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Dear Sushil

Cannock Chase District - Local Plan Preferred Options

Thank you for consulting Staffordshire County Council on your Preferred Options Local Plan. The 8 Strategic Objectives for the Plan are supported and provide a clear vision for the development of the District.

It is acknowledged that the Plan sets out provision for 6,016 dwellings (including 500 for the wider housing market shortfall) at 276 units per annum and 50 Hectares of employment land. Coupled with the spatial distribution of this growth in the Preferred Options Plan we can now work with you towards identifying the precise infrastructure requirements necessary to support the delivery of the Plan.

At the last round of public consultation, we noted that we had held numerous meetings with your department to understand the challenges for the Plan and what the key considerations. We would want to continue this close working relationship moving forward to support the development of the Publication Plan and Infrastructure Delivery Plan.

We have sought below to provide thematic feedback and answers to the consultation questions where they are relevant to the County Council.



Education

This section provides an overview of the likely education infrastructure requirements necessary to support the delivery of identified residential development sites in the Plan.

We have provided a summary of the likely mitigation required within each school place planning area. If a school place planning area has not been included, it is because there are no identified sites in that area.

This review has been undertaken as at April 2021 and the school organisation team will continue to undertake detailed analysis as the Local Plan emerges and further detail about the potential sites are known and take into consideration any changes in local demographic information.

Norton Canes Primary School Place Planning Cluster

The two sites in Norton Canes are both within Jerome Primary School's catchment area. Along with Norton Canes Primary Academy, these are the only two primary schools in Norton Canes. There is existing pressure for primary school places in this area, with an identified need to provide additional primary school places to mitigate housing developments that have recently been built, are ongoing or are due to commence.

Any further housing will therefore require the provision of additional primary school places to mitigate its impact. The two identified sites in this school place planning cluster will generate a total of 41 pupils and will increase the pressure for places. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contribution requirements may change in the future.

Cannock 1 Primary School Place Planning Cluster

You may be aware that a 1 Form Entry (FE) primary school (Poppyfield Academy) has opened in this cluster area to provide primary school places for the ongoing Pye Green development and has been designed to be able to expand by ½ FE. Two of the proposed sites are already known to the school organisation team as planning applications have already been submitted and the level of mitigation for these two sites are included in draft S106 agreements. It is also expected that Poppyfield will provide the mitigation for the other proposed site which appears to be an extension of the Pye Green development.

There are a further 768 additional dwellings proposed across the remainder of the cluster. Whilst it is noted that there is limited or no expansion potential at two primary schools within this planning area the current pupil movement trend would suggest that there would be potential for primary pupils from proposed housing development(s) in these catchment areas to be accommodated; on the assumption that not all the housing is delivered at the same time.

The remaining schools in the cluster either have no proposed housing development in their catchment area or if they do it is expected that the level of development

could be accommodated within existing capacity. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contribution requirements may change in the future.

Cannock 2 Primary School Place Planning Cluster

There are seven sites identified within this planning cluster, potentially delivering 1,328 dwellings, with sites identified in all three of the primary schools. Heath Hayes primary school could not support the proposed level of development within its existing capacity and there is no potential to increase the school site. It may be possible to accommodate a smaller level of development. The number of dwellings proposed are too few to make the provision of a new 1FE primary school viable.

The small development within the catchment area of Five Ways primary could be accommodated within the existing capacity of the school.

Within the catchment area of Gorsemoor primary, four sites are identified delivering 905 dwellings, three relating to a strategic site delivering the majority of the dwellings (875). Whilst there may be limited expansion potential at the school, currently there is some available capacity. The overall level of development proposed would require the provision of additional capacity which could be achieved by a new 1FE primary school, which would need to be located within one of the proposed sites and additional land may also be required to future proof this area for any future proposed housing development. We would wish to work with CCDG to better understand the timing and size of the development(s) being allocated to establish the most appropriate means of mitigation and advise on appropriate Policy provision in the Plan to secure the required infrastructure.

This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contribution requirements may change in the future.

During the analysis of the proposed sites in this planning cluster it was noted that a previously considered potential development site East of Wimblebury is no longer included. As such the impact and mitigation required is not included within this response.

Cannock Secondary School Place Planning Cluster

Within the five secondary schools within this cluster there are 2,281 dwellings proposed.

The number of potential dwellings located in Norton Canes High School catchment is 1,510 dwellings. The school site provides some potential for expansion.

The current pupil movement trend would suggest that there is likely to be potential for secondary pupils from proposed housing development(s) in this catchment area to be accommodated. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that

the revision of the Local Plan covers, circumstances may change over this period and education contributions may be required in the future.

There are 164 dwellings proposed within the catchment area of Kingsmead. Whilst it is noted that there is no potential for expansion at the school, the current pupil movement trend would suggest that depending on the timing of delivery of the dwellings some secondary pupils may be accommodated.

The remaining three schools in the cluster could accommodate the level of development proposed within their catchment areas. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contribution requirements may change in the future.

Rugeley Town Primary School Place Planning Cluster

There are fourteen sites identified within this planning cluster, with all sites located within only three of the nine primary school catchment areas. The total number of dwellings within this area is 1,450 of which the majority of dwellings proposed (1,000) are on the Former Rugeley Power Station Development. This development has now been granted planning permission with a suitably sized All Through School/Primary School on site to mitigate its impact.

The remaining 450 dwellings proposed to be built in this school place planning cluster will be delivered within the catchment areas of Chancel, Redbrook Hayes and Hob Hill primary schools.

There are six sites proposed to be built within Chancel Primary School catchment area, the school is currently full and there is limited potential to increase the school size.

Four sites are proposed to be built in the catchment area of Hob Hill CE Methodist(VC) Primary, recently expanded by 105 places ($\frac{1}{2}$ FE) to mitigate the impact of development in the South of Rugeley in the current Local Plan.

Three sites are proposed to be built within the catchment area of Redbrook Hayes Community Primary School, this school is currently full and offers no opportunity for further expansion.

Whilst it is noted that there is limited or no expansion potential at the above-named primary schools, within this planning area some surplus capacity currently exists. The current pupil movement trend would suggest that there is likely to be potential for primary pupils from proposed housing development(s) in these catchment areas to be accommodated. This is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period of time that the revision of the Local Plan covers, circumstances may change over this period and education contributions may be required in the future.

Rugeley Secondary School Place Planning Cluster

There is currently one secondary school which serves the Rugeley area. This school is full and is expected to remain under pressure for places without any additional housing in the area. Any level of housing will therefore necessitate additional secondary school provision in the town. Secondary school places will be provided either through the delivery of a new All Through School proposed as part of the Rugeley Power Station Development or through the delivery of new secondary school provision in the town. All future development will need to contribute proportionately to support the provision of additional school places.

Transport

Five Ways Junction (A5190/B4154/Wimblebury Road)

At the last Local Plan consultation phase we identified a constraint at the Five Ways junction. It is noted that POLICY SO3.1: PROVISION FOR NEW HOMES identifies new strategic housing sites at:

- SH1 South of Lichfield Road, Cannock approx. 875 dwellings;
- SH2 East of Wimblebury Road approx. 410 dwellings;
- SH5 Land to the north of no.2 west of Hednesford Road, Norton Canes approx. 175 dwellings.

Staffordshire County Council (SCC) is concerned that traffic generated by new housing developed in these locations will adversely impact on the A5190/B4154/Wimblebury Road Five Ways Junction. This junction is a known congestion hot spot at peak times and has also been identified as an AQMA. Data shows that the A5190 approach exceeds the national objective for transport related NO2 pollutants impacting on residential properties.

Prior to the pandemic, work was undertaken by SCC to identify an improvement scheme (larger roundabout) to address existing deficiencies in the current junction design. This resulted in an expression of interest (EoI) being submitted for Local Pinch Point (LPP) Funding to the DfT in 2020 (Appendix 1).

The LPP EoI notes a number of deficiencies in the current roundabout design;

- All 5 arms have single lane approaches with no flaring on the entry or exit
- Heavy Goods Vehicles can only circulate at very low speeds due to tight radii
- There are no formal crossing facilities and pedestrians and cyclists do so via dropped kerbs and during gaps in traffic. There is no guard rail or tactile paving
- Speed limits on the approach roads vary from 30mph to the national speed limit. Capacity constraints are evident in the AM and PM Peak Hours (0800-0900 and 1700-1800 hours) causing significant delays to travellers through the junction.

Traffic demand to use the junction is significant with 2017 traffic flows over 2500 vehicles per hour during peak times. The main movements through the junction are along A5190 Cannock Road with Average Annual Daily Traffic flows (AADT) of between 17366 and 12,616 vehicles per day. There are heavy movements on the B4154 northern and southern approaches of 10,552 and 9682 vapid respectively.

Unfortunately, at the detailed design stage it emerged that land outside the Highway maintainable at public expense (HMPE) was required to develop and deliver the concept design, and this could not be made available to the planned delivery programme. Funding for third party land acquisition had not been included within the EoI and the submission was withdrawn from consideration for funding (to the successive Levelling Up Fund - LUF), although there is an opportunity to resubmit to a later round of LUF.

The LPP EoI was formulated using data collected pre-pandemic. We do not know what the successive 'new normal' travelling conditions might be on this part of the network.

Assuming that the pre-pandemic travelling conditions return, we know that improvements are required to address existing concerns and that traffic generated by the proposed allocations will add to the transport and environmental problems in this location. The opening of McArthur Glen West Midlands Designer Outlet opening in 2021 to the west will also add to the traffic demand at Five Ways. In addition to highway works to increase capacity, there will be a need to provide a significant improvement in facilities to enhance connectivity for non-motorised users, particularly cyclists to LTN 1/20 standard (published July 2020). This will further increase the necessary land take for any improvement scheme. Currently there is no identified solution or funding mechanism to deliver improvements to make these strategic housing allocations acceptable in transport terms.

Sustainable Transport (Policy CP10) in the currently adopted Local Plan recognises the need to seek development contributions to support key road infrastructure improvements including Five Ways Island, Heath Hayes.

Policies SO5.1: ACCESSIBLE DEVELOPMENT and SO5.4: MAINTAINING AND IMPROVING THE TRANSPORT SYSTEM do not recognise the need for highway improvements at Five Ways.

Solution

Work is required to establish new baseline traffic conditions or confirm previous conditions at Five Ways. Traffic forecasts need to be developed to the end of the Local Plan Period, that include the cumulative traffic from these sites.

A deliverable improvement scheme needs to be identified that can deliver acceptable travelling conditions through Five Ways and reduce traffic related NO₂ emissions to acceptable levels. It is requested that a meeting be held between the County and District council to discuss the issues at hand, potential options and mechanisms for delivery (including roles and responsibilities) so that we can work towards an agreed approach for the Publication Plan and future examination.

It is recommended that Strategic Policies SO 5.1 and SO 5.4 need to be amended to address this issue positively:

1. SO 5.1 • Developments which, individually or cumulatively, cause an unacceptable impact on the highway network in terms of safety, air quality, capacity or congestion will not be supported, *unless it can be demonstrated that they can be satisfactorily mitigated;*

2. SO 5.4 ; • Supporting traffic management *and highway improvement* schemes that will provide for the safe and efficient use of the local highway network;
 - Reducing transport pollution and carbon emissions, protect the natural environment, and promote improved public health and wellbeing

Site Specific Policies are needed to require the developers of SH1, SH2 and SH5 to work together to develop an evidence base that demonstrates that residential development in these locations can and be made acceptable in transport terms by delivering the necessary improvements at Five Ways to fully mitigate their transport impact

General transport comments

At Paragraph 4.6 replace 'Transport Strategies' with the following:

- DfT Gear Change: A bold vision for cycling and walking, July 2020
- Statutory Cycling and Walking Investment Strategy (CWIS), 2017
- Staffordshire Local Cycling and Walking Infrastructure Plan 2021
- Cannock Chase Integrated Transport Strategy (to be reviewed)

Strategic Objective: 5 (SO5) should recognise the Core Design Principles for walking and cycling that are embedded in Gear Change and Local Transport Note 1/20 (LTN 1/20) Cycle Infrastructure Design, which is referenced in the National Model Design Code. Walking and cycling networks need to be Coherent, Direct, Safe, Comfortable and Attractive.

The Spatial Strategy for Cannock/Hednesford/Heath Hayes (Paragraph 5.16) does not reflect the need to provide a walking and cycling network in line with the five Core Design Principles.

At Paragraph 6.71 Design and Access Statements need to consider LTN 1/20.

Lists of Relevant Evidence

The following should be included in the appropriate lists of relevant evidence:

- DfT Gear Change: A bold vision for cycling and walking July 2020
- Statutory Cycling and Walking Investment Strategy (CWIS), 2017
- Local Transport Note LTN 1/20 Cycle Infrastructure Design, 2020
- Staffordshire Local Cycling and Walking Infrastructure Plan, 2021

Within Gear Change, the Government has announced the setting up of an inspectorate led by a new national walking and cycling commissioner. They will be a statutory consultee within the planning system, pressing for high quality walking and cycle provision in Local Plans and planning applications, in line with new standards laid down in LTN 1/20 guidance. Active Travel England will also be publishing annual reports on highway authorities and grading our performance.

National Policy Context

The Local Plan should recognise NPPF Paragraph 110a that is highlighted in 14.2.2 of LTN 1/20:

NPPF Paragraph 110a states that applications for development should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas.

Paragraph 6.335 should also make reference to the Cannock Chase Integrated Transport Strategy being supported by Staffordshire's LCWIP.

Any relevant Local Design Code to be produced will need ensure consistency with LTN 1/20.

POLICY SO6.5: CANNOCK TOWN CENTRE REDEVELOPMENT AREAS:

The County Council is concerned that Policy SO6.5 Town Centre Redevelopment Areas includes a proposal to redevelop the Cannock bus station. However, no alternative well located site for this facility has been identified.

- Bus Station (0.11ha) –hotel and conferencing facilities or residential uses and supporting an improved intermodal interchange. Site ref M2

There has been previous dialogue concerning this proposal and Consultants have looked at site options. Beecroft Road, Church Street and reconfiguration of the existing bus station site to accommodate development but with less capacity for buses, were all considered but no suitable alternative option for the bus station emerged. SCC considered that reconfiguration would negatively affect capacity and therefore service provisions locally. The issue of layover was also a problem when considering alternative sites and reducing capacity at the current location.

The suggestion of Church Street as an alternative location cannot be supported as the road isn't that wide; there is very little space for pedestrians let alone bus shelters and stops etc. There are currently 10 bus stands in the bus station, 4 or 5 maximum would only have been available with this option and no layover space. There are very few options in Cannock town centre otherwise, and there are no other stopping locations within the town centre, unlike Stafford for example, most passengers board/alight in Cannock bus station due to no other options.

Policy SO7.8

Staffordshire County Council supports the integration of both cycling and walking within the Green Space Network

At the last Local Plan consultation we advised that there is an existing shortage of lorry parking in Staffordshire as identified by the DfT National Survey of Lorry Parking 2017, with existing facilities concentrated around the A5 and M6. The West Midlands region also has critically high usage of lorry parking facilities. We stated the County Council would support the provision of new facilities, but we note none are proposed in the Plan. In addition, we recommended that any new development that would increase road-based freight should consider where vehicles will park overnight and provide suitable facilities to accommodate deliveries and distribution vehicles. However, no such provision has been made in the Plan for promoters of such sites to consider this issue.

Monitoring and Evaluation SO5.1

An indicator should be the number of developments delivered in line with LTN 1/20.

Monitoring and Evaluation SO5.4

Staffordshire County Council will work with the planning authority to agree the appropriate monitoring indicators, targets and contingencies.

Rail

In relation to rail provision in the District we have the following comments to make:

Page 12:

The Rugeley-Hednesford-Cannock-Walsall-Birmingham, 'Chase Line' rail service continues to grow in its popularity and the three stations at Cannock, Hednesford and Rugeley Town carry over 700,000 passengers' per year. The Chase Line electrification and line speed improvements completed in May 2019 have enabled the introduction of faster, longer and more frequent services, including two trains per hour throughout the day to Birmingham, and new direct services to the NEC/Birmingham Airport. The Council is also actively involved in the innovative Chase Line 'Stations Alliance', with the West Midlands Combined Authority, LEPs, Network Rail and West Midlands Trains (the new West Midlands franchise operator). Cannock station in particular is the focus of attention for a major upgrade, in view of its close proximity to the £160m, Mill Green retail designer outlet village, which will attract 3-4 million visitors per annum.

- Having checked footfall levels from official ORR figures for 2018/19 at these stations, the total footfall is around 500,000. The data therefore needs to be checked and the source and date of the data needs to be referenced.
- Reference to the impact of Covid on footfall levels needs to be made in conjunction with the expectation that footfall will begin to grow again with the return of passengers to the railway and building back better.
- The Chase Line Stations Alliance is with West Midlands Rail Executive and also Staffordshire County Council. This should replace West Midlands Combined Authority and also the LEPs are involved.

Page 15:

Rail services have seen significant improvements and strong growth in passenger numbers leading to continued investment in infrastructure. Parts of the District have seen reduced levels or even loss of their bus services and are now more isolated, especially away from the main commuter routes. Social isolation is an issue for many people who do not have access to cars.

- It is suggested that this needs to be slightly reworded to take into account the impact of Covid on passenger numbers. This could be reworded to say strong growth in passenger numbers in recent years and prior to the Covid pandemic.

Page 16:

Rail services have seen significant improvements to Birmingham, London and the north-west. The off-peak Chase Line service frequency to Birmingham has been increased, while the electrification and line speed increase schemes have been completed, including the introduction of longer, faster services to Birmingham with direct services to Birmingham International (Airport/NEC).

- It is important to note that whilst there is an hourly direct service to Birmingham International this could change (not aware that it is changing) in the future following the conclusion of negotiations with Government over the content of the Franchise going forward.

Page 28:

A masterplan approach to the improvements to the Town Centre will be taken forward that will take in the opportunities to integrate the train station with the Town Centre and Mill Green. The recent upgrade of rail services to Birmingham and London will be reflected in the masterplan to harness the benefits of these improved links and provide a station facility that will be a key feature of the regeneration of Cannock Town Centre.

- Services no longer run to London. They currently terminate either at Birmingham New Street or Birmingham International.

Page 34:

Option B: As above but also to add more specific reference to particular local heritage opportunities in town centres, canals and collieries and former mineral railway lines to help bring new life into town centres and historic commercial buildings, consider other regeneration/leisure opportunities and enhance the footway/cycleway network. This more specific reference to heritage opportunities could also refer in generic terms to the (forthcoming) Heritage Impact Assessment evidence to provide guidance for managing change at allocated sites.

- The concept of using disused railway to enhance the footway/cycleway network is acceptable as long as it is no longer required for railway use in the future.

Page 34:

- The same comment as on page 34 applies.

Page 106:

Support the development of rail freight within the District, in particular, the promotion of the Mid-Cannock site as a road/rail interchange depot, and safeguarding inland waterways and wharfage.

- Support the above statement but should include the caveat where there is available capacity on the rail network. There also needs to be consideration of impacts on the local and strategic road network.

Page 114:

- The same comments as on page 106 applies.

Page 120:

These routes are largely former mineral railway lines that carried coal from the coalfields on Cannock Chase to the main line railway for onward distribution to local customers and markets further away. Some routes have been restored as opportunities allow, but the remaining protected routes provide an opportunity for a wider network of off-road sustainable transport corridors. They also link with other local off-road routes including the Cannock Chase Heritage Trail from Cannock to Rugeley via Hednesford and phase 1 of the Brereton and Ravenhill Way from Rugeley Town Railway Station to Brereton.

- Need to ensure that these railway lines are not required for future railway use. It may be useful to include a caveat here.

Local Design Code

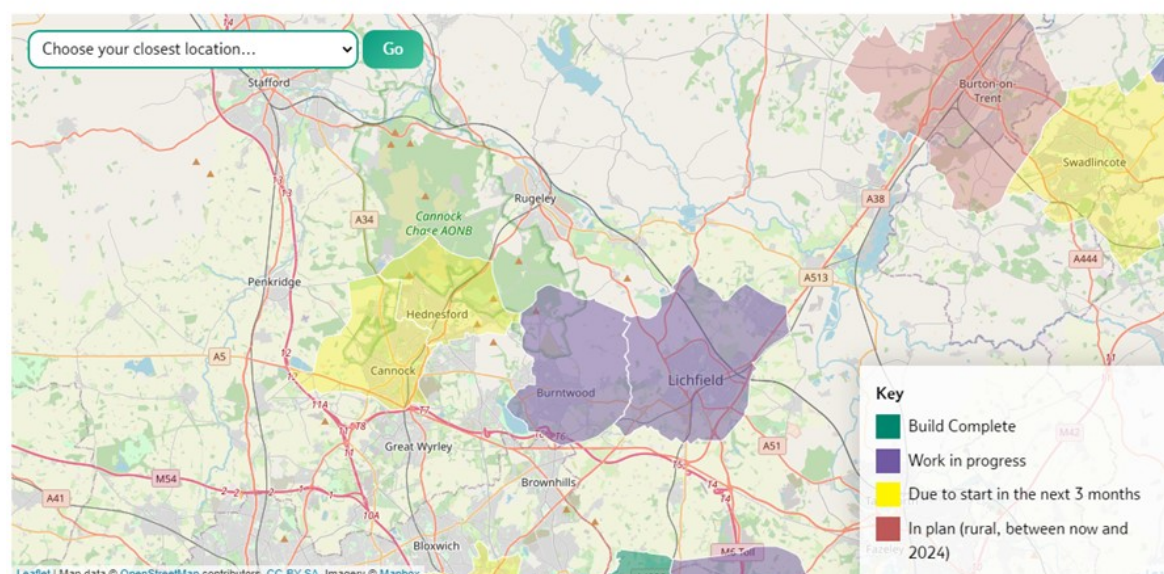
The Plan makes reference to the preparation of Local Design Codes following on from the National Design Code and Guidance. It will be important for discussions to be held with the County Council on the preparation of any design code primarily relation to the design and layout of highway maintainable at public expense and SuDS.

Digital Connectivity

There are a couple of key principles that would be worth adopting. Any reference to improving access to services is equally important to both business and residents alike. Government and the industry are moving away from the language of “superfast broadband” to “gigabit capable”, “full fibre” or “ultrafast broadband”.

The Cannock district is quite well served with superfast broadband (>30Mbps) at 99.54% and are currently at 26.70% gigabit capable (>1,000Mbps). It is highly likely suppliers such as Openreach and Virgin will start to address the gigabit capable service, given the majority of the premises in Cannock ought to be commercially viable. Openreach have already announced the Cannock exchange for upgrade to full fibre within their Fibre First programme.

FTTP Fibre First Build Programme



The above map currently shows Openreach's FTTP plans for our Fibre First Towns, Cities and Boroughs and Rural Market Towns and Villages Build Programme. It does not show FTTP deployment related to other programmes such as BDUK, new sites/retro new-sites, and other smaller scale programmes or infill.

It is anticipated that approximately 80% of the premises across the UK will be considered commercially viable and thus delivered by the commercial sector at their own expense. The remaining "Final 20%" will require a public sector subsidy and Project Gigabit was launched recently (£5bn) to address premises in the "Final 20%". In this case I would assume that is likely to be premises in rural areas of Cannock, including those on the Chase.

<https://www.gov.uk/government/news/government-launches-new-5bn-project-gigabit>

This time the contracts will be procured centrally and we will be expected to facilitate delivery. The Superfast Staffordshire Team are also in the process of assisting 70 communities to access to UK Gigabit Vouchers to bring full fibre services to their communities in rural areas.

Ecology

Q9 Do you support the preferred policy direction to protect existing, and provide additional, allotments and community food growing sites?

Yes, these can provide small areas of linking habitat in otherwise poor areas. New allotments should be designed with good biodiversity principles in mind too.

Q40 Do you support the preferred policy direction to protect, conserve and enhance biodiversity and geodiversity

Yes, this is welcomed. It may be that greater clarity around the avoid – mitigate-compensate hierarchy described in NPPF would be helpful here.

Q41 Do you support the preferred policy direction to achieve net gains in biodiversity through development?

Yes, this is welcomed. It is noted that there is an intention to amend the Local Plan to conform with changes to NPPF (6.472). Review of the Local Plan is, however, a time-consuming task and it would be helpful if policy paved the way for likely forthcoming changes. The policy (and the one above) should refer to 'measurable net gain', ideally with a specific requirement for 10% net gain as is becoming

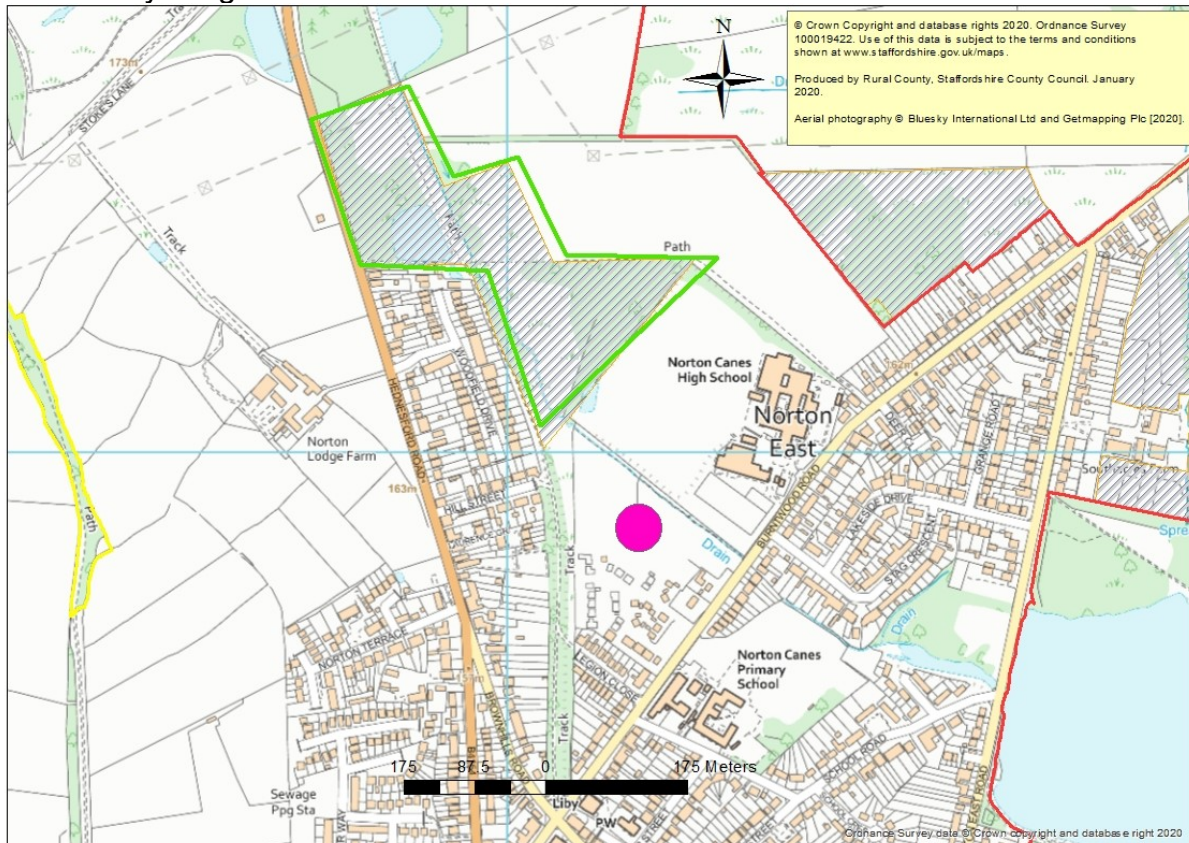
standard. The policy states that ‘The level of biodiversity net gain required will be proportionate to the type scale and impact of development’, however using a percentage ensures proportionality. The policy should also refer to the use of Defra metrics to demonstrate that gain can be achieved (a metric specifically for small sites is expected soon to complement the current one which works better on areas that can be measured in units no smaller than 0.1 ha.)

Q42 Do you support the preferred policy direction for the Special Areas of Conservation?

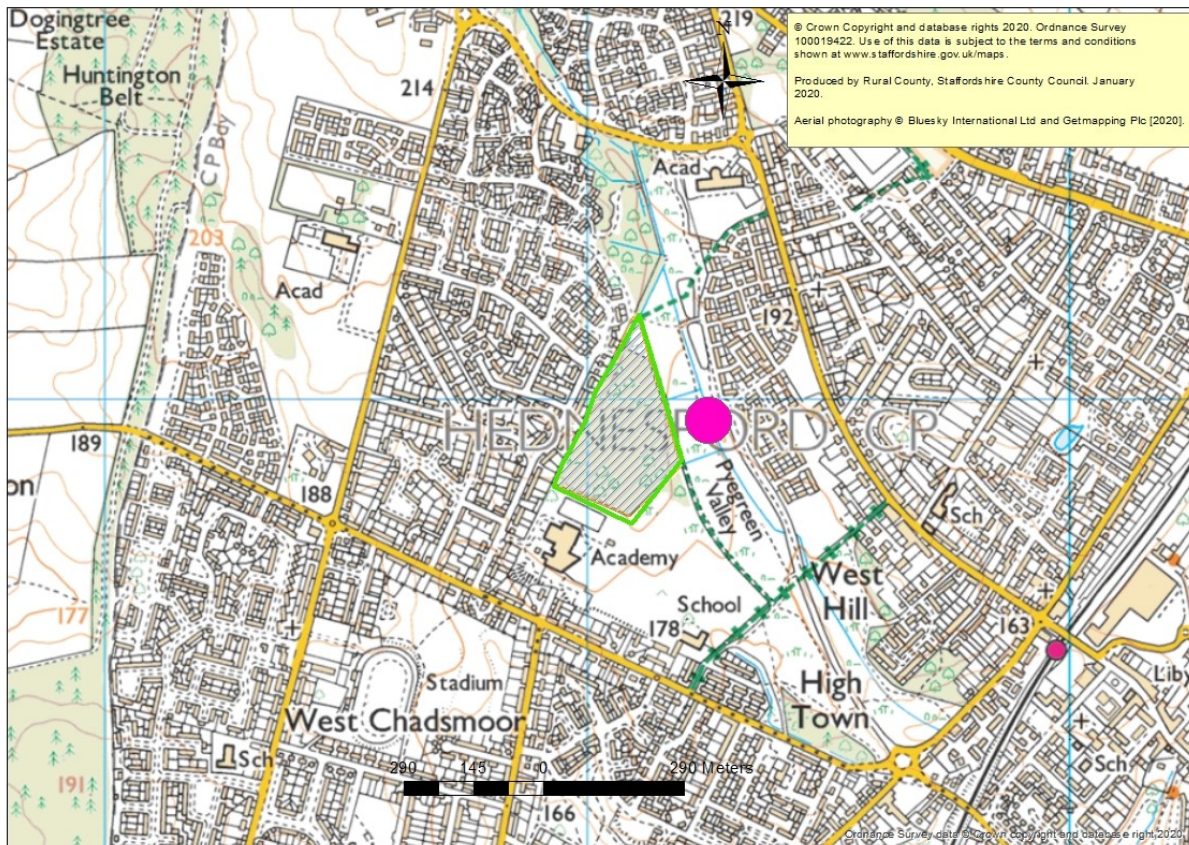
Yes, this is welcomed. A minor point – in 6.489 industrial emissions are mentioned as a source of pollutants; agricultural emissions are also relevant.

Specific allocations – section 6

At Norton Pools (plan below) it should be noted that there is a Local Wildlife Site (LWS) (green boundary) which adjoins the northern edge of the housing site (allocation is shown as a pink dot). Impacts (especially those from dog walking) on the LWS, which comprises heathland and grassland habitats, will therefore need to be carefully mitigated.



The Pyegreen valley allocation (below) is also in close proximity to a LWS and mitigation will need to be thought through if damage to the LWS is to be avoided.



Archaeology / Historic Environment

Q1 Do you support the preferred policy direction to protect, conserve and enhance the distinctive local historic environment?

Firstly, it must be noted that one of the key aspirations of the emerging Local Plan to ensure that new development in the district will be accommodated whilst protecting and enhancing the historic and built environment is very much welcomed. The preferred policy direction, which sees the protection, conservation and enhancement of the distinctive local historic environment forming part of SO1.1, is supported, however, it is suggested that consideration is given to the overall title of Strategic Objective 1 to better reflect the inclusion of the historic environment here. A suggested simple amendment could be: 'Delivering High Quality Development that is Appropriate, Distinctive, Attractive and Safe'. It is also suggested that mention of sites of archaeological interest could be specifically mentioned in SO1.1 (as is the case in Section 1.10 in the non-technical summary).

With regards to the Preferred Policy Direction (Page 36) where the requirement for a Design and Access Statement to be produced for all major development proposals and all Listed Building consent applications is proposed, it is recommended that this Design and Access Statement should incorporate, or be supported by a Heritage Statement which would 'describe the significance of any heritage assets affected, including any contribution made by their setting' as per Par 189 of the NPPF, and where more complex remains or larger developments are being considered, then a full Historic Environment Desk-Based Assessment should be prepared. In all cases these documents should be prepared at an early stage by appropriately experienced historic environment specialists and they will inform discussions with the Local Planning Authority and their historic environment advisors regarding the need for and scale of any historic environment interventions

including opportunities (where appropriate) to enhance heritage assets within a scheme.

Other suggestions:

6.41 could also include reference to the Extensive Urban Surveys and Historic Environment Character Assessments which form part of the evidence base. Likewise, the Chase Through Time Project. Also, would it be appropriate to include these studies and the Heritage Impact Assessment in the list of relevant evidence on Page 39?

Q2 Do you support the preferred policy direction to enhance the quality of the built environment?

Yes, the proposed policy direction to retain and enhance the distinct and separate character of each of the District's settlements, and deliver the highest quality of building design and layout which has been developed to enhance the District's distinctive character and heritage assets is very much supported.

Also please see under Q1 above regarding what should be included/accompany a Design and Access Statement in terms of archaeology and the historic environment.

Q3 Should the preparation of Local Design Codes be based on the Character Areas that were included in the Cannock Chase Design SPD?

Yes, and it is suggested that the (ideally updated- as per our suggestion in our response to the Issues and Options Consultation) Historic Environment Character Assessments and Extensive Urban Survey should be utilised to help better understand the special character of these areas.

Q 13 Do you support the proposed allocations of the sites listed in Tables B and C?

We have not reviewed each of these but provisionally yes, so long as they have been assessed as part of the Heritage Impact Assessment exercise, and any potential harm can be mitigated as per the recommendations of that report. Further archaeological evaluation and recording works may be required as per NPPF 189 and 199 for specific applications.

Q21 Do you support the preferred policy direction to develop sustainable tourism and the rural economy?

The proposed use of the local canal network and the abandoned canal network to support economic growth is supported, as is the proposal to safeguard these, along with sufficient space, to enable the associated infrastructure to be reinstated so that the long term potential of these historic features can be realised.

Q28 Do you support the preferred policy direction to safeguard the route of the Hatherton Canal?

Yes, this proposal is very much supported.

Q53 Do you support the preferred policy direction to brownfield and despoiled land and under-utilised buildings?

Yes, but with a reminder that an awareness needs to be had that brownfield sites can often retain evidence of historic industry above and below ground. Further archaeological evaluation and recording works may be required as per NPPF 189 and 199 for specific applications.

Other comments:

7 Monitoring Framework –

Suggestions above with regards to the production of a Heritage Statement as part of the Design and Access Statement and the production of a Historic Environment Desk Based Assessment should be considered for inclusion here.

Appendix I: Glossary

A definition of what a heritage asset is would be useful here- this could draw the distinction between designated and non-designated.

Sustainability Appraisal

We welcome the enhancement of the evidence base through the production of the Cannock Chase Heritage Impact Assessment. This was produced using a robust methodology, working to national standards, and it is particularly noted that, in addition to assessing significance and impact, this also explored each site through the lens of maximising enhancement and the mitigation of harm. Whilst we haven't taken the opportunity to review each of the 69 sites ultimately chosen for assessment in this report, we have reviewed a selection of these which appear to be comprehensive and generally fit for purpose.

The inclusion of the historic environment, including heritage assets and their settings, as a specific SA Objective is welcomed, and the assessment of the likely sustainability effects for the various different site types and the specific site options (Appendix 5) has made use of the enhanced evidence base to provide a detailed assessment against this objective. These assessments are generally supported.

Please also note that the number of scheduled monuments in the district outlined in section 47 (page 215) is incorrect- the Conduit Head at High Green, Cannock has been removed from the National Heritage List for England.

Public Rights of Way

The plan doesn't really contain any specific information about public rights of way other than acknowledging that *improvements to cycle and footpath networks will be made to enhance connectivity and encourage more active travel, health and well-being* (5.17). Whilst this is supported ultimately the Plan needs to aspire to improve accessibility on the walking and cycling networks (including towpath links) throughout the District.

It is noted that the Plan does not mention horse riding, which is an omission given Cannock Chase District has a number of livery yards and there are public bridleways throughout the District. Future iterations of the Plan should give consideration to the equestrian community and their usage of bridleways, roads and lanes across the District.

The Plan requires new developments should seek to improve non-vehicular public access to the wider path network. This is essential if the aims of increasing the levels of physical activity are to be met and the public rights of way network should be integral to any schemes that are developed to promote this.

Where development is likely to affect the path network, either directly or indirectly, such as where development is likely to lead to an increase in usage of the network in the vicinity the Plan should make policy provision for improvements to be sought. This could be via direct delivery via Planning Condition, use of section 106 Obligations and/or CIL.

Where Developers are to provide direct improvements the Plan should signpost them to enhance the existing path network where possible in line with Staffordshire County Council's Rights of Way Improvement Plan. This could include:

- the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists across Staffordshire where there is currently a shortfall in available access routes.
- the creation and promotion of short circular walks to promote the health benefits of walking
- the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture

The County Council expects to be consulted on any submitted applications in due course and is able to provide further advice and guidance as and when required.

The Plan should ensure that the supporting text makes it clear that where appropriate development needs to take suitable mitigation to ensure the public path network is protected. Further, the Plan should make reference that there are likely to be many non-definitive routes across proposed development sites that should be considered by any applicants. In many cases these routes could have become rights of way by virtue of established usage and should be treated as public. There will also be sites where such usage or historic evidence has already resulted in applications being made to the County Council under Section 53 of the Wildlife and Countryside Act 1981 to add or modify the Definitive Map of Public Rights of Way, which affects the land in question.

Employment

It is noted that the Plan provides for 50 Hectares of Employment sites against a range of 46-66 (net) Hectares as identified in the EDNA. The ELAA identifies that 12.47 Hectares of employment sites have been completed since 2018 and the Plan proposes to allocate 27 Hectares of new employment sites to meet the 50 Hectare target.

We acknowledge that the target sits within the range identified by the EDNA albeit at the lower end of the range suggested. However, when considering potential losses of employment sites over the plan period the EDNA suggested a higher range which the Plan target is below. Whilst Policy SO4.1 provides protection to safeguard against losses of existing employment areas, which is supported. There is a concern that with only allocating 27 Hectares of new sites against a relatively low target of 50 Hectares will not provide sufficient flexibility to ensure a sustainable pipeline of site and jobs coming forward.

The County Council has further land holdings available at the Kingswood Lakeside Business Park, which it has regenerated over the years. The site is now well established and highly regarded. We have received repeated approaches from developers keen to build on the success of Kingswood Lakeside and expand the park further. There is potentially one development area left that would complete the site. We are presently considering a smaller area than that shown in the Employment Land Availability Assessment 2020 and on the Cannock Chase 2014 Policies Map. The 10.86 hectare platform under consideration would allow better connectivity for landscape and ecology around each end of the plot towards the

open countryside to the northwest. The revised approach could allow us to achieve Biodiversity Net Gain targets more easily and retain more of the existing green space.

We recognise that the area under consideration sits within the Green Belt but as it is adjacent to an existing high quality employment site with good sustainable transport links we feel the very special circumstances for its release from the Green Belt could be readily met. We would wish to meet with you to share our plans and discuss the potential for the site to be included as an allocation in the Plan. We would also wish to engage with you on the other site in our ownership south of the A5/M6T that has been allocated and options that could be considered.

Economy and Skills

The County Council recognises the importance of access to good jobs for its residents. Whilst the new development proposed in the Plan will provide job opportunities for local residents at both construction and operational phases these could be reinforced and complemented by the provision of Employment and Skills Plans (ESP). As such we fully support POLICY SO4.5: PROVISION FOR LOCAL EMPLOYMENT AND SKILLS.

The County has been working with District, Borough, and Stoke-on-Trent City Council colleagues to prepare a draft Employment and Skills Plan Framework that will provide advice and structure on the preparation of Employment and Skills Plans associated with new development. We would recommend that the Plan includes reference in the supporting text to the ESP Framework that will hopefully be agreed and adopted across the SSLEP area in the Summer 2021. We would suggest a meeting between ourselves and Cannock Chase Council, including your Economic Development Officers to discuss further how best to take forward this matter.

Public Health

Staffordshire County Council and partners have recently commenced work to establish and implement a whole systems approach (WSA) to address obesity and promote a healthy weight. Obesity is a complex problem with multiple causes and significant implications for health and beyond. Tackling such an ingrained problem requires a long-term, system-wide approach that makes obesity everybody's business, tailored to local needs and works across the life course.

Cannock Chase is one of three 'pathfinder' districts in Staffordshire that will be piloting the WSA to obesity in 2021, along with East Staffordshire and Staffordshire Moorlands.

The use of the planning system to promote health and reduce inequalities is well established¹. The Local Plan provides opportunities to promote a healthy weight environment supporting the WSA to obesity in Cannock Chase and Staffordshire. The Local Plan provides opportunity to demonstrate how Cannock Chase Council, along with Staffordshire County Council, are working as part of a whole system approach, where planning forms part of a wider approach to addressing obesity.

¹ [Using the planning system to promote healthy weight environments \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

The Local Plan 'Preferred Options' document includes eight Strategic Objectives, all of which have some relevance to the health and wellbeing of the community.

KEY ISSUES

The Key Issues identified within the Updated District Profile include many issues related to health and wellbeing, including:

- Low standards of health, which require improvement;
- The natural and built environment (inclusive of indoor, built and outdoor sports), which should be planned effectively to encourage opportunities for healthy and active lifestyles amongst all sections of the community;
- The highly valuable and sensitive natural environment and canal network, which need to be protected and enhanced;
- Linked cycleways and walkways being planned effectively to encourage opportunities for healthy and active lifestyles amongst all sections of the community;
- The potential challenges posed by the need to respond to climate change.

The Updated District Profiles for Health and Education, Community Deprivation, Transport and Infrastructure, Environment and Climate Change provide detailed overviews and supporting data and evidence of the range of health inequalities which impact on the welfare of the District and its residents. The data and other supporting evidence identified around health inequalities within the Local Plan Preferred Options document is welcome.

The Local Plan Preferred Options document doesn't satisfactorily demonstrate how health inequalities, and health and wellbeing needs identified within the Updated District Profile, might apply to development proposals.

POLICIES

The County Council notes that there is an absence of specific detail within the existing and proposed Local Plan Policies that would explicitly support addressing health inequalities or the health and wellbeing needs of the District and its residents.

Existing Local Plan Policy "CP5: Social Inclusion and Healthy Living²" is referred to in relation to Strategic Objectives 1, 2 and 7. It is considered specifically to help deliver Strategic Objective 2, where Option A is to update and bolster this existing policy in order to help deliver this strategic objective. Option B, to help deliver Strategic Objective 2 is as per Option A but with further policy elaboration via supplementary planning documents, appears to have received the least support/ been discounted (as per paragraph 6.101).

The current Policy CP5 includes key elements of infrastructure related to health and wellbeing, including health facilities, parks, open spaces and woodlands, playing pitches and facilities for athletics, tennis and bowling, cycling/ pedestrian routes and pathways, sport and physical activity facilities and community facilities and leisure/

² [local_plan_part_1_09.04.14_low_res.pdf](#)

activity opportunities. It also states that the standards of provision of open space, sport and recreation facilities will be identified in a Supplementary Planning Document (SPD).

Notwithstanding the above the proposed updating and strengthening of existing Policy CP5 is welcome.

We also welcome and note the inclusion of Strategic Objective 2: to create community infrastructure and healthy living opportunities across the District, and the inclusion of these policies within the Local Plan preferred Options document.

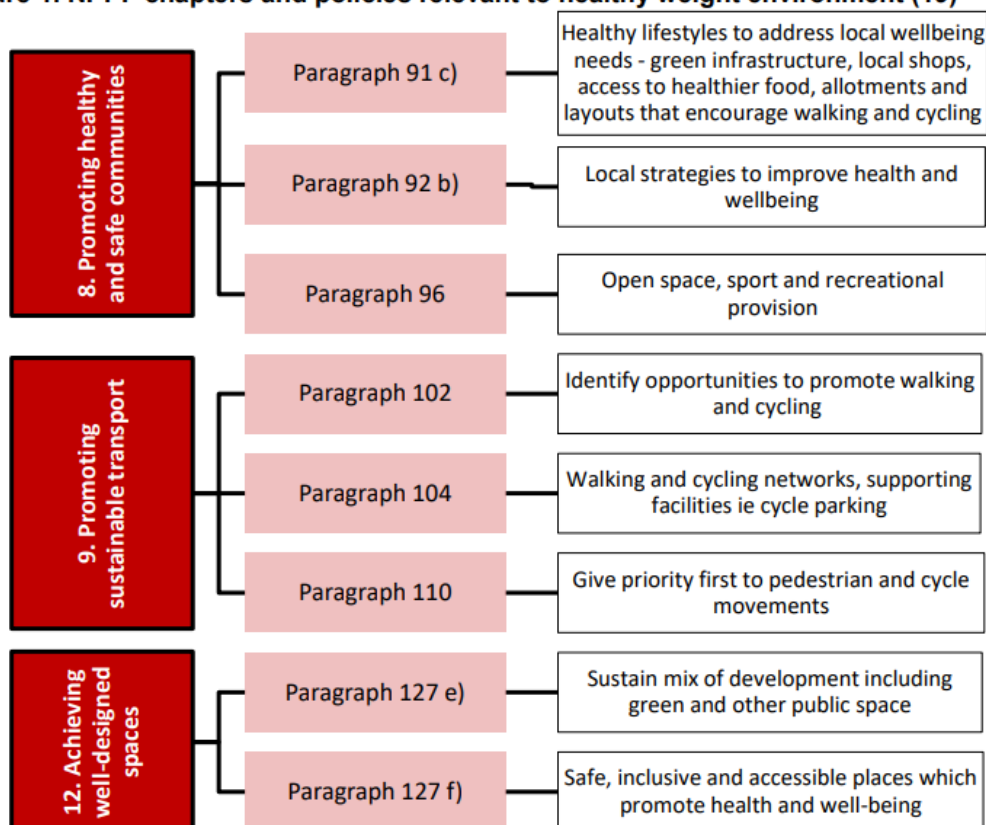
We note that these current policies refer to major development and requirements upon them. There is no indication of any thresholds, other than major development, at which proposals must demonstrate how they will maximise positive impacts on health and healthy living within the development and adjoining areas or how these requirement will apply to smaller-scale developments where there are reasons to indicate that a proposal may give rise to a significant impact on health.

We also note that these policies do not reference any mechanism for development proposals to comprehensively set out how health and wellbeing impacts will be avoided, if not mitigated.

The Local Plan Preferred Options document sets out the national policy context around Strategic Objective 2: to create community infrastructure and healthy living opportunities across the district. There are references to the NPPF 2019 paragraphs 91(b) and 96.

There are several other chapters of the NPPF 2019 which promote the wider health and wellbeing of communities, including active travel and physical activity, as well as access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation:

Figure 1. NPPF chapters and policies relevant to healthy weight environment (19)



Source: [Using the planning system to promote healthy weight environments: guidance and supplementary planning document template for local authority public health and planning teams \(2020\)](#)

There is an opportunity to strengthen Cannock Chase District Council's delivery of Strategic Objective 2, by not only elaborating and bolstering existing Policy CP5, but also adding an SPD. A 'healthy lifestyles' SPD would provide detailed advice and requirements in accordance with the Local Plan objectives related to health and wellbeing and draw upon the wider NPPF chapters relating to a healthy weight environment. A SPD would support the authority to better determine planning applications in accordance with the Local Plan and its objectives around health and wellbeing, and health inequalities.

Local Plan Preferred Options document paragraph 6.69 references 'Active Design', developed by Sports England and supported by Public Health England. It also states that planning applications will be assessed against how they support healthy lifestyles by facilitating participation in sport and physical activity.

Paragraph 6.69 is the only reference to assessing health and wellbeing impacts of proposed development. However, the Design and Access Statement information provided within the Local Plan Preferred Options document (paragraphs 6.70 and 6.71) do not include any reference to an Active Design assessment and does not specify that the Design and Access statement should consider health and wellbeing requirement/ impacts.

The Local Plan Preferred Options document does not currently provide any mechanism for development proposals to comprehensively set out how health and wellbeing impacts will be avoided, or if not, mitigated.

A Health Impact Assessment (HIA) could be used to identify issues related to health and wellbeing which might apply to development proposals. Health Impact Assessments are defined as a *"combination of procedures, methods and tools by which a policy, programme or project may be judged as to its potential effects on the health of a population"* (European Centre for Health Policy, 1999). HIAs could be applied for the purposes of development management as a process and tool for assessing both the potential positive and negative impacts of a proposal on health and wellbeing and suggest ways in which opportunities to improve health can be maximised and risks to health or negative impacts on health minimised.

HIAs could be combined with an Environmental Impact Assessment (EIA) if it makes sense to integrate health impacts into the methodology for the EIA. If an EIA is not required, the HIA should form a stand-alone assessment and submission, but would not be recommended as part of the Design and Access Statement, although the design and access statement should draw on the outcomes of the HIA. It is suggested that a meeting is convened with officers from our Public Health team to discuss further collaborative working address the issues raised above.

Sustainability & Climate Change

We acknowledge that Climate Change is a key consideration in the Plan and cuts across numerous Policies. We worked jointly along with the other Staffordshire Borough's and District's to commission the 'Climate Change Adaptation and Mitigation' study that has been used to help inform policies within the Plan. The report suggested opportunities for off-site mitigation/off-setting would potentially

have a greater scope if considered over a broader geography than individual District/Borough areas. It is suggested we progress this matter through the Staffordshire Development Officers Group to consider the merits and operation of a collaborative approach.

It is noted that the Norton Canes and Rural areas spatial strategy does not make reference to net zero as per the other areas set out in the Plan.

Minerals and Waste

Our comments at the previous stage of consultation, in June 2019, highlighted the need to recognise the importance of safeguarding underlying mineral resources, and existing waste management facilities. These points appear to have been effectively addressed through Draft Policies SO8.7 and SO8.8.

In the light of these draft policies, and Policy 2.5 of the [Staffordshire and Stoke-on-Trent Waste Local Plan](#), concerns should be raised over the proximity of Strategic Housing Site SH1 to the boundary of Poplars Landfill. Great care will be needed to ensure that proposals to introduce housing nearby do not lead to constraints on the continued operation of the site. Whilst landfill is at the bottom of the waste hierarchy, and other methods of disposal should be used wherever possible, the demand for this form of disposal will continue for the foreseeable future.

Older Persons Housing

In relation to the ageing population issue we refer to our comments from the previous rounds of consultation where we set out work undertaken on our 'Next Generation Care' project would be useful in Plan making and provide evidence on need for older age accommodation. However, the evidence base does not appear to include anything other than the Local Housing Needs Assessment 2019.

We are happy to provide officer input and assistance from our Next Generation Care project team, which could be useful in helping shape and refine the housing choice and mix Policy options.

The evidence base and locality analysis, can be found at <https://www.staffordshire.gov.uk/Care-for-all-ages/Information-for-providers/Information-for-providers.aspx>

Flood Risk & SUDS

We have provided to you separately technical input on flood risk for the sites proposed for allocation, which we will not repeat here.

It is noted that Policies SO8.3 and SO8.4 make reference to sustainable drainage systems (SuDS) and surface water management. However, it is not clear to which developments SuDS would apply as SO8.3 refers to SuDS in the context of Protect, improve, and enhance existing woodlands and habitats, and integrate new green and blue infrastructure with sustainable drainage systems (SuDS).

Policy SO8.4 Managing Flood Risk includes in the supporting text reference to our Sustainable Drainage Systems Handbook but the Policy itself is more about management of flood risk and avoidance of sites known to flood. It is suggested these policies are reviewed to make clear where SuDS would be expected to be delivered and it would also be helpful if the Plan could signpost developers to our

website containing our relevant advice -

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

Yours sincerely

James Chadwick
Planning Policy Officer

Enc.

Appendix 1 – DfT Local Pinch Point EoI