



MIDLANDS OFFICE

For attention of: Local Plan Team
Cannock Chase Council

Telephone: [REDACTED]
Email: [REDACTED]

18 March 2024

Dear Sir, Madam,

Re: Cannock Chase Pre-Submission Regulation 19 Local Plan consultation, March 2024

Many thanks for consulting Historic England on the above consultation.

We have raised specific comments in relation to the proposed policies and site allocations, appended to this letter, in Table 1.

Overall, we welcome the references to the historic environment within the Vision, Objectives and the heritage policies. We have made recommendations where we consider that there are areas within the policies that are not fully covered or clear, in an effort to ensure that the policies are effective and justified and compliant with the National Planning Policy Framework.

As you are aware, Historic England commented on the earlier stages of the local plan preparation and in particular made extensive comments to the Regulation 18 consultation in March 2021. I re-attach our comments from 2021 as we consider that there are areas within this response that have not been considered within the Regulation 19 consultation version and as such remain relevant.

In particular we consider that the Heritage Impact Assessment (HIA) raised a number of suitable mitigation and enhancement measures relating to specific site allocations and that these have not been accurately included within the design considerations of the site allocation policies. Whilst we recognise that there is a general reference to heritage assets within a number of policies, they are not the specific recommendations set out in the HIA, and we consider that this needs to be rectified.

Furthermore, there are a number of site allocations where we have requested HIA to be undertaken and we cannot find any information under the Heritage Evidence Base section, relating to this additional information. As such we do have concerns about a number of the site allocations and request to see this heritage evidence base as a matter of urgency, to assess if we have any objections to the inclusion of those specific site allocations. We accept that once we have seen the evidence



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base, it is possible that we will have no further comments, yet it is essential to ensure that all site allocations are fully evidenced and justified, to be included within the Local Plan.

Additionally, we are concerned about the cumulative impact of a number of developments in the same area and how these may impact the Grade II* St Luke's Church and the Cannock Chase Town Centre Conservation Area. How was the Council considered the cumulative impacts of these developments and can the harm be overcome? This is something that the HIA process can address.


If you have any questions, please contact us.

Yours sincerely,



Kezia Taylerson

Historic Environment Planning Adviser (Midlands)



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Historic England comments on the Cannock Chase Local Plan Regulation 19, March 2024

Table 1: Comments on the Cannock Chase Local Plan

Area of Plan	Historic England Comments
Page 22 Vision	We welcome a comprehensive section in the vision around the Borough's strong and distinct local heritage.
Page 23	We welcome reference to the challenges and opportunities that the historic environment can bring for an area.
Page 30	We welcome the inclusion of the Strategic Objective 1 for the historic environment and its specific reference to the historic environment at this stage.
Page 38/39	We welcome the reasoned justification for the historic environment policy in the Plan. We recognise that the text is trying to see the benefits that heritage can bring through heritage tourism and heritage led regeneration and we welcome this approach. We would recommend in this section that additional detail is included about what type of heritage assessment will be required with planning applications and what level of detail this should include – focusing on issues of significance, setting, key views and sightlines, design considerations and use of materials, height, massing, scale etc. Also, setting out whether there are enhancement opportunities or ways to better reveal heritage assets.
Policy S01.1 Page 31	<p>First para we recommend that you consider adding in 'such as' between 'them in ways'... 'that will'.</p> <p>Para two – do you have any Registered Parks and Gardens in Cannock Chase? These should also be included as designated heritage assets within this section.</p> <p>Para three – consider including sensitive/ heritage led regeneration in the sentence to ensure that appropriate regeneration options come forward. Also, delete 'preserve' and replace with 'conserve'. Last sentence we recommend that you consider a re-write to make it clear what is being achieved by this paragraph. We support the overall intention and welcome its inclusion.</p> <p>We strongly support the references to a Heritage Statement – we consider, however, that additional detail is required, either within the policy or the reasoned justification text, to explain what is needed. For example, the Heritage Statement should set out the significance of the heritage asset but also - how will the proposed development affect the significance of the heritage asset; how does the development site contribute to the asset's significance; are there key views and sightlines that need to be safeguarded; what is the relationship between the heritage asset and other assets within a wider landscape; are there any setting issues and how does the setting contribute to significance. If the development affects archaeological heritage assets then a reference is needed for a desk based assessment as a minimum and the potential need for field evaluation also, within the policy. These should all be undertaken by appropriate and qualified professionals and the aim of the assessment should be to understand what harm might</p>

	<p>occur and how this can be avoided/ mitigated and also to see enhancement opportunities to better reveal heritage assets.</p> <p>We support the reference to refer to the Historic Environment Record in the minimum.</p> <p>We would consider that a separate heritage impact assessment is more suitable to ensure that all of the appropriate information is included and in enough detail.</p> <p>Para relating to less than substantial harm should be stronger and set out that applications will be refused, unless ... Heritage assets are irreplaceable resources and every effort should be made to ensure that harm is avoided/ minimised. Less than substantial harm can still be significant and can result in the need to refuse planning permission.</p> <p>We consider that the policy requires a paragraph on archaeology and the need for relevant assessments and at what stage. Amend the wording relating to non designated archaeology as this could be of national importance and harm should still be avoided/ minimised for non designated heritage assets.</p> <p>We suggest including a paragraph that sets out what happens in the event of unavoidable loss of heritage including any reports or assessments/ information relating to these heritage assets being included on the Historic Environment Record as a minimum.</p> <p>Where there is unavoidable loss of a heritage asset there should be a clause included that states that the development must be secured and going ahead, before the demolition of a heritage asset.</p> <p>We would welcome a clause on enhancement opportunities and the policy actively seeking enhancement opportunities.</p> <p>How is heritage at risk within the Borough being considered?</p> <p>We have re-attached our comments from the Regulation 18 stage as many of them remain relevant here. We do welcome the many improvements that have been made and the additional references that have been included, as a result of our earlier comments. We are happy to have a meeting to discuss this policy in more detail and where the Council can make additional changes in relation to our comments.</p>
Para 6.7	We consider additional detail is required about what information a Heritage Statement should include – see comments above.
Para 6.12/6.13	Comments in this paragraph would also relate to other heritage asset types.
Overall heritage section	This section is written positively and includes a lot of beneficial and relevant information to help prospective applicants make informed choices and prepare appropriate evidence base to support planning applications and we welcome the inclusion of this information in the Plan.
Para 6.17	Is there any heritage at risk and can the Plan identify any ways to address this?

Para 6.20	We consider that there should be a specific clause in the policy relating to the need for archaeological assessment and how it should be undertaken.
Para 6.22	Non designated heritage assets are covered by the National Planning Policy Framework (NPPF).
Para 6.23	We are strongly supportive of the preparation of a Local List.
Policy S01.2	<p>Bullet point relating to sympathetic development – we would recommend that the design is respectful of local character and distinctiveness and that this is considered through all proposals to ensure that appropriate and relevant design is included and not a ‘one size fits all’. The proposed development should utilise and reflect the local character and heritage in a positive way.</p> <p>We do recommend that where heritage can be affected that there is a separate heritage impact assessment undertaken to ensure that the appropriate information and sufficient detail, is included.</p> <p>We are supportive of a masterplan led approach and are available to comment, where heritage is a key factor.</p>
Para 6.30	If heritage is going to remain as an element of the Design and Access Statement, then there should be appropriate information included within this section to ensure that developers know what should be included – a bullet point could be added in the list to outline the relevant heritage considerations.
Para 6.31	It should be clear that Listed Building Consent is a separate process to planning consent and that there is a specific process for applicants to undertake, with the relevant information to adhere to.
Policy S03.4	Penultimate paragraph should ensure that development appropriately considers the relevant environmental considerations and does not harm heritage assets, including their settings.
Policy S04.4	<p>We consider that there needs to be a reference to heritage tourism within this policy and the opportunity to ensure relevant heritage led regeneration and appropriate tourism is considered and sought. Additionally, we consider there should be a reference to the canal network as a heritage asset and the need to consider the challenges and opportunities that the canal presents as a heritage asset and that appropriate and sensitive development opportunities are sought.</p> <p>We also consider that the policy should reference historic farmsteads and how these need to be protected and ensure development is appropriate to their context. We have some additional information you may find informative:</p> <p>https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/</p> <p>We would also require a clause on the AONB as an important asset for heritage, both designated and non designated heritage assets and as a heritage landscape and how this needs to be considered in proposals. This section could be included as an additional bullet point in the last list.</p>

	Heritage is a component of landscape and this needs to be fully reflected within this policy.
Para 6.145	Heritage is briefly mentioned within this paragraph, and we consider that a specific paragraph is required to detail heritage as a component of the AONB, as well as consider heritage tourism and heritage led regeneration in a rural context.
Policy S05.4	<p>We consider that there should be a clause relating to the historic environment within this section and how the historic environment will be conserved and enhanced. The canal network is referenced within the policy and the provision of transport infrastructure has the potential to affect heritage assets and their settings and need to be fully considered at an early stage.</p> <p>It should also be recognised that there are opportunities to better reveal heritage assets through initiatives such as walking and cycling or re-routing busy road networks away from heritage assets, and these opportunities should be sought.</p>
Policy S05.5	This policy would benefit from references to the historic environment within it and the role of the canal in Cannock Chase through history and as a heritage asset.
Policy 6.04	<p>We welcome reference to the historic environment within this policy. We consider that the policy needs to ensure that all heritage assets, designated and non designated are protected and opportunities for enhancement sought. Any new design should respect and reflect local character and distinctiveness and should conserve the significance of heritage assets. Design considerations should be made to ensure that any new design is appropriate in the context of Conservation Areas and when affecting the significance of heritage assets, such as listed buildings. Such measures may include limiting the height of new development, the scale and massing of development, what materials are considered appropriate etc. The policy should reflect this and we consider that the current wording needs updating.</p> <p>We are supportive of the clause to protect historic shop fronts and suggest that the policy seeks to restore historic shopfronts too. Are there any Conservation Areas at risk or listed buildings at risk within a retail core? If so, how could the policy try to address this 'at risk' element of heritage?</p>
Policy S06.5	The policy should refer to 'heritage assets' rather than 'historic assets'. It should be clear that proposals will be supported where there is no harm to heritage and where enhancement opportunities are sought.
Policy S06.6	It should be clear that proposals will be supported where there is no harm to heritage and where enhancement opportunities are sought.
Policy S07.4	We consider that the policy needs to include a clause to reflect heritage as a component of landscape and how heritage will be considered within this context. We note there is a minimal reference to heritage, which we support, however, we consider that this needs to be further developed to ensure that heritage is appropriately considered within this context.
Policy S07.5	We welcome the inclusion of the bullet point for heritage within this policy.

	As raised previously we consider that the policy should draw in some of the specific objectives of the AONB Management Plan and how the policy can support the delivery of the AONB Management Plan objectives.
Para 6.336	We welcome the reference to heritage as a component of Green Infrastructure, within this section.
Policy S08.3	We would welcome a reference in the policy and text to the need to consider the historic environment and be compatible with the aims of the historic environment. We are supportive of measures to respond to climate change and promote the opportunities where this can be achieved for heritage assets, without causing harm to them. We consider that the policy should set out a balanced approach, as we raised in our Regulation 18 comments.
Policy S08.5	We would welcome a clause that considers the historic environment in this policy and especially the need to consider issues such as light and noise pollution as these can impact the significance of heritage assets.
Site Land South of Lichfield, Cannock	Amend 'recommends' with 'requires', as the HIA noted that this was an important mitigation consideration to prevent harm to the Grade II heritage asset and as such the policy should ensure that it occurs at planning application stage. There also needs to be reference within the policy to the heritage asset and the need to protect this heritage asset and the relevant mitigation measure that is required and why.
Site Land rear of Longford House, Watling Street.	<p>We made these comments at the previous stage –</p> <p><i>'Development of the site has the potential to impact the setting of Longford Lodge Grade II and to a lesser extent Longford House (non-designated). HE welcomes the approach recommended by the HIA of locating access off Wellington Drive and retaining planting to the north-east of the asset, plus demolition of modern buildings on the site and advises that these requirements should be included in any policy specification/site development considerations for this allocation. HE also advises that a Heritage Statement will be necessary to fully appraise any impacts and suggests that this is also encompassed in the site requirements'.</i></p> <p>We welcome the inclusion of these requirements in the policy.</p>
Site Specific Policy M1	The policy would benefit from incorporating the mitigation and enhancement measures set out in the Heritage Impact Assessment, to ensure that the heritage assets are appropriately safeguarded. As well as ensuring that a Heritage Statement is supplied at planning application stage.
Site Avon Road, H32	The policy would benefit from incorporating the mitigation and enhancement measures set out in the Heritage Impact Assessment, to ensure that the heritage assets are appropriately safeguarded. As well as ensuring that a Heritage Statement is supplied at planning application stage.
Site Beecroft Road Car Park M3	The policy would benefit from incorporating the mitigation and enhancement measures set out in the Heritage Impact Assessment, to ensure that the heritage assets are appropriately safeguarded. As well as ensuring that a Heritage Statement is supplied at planning application stage.
Site Park Road Offices, H36	<p>We made these comments at the previous stage –</p> <p><i>'Development of the site has the potential to impact the setting of the Cannock Town Centre Conservation Area and two Grade II Listed Buildings located to the south of Park Road – Congregational Chapel and Manse</i></p>

	<p><i>(Vicarage) immediately south of Congregational Chapel. HE advises that a Heritage Statement will be necessary to fully appraise any impacts and suggests that this requirement is encompassed in any policy specification/site development considerations for this allocation. HE also recommends that the suggestions for maximising enhancement and mitigating harm should be encompassed in the specific site requirements for this allocation’.</i></p> <p>There is no reference to heritage assets within this policy and we consider that this needs to be amended to ensure that any harm to heritage assets are fully mitigated within the Local Plan.</p>
Site Police Station Car Park	<p>We requested a HIA be undertaken of this site, at the previous stage of consultation. We note that this has not been undertaken and that there is the potential for harm to the Cannock Town Centre Conservation Area. We require this evidence base in order to make a judgement about the suitability of this site as an allocation within the Plan.</p>
Site Walsall Road, H38	<p>The policy would benefit from incorporating the mitigation and enhancement measures set out in the Heritage Impact Assessment, to ensure that the heritage assets are appropriately safeguarded. We would welcome the retention of the non designated heritage asset to be included within the policy text. As well as ensuring that a Heritage Statement is supplied at planning application stage.</p> <p>We raised these comments at the previous stage –</p> <p><i>‘Development of the site has the potential to impact the setting of adjacent Cannock Town Centre Conservation Area and the setting of Grade II* Parish Church of St. Luke (plus Grade II church railings & gates). The non-designated Electric Palace Picture House and several late 19th century houses lie within the site. HE advises that a Heritage Statement will be necessary to fully appraise any impacts and suggests that this is encompassed in any policy specification/site development considerations for this allocation. HE also recommends that the suggestions for maximising enhancement and mitigating harm should be encompassed in the specific site requirements for this allocation, particularly the retention of buildings, including the Electric Palace Picture House and consideration of this building for local listing’.</i></p>
Site Wolverhampton Road, H39	<p>We raised these comments at the previous stage –</p> <p><i>‘No Designated Heritage Assets on/near to the site, but HE notes that the HIA includes both 26 & 28 Wolverhampton Road as being of historic interest as part of Cannock’s 19th century growth, adding interest to the street scene, and recommends their retention. Based on these findings HE suggests that this is encompassed in any policy specification/site development considerations for this allocation and that the suggestions for mitigating harm could also be encompassed in the specific site requirements for this allocation’.</i></p> <p>We would welcome the inclusion of these considerations within the policy text.</p>

<p>Site Danilo Road, H40</p>	<p>We raised these comments at the previous stage –</p> <p><i>'HE notes that the HIA concludes that due to the distance from the site to the Cannock Town Centre Conservation Area and lack of intervisibility to the Listed Buildings located to the north-east (The Council House, Grade II* & 79 High Green, Grade II), there is the potential for only low impact. However, HE advises that a Heritage Statement, to fully appraise any impacts, should be encompassed in any policy specification/site development considerations for this allocation and also the recommendations to mitigate harm set out in the HIA'.</i></p> <p>These comments remain relevant and we would welcome the specific details being included within the policy text. We are particularly concerned to ensure that the buildings which lie just outside of the Conservation Area along Walsall Road and are identified as significant buildings with positive impact in the Management Plan, are retained and considered in any HIA in how they contribute to the character of the Conservation Area and relate to the listed buildings nearby.</p>
<p>Site M4</p>	<p>We requested that a Heritage Impact Assessment was undertaken for this site. We cannot find any information relating to an updated HIA after 2020. Please can we have sight of any additional heritage impact assessment for this site so that we are able to make a judgement about its suitability as a site allocation.</p>
<p>Site M8</p>	<p>We requested that a Heritage Impact Assessment was undertaken for this site. We cannot find any information relating to an updated HIA after 2020. Please can we have sight of any additional heritage impact assessment for this site so that we are able to make a judgement about its suitability as a site allocation.</p>
<p>Site M2</p>	<p>We raised these comments at the previous stage –</p> <p><i>'Development of the site has the potential to impact the setting of the Cannock Town Centre Conservation Area and three Listed Buildings located on the opposite side of Stafford Road - Congregational Chapel and Manse (Vicarage) immediately south of Congregational Chapel, both Grade II, and The Council House, Grade II*. However, it is noted that the site is currently a car park and makes no contribution to the significance of the Conservation Area or the heritage assets, and that there are opportunities to enhance the setting of the Conservation Area and the Congregational Chapel and Manse. HE advises that a Heritage Statement will be necessary to fully appraise any impacts and suggests that this is encompassed in any policy specification/site development considerations for this allocation. HE also recommends that the suggestions for maximising enhancement and mitigating harm set out in the HIA should be encompassed in the specific site requirements for this allocation'.</i></p> <p>We would welcome the specific mitigation details being incorporated into the policy text.</p>
<p>Site Mill Street, H60</p>	<p>We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation.</p>

Site Springvale Area offices, H62	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation.
Site corner of Avon Road and Hunter Road, H66	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation.
Site land at the Mossley, H49	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation. We have previously requested this information.
Site Nursery Fields, H50	<p>We raised these comments at the previous stage –</p> <p><i>'A small part of the site, fronting Main Road, lies within the Brereton Conservation Area, whilst the rest of the site lies adjacent to the Conservation Area, and within the setting of the Grade II Listed Church of St. Michael. HE notes that the Council's HIA also includes reference to non-designated buildings 1-9 Old School Mews; a re-developed former school dating from the 19th century. HE advises that a Heritage Statement will be necessary to fully appraise any impacts on these heritage assets and suggests that this requirement is encompassed in any policy specification/site development considerations for this allocation. HE also recommends that the suggestions for mitigating harm through sensitive development on the road frontage and screening to the eastern boundary should be encompassed in the specific site requirements for this allocation'.</i></p> <p>The policy text should set out what the specific mitigation measures are that are required to overcome the harm. This should be clear in the policy text.</p>
Site Castle Inn, H51	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation. We have previously requested this information.
Site Gregory Works, H52	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation. We have previously requested this information.
Site Lichfield Street, H53	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation. We have previously requested this information.
Site The Fairway Motel, H64	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation.
Site Land at Pendlebury Garage, H67	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation. We have previously requested this information.
Site Norton Hall Lane, H68	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation.

Site Hednesford Road, H69	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation. We have previously requested this information.
Site Land at Academy Early Years, E6	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation. We have previously requested this information. We raised these comments at the previous stage – <i>'Site lies within the Brereton Conservation Area and opposite the Grade II* Listed Brereton Hall, and Grade II Listed Barn to the rear of the Hall. HE therefore advises that a Heritage Impact Assessment is undertaken prior to the allocation of this site within the Local Plan, to inform the impact of the proposed allocation on the significance of the designated heritage assets'.</i>
Site E12	We raised concerns about this site at a previous stage – is this site no longer going ahead? If it is, we would request an understanding of the local archaeology service views on the non designated archaeology and any suitable mitigation measures to be incorporated into policy.
Assessment of archaeological assets	We raised some concerns at Regulation 18 stage about the assessment of Scheduled Monuments and other archaeological assets. How has this been addressed? This remains a concern. We raised these comments at the previous stage – <i>'Assessment of potential development should fully consider the impact on the setting of Scheduled Monuments, including the landscape views from Castle Ring (e.g. for development to the north in Rugeley), as well as, and, assets which are outside of the District (e.g. the setting of the Saucer barrow on Spring Hill, or Shugborough Registered Park & Garden)'.</i>
Cumulative Impacts	We are concerned about the cumulative impact of development in the setting of St Luke's Church Grade II* and the Cannock Chase Town Centre Conservation Area. How has the Plan assessed the cumulative impact of a number of developments affecting the same assets and can this harm be overcome?

*We have re-attached our comments to the Regulation 18 Local Plan consultation, and these remain particularly relevant to our comments on the proposed site allocations and the contribution made by the Heritage Impact Assessment (HIA) evidence base. We consider that the policies would benefit from including the mitigation measures into the site allocations policies, in all instances, to ensure that harm to heritage assets are prevented. We note in many cases that there is a reference to heritage assets, but it may be that these need to be strengthened in relation to the evidence contained within the HIA document.



Our ref: PL-00581022
Your ref:



29 April 2021

FAO: planningpolicy@cannockchasedc.gov.uk

Dear Sir or Madam,

Re: Cannock Chase District Local Plan Preferred Options (Regulation 18) Consultation (February 2021)

Thank you for consulting Historic England on the Draft Cannock Chase District Local Plan Preferred Options (Regulation 18) consultation document. We note that this follows on from your 'Issues and Options Consultation', held in May 2019. In relation to this latest Local Plan consultation we have the following comments:

General Comments

Firstly, we note that the Plan is accompanied by a Heritage Impact Assessment, which assess the impact of development on designated and non-designated heritage assets and their settings. Historic England welcomes this approach and is pleased to see that the methodology used is generally in line with that set out in Historic England's Advice Note 3: The Historic Environment and Site Allocations in Local Plans, 2015 (HEAN3):

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/>

We also welcome the fact that this Heritage Impact Assessment (HIA) has been prepared with reference to Historic England's Advice Note 3: The Historic Environment & Site Allocations in Local Plans, 2015 (HEAN3) and Good Practice Advice Note 3 (Second Edition): The Setting of Heritage Assets (2017) (GPAN3):

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>



However, we note that some of the proposed allocations which may have an impact on the significance of designated heritage assets have not been carried through to the second stage of assessment within the HIA. Historic England considers that the following proposed allocations would benefit from such assessment work to inform decisions, prior to their allocation: H37, H48, H49, H51, H53, M4, M8 and E6. Please see our tabulated comments in the attached **Appendix A** for further detail.

We understand that for certain of the above sites (H37, H48, H49 and H52) the methodology adopted by the HIA has omitted their assessment because they are either located within, or within the setting of, a Conservation Area, and with no other heritage constraints. In these cases, we also note that the HIA recommends that the requirements for new development set out in the relevant Conservation Area Management Plan should be brought to bear for all planning applications on these sites. However, Historic England considers that in omitting these sites from assessment within the HIA it is not clear how the impact on the significance of the relevant Conservation Area has been assessed and how the Council envisages development would take place in respect of the historic environment. The NPPF (Para 185) requires that a positive approach to the historic environment should be demonstrated as part of the Plan process. Since this is not clear at this time Historic England recommends that these matters are addressed in relation to the above sites, prior to the Regulation 19 stage, so as to avoid any issues over the soundness of the Plan.

Given the number of sites that have the potential to impact on the significance of designated heritage assets and their settings, Historic England would urge you to consider obtaining specialist conservation advice, particularly with regard to interpreting the findings of the HIA.

Assessment of potential development should fully consider the impact on the setting of Scheduled Monuments, including the landscape views from Castle Ring (e.g. for development to the north in Rugeley), as well as, and, assets which are outside of the District (e.g. the setting of the Saucer barrow on Spring Hill, or Shugborough Registered Park & Garden).

With specific reference to non-designated heritage assets, these can make a positive contribution to the character of our settlements and enrich our sense of place. We recommend that the views of your chosen specialist archaeological adviser are sought on these allocations to confirm that the evidence base is sufficiently robust to ensure that any proposed allocation is deliverable in accordance with local and national planning policies. Your adviser will inform you on whether further assessment work is required through field assessment prior to allocation to ensure the extent, character and significance has been adequately understood to inform the allocation of a site.

Our tabulated comments in the attached **Appendix A** and your own assessments, highlight a number of non-designated heritage assets that may be affected by the proposed allocations. Areas within the District of note for non-designated historic assets are the A5 corridor and the Cannock Chase Area of Outstanding Natural



[Redacted text]

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Beauty (AONB). We note that the Local Plan makes reference to the Cannock Chase AONB Management Plan 2019-2024 and recommend that specific links are made to the policies in the Management Plan which have the objectives of conserving the Chase's historic environment and connecting communities with the Chase's history and culture.

With regard to the interactive policies map, we recommend that this should show the Scheduled Monuments as polygons, not as points, and it should also show Registered Parks and Gardens within the District.

District Profile

Historic England are supportive of the paragraphs relating to the historic environment within the District Profile on page 13.

Detailed Comments

The Preferred Options proposes several different categories of proposals and we comment on them as follows:

- Strategic Objectives
- Spatial Strategy
- Preferred Policy Directions
- Strategic Housing Allocations
- Proposed Housing Allocations
- Employment Site Allocations
- Town Centre Redevelopment Areas

Strategic Objectives

Historic England welcomes that the 'Preferred Options' document includes policies that seek to conserve and enhance the historic environment, and thus deliver **Strategic Objective 1**. However, it is not readily apparent from the title of Strategic Objective 1: 'Delivering high quality development that is distinctive, attractive and safe', that consideration of the historic environment is encompassed within this objective and we suggest that the title of this objective is amended to make specific reference to the historic environment.

With regard to **Strategic Objective 6**: 'To create attractive Town and Local Centres', Historic England recommend that reference be made to the wider, social, cultural, economic and environmental benefits that conservation of the historic environment can bring to such areas (NPPF para.185).



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With regard to **Strategic Objective 8**: ‘To support a greener future’, Historic England recognises the urgent need for positive action in response to the global climate crisis and is committed to achieving net zero carbon emissions. Heritage assets can be a valuable aid to achieving sustainable development and we therefore suggest that reference to the re-use of historic buildings should be specifically included within this strategic objective; with reference made to the carbon saving benefits of sympathetic restoration and retention of historic buildings, rather than their demolition and replacement.

Spatial Priorities

Historic England welcomes the inclusion of safeguarding historic assets as a spatial priority in the future development of the District (paragraph 5.1).

The Spatial Strategy

Reference to the Local Plan protecting cultural and heritage assets within the overall spatial strategy is welcomed by Historic England.

With regard to the spatial strategies for Cannock and Rugeley, Historic England welcomes the Masterplan approach to town centre improvements in these settlements and would welcome the opportunity to be involved in the masterplanning process at an early stage.

Historic England also suggests that within the spatial strategies for these settlements reference should be made to maximising opportunities to better reveal the significance of heritage assets and their Conservation Areas. We also welcome reference to the prioritisation of residential and commercial units that respect the historic town centre of Rugeley but note that any such reference to the historic environment is absent from the spatial strategy for Cannock and should be included.

Preferred Policy Directions

POLICY SO1.1: PROTECTING, CONSERVING AND ENHANCING THE DISTINCTIVE LOCAL HISTORIC ENVIRONMENT

Historic England welcomes this policy direction on the historic environment and has the following comments to bring the policy into greater alignment with the NPPF:

- The policy should set out a positive strategy for the conservation and enjoyment of the historic environment.
- We suggest that designated and non-designated heritage assets are dealt with separately within the policy;
- The policy asks for a ‘Design and Access Statement’ for development proposals affecting heritage assets. We recommend that the policy should



[REDACTED]

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require a specific 'Heritage Statement' and that this should also consider the contribution to significance made by the setting of a heritage asset and the effect of proposals therein.

- We recommend that the policy includes recognition of the historic environment as a catalyst for positive regeneration. For example, with regard to new development in Conservation Areas, and within the setting of heritage assets, we suggest inclusion of a positive policy approach, to encourage development proposals to preserve elements of their setting and to enhance, or better reveal their significance.
- We suggest a separate section/point within the policy on non-designated archaeology, requiring an appropriate desk-based assessment/field evaluation as necessary and setting out how development proposals affecting archaeological interests will be considered.
- Great benefits can be realised from the re-use of historic buildings, but conversions/changes of use should be carried out sensitively. We suggest that consideration/guidance on this should be included within the policy.
- We suggest that the scope of the policy should be widened to include measures for preserving or enhancing heritage assets, including Heritage at Risk.
- With regard to the 'Explanatory Text', accompanying the draft policy, we welcome reference to the Cannock Chase District Conservation Areas Management Plan SPD, to the area-specific Management Plans relating to the individual Conservation Areas and to the Local List. These are useful sources of information and indicators about the state of the historic environment locally, and we recommend that they are kept up-to date.

POLICY SO1.2: ENHANCING THE QUALITY OF THE BUILT ENVIRONMENT

Historic England welcomes the references in this policy direction to local distinctiveness and character, in terms of heritage, as well as building materials and detailing, which offers the opportunity to enhance townscape and landscape quality through the built environment.

We are also pleased to see the intention to prepare Local Design Codes for the defined Character Areas and Historic England would welcome the opportunity to engage in developing these, with regard to specific considerations for the historic environment.

POLICY SO2.2: SAFEGUARDING HEALTH AND AMENITY

We suggest that acknowledgment of the critical role the historic environment plays in the health and welfare of individuals and communities is included within this policy.



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POLICY SO3.1: PROVISION FOR NEW HOMES

Historic England's comments on the proposed allocated housing sites can be found at **Appendix A** to this letter.

POLICY SO3.4: GYPSIES, TRAVELLERS AND TRAVELLING SHOW PEOPLE

Any sites identified for allocation to meet the needs of these groups would need to be accompanied by an appropriate heritage impact assessment.

POLICY SO4.2: PROVISION FOR NEW EMPLOYMENT USES

Historic England's comments on the proposed allocated employment sites can be found at **Appendix A** to this letter.

POLICY SO4.3: SUSTAINABLE TOURISM AND THE RURAL ECONOMY

Although the policy direction requires tourism and visitor developments to display educational material about the history of the area as part of a mitigation package under the Habitats Regulations, we would be supportive of the inclusion of text referencing the important role of heritage/the heritage sector as supporting sustainable tourism and the rural economy.

POLICY SO6.2: PROVISION OF MAIN TOWN CENTRE USES AND TOWN CENTRE SERVICES

Historic England notes that this policy direction is mainly focused on floorspace thresholds and impact tests for town centre services and suggests that the additional emphasis of the role of heritage assets in driving regeneration (as commented on previously) could also be included, so that local heritage opportunities to bring new life into towns centres and historic commercial buildings is supported.

POLICY SO6.4: TOWN CENTRE DESIGN

Historic England is supportive of this policy direction and welcomes the various references to the historic environment and heritage assets. However, we recommend that 'preserved' is amended to 'conserved' in the first bullet point.



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POLICY SO6.5: CANNOCK TOWN CENTRE REDEVELOPMENT AREAS

Historic England is supportive of this policy direction which seeks to regenerate Cannock Town Centre. We suggest that rather than just protecting the Conservation Areas from development, reference should be made to maximising opportunities to enhance and better reveal the significance of the Cannock Town Centre Conservation Area through the sites proposed as allocations. Our comments on the proposed mixed-use allocated sites can be found at **Appendix A** to this letter.

POLICY SO6.6: RUGELEY TOWN CENTRE REDEVELOPMENT AREAS

Historic England is supportive of this policy direction which seeks to regenerate Rugeley Town Centre. We suggest that rather than just protecting the Conservation Area from development, reference should be made to maximising opportunities to enhance and better reveal the significance of the Rugeley Town Centre Conservation Area through sites proposed as allocations. Our detailed comments on the proposed mixed-use allocated sites can be found at **Appendix A** to this letter.

POLICY SO6.7: HEDNESFORD TOWN CENTRE REDEVELOPMENT AREAS

Historic England is supportive of this policy direction which seeks to regenerate Hednesford Town Centre. We suggest that reference should be made within the policy to conserving and enhancing heritage assets within the town centre through the sites proposed as allocations. Our comments on the proposed mixed-use allocated sites can be found at **Appendix A** to this letter.

POLICY SO7.4: PROTECTING, CONSERVING AND ENHANCING LANDSCAPE CHARACTER

Historic England welcomes the references in this policy direction to local distinctiveness and character and also suggest that the policy specifically references the historic environment.

POLICY SO7.5: PROTECTING, CONSERVING AND ENHANCING THE CANNOCK CHASE AREA OF OUTSTANDING NATURAL BEAUTY (AONB)

We welcome the inclusion of the historic environment and culture as considerations for development within the AONB. However, as we stated at the last consultation, we would be supportive of the inclusion of text within this policy direction to reference the role of heritage within the AONB. Referencing heritage such as the World War trenches and cemeteries, as well as research such as 'Chase Through Time', will assist in reflecting this important asset as a heritage landscape and we also recommend that links are made to the Cannock Chase AONB Management Plan, as referenced earlier in this letter.



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POLICY SO8.1: LOW AND ZERO CARBON ENERGY AND HEAT PRODUCTION

Historic England supports the policy direction in seeking to achieve low and zero carbon emissions from energy generation and heat production. We welcome the reference to the requirement for the assessment of impacts on heritage assets and suggest that this should also reference the setting of heritage assets. We refer you to Historic England's Advice Note 15 (February 2021): Commercial Renewable Energy Development and the Historic Environment -

<https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment-advice-note-15/heag302-commercial-renewable-energy-development-historic-environment/>

POLICY SO8.2: ACHIEVING LOW AND ZERO CARBON DEVELOPMENT and POLICY SO8.3: SUSTAINABLE DESIGN

Historic England supports these policy directions and is committed to the achievement of net zero carbon emissions from development. We recommend that a sustainable approach to climate change mitigation measures should aim to secure a balance between the benefits such development delivers and the environmental costs it incurs. The policies should seek to limit and mitigate any such cost to the historic environment and when considering energy efficiency measures and the benefits of alternative options should be weighed against the impact upon historic assets and their setting.

Historic England have produced a list of technical guidance on energy efficiency and sustainable design, including research reports which could form a useful part of the plan's evidence base. These can be found in our publication directory:

- <https://historicengland.org.uk/content/docs/advice/technical-conservation-guidance-and-research-brochure-pdf/>

POLICY SO8.6: BROWNFIELD AND DESPOILED LAND AND UNDER-UTILISED BUILDINGS

Historic England supports this policy direction and suggests that the policy makes specific reference to historic buildings, as they represent a significant investment of expended energy. Demolishing and replacing them requires a major reinvestment of embodied energy and other resources. The policy direction should therefore encourage & recognise the benefits of sympathetic restoration and retention of historic buildings, rather than their demolition and replacement.



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Strategic Housing Allocations

Historic England notes that two of the five proposed strategic housing allocations have not been included for assessment within the HIA, due to there being no heritage assets on/near to these sites. With regard to the assessment of proposed sites SH1, SH3 and S5, Historic England's detailed comments can be found at **Appendix A** to this letter.

Proposed Housing Allocations

Historic England's detailed comments on the proposed housing allocations assessed within the Council's HIA can be found at **Appendix A** to this letter. However, Historic England notes that there are a number of proposed housing allocations that have not been assessed, but which may have an impact on the significance of a heritage asset/s and therefore considers that these would benefit from such an assessment, prior to allocation. These include: **H37, H48, H49, H51 and H53**.

Employment Site Allocations

Historic England notes that most of the proposed employment site allocations have no designated heritage assets on or near to these sites and therefore have not been included within the HIA for assessment. However, we recommend that proposed employment site allocation **E6** should be included for assessment within the HIA prior to allocation and our detailed comments on this site can be found at **Appendix A** to this letter.

Town Centre Redevelopment Areas

Historic England notes that through the Local Plan there are opportunities to enhance or better reveal the significance of heritage assets and Conservation Areas within the town centres of both Cannock and Rugeley.

Historic England notes and welcomes that the majority of the proposed town centre/mixed-use allocations have been assessed within the HIA and our detailed comments on these sites can be found at **Appendix A** to this letter. However, we advise that proposed sites **M4** and **M8** should also be assessed for their potential impacts on the significance of nearby heritage assets, prior to their allocation.

Sustainability Appraisal

With regard to the Integrated Impact Assessment: Cannock Chase Local Plan Preferred Options, Sustainability Appraisal Report (incorporating Health Impact Assessment) which accompanies the Regulation 18 Plan, Historic England welcomes the inclusion of a specific indicator for the historic environment (SA17) and considers this essential for the SA process.



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Furthermore, we are pleased to see that during the course of plan preparation SA objective 17 was updated to reflect a consultation comment received from Historic England and to better conform to the guidance of the NPPF.

Historic England also notes that the appraisal of SA objective 17 for all sites at this stage of the Local Plan process has been informed by the Cannock Chase Heritage Impact Assessment (HIA), September 2020, commissioned by the Council, and that the effects recorded through this assessment have been drawn upon for each site option to inform the effects presented in the SA in relation to SA objective 17. In this regard, we are very pleased to see that previous advice from Historic England has been followed.

We also note the inclusion of the consideration of the historic environment in Table 3.1 “Key Sustainability Issues for Cannock Chase and Likely Evolution without the Local Plan”. We note and welcome the acknowledgement that the new Local Plan offers the opportunity to update and develop the overarching policy on the historic environment within the adopted Local Plan, as well as offering opportunities to incorporate mitigation into site specific policies where appropriate. We also welcome that possible opportunities to deliver heritage-based regeneration are highlighted, such as those linked to canal networks and former collieries. However, we consider that this aspect could be developed further in several Local Plan policies; particularly policies SO1.1, SO1.2, SO4.3, SO6.5, SO6.6 and also through development guidelines for the relevant site allocations as they emerge. With regard to the canal network in particular, the Sustainability Appraisal offers opportunities to highlight synergies between the natural and historic environment and we recommend that these should also be developed through Local Plan policies.

We note that all sites have been assessed in the SA on the assumption that no mitigation measures are in place at this stage. This inevitably will give “a worst-case scenario’ of effects. However, it is clear from the Council’s HIA that for some sites mitigation of harm and maximisation of enhancements in relation to the historic environment are recommended and once these are encompassed into site specific policy requirements at the next stage of the Local Plan, the outcomes of some site assessments may change in the next iteration of the SA and we will comment further at that stage.

With regard to the assessment of effects of allocations on SA objective 17 we have the following comments:

- Sites scoring --? (**uncertain / likely significant negative effects**) – Historic England notes that several of the proposed site allocations (SH1/SH5/H38/H39/M1 and M2) have been assessed as having ‘uncertain / likely significant negative effects’ on the historic environment. We refer you to our comments on these sites contained in **Appendix A** to this letter. We also note that proposed allocation M9 has no heritage assets on, or near to the site and was not assessed in the Council’s HIA. Explanation of why this has been scored with --? would therefore be welcomed.



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- Sites scoring **-? (uncertain / minor negative effects)** - we note that some sites that have been assessed as having uncertain / minor negative effects on heritage assets where we consider there may be the potential for significant effects and would recommend further consideration of sites H36/H40/H45/H50/M5 and M10.
- Sites scoring **0? (uncertain / negligible/no effects)** - we note that some sites that have been assessed as having uncertain / negligible/no effects on heritage assets where we consider there may be the potential for minor effects and would recommend further consideration of sites H37/H48/H49/H51/H52/H53/M4/M8 and E6.

However, it is accepted that the effects of new development on the historic environment will be dependent, in part, upon their specific layout and design, and also on any mitigation and enhancement, which is an unknown at this stage in the Plan process.

Historic England would therefore be happy to provide further comments as the Plan is progressed over the coming months. We should like to stress that the above opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation, or in later versions of the plan/guidance) where we consider that these would have an adverse impact upon the historic environment.

We hope that the above comments will assist in the further preparation of the Regulation 19 Pre-Submission Plan, but if you have any queries about any of the matters raised, or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours faithfully,

Elizabeth Boden

Elizabeth Boden (Mrs)
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