

Part B: Representation Form

Part B: Representation			
Name and Organisation:	Paul Hill, RPS		
Q1. To which Main Modifi	ication (MM) does	this represe	entation relate?
MM: PMM9			
Q2. Do you consider the	Main Modification	is:	
A. Legally compliant		Yes: ⊠	No: □
B. Sound (Please tick as appropriate).		Yes: □	No: ⊠
Q3. Please give details of compliant or sound. Plea Your representation should relate or	ise be as precise a	s possible.	lodification is or is not legally
sets and non-designated I	l be modified to read heritage assets that	could be are	I those designated heritage ase affected by the development or architectural significance"
cal, artistic or architectura identified heritage assets	ts that could be affect Il significance. <u>Cons</u> <u>in terms of their wid</u>	cted and exp ider whether er setting."	to the following: lain their historic, archaeologi- there is a relationship between significance of the heritage as-
RPS consider this modific	ation to be unsound	l on the basis	s that it is not effective.
The approach in national planning application stage tial impacts should focus of sought to treat all heritage	policy to the assesse is clearly one that in on the 'significance' assets in the same	ment of impa is based on ' of the assets way, regard	ric aspects in the draft policy. act on heritage assets at the proportionality' and any poten- s identified. The criteria above dless of their importance or sig- rding at SO1.1 (d)(li). Further-



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.

Cannock Chase Council: Cannock Chase Local Plan Representation Form	Chase
	(Please continue on a separate sheet if necessary)
	Sustainability Appraisal, Habitats Regulations respect of this particular Main Modification.
	(Please continue on a separate sheet if necessary)
L	(i loade continue on a separate sheet ii hecessary)
supporting information necessary to support	hould provide succinctly all the evidence and ort your representation and your suggested nat you will have a further opportunity to make

submissions.

Signature:		Date:	ļ
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For Office Use	Part B Reference	
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Part B: Representation Form

Part B: Representation		
Name and Organisation:	Paul Hill, RPS	
Q1. To which Main Modi	fication (MM) does this repre	sentation relate?
MM: PMM12		
Q2. Do you consider the	Main Modification is:	
A. Legally compliant	Yes: ⊠	No: □
B. Sound (Please tick as appropriate).	Yes: ⊠	No: □
compliant or sound. Plea	of why you consider the Main ase be as precise as possible only to the Proposed Main Modifications.	Modification is or is not legally e.
	emoval of unnecessary cross-r ty within the Plan and to make	eferencing between the Plan's the Plan effective.
will set out how proposals	s will align with the relevant Lo ocal Plan Policies…' and then	Design and Access Statement cal Design Guide and the requirelists seven specific policies as
relevant policies of the de wise, in accordance with posal should also take in	evelopment plan unless material section 38(6) of the Town and to account other guidance (bot	of principle, need to align with the al considerations indicate other-Country Planning Act 1990. Prohlocal and national in nature) ely repeats what is already a re-
	(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 guestion.

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No further modification	s required as relevant t	to PMM12.			
		(Dlassa		avata abaat if vaasa	m ()
		(Please d	continue on a sep	arate sheet if nece	ssary)
	comments on the Sustes Map changes in respectively. The box below.				
		(Please co	ontinue on a sepa	rate sheet if neces	sary)
supporting information	epresentation you shou necessary to support y hould not assume that y	our repres	entation and y	our suggested	
Signature:			Date:		
		For Office	e Use Part B F	Reference	



Part B: Representation Form

Part B: Representation			
Name and Organisation:	Paul Hill, RPS		
Q1. To which Main Modif	ication (MM) does this	represen	tation relate?
MM: PMM15			
Q2. Do you consider the	Main Modification is:		
A. Legally compliant	Ye	s: ⊠	No: □
B. Sound (Please tick as appropriate).	Ye	s: 🗵	No: □
Q3. Please give details of compliant or sound. Pleat Your representation should relate or	ise be as precise as po	ssible.	dification is or is not legally
Support is had for the rem			ncing between the Plan's poli- n effective.
	(Please co	ntinue on a	separate sheet if necessary)
sary to make it legally coness matters you have it will make the Local Plan le	empliant and sound, in dentified at Q.3 above. gally compliant or sound vised wording of any pol	respect of You will not d. It will be icy or text	n that you consider neces- of legal compliance or sound- eed to say why each change helpful if you are able to put Please be as precise as pos- on.
No further modifications re		-	

Cannock Chase Council: Cannock Chase Local Plan Representation Form	Chase
(F	Please continue on a separate sheet if necessary)
Q5. Do you have any comments on the Sustain Assessment or Policies Map changes in respectively.	



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:
	For Office Use Part B Reference



Part B: Representation Form

Part B: Representation			
Name and Organisation: Paul Hill,	RPS		
Q1. To which Main Modification (M	M) does this represe	entation relate?	
MM: PMM20; Page 77; Policy SO2.3 (e)			
Q2. Do you consider the Main Mod	ification is:		
A. Legally compliant	Yes: ⊠	No: □	
B. Sound (Please tick as appropriate).	Yes: □	No: ⊠	
Q3. Please give details of why you compliant or sound. Please be as property our representation should relate only to the Property of the Prop	precise as possible.	lodification is or is not legal	lly
The wording as drafted recognises t lated to the proposed development. and 58 of the NPPF dealing with the	This accords with nati	ional policy under paragraph 5	57
The policy still states at new indent (there are <u>anticipated deficiencies</u> , fir sought to enable the impacts of the the required facilities will be phased ment." (RPS emphasis)	nancial contributions to be new development to b	o appropriate projects will be be mitigated. Where practicabl	
Any financial contribution would nee tion, in accordance with paragraph 5 rately to Regulation 122(2) of the Coplanning obligations is further clarific	57 of the NPPF, and for ommunity Infrastructur	potnote 26 which refers sepa- re Levy 2010. The purpose of	
"planning obligations will be appro that specific development."	priate for funding a pr	roject that is directly related to	ı



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.



Please note : In	your representation you should provide succinctly all the evidence and
supporting infori	mation 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

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Part B: R	Representation	
Name a	nd Organisation:	Paul Hill, RPS
Q1. To w	hich Main Modi	fication (MM) does this representation relate?
MM:	PMM22	
Q2. Do y	ou consider the	Main Modification is:
A. Legally	y compliant	Yes: ⊠ No: □
B. Sound	l k as appropriate).	Yes: ⊠ No: ⊠
compliar	nt or sound. Ple	of why you consider the Main Modification is or is not legally ase be as precise as possible. Soly to the Proposed Main Modifications.
		ssary to remove unnecessary crossreferencing between the le clarity within the Plan and to make the Plan effective.
		(Please continue on a separate sheet if necessary)
sary to n ness ma will make forward y	nake it legally co tters you have i the Local Plan lo rour suggested re	nange(s) to the Main Modification that you consider necesompliant and sound, in respect of legal compliance or soundentified at Q.3 above. You will need to say why each change egally compliant or sound. It will be helpful if you are able to put vised wording of any policy or text. Please be as precise as postodification, please skip this question.
No furthe	er modifications re	equired to regarding unnecessary duplication.



	Policies Map changes in respect of this particular Main Modification to the box below.	on.
	(Please continue on a separate sheet if necessa	anu)
Please note: In v	your representation you should provide succinctly all the evidence and	<i>11 y)</i>
supporting inform	nation necessary to support your representation and your suggested You should not assume that you will have a further opportunity to make	a
submissions.	Tou should het accume that you will have a further opportunity to make	•
Signature:	Date:	



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		
Q1. To whic	h Main Modif	fication (MM) does	this represe	ntation relate?
MM:	PMM23			
	-			
Q2. Do you	consider the	Main Modification	is:	
A. Legally co	ompliant		Yes: ⊠	No: □
B. Sound (Please tick as	appropriate).		Yes: □	No: ⊠
compliant o	r sound. Plea	f why you conside ase be as precise a only to the Proposed Main N	s possible.	odification is or is not legally
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 pos-				

sible. If you support the modification, please skip this question.

Following modification suggested:



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

Assessment or	e any comments on the Sustainability Appraisal, Habitats Regulations Policies Map changes in respect of this particular Main Modification. t in the box below.
	(Please continue on a separate sheet if necessary)
supporting inform	your representation you should provide succinctly all the evidence and nation necessary to support your representation and your suggested You should not assume that you will have a further opportunity to make
Signature:	Date:
	For Office Use Part B Reference



Part B: Representation Form

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Part B: Representation					
Name and	Organisation:	Paul Hill, RPS			
Q1. To whice	ch Main Modif	ication (MM) does	this represe	ntation relate?	
MM:	PMM25				
Q2. Do you	consider the	Main Modification	is:		
A. Legally co	ompliant		Yes: ⊠	No: □	
B. Sound (Please tick as	B. Sound Yes: ☐ No: ☒ (Please tick as appropriate).				
compliant of	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.					
		(Plea	ase continue on	a separate sheet if necessary)	
sary to mak ness matter	e it legally co rs you have ic	mpliant and soundlentified at Q.3 abo	d, in respect ove. You will	on that you consider neces- of legal compliance or sound need to say why each change he helpful if you are able to put	

forward your suggested revised wording of any policy or text. Please be as precise as pos-

sible. If you support the modification, please skip this question.

Following modification suggested:



e. All proposals for housing <u>must should</u> 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.

	y comments on the Sustain cies Map changes in respe the box below.		
	(P	lease continue on a separa	ate sheet if necessary)
supporting information	representation you should pon necessary to support your should not assume that you	representation and yo	ur suggested
Signature:		Date:	

For Office Use	Part B Reference	
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Part B: Representation Form

Part B: Representation	
Name and Organisation:	Paul Hill, RPS
Q1. To which Main Modif	ication (MM) does this representation relate?
MM: PMM40	
Q2. Do you consider the	Main Modification is:
A. Legally compliant	Yes: ⊠ No: □
B. Sound (Please tick as appropriate).	Yes: ⊠ No: □
compliant or sound. Plea	f why you consider the Main Modification is or is not legally use be as precise as possible. The proposed Main Modifications.
The modification is neces consistent with national per	sary to ensure the Plan and Policy is justified, effective and olicy.
	(Please continue on a separate sheet if necessary)
sary to make it legally coness matters you have it will make the Local Plan leforward your suggested rev	ange(s) to the Main Modification that you consider necesmpliant and sound, in respect of legal compliance or sound lentified at Q.3 above. You will need to say why each change gally compliant or sound. It will be helpful if you are able to put vised wording of any policy or text. Please be as precise as postodification, please skip this question.
No further modifications re	auired.



	(Please continue on a separate sheet if necessary)
supporting information necess	ntation you should provide succinctly all the evidence and sary to support your representation and your suggested not assume that you will have a further opportunity to make
Signature:	Date:



Part B: Representation Form

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Part B. Repi	Part B: Representation					
Name and Organisation: Paul Hill, RPS						
Q1. To which Main Modification (MM) does this representation relate?						
MM:	PMM51					
Q2. Do you	Q2. Do you consider the Main Modification is:					
A. Legally compliant Yes: $oximes$ No: $oximes$		No: □				
B. Sound Yes: ⊠ No: □ (Please tick as appropriate).						
compliant o	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 is necessary to ensure Policy SO5.4 is consistent with national policy.						
(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 modification necessary. It is consistent with national policy, paragraph 32 of the NPPF, which states that "Significant adverse impacts on these objectives should be



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 i	f necessary)
supporting inform	your representation you shou nation necessary to support y You should not assume that	our representation	and your sugge	ested
Signature:		Date:		



Part B: Representation Form

Part B: Re	presentation			
Name and	d Organisation:	Paul Hill, RPS		
Q1. To wh	ich Main Modif	ication (MM) does th	nis represe	entation relate?
MM:	PMM61			
Q2. Do yo	u consider the	Main Modification is	:	
A. Legally	compliant	•	Yes: ⊠	No: □
B. Sound (Please tick a	as appropriate).	`	Yes: □	No: ⊠
compliant	or sound. Plea	f why you consider to use be as precise as nly to the Proposed Main Mo	possible.	Modification is or is not legally
tionally re paragraph	elated to a site. F h 3. However, Pl	RPS previously sugges MM61 follows off-site	sted altern considerat	ted on land adjacent to or func- ative wording more widely in tions and it is considered the raph 3 to improve the effective-
		(Please	continue on	a separate sheet if necessary)
sary to ma ness matt will make t forward yo	ake it legally co ers you have ic he Local Plan le ur suggested re	mpliant and sound, lentified at Q.3 abov gally compliant or sou	in respecte. You will und. It will loolicy or te	ion that you consider neces- t of legal compliance or sound need to say why each change be helpful if you are able to put ext. Please be as precise as pos- tion.
As previou	ısly suggested, F	RPS considers the foll	owing mod	difications are required:



... 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 Geodiversity' and the Local Nature Recovery Strategy, when adopted and The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024,

ssessment or P ease comment			respect o	t this part	icular M	iain Modi	tication.
			(Please	continuo on	a congra	to shoot if n	00055274)
			(Please	continue on	a separa	te sheet if n	ecessary)
•	•	•	nould provid	de succinci	tly all the	e evidence	e and
pporting informa odification(s). Y	ation necessar	ry to suppo	nould provid	de succinct esentation	tly all the	e evidence ur suggesi	e and ted
ease note: In yo pporting informa odification(s). Y bmissions.	ation necessar	ry to suppo	nould provid	de succinct esentation	tly all the	e evidence ur suggesi	e and ted
pporting informa odification(s). Y bmissions.	ation necessar	ry to suppo	nould provid	de succinct esentation	tly all the	e evidence ur suggesi	e and ted
pporting informa odification(s). Y	ation necessar	ry to suppo	nould provid	de succinci esentation have a furt	tly all the	e evidence ur suggesi	e and ted

Part B: Representation



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.

Name and Organisation:	Paul Hill, RPS
Q1. To which Main Modif	cation (MM) does this representation relate?
MM: PMM64	
Q2. Do you consider the	Main Modification is:
A. Legally compliant	Yes: ⊠ No: □
B. Sound (Please tick as appropriate).	Yes: □ No: ⊠
compliant or sound. Plea	why you consider the Main Modification is or is not legally se be as precise as possible. The proposed Main Modifications.
RPS retains its concerns drafted, the policy fails to tunity to do provide 'links such circumstances and garding how proposals shive and so is not soundly	to the draft criteria SO7.4, bullet point 6 (vi) because, as recognise that not all development sites may have an opporto the Strategic Green Network'. The policy does not allow for o offers no guidance to the decision-maker or the applicant resould respond to this requirement. The draft policy is not effective. The wording should be modified accordingly. This modified clarity within the Plan and to make the Plan effective.
	(Please continue on a separate sheet if necessary)
Q4. Please set out the ch	ange(s) to the Main Modification that you consider neces-

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

sible. If you support the modification, please skip this question.

sary 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 pos-



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

Assessment or	e any comments on the Sustainability Appraisal, Habitats Regulations Policies Map changes in respect of this particular Main Modification. t in the box below.
	(Please continue on a separate sheet if necessary)
supporting inform	your representation you should provide succinctly all the evidence and nation necessary to support your representation and your suggested You should not assume that you will have a further opportunity to make
Signature:	Date:
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Part B: Representation Form

Part B: Rep	resentation	
Name and (Organisation:	Paul Hill, RPS
Q1. To whic	h Main Modif	ication (MM) does this representation relate?
MM:	PMM67	
Q2. Do you	consider the	Main Modification is:
A. Legally co	mpliant	Yes: ⊠ No: □
B. Sound (Please tick as	appropriate).	Yes: ⊠ No: □
compliant o	r sound. Plea	f why you consider the Main Modification is or is not legally use be as precise as possible. nly to the Proposed Main Modifications.
penultimate	paragraph to nd not mandat	aph wording from 'would' to 'should' and include 'and/or' in the assist in providing sufficient flexibility to adapt to the context of e every criterion to be applied is consistent with the NPPF and
		(Please continue on a separate sheet if necessary)
sary to mak ness matter will make the forward your	e it legally co s you have ic Local Plan le suggested re	nange(s) to the Main Modification that you consider necesompliant and sound, in respect of legal compliance or sound-lentified at Q.3 above. You will need to say why each change egally compliant or sound. It will be helpful if you are able to put vised wording of any policy or text. Please be as precise as posodification, please skip this question.
sary to mak ness matter will make the forward your	e it legally co s you have ic Local Plan le suggested re	Impliant and sound, in respect of legal compliance or sound lentified at Q.3 above. You will need to say why each change gally compliant or sound. It will be helpful if you are able to put wised wording of any policy or text. Please be as precise as possible.



	(Please continue on a separate sheet if necessary)
supporting information necess	ntation you should provide succinctly all the evidence and sary to support your representation and your suggested not assume that you will have a further opportunity to make
Signature:	Date:



Part B: Representation Form

Part B: Rep	resentation			
	Organisation:	Paul Hill, RPS		
Q1. To whic	h Main Modif	ication (MM) does	this represe	entation relate?
MM:	PMM88, Page 167 Policy SH2, First Para- graph			
		Q2. Do you consi	der the Maii	1 Modification is:
A. Legally co	ompliant		Yes: ⊠	No: □
B. Sound (Please tick as	appropriate).		Yes: ⊠	No: □
compliant o	r sound. Plea	f why you conside use be as precise a nly to the Proposed Main	s possible.	lodification is or is not legally
		nodification is neces	•	e a factual correction, for clarifilicy and the Plan.
		(Plea	se continue on	a separate sheet if necessary)
sary to make ness matter will make the forward your	e it legally co s you have ic e Local Plan le suggested re	mpliant and sound lentified at Q.3 abo gally compliant or s	d, in respect ove. You will ound. It will by y policy or te	on that you consider necest to of legal compliance or sound- need to say why each change be helpful if you are able to put ext. Please be as precise as pos- tion.
No further ch	nanges require	d.		



	(Please continue on a separate sheet if necessary)
	ry to support your representation and your suggested t assume that you will have a further opportunity to make
` /	
` /	Date:
submissions. ´	
submissions. ´	

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Name and 0	Organisation:	Paul Hill, RPS		
	J			
Q1. To whic	h Main Modif	ication (MM) does	this represe	entation relate?
MM:	PMM89			
Q2. Do you	consider the	Main Modification	is:	
A. Legally co	mpliant		Yes: ⊠	No: □
B. Sound (Please tick as	appropriate).		Yes: □	No: ⊠
compliant o	r sound. Plea	f why you conside use be as precise a nly to the Proposed Main	s possible.	lodification is or is not legally
		anging the sites capa		ellings.
However, the	e first bullet poir	nt to the draft policy, a	also states:	
"land <u>will b</u>	<u>e</u> released fron	n the Green Belt."		
of adoption. should be re is not effective	Consequently, moved as the s	any references to the ite (at the point of ado oundly-based. RPS re	future release option) will not	needs to be written as at the point of the site from the Green Belt be in the Green Belt. Draft policy be wording 'will be' referred to the
		(Plea	se 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.

This modification i its relevant policie	is necessary for consistency, flexibility and effectiveness of the Plan and
	(Please continue on a separate sheet if necessary)
Assessment or P	any comments on the Sustainability Appraisal, Habitats Regulations Policies Map changes in respect of this particular Main Modification. in the box below.
	(Please continue on a separate sheet if necessary)
	our representation you should provide succinctly all the evidence and ation necessary to support your representation and your suggested
	ou should not assume that you will have a further opportunity to make
Signature:	Date:
	For Office Use Part B Reference



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.

Name a	and Organisation:	Paul Hill, RPS	
Q1. To v	which Main Modif	cation (MM) does this repre	sentation relate?
MM:	PMM90, Page 168 Policy SH2, Fifth Para- graph	Q2. Do you consider the Ma	ain Modification is:
A. Legal	lly compliant	Yes: ⊠	No: □
B. Soun (Please tid	d ck as appropriate).	Yes: ⊠	No: □
complia	nt or sound. Plea	why you consider the Main se be as precise as possible by to the Proposed Main Modifications.	Modification is or is not legally e.
The mo	dification is required	or clarification on the level of ac fectiveness of the Policy and the	
		(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 modification necessary. It is consistent with national policy, paragraph 32 of the NPPF, which states that "Significant adverse impacts on these objectives should be



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".

Assessment or F	any comments on the Sustainability Appraisal, Habitats Regu Policies Map changes in respect of this particular Main Modific in the box below.	
	(Please continue on a separate sheet if neo	essary)
supporting informa	our representation you should provide succinctly all the evidence a ation necessary to support your representation and your suggeste ou should not assume that you will have a further opportunity to n	d
Signature:	Date:	
	For Office Use Part B Reference	



Part B: Representation Form

Name and	Organisation:	Paul Hill, RPS		
Name and Organisation:		r adi riii, ra o		
Q1. To whice	ch Main Modif	ication (MM) does	this represe	entation relate?
MM:	PMM91, Page 168 Policy SH2, Sixth Para- graph	Q2. Do you consi	der the Mai	n Modification is:
		QL. Do you consi	aci tile mai	ii modification is:
A. Legally co	ompliant		Yes: ⊠	No: □
B. Sound (Please tick as appropriate).			Yes: ⊠	No: □
compliant of	or sound. Plea	f why you conside se be as precise a nly to the Proposed Main I	s possible.	Modification is or is not legally
	ation is necessa and the Plan.	ry to make a factual c	orrection, for	clarification and the effectiveness
		(Plea	se continue on	a separate sheet if necessary)
sary to make ness matter will make the forward your	ke it legally co rs you have ic e Local Plan le r suggested re	mpliant and sound lentified at Q.3 abo gally compliant or s	I, in respec ve. You will ound. It will I policy or te	ion that you consider neces- t of legal compliance or sound need to say why each change be helpful if you are able to put ext. Please be as precise as pos- tion.
No further m	nodification ned	essary.		



Please continue on a separate sheet if necessary) provide succinctly all the evidence and representation and your suggested
•
ı will have a further opportunity to make
Date:



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: Re	epresentation				
Name and Organisation:		Paul Hill, RPS			
Q1. To wh	hich Main Modif	ication (MM) does t	his represe	entation relate?	
MM:	PMM93				
Q2. Do yo	ou consider the	Main Modification i	s:		
A. Legally	compliant		Yes: ⊠	No: □	
B. Sound (Please tick	as appropriate).		Yes: □	No: ⊠	
Your represent The modificately in results that the policy It also refet tory design wording.	t or sound. Pleantation should relate of fication wording is elation to different tess will be required so, which doesn't so requires. We've so the sound is to Areas of Biometric sound in the sound is the sound is the sound is the sound is the sound in the sound is	f why you consider ase be as precise as any to the Proposed Main Man't clear to readers of the sites - we think this cond in relation to all relevit right for a policy and suggested wording so the logical Importance — and be Sites of Biological ve issues:	s possible. odifications. he Plan. It's r uld be rationa vant NSN site pre-empts th nere is more ssuming they	referring to the HRA alised into discussi es. It also states that he results of the associarity regarding re	A process sepang that the at there will be sessments that equirements.
"In line wing sessment Sites Network Character with the control of	th Policy SO7.3, at screening to dete work site. Where resemble must demonstrate se SAC or on the lons, including Cha	ny proposal for this site rmine whether it is like equired, an Appropriate that they will not result environmental quality of sewater and Southern	ly to have a see Assessmer alt in adverse of other releva	significant effect on nt will be undertake effects on the inte ant statutory nature	any National en. Development grity of the Can- e conservation
Where no	ressary nronosal	s should be supported	hy annronria	ite technical assess	sments such as

a Shadow Habitats Regulations Assessment report and, to identify potential effects and set out

Cannock Chase Council: Cannock Chase Local Plan Representation Form any mitigation needed to ensure compliance with statutory requirements. Development



•	d or minimise impacts on locally important habitats, including apportance in proximity."
sary to make it legally compliness matters you have identified will make the Local Plan legally forward your suggested revised	e(s) to the Main Modification that you consider necestant and sound, in respect of legal compliance or soundfied at Q.3 above. You will need to say why each change compliant or sound. It will be helpful if you are able to put I wording of any policy or text. Please be as precise as posation, please skip this question.
See above	
	(Please continue on a separate sheet if necessary)
	nts on the Sustainability Appraisal, Habitats Regulations changes in respect of this particular Main Modification. elow.
	(Please continue on a separate sheet if necessary)
supporting information necessa	ation you should provide succinctly all the evidence and ary to support your representation and your suggested t assume that you will have a further opportunity to make
Signature:	Date:
	For Office Use Part B Reference