

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:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM9
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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.

RPS previously raised at Regulation 19 that:

The 4<sup>th</sup> bullet point should be modified to read: "Identify all those designated heritage assets and non-designated heritage assets that could be affected by the development proposal and explain their historic, archaeological, artistic or architectural significance...."

PMM9 proposes the amendment to criterion (d)(i) and (ii) to the following:

"Identify all heritage assets that could be affected and explain their historic, archaeological, artistic or architectural significance. Consider whether there is a relationship between identified heritage assets in terms of their wider setting."

(ii): "Consider how the development site contributes to the significance of the heritage asset"

RPS consider this modification to be unsound on the basis that it is not effective.

RPS raised issue with the evidential basis is for the specific aspects in the draft policy. The approach in national policy to the assessment of impact on heritage assets at the planning application stage is clearly one that is based on 'proportionality' and any potential impacts should focus on the 'significance' of the assets identified. The criteria above sought to treat all heritage assets in the same way, regardless of their importance or significance. This is now addressed through the modified wording at SO1.1 (d)(li). Further-

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more, national planning policy also makes no reference to 'artistic or architectural' significance in terms of assessing the potential impact on designated or non-designated heritage assets.

Further advice on defining the heritage value of assets is set out in current guidance Conservation Principles, Policies and Guidance published by Historic England (2008), this states such values as evidential, historical, aesthetic and communal.

*(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.

Policy SO1.1 (d) (i) should be modified to read:

Identify all heritage assets that could be affected and explain their ~~historic, archaeological, artistic or architectural~~ evidential, historical, aesthetic and/or communal significance. Consider whether there is a relationship between identified heritage assets in terms of their wider setting.

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(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.**

(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.

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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM12
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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.

Support is given for the removal of unnecessary cross-referencing between the Plan's policies and provide clarity within the Plan and to make the Plan effective.

Previously the Policy wording for SO1.2 (c) stated: "The Design and Access Statement will set out how proposals will align with the relevant Local Design Guide and the requirements of other relevant Local Plan Policies..." and then lists seven specific policies as being 'particularly' relevant.

It must be assumed that all proposals will, as a matter of principle, need to align with the relevant policies of the development plan unless material considerations indicate otherwise, in accordance with section 38(6) of the Town and Country Planning Act 1990. Proposal should also take into account other guidance (both local and national in nature) where relevant to do so. The wording in this policy merely repeats what is already a requirement in law.

*(Please continue on a separate sheet if necessary)*

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**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.

No further modifications required as relevant to PMM12.

*(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.**

*(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.

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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM15
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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.

Support is had for the removal of unnecessary cross-referencing between the Plan's policies and provide clarity within the Plan and to make the Plan effective.

*(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.

No further modifications required as relevant to PMM15.

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*(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.**

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(Please continue on a separate sheet if necessary)

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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM20; Page 77; Policy SO2.3 (e)
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**Q2. Do you consider the Main Modification is:**

A. Legally compliant	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
B. Sound	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>

(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.

The wording as drafted recognises that any new provisions of open space must be related to the proposed development. This accords with national policy under paragraph 57 and 58 of the NPPF dealing with the developer contributions

The policy still states at new indent (e), as part of the modified tracked changes, "Where there are anticipated deficiencies, financial contributions to appropriate projects will be sought to enable the impacts of the new development to be mitigated. Where practicable, the required facilities will be phased and delivered as an integral part of the development." (RPS emphasis)

Any financial contribution would need to be secure via a suitably worded planning obligation, in accordance with paragraph 57 of the NPPF, and footnote 26 which refers separately to Regulation 122(2) of the Community Infrastructure Levy 2010. The purpose of planning obligations is further clarified in the PPG, which states:

*"...planning obligations will be appropriate for funding a project that is directly related to that specific development."*

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Paragraph: 004 Reference ID: 23b-004-20190901 Revision date: 01 09 2019 (RPS emphasis)

The draft wording suggests that monies will be sought from applicants where the Council (or presumably any other party) indicates there may be a current or future shortfall in provision of open space or other recreational uses. The nature of these deficiencies is not clarified within the policy, but points to contributions being sought to address existing deficits in addition to those contributions (either on-site provision, or through off-site contributions) required to meet the additional demands generated by that specific development. This approach goes beyond the remit of national policy and guidance which ensures that contributions (inc. financial) are fair and transparent and are relevant and related to the development as per the Regulations.

It also contradicts the NPPF-compliant criteria included at an earlier part of the policy and which RPS has highlighted above.

*(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.

RPS recommends that the draft wording in Policy SO2.3 is modified to ensure it is consistent with national policy dealing with financial contributions. To this end, RPS would recommend the following modification, with no replacement text required:

~~“Where there are anticipated deficiencies, financial contributions to appropriate projects will be sought to enable the impacts of the new development to be mitigated. Where practicable, the required facilities will be phased and delivered as an integral part of the development.”~~

This modification is necessary to provide clarity within the Plan and Policy and ensure that both are effective.

*(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.**

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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM22
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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.

<p>This modification is necessary to remove unnecessary crossreferencing between the Plan's policies and provide clarity within the Plan and to make the Plan effective.</p> <p>(Please continue on a separate sheet if necessary)</p>
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**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.

No further modifications required to regarding unnecessary duplication.
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(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.**

(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.

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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM23
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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.

RPS objects to Development will achieve an average site density of 50dph in Cannock, Rugeley and Hednesford town centres and 35dph in the suburban areas. Clarification should be provided this just relates to unallocated/windfall sites, given the presence of site specific policies for the allocated sites.

Whilst the clarification in the amended wording is for 'target' density, which does provide clarity within the Plan and to make the Plan effective. It remains unclear as to need for specific mention to density targets, if allocated sites have their own site specific policies.

*(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.

Following modification suggested:

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Development on un-allocated sites will achieve an average target site density of 50dph in Cannock, Rugeley and Hednesford town centres and 35dph in the suburban areas.

*(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.**

*(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.

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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM25
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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.

RPS would suggest the sixth paragraph, which requires all proposals to provide a broad mix in accordance with the Local Housing Needs Assessment 2024 and Table E using the word "must", is overly prescriptive and does not allow sufficient flexibility to respond to changing market demands or local circumstances. We contend that this lack of flexibility means the policy is not positively prepared as it hinders the delivery of a wide choice of high-quality homes. For the reasons set out previously, the policy should be amended to allow for individual site viability assessments to come forward at the planning application stage.

(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.

Following modification suggested:



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e. All proposals for housing ~~must~~ should provide a broad mix of housing suitable for different household types taking into account the evidence base from the Councils Housing Need Assessment Addendum 20243 (or subsequent updates) and recommended housing mix set out in Table E.

OR

f. The Council will consider evidence set out in Housing Mix Statements in instances where a variation to ~~this~~ the mix in Table E is sought. The Council will only support applications that achieve a balance of different dwelling sizes. Applications should present a mix of dwelling sizes across both market and affordable housing tenures.

*(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.**

*(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.

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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM40
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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.

<p>The modification is necessary to ensure the Plan and Policy is justified, effective and consistent with national policy.</p> <p style="text-align: right;"><i>(Please continue on a separate sheet if necessary)</i></p>
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**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.

No further modifications required.
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(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.**

(Please continue on a separate sheet if necessary)

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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM51
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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.

<p>The modification is necessary to ensure Policy SO5.4 is consistent with national policy.</p> <p style="text-align: right;"><i>(Please continue on a separate sheet if necessary)</i></p>
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**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.

No further modification necessary. It is consistent with national policy, paragraph 32 of the NPPF, which states that " <i>Significant adverse impacts on these objectives should be</i>
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*avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed". Paragraph 111 of the NPPF, which indicates that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe".*

*(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.**

*(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.*

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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM61
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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.

Biodiversity net gain off site, should preferentially be located on land adjacent to or functionally related to a site. RPS previously suggested alternative wording more widely in paragraph 3. However, PMM61 follows off-site considerations and it is considered the previously suggested modification can be added to paragraph 3 to improve the effectiveness.

*(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.

As previously suggested, RPS considers the following modifications are required:

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... The delivery of net gains in biodiversity will be designed to support the delivery of a District-wide biodiversity network based on the designated biodiversity sites and in accordance with guidance set out in ~~Policy SO7.1: 'Protecting, Conserving and Enhancing Biodiversity and Goodiversity'~~ and the Local Nature Recovery Strategy, when adopted and The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024,

*(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.**

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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.

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Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM64
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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.

RPS retains its concerns to the draft criteria SO7.4, bullet point 6 (vi) because, as drafted, the policy fails to recognise that not all development sites may have an opportunity to do provide 'links to the Strategic Green Network'. The policy does not allow for such circumstances and so offers no guidance to the decision-maker or the applicant regarding how proposals should respond to this requirement. The draft policy is not effective and so is not soundly-based. The wording should be modified accordingly. This modification is required to provide clarity within the Plan and to make the Plan effective.

*(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.

As previously suggested, RPS considers the following modifications are required:



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vi. Where appropriate and viable, ~~C~~reating new green infrastructure within the development which links to the 'Strategic Green Space Network'

*(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.**

*(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:	
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**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:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM67
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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.

Amending the last paragraph wording from 'would' to 'should' and include 'and/or' in the penultimate paragraph to assist in providing sufficient flexibility to adapt to the context of each site and not mandate every criterion to be applied is consistent with the NPPF and therefore supported.

(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.

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(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.**

(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.

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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM88, Page 167 Policy SH2, First Paragraph
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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.

Factual correction. This modification is necessary to make a factual correction, for clarification and to therefore ensure the effectiveness of the Policy and the Plan.

(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.

No further changes required.

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(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.**

<p>(Please continue on a separate sheet if necessary)</p>
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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.

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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM89
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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.

<p>Support the Modification changing the sites capacity to 435 dwellings.</p> <p>However, the first bullet point to the draft policy, also states:</p> <p><i>"...land <u>will be</u> released from the Green Belt."</i></p> <p>Given this is the pre-submission version of the Plan, the policy needs to be written as at the point of adoption. Consequently, any references to the future release of the site from the Green Belt should be removed as the site (at the point of adoption) will not be in the Green Belt. Draft policy is not effective and so not soundly-based. RPS recommends the wording 'will be' referred to the first bullet point should be deleted.</p> <p>(Please continue on a separate sheet if necessary)</p>
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**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

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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.

This modification is necessary for consistency, flexibility and effectiveness of the Plan and its relevant policies.

*(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.**

*(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.

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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM90, Page 168 Policy SH2, Fifth Para- graph
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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.

<p>The modification is required for clarification on the level of adverse impact to be determined through the Policy and the effectiveness of the Policy and the Plan.</p> <p style="text-align: right;"><i>(Please continue on a separate sheet if necessary)</i></p>
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**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.

No further modification necessary. It is consistent with national policy, paragraph 32 of the NPPF, which states that "Significant adverse impacts on these objectives should be
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*avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed".*

*(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.**

*(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:	
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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM91, Page 168 Policy SH2, Sixth Paragraph
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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.

<p>The modification is necessary to make a factual correction, for clarification and the effectiveness of the Policy and the Plan.</p> <p style="text-align: right;"><i>(Please continue on a separate sheet if necessary)</i></p>
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**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.

No further modification necessary.
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(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.**

(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.

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**Part B: Representation**

Name and Organisation:	Paul Hill, RPS
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM93
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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.

The modification wording isn't clear to readers of the Plan. It's referring to the HRA process separately in relation to different sites - we think this could be rationalised into discussing that the HRA process will be required in relation to all relevant NSN sites. It also states that there will be no impacts, which doesn't sit right for a policy and pre-empt the results of the assessments that the policy requires. We've suggested wording so there is more clarity regarding requirements.

It also refers to Areas of Biological Importance – assuming they are referring to local non-statutory designations, this should be Sites of Biological Importance. We suggest this is clarified in the wording.

Suggested wording to resolve issues:

*"In line with Policy SO7.3, any proposal for this site will be subject to Habitats Regulations Assessment screening to determine whether it is likely to have a significant effect on any National Sites Network site. Where required, an Appropriate Assessment will be undertaken. Development proposals must demonstrate that they will not result in adverse effects on the integrity of the Cannock Chase SAC or on the environmental quality of other relevant statutory nature conservation designations, including Chasewater and Southern Coalfields Heaths SSSI and Cannock Extension Canal SAC.*

*Where necessary, proposals should be supported by appropriate technical assessments, such as a Shadow Habitats Regulations Assessment report and, to identify potential effects and set out*

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*any mitigation needed to ensure compliance with statutory requirements. Development should also demonstrate how it will avoid or minimise impacts on locally important habitats, including those within Sites of Biological Importance in proximity."*

**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.

See above

*(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.**

*(Please continue on a separate sheet if necessary)*

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