friel Homes with respect to Land South of Armitage Lane, Rugeley. The site is shown marked red on the attached plan (drawing ref. 4934.99).

Objection is made to the non-inclusion of Land South of Armitage Lane as a strategic housing allocation in Chapter 6, *Paragraph 6.404 Strategic Residential Sites*, page 157 of the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023.

Land South of Armitage Lane comprises some 1.7 ha of grazing land. It is in the Green Belt. The site is broadly rectangular in shape, it abuts the defined Settlement Boundary for Rugeley. North of the site lies Armitage Lane, to the east is the A51 Rugeley Bypass and to the south lies Brereton Lane. To the west of the site is Hob Hill Primary School and the rear garden to properties facing Armitage Lane. The site is evidently well contained by existing built features. The site could deliver some 33 dwellings.

Land South of Armitage Lane was proposed as a Strategic Housing Allocation in the Cannock Chase Council Local Plan Preferred Options Plan (March-April 2021). The site was identified as Site SH4: Land East of the Meadows to deliver some 33 dwellings. This proposed allocation has been deleted from the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023.

The Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023 relies on a small number of large sites and a large number of small Brownfield sites to deliver its housing requirement, each of which have inherent constraints to delivering dwellings quickly. Large sites take time to deliver housing due to the need to provide infrastructure and whilst the development of Brownfield land in preference to greenfield sites accords with the National Planning Policy Framework (NPPF), there is a concern as to the deliverability of Brownfield sites. Many of the proposed housing sites identified in the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023 are in some form of lawful use. There is a risk that these sites will not come forward in a timely manner given that any housing development on the site would have to prove to be more viable than the existing lawful use. Given the need to provide for affordable housing and contribute to other infrastructure through CIL and S106, together with the contributions to the Cannock Chase SAC and BNG, it becomes less viable to redevelop a brownfield site for housing. The Local Plan should allocate small to medium-sized greenfield sites that can deliver homes quickly in the plan period to counter the over reliance of Brownfield allocations.

Land South of Armitage Lane is a small to medium sized site. It represents exactly the type of site required by paragraph 70 of the NPPF to be identified as a housing allocation in Development Plans which can be delivered quickly. The other proposed Strategic Housing

Cannock Chase Council: Cannock Chase Local Plan Representation Form



Allocations set out in the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023 have a considerably greater housing capacity and will take longer to be built out than smaller sites. Coupled with the proposed allocation of 1000 homes at the former Rugeley Power Station, this will inevitably mean that a large proportion of the proposed dwellings for the District will take some time to come forward. Friel Homes, known for the delivery of high quality and attractive housing sites in the local area, own Land South of Armitage Lane and have an interest to bring the site forward early in the Plan period.

It is submitted that Land South of Armitage Lane/Land East of The Meadows should be allocated in the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023 as a proposed Strategic Housing Allocation for 33 dwellings. The site is well related, and well located, to the existing built development of Brereton. It is in a sustainable location close to public transport and local services and facilities. The site is contained on all sides by existing urban development and infrastructure. The site can come forward as a discrete development without encroachment on the wider countryside/Green Belt. One third of the properties can be delivered as bungalows. Bungalows will offer housing choice to residents who may require single storey homes whether through age or long-term illness. The scheme can deliver properties that would assist the Local Authority in meeting its requirement to provide for the housing needs of different groups in society. The allocation of Land South of Armitage Lane for housing would make a meaningful contribution to the required housing needs of Cannock Chase Council and Brereton and Ravenhill Parish Council.

It is submitted that the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023 should include more small and medium sites as they are often built-out relatively quickly and thus can make an important contribution to the housing requirement of the area. Such an approach would be consistent with paragraph 70 of the NPPF. An over reliance on larger sites could fetter the ability of the development plan to deliver housing in a timely manner, especially during the early years of the plan period.

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.

Land South of Armitage Lane/Land East of The Meadows as shown marked red on the attached drawing ref. 4934.99 should be identified as a Strategic Housing Allocations for 33 dwellings at Chapter 6 Local Policy Options; Site Allocations, *Paragraph 6.404 Strategic Residential Sites*, page 157 of the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023.

(Please continue on a separate sheet if necessary)

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



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

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

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

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

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

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

(Please tick one box)

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

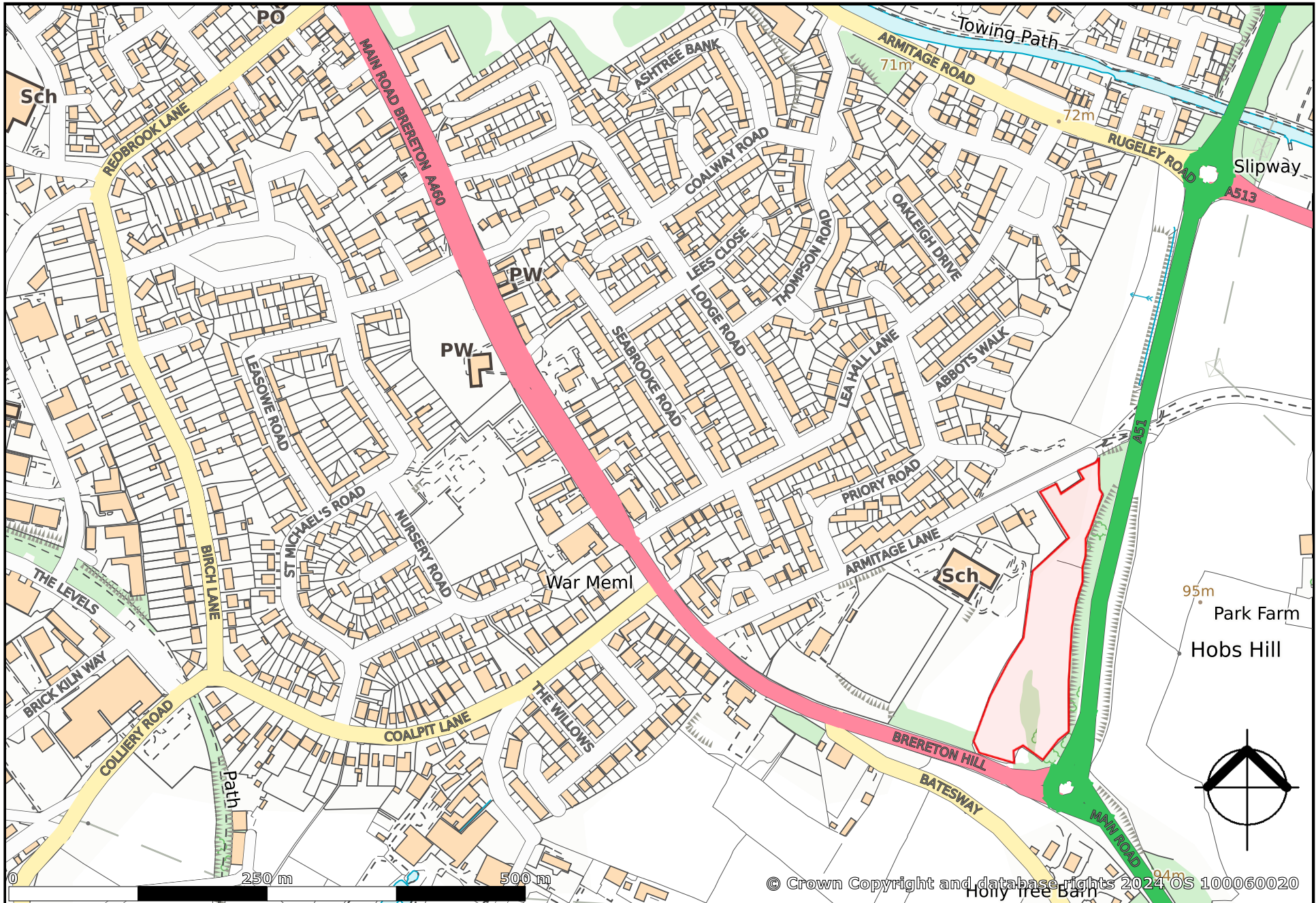
To ensure that the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023 Plan introduces additional housing allocations of small to medium greenfield sites so that the Plan is not reliant on large sites that will take a long period of time to be built out and small Brownfield sites that are often not viable to redevelop for residential compared to their lawful use.

(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: [REDACTED]

Date: 15 March 2024



© Crown Copyright and database rights 2024 OS 100060020

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:	Mrs P Kreuser, CT Planning on behalf of Mr W Friel, Friel Homes
------------------------	--------------------------------------------------------------------

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:	Page 135	Policy:	SO7.7	Site:		Policies Map:	
-----------------	----------	---------	-------	-------	--	------------------	--

Q3. Do you consider the Cannock Chase Local Plan is:

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

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

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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.

This submission is made on behalf of Friel Homes with respect to Land South of Armitage Lane, Rugeley. The site is shown marked red on the attached plan (drawing ref. 4934.99).

Objection is made to Policy SO7.7: Amendments to the Green Belt and the non-inclusion of Land South of Armitage Lane/Land East of the Meadows as a location where amendments are proposed to the Green Belt boundary of the District to accommodate the future growth requirements proposed in the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023.

Land South of Armitage Lane was proposed as a Strategic Housing Allocation in the Cannock Chase Council Local Plan Preferred Options Plan (March April 2021). The site was identified as Site SH4: Land East of the Meadows to deliver some 33 dwellings. This proposed allocation has been deleted from the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023.

It is submitted that Land South of Armitage Lane/East of The Meadows should be re-instated as a proposed Strategic Housing Allocation for 33 dwellings.

Land South of Armitage Lane is located in the Green Belt. It comprises some 1.7 ha of grazing land. Land South of Armitage Lane is well located in size and scale to the existing built form of Brereton/Rugeley. The site abuts the Settlement Boundary for Rugeley.

Land South of Armitage Lane is fully contained by existing urban development and infrastructure; to the north of the site lies Armitage Lane, to the east is the A51 Rugeley Bypass and to the south lies Brereton Lane and to the west of the site is Hob Hill Primary School and the rear garden to properties facing Armitage Lane. The site thus forms a stronger relationship with the urban area than it does with the wider Green Belt. The site can come forward as a discrete development without encroachment on the wider countryside/Green Belt. The presence of the A51 and A460 in effect act as clearly defined boundaries, preventing the urban sprawl of Rugeley eastwards and any potential merging with Armitage and Upper Longdon. Land South of Armitage Lane can come forward for development whilst retaining the majority gap between settlements and safeguarding the countryside from encroachment.

It is submitted that Land South of Armitage Lane/Land East of The Meadows should be allocated in the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023 as a proposed Strategic Housing Allocation for 33 dwellings. The site is well related, and well located, to the existing built development of Brereton. It is in a sustainable location close to public transport and local services and facilities. One third of the properties can be

Cannock Chase Council: Cannock Chase Local Plan Representation Form



delivered as bungalows and can offer housing choice to residents who may require single storey homes whether through age or long-term illness. The scheme can deliver properties that would assist the Local Authority in meeting its requirement to provide for the housing needs of different groups in society. The allocation of Land South of Armitage Lane for housing would make a meaningful contribution to the required housing needs of Cannock Chase Council and Brereton and Ravenhill Parish Council.

Land South of Armitage Lane is a small to medium sized site. It represents exactly the type of site required by paragraph 70 of the NPPF to be identified as a housing allocation in Development Plans which can be delivered quickly. The other proposed Strategic Housing Allocations set out in the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023 have a considerably greater housing capacity and will take longer to be built out than smaller sites. Coupled with the proposed allocation of 1000 homes at the former Rugeley Power Station, this will inevitably mean that a large proportion of the proposed dwellings for the District will take some time to come forward. Friel Homes, known for the delivery of high quality and attractive housing sites in the local area, own Land South of Armitage Lane and have an interest to bring the site forward early in the Plan period.

It is submitted that the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023 should include more small to medium sites as they are built-out relatively quickly and thus can make an important contribution to the housing requirement of the area. Such an approach would be consistent with paragraph 70 of the NPPF. An over reliance on larger sites could fetter the ability of the Development Plan to deliver housing in a timely manner, especially during the early years of the plan period. Therefore Policy SO7.7: Amendments to the Green Belt of the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023 should be amended to include Land South of Armitage Lane/Land East of the Meadows as a location where amendments are proposed to the Green Belt boundary of the District to accommodate the future growth requirements.

(Please continue on a separate sheet if necessary)

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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.

Land South of Armitage Lane/Land East of The Meadows as shown marked red on the attached drawing ref. 4934.99 should be identified in Policy SO7.7: Amendments to the Green Belt of the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023 as a location where amendments are proposed to the Green Belt boundary of the District to accommodate the future growth requirements.

Land South of Armitage Lane/Land East of the Meadows should be identified in Policy SO7.7 as a Strategic Housing Allocation.

(Please continue on a separate sheet if necessary)

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

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

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

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

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

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

(Please tick one box)

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

To ensure that the Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023 Plan introduces additional housing allocations of small to medium greenfield sites so that the Plan is not reliant on large sites that will take a long period of time to be built out and small Brownfield sites that are often not viable to redevelop for residential compared to their lawful use.

(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: [REDACTED]

Date: 15 March 2024

