

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form
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:	Holly Marlow, West Midlands Team. Natural England
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Q1. To which Main Modification (MM) does this representation relate?

MM:	PMM1- PMM7
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Q2. Do you consider the Main Modification is:

A. Legally compliant Yes: ☒ No: ☐

B. Sound Yes: ☒ No: ☐

(Please tick as appropriate).

Q3. Please give details of why you consider the Main Modification is or is not legally compliant or sound. Please be as precise as possible.

Your representation should relate only to the Proposed Main Modifications.

PMM1: We welcome the change in wording for the Vision which includes providing a 'platform for healthier lifestyles' and the 'transition to a low carbon economy.'

PMM1: 4.8. We welcome the additional text proposed for justification which make explicit the focus on well designed sustainable places; opportunities for healthy living; low carbon transport, and low carbon development.

PMM2: We welcome the modification to the wording to make the distinction between the National Landscape and the Green Belt, and that certain sections will be released where needed.

PMM3: This modification inserts new Policy SS1 Spatial Strategy. The policy will focus the development around existing urban areas and away from National Landscapes and Green Belt.

Section I) Development proposals will be proportionate to the capacity of local infrastructure. Developer contributions will be required to mitigate the impact of development and support infrastructure improvements. We welcome this additional text in the policy.

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We are aware that this change is relevant to the HRA and has been screened into the new HRA for the main modifications. We provide comments relating to this in the HRA section of this document.

PMM4: This modification inserts new Policy SS2 Spatial Strategy for Cannock, Hednesford, Heath Hayes.

E,F) The wording explicitly states a network of open space, supporting natural assets and new cycle/footpath networks.

PMM5: This modification inserts new Policy SS3 Spatial Strategy for Rugeley and Brerton

F,G) The new wording explicitly states improvements to cycle/footpaths networks, the protection and enhancement of space through G.I. and active travel.

PMM6: This modification inserts new Policy SS4 Spatial Strategy for Norton Canes

D) The new wording explicitly states new biodiversity links will be made between Sutton Park, Cannock Chase and Cannock Chase Extension Canal; this is welcomed.

PMM7: This modification inserts new Policy SS5 Spatial Strategy for Rural Areas

B) The new wording explicitly states 'great weight' will be given to enhancing Cannock Chase National Landscape; this is welcomed.

5.28 We are pleased to see the wording now states that Management Plans will be created to provide guidance for the National Landscape management; this is strongly welcomed.

Spatial Strategy

The provisions within these new policies were previously set out in the Visions and Objectives chapter of the Local Plan and have now been turned into strategic policies.

These policies will not result in likely significant effects because, although they set out the principles that underpin the sites selected for allocation within the Local Plan, they do not themselves result in new development. No Appropriate Assessment is required.

PMM41: The addition of the wording "*new development should be located in sustainable locations*" gives greater clarity and strength to the policy, which should focus on choosing sustainable locations for development; we are pleased to see this.

PMM50: The amendment to the 1st bullet point includes the words "promote walking and cycling" in relations to sustainable modes of transport. We are pleased to see this and this ensure the policy is effective.

PMM57: The policy has been amended to include wording "*protect, conserve and enhance the Districts natural environment assets, valued landscape and townscape, sites of biodiversity or geological value and soils.*" Including protection of the Cannock Chase National Landscape, this relates to PMM7. We welcome the amendment to this strategic objective.

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PMM58: This modification includes the **support** of the Cannock Chase SAC and focus on considering ecological linkages with new and existing habitats; we welcome this.

PMM60: We are pleased to see the policy has been clarified to not apply to **irreplaceable habitats**. Natural England made comments on the requirement of this specification during the Reg. 19 consultation.

PMM62: We are pleased to see the amended wording which includes “*long term management of biodiversity features retained and enhanced*” it will be made effective by including a legal agreement and where applicable a Habitat Management and Monitoring Plan.

PMM63: This modification requires a HRA to be conducted for proposals that will increase concentrations of NO_x, NH₃, and nitrogen deposition; we are pleased to see this. We note the wording has been amended so that mitigation will be provided “*for the full impact*”. This is positive; if you have questions regarding Air Quality, then please contact Natural England.

PMM67: We are pleased to see the amended wording which stresses the compensation needed for the loss of Green Belt land.

PMM83: Wording has been added which will not require Parcel C116a to require a screening assessment for European sites, and potentially a HRA. We welcome this change and stress the importance assessment of potential ‘likely significant effects’ on any European designations.

PMM90: This policy is modified to clarify the need for mitigation by adding phrasing “*of any level of adverse impacts on air quality and traffic congestion*”. We are pleased to see this stated clearly.

PMM93: The amended wording will provide strengthened protection by requiring a screening assessment of potential likely significant effects on a European sites, this could potentially progress to an Appropriate Assessment. We welcome the explicit phrasing in this amendment and the added clarification on level of adverse impact to be determined.

PMM105: The amended wording will provide strengthened protection by requiring a screening assessment of potential likely significant effects on a European sites, this could potentially progress to an Appropriate Assessment. We welcome the explicit phrasing in this amendment and the added clarification on level of adverse impact to be determined.

PMM108: The amended wording will provide strengthened protection by requiring a screening assessment of potential likely significant effects on a European sites, this could potentially progress to an Appropriate Assessment. We welcome the explicit phrasing in this amendment and the added clarification on level of adverse impact to be determined.

PMM112: We welcome the clarification in wording which makes clear the sustainable travel modes which will be maintained its access.

PMM124: We welcome the addition of this amendment, it will contribute to benefiting nature in the site.

MOD2: Proposed Additional Main Modifications Cannock Chase Local Plan

PAM22 and PAM32: We note these series of proposed modifications add wording for the strategic objectives and spatial priorities. This sets out the priorities in a clearer fashion.

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PAM41: We welcome the additional wording here which makes the general layout, and list of policies clearer to interpret.

Strategic Objectives

PAM54: Policy SO2.5: We welcome this additional wording which provides clarity over the provision of active travel.

PAM84: Policy 205.6: We welcome this additional wording which seeks to protect proposed recreational footpath and cycle routes.

PAM85: Policy SO5.6: The additional wording focusing on additional opportunities for development to contribute to improvements in footpath and cycle routes is proactive and strongly supported.

PAM99: Policy SO.7.1: We strongly welcome the amended wording which explicitly mention the Midlands Heathland Heartlands Project. This follows our comments to the Reg.19 plan which recommended the project be added to Objective 7; this amendment is proactive and supported by Natural England.

PAM100: We welcome the addition of this text and the clarity it provides on conserving and enhancing Biodiversity and Geodiversity.

PAM108: Policy SO7.3: We welcome the addition of this text which clearly sets out the protections for designated sites. Specifically, it requires development resulting in a significant recreation impact to make a financial contribution to the most up to date Cannock Chase SAC Partnership Mitigation Scheme.

PAM11: Policy SO7.5: We welcome the addition of this text which clearly sets out the protection and enhancement of the national landscape

PAM115: Policy SO7.8: We welcome the addition of this text which clearly sets out the protection and enhancement of Green Infrastructure.

PAM126: Policy SO8.5: We welcome the addition of this text which clearly sets out the protection of Air, Water, Soil quality.

PAM127: Policy SO8.5: We welcome the addition of this supporting text which clearly requires the protection of BMV soils.

However, Natural England provided comments at the Reg.19 stage namely: "*There is however no definition of best and most versatile (BMV) agricultural land nor high quality agricultural land within the Plan, and this should be rectified*" I reiterate these comments here, the policy would strengthened with the inclusion of a definition.

Strategic Sites

Natural England have reviewed the Main Modifications relating to strategic sites. We provide comments relating to our remit to the following two Strategic Sites:

PAM159: Strategic Site Policy Kingswood Lakeside Extension 2. Natural England note that the amended wording states that 14.54ha (67.6%) instead of 8.6ha (40%) of green belt is to be released for the extension to employment land. We provided comments relating to this in the Reg.19 consultation response.

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PAM165: Policy SE2: Watling Street Business Part Extension: **J**: The amended wording includes the requirement for a Habitats Regulations Assessment and have no adverse impact on water quality of the Cannock Extension Canal SAC. We welcome this modification.

(Please continue on a separate sheet if necessary)

Q4. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of legal compliance or soundness matters you have identified at Q.3 above. You will need to say why each change will make the 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. If you support the modification, please skip this question.

MOD3: Schedule of Proposed Additional Changes to Policies Map

We have reviewed this document and have no comments to make.

(Please continue on a separate sheet if necessary)

Q5. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification. Please comment in the box below.

MOD4: Integrated Impact Assessment

Having reviewed the IIA, Natural England agree with the conclusions in Section 1.25 that "LUC has reviewed all of the proposed Main Modifications and found that most of them will not affect the IIA assessment or findings".

MOD5: Habitats Regulations Assessment

We acknowledge and welcome the updated HRA for the Main Modifications. The report has been produced to consider the modifications and the potential impacts on European sites.

It is clear that the overall quantum of housing and employment development proposed in the Local Plan remains a minimum of 6,308 homes and up to 74ha of employment land (Section 2.4

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Background: Air Quality

Natural England submitted a local plan response for the Reg.19 stage which concluded the plan was unsound. This was because “at the time of writing, traffic data was not available to screen the potential effects of vehicle emissions on Habitats Sites, and to carry out air quality assessment to inform an Appropriate Assessment” (Section 1.3).

Natural England were then consulted on the HRA addendum (Nov 2024) which was able to conclude that there would be ‘no adverse effects on integrity’ (AEOI) on habitat sites, as a result of air pollution from vehicle emissions. As a result of the updated evidence base, Natural England were able to agree with the conclusions of the updated HRA and that the issues are resolved.

Natural England have agreed that the new data on air quality, and conclusions of the HRA addendum. These are set out in the Statement of Common Ground (SOCG Nov 2024) with Natural England and Cannock Chase District Council and the Statement of Common Ground (SOCG Dec 2024) between Cannock Chase District Council and neighbouring authorities

Updated HRA Mitigation

The report outlines the main modifications which now provide additional safeguards. Comments have been made in the previous sections of this document.

Notably the Main Modifications: Policies SH1, SH2, SE1, SE2 now include the requirements for HRA into these site allocation policies. The requirement for HRA where there could be significant effects on the integrity of Habitats Sites was already a requirement of Policy SO7.1 and SO7.2.

We note the report’s conclusion that despite providing additional clarity, it does not alter the conclusions of the Reg. 19 HRA.

Conclusions

Natural England agree with Section 2.15: “The proposed Main Modifications will not affect the conclusions of the Reg. 19 HRA or its addendum”.

(Please continue on a separate sheet if necessary)

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

Signature:

Date:

17/11/2025

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For Office Use	Part B Reference	
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