

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:	Philip G. Sharpe Planning Officer Inland Waterways Association, Lichfield Branch
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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:		Policy:	SO7.7	Site:	S4 Jubilee Field, Watling St	Policies Map:	
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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	
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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.

The Inland Waterways Association (IWA) is the membership charity that works to protect and restore the country's canals and river navigations for public benefit. IWA is a national organisation with a network of local branches and volunteers who work with navigation authorities, national and local government, and a wide range of voluntary, private and public sector organisations for the benefit of the waterways and their users. IWA is a consultee for planning policy and applications affecting the canal system.

This site lies alongside the Cannock Extension Canal which is a historic waterway and a valuable amenity and recreational corridor providing leisure boating, walking, angling, cycling and nature conservation benefits to the area. It is designated as a SSSI and SAC for its special nature conservation interest.

The canal between the A5 and the Pelsall Road Bridge is also home to a community of permanently moored residential boats, with individuals and families occupying about 17 canal narrowboats. This is a very undisturbed and tranquil part of the canal system where its residents enjoy open rural views to the west across the Jubilee Field site and adjacent farmland to Wyrley Common.

This site was previously proposed for development in 2017 as part of the Cannock Chase Local Plan Part 2 Issues & Options consultation as either a Gypsy & Traveller site (GT5) or an Employment site (NE6). IWA objected to both of these suggestions, and the Plan Part 2 was subsequently discontinued in favour of a full plan review. Since then there has been a Local Plan Review (Issues & Scope) consultation in 2018, a Local Plan (Issue & Options) consultation in 2019, and a Local Plan (Preferred Options) consultation in 2021. At none of these stages was this site included, so its reappearance at this late (Publication) stage of the Plan is a surprise and has not been tested through public consultation.

Industrial development of the site would adversely affect the historic setting of the canal as an undesignated heritage asset. It would adversely affect the occupants of the permanent residential boats, and others that are used residentially for varying periods of time, through visual impact and noise from industrial activities and associated traffic. It would also potentially affect the SAC through pollution of drainage into the canal and would require an Appropriate Assessment.

This site is mostly greenfield farmland in the Green Belt where this would clearly be inappropriate development, but no justification is advanced other than vague suggestions that it could incidentally provide "enhanced connectivity for recreation and walking and cycle routes along with a safe crossing (of) the A5" and potential "green infrastructure links to the Cannock Extension Canal SAC" etc. Whilst these are desirable objectives, they do not amount to the exceptional circumstances required to justify removal from the Green Belt.

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Development here would clearly damage part of the landscape that these improved recreational links seek to access, and It is not explained how building on this land could enhance biodiversity or habitat connectivity.

The A5 is a very busy and dangerous road to cross, and a safe crossing west of the Turf Roundabout (junction of A5 and B4154) would be beneficial in connecting Norton Canes residents with the recreational route of the canal towpath and footpaths on Wyrley Common. It would also provide walking and cycling access from the village to the existing employment site at Watling Street Business Park, which it is proposed to extend under Policy SO7.7 as Strategic Site SE2.

However, given the width, gradient, and speed limit on the A5 it will be difficult to provide a safe crossing here, and it could be very expensive if a footbridge is required. If, as seems likely, this would need a development funding contribution (S.106 or CIL) then it would be more likely to succeed, and quicker to achieve, to relate this requirement to the SE2 site development rather than to S4 which is a smaller site, with a longer and indeterminate timescale, is not currently needed and may never be justifiable.

Furthermore, the whole concept of prematurely removing any land from the Green Belt as 'safeguarding' is highly questionable. If there is no current need and therefore no exceptional circumstances then the decision should be left to a future plan review.

Paragraph 143c) of the NPPF says:

"where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs ..."

This is clearly intended to facilitate urban fringe developments and not isolated sites such as Jubilee Field which lies deep within the Green Belt.

Given that the Local Plan has allocated a sufficient employment land provision, and that other future options may exist that are not in the Green Belt, there should be no further consideration of this site for employment use at this time.

(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.

Delete Site Allocation S4 – Jubilee Field, Watling Street from Policy SO7.7 and the Policies Map.

(Please continue on a separate sheet if necessary)

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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 more fully explain to the Inspector the damaging impacts this allocation would have on the environment and amenity of the Cannock Extension Canal and on its residential boating community.

(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: 19 Feb. 2024



6. Local Plan Policy Options

Site Allocations

Site Specific Policy - Springvale Area Service Office, Walhouse Street, Cannock (H62)

Site Reference: H62

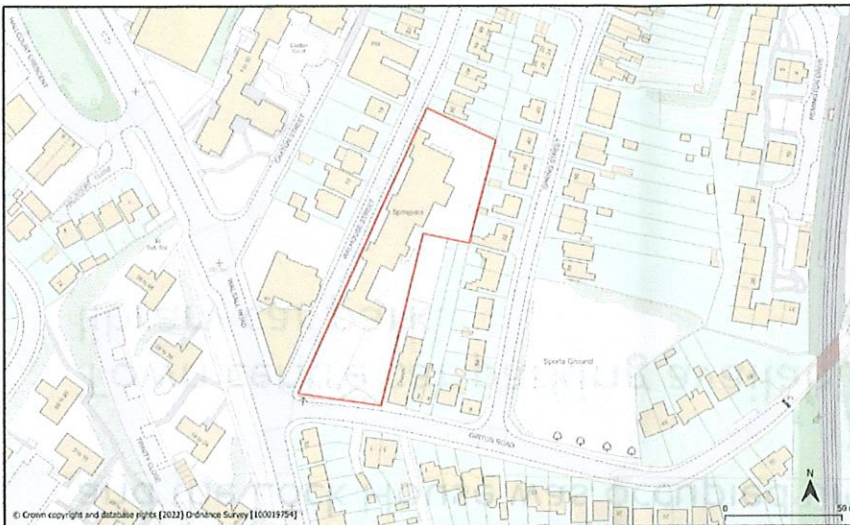
Address: Springvale Area Service Office, Walhouse Street, Cannock

Indicative Dwelling Yield: 10 dwellings

Site Area (Hectares): 0.40 hectares

Proposed Use: Residential Development

Site Boundary



Site Specific Policy: H62

Key Development Considerations:

- Provide access from Girton Road/Walhouse Street
- Include new or enhance cycle and footpath linkages, including enhanced connections and alignments to existing Public Rights of Way, including links to Cannock Town Centre
- Provide an appropriate Education contribution as requested by Staffordshire County Council
- Incorporate existing trees where possible within the proposed development and provide suitable ecological mitigation and/or compensatory and enhancement measures within the site and green infrastructure connectivity
- Incorporate suitable water harvesting and drainage systems on the site to minimise water use and limit water run-off from the site
- **The design of the development and buildings should respect the setting and structures within the adjacent Trent and Mersey Canal Conservation Area**

No!