

**Cannock Chase Council:
Cannock Chase Local Plan
Representation Form**



Name of the Local Plan to which this representation relates: Cannock Chase Local Plan

Please return to: planningpolicy@cannockchasedc.gov.uk or:
Planning Policy, Cannock Chase Council, Civic Centre, PO Box 28,
Beecroft road, Cannock, Staffordshire, WS11 1BG

Please return by: 5:00pm on Monday 18 March 2024 (late forms will not be accepted)

Part A: Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)*
	*If an agent is appointed, please provide client Title, First Name, Last Name, Organisation (if applicable) and Post Town in column 1 and provide full contact details for the agent in column 2.	
Title	Mr	Mr
First Name	Claude	Ralph
Last Name	Hargreave	Elliott
Post Town		London
Organisation (where relevant)	McArthurGlen	Carter Jonas
Address Line 1		[REDACTED]
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	

Do you consent to be notified about progress of the Cannock Chase Local Plan?
 Yes No

Notifications: If you consent to be notified about progress on the Local Plan your details will be added to the consultation database. Your personal data will be held securely and processed in line with our privacy notice www.cannockchasedc.gov.uk/privacynotices. Contact will be limited to information regarding planning policy and your data will not be shared. You may unsubscribe at any time by email or writing to us using the details on this form. Data will only be held until adoption of the Cannock Chase Local Plan.

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Making a representation: We cannot accept anonymous representations. You must provide your contact details but only your name and comments will be published on the website. Your personal data will be held securely and processed in line with our privacy notice www.cannockchasedc.gov.uk/privacynotices. Once the plan is submitted your comments will be shared with the Planning Inspectorate and an independent inspector will review representations. You have the right to withdraw your representation and your data will be destroyed. Data will only be held until adoption of the Cannock Chase Local Plan.

Part B: Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**. We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	McArthurGlen
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Q1. To which document does this representation relate? (Please tick one box)

- Cannock Chase Local Plan 2018-2040
- Sustainability Appraisal of the Cannock Chase Local Plan 2018-2040
- Habitats Regulations Assessment of the Cannock Chase Local Plan 2018-2040

Q2. To which part of the document does this representation relate?

Paragraph :		Policy:	SO5.3 SO5.4 SO5.7 SO6.2	Site:	MGDOW M	Policies Map:	
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Q3. Do you consider the Cannock Chase Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate (Please tick as appropriate). Yes: No:

For office use	Part B reference	
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Q4. Please give details of why you consider the Cannock Chase Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Cannock Chase Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst the Local Plan is supported in principle, on behalf of our client who is the operator of McAthurGlen Designer Outlet West Midlands ('MGDOWM'), there are several clarifications that should be made to ensure the plan's soundness.

Transport & Infrastructure (p.20)

Within the District Context, there is reference to Cannock train station being the *'focus of attention for a major upgrade, in view of its close proximity to the £160m, Mill Green retail designer outlet village, which will attract 3-4 million visitors per annum'*.

As the MGDOWM serves a wide catchment, we support the delivery of the major upgrade to Cannock train station (alongside the electrification of the line) which will improve a key transport link to the development for a vast number of visitors. The upgrade works will also increase the attractiveness for people having the option of using sustainable modes of travel to one of the major visitor attractions in the District.

Policy SO5.3: Low and Zero Carbon Transport

Whilst we support the general principles of the Policy and the need to promote low and zero carbon transport, the provision of necessary infrastructure should be proportionate to the level and type of development. This will ensure development is not impacted upon in respect of either design or financial viability.

Policy SO5.4: Maintaining and Improving the Transport System

We support the Council's preferred policy direction to maintain and improve the transport system. As mentioned in our response to 'Transport & Infrastructure' above, the upgrade of Cannock train station is vital to support MGDOWM – one of the Council's strategic objectives – and to ensure that it is as easy as possible for customers to visit MGDOWM by train.

Policy SO5.7: Parking Provision

We support the provision of electric charging points / spaces reserved for low emission vehicles.

Policy SO6.2: Provision of Main Town Centre Uses and Town Centre Services

As written, the Policy will require impact assessments for development that creates new or additional floorspace of 500 sqm (gross) outside of the designated Primary Shopping Area *within the Strategic Town Centre of Cannock and the Town Centres of Rugeley and Hednesford and development proposals creating new or additional floorspace greater than 200 square metres (gross) outside of the Local Centres.*

MGDOWM functions as a specialist retailer – selling discounted comparison goods priced at least 30% below the normal price at which similar types of merchandise are or have been offered for sale at their usual place of sale. This is entirely different to the type of retail available in either the strategic town centre of Cannock and/or the town centres of Rugeley and Hednesford.

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Given the location of MGDOWM which is situated outside of the Local Centres, as drafted, there would be a requirement to undertake an impact assessment for any development (including the changes of use and variations of conditions) of more than 200 sqm. Given the different retail offer, to ensure MGDOWM can respond to market conditions and remain attractive to leading brands that focus solely on retail outlets, we propose that the larger threshold (500 sqm) should be applicable and not the 200 sqm threshold.

Site Allocations (p.156 – 231)

Although MGDOWM is now an established attraction with Phase I having opened in 2021, the Council should make clear policy support for the approved further phases of the centre and any changes to its offering which will bolster the retail offering and enhance MGDOWM as a visitor destination.

The Local Plan confirms that MGDOWM “*will provide a specialist retail offer and support the town by encouraging greater visitors to Cannock town centre*” (see paragraph 6.239) and can enhance the District’s reputation and profile (see paragraph 6.241). In light of this support, we suggest that the MGDOWM should be allocated for a specialist retail / leisure destination in the Local Plan and identified as such on the Proposals Map.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy SO5.3: Low and Zero Carbon Transport

We suggest the following text is added to the draft policy (**in bold**):

Subject to design and financial feasibility and viability, all major developments will set out as part of the Design and Access Statement how they will:

- Support changes to the road network where they are related to the reduction of environmental impacts and the enhancement of public transport.*
- Include the provision of electric vehicle charge points and, where appropriate and proportionate **to the type of development**, other infrastructure that may be required for alternative low and zero carbon transport options, designate parking spaces for low emission vehicles, and facilitate low emission bus service operations.*
- Support, as appropriate, sustainable freight distribution by road and rail.*
- Ensure that the design and layout of the development will reduce reliance on private vehicles while promoting walking, cycling and public transport (as required by Policy SO5.1 'Accessible Transport').*

This will ensure that the Local Plan's policies are effective in accordance with requirement c) of NPPF paragraph 35, which requires plans to be effective in that they are deliverable over the plan period. As currently worded, Policy SO5.3 provides insufficient flexibility and because of this, may negatively impact development in respect of either design or financial feasibility viability. The suggested amendments provide this flexibility.

Policy SO6.2: Provision of Main Town Centre Uses and Town Centre Services

Given the location of MGDOWM which is situated outside of the Local Centres, as drafted, there would be a requirement to undertake an impact assessment for any development (including the changes of use and variations of conditions) of more than 200 sqm. Given the different retail offer, to ensure MGDOWM can respond to market conditions and remain attractive to leading brands that focus solely on retail outlets, we propose that the larger threshold (500 sqm) should be applicable and not the 200 sqm threshold. This is consistent with MGDOWM's establishment as a key attraction in the District.

We therefore propose the following addition to Policy SO6.2 (**in bold**):

Proposals for Main Town Centre Uses which are located outside the designated Strategic Town Centre and Town Centres should be supported by a sequential test that demonstrates that there are no other sequentially preferable, suitable and available sites within or on the edge of an appropriate centre within the hierarchy of centres.

Proposals for Retail and Leisure Uses which are located outside designated Primary Shopping Areas must be accompanied by an appropriate and qualified impact assessment where the floorspace exceeds the thresholds set out below. Any proposal that is likely to have a significant adverse impact on the investment in and/or the vitality and viability of an existing centre will not be permitted.

- Development proposals creating new or additional floorspace greater than 500 square metres (gross) outside of the designated Primary Shopping Areas within the Strategic Town Centre of Cannock and the Town Centres of Rugeley and Hednesford **and within MGDOWM.***
- Development proposals creating new or additional floorspace greater than 200 square metres (gross) outside of the Local Centres.*

The thresholds shall apply to all new developments requiring planning permission including applications for new floorspace, changes of use and variations of condition.

The impact assessment will be proportionate to the scale of the development proposed and undertaken by a suitable qualified person to enable the Council to have confidence in the findings.

The principle of MGDOWM has been established and the Council are satisfied that the development is consistent with national policy. The proposed amendment to Policy SO6.2 would therefore ensure that the Local Plan is consistent with national policy by enabling the delivery of sustainable development in accordance with requirement d) of NPPF Paragraph 35.

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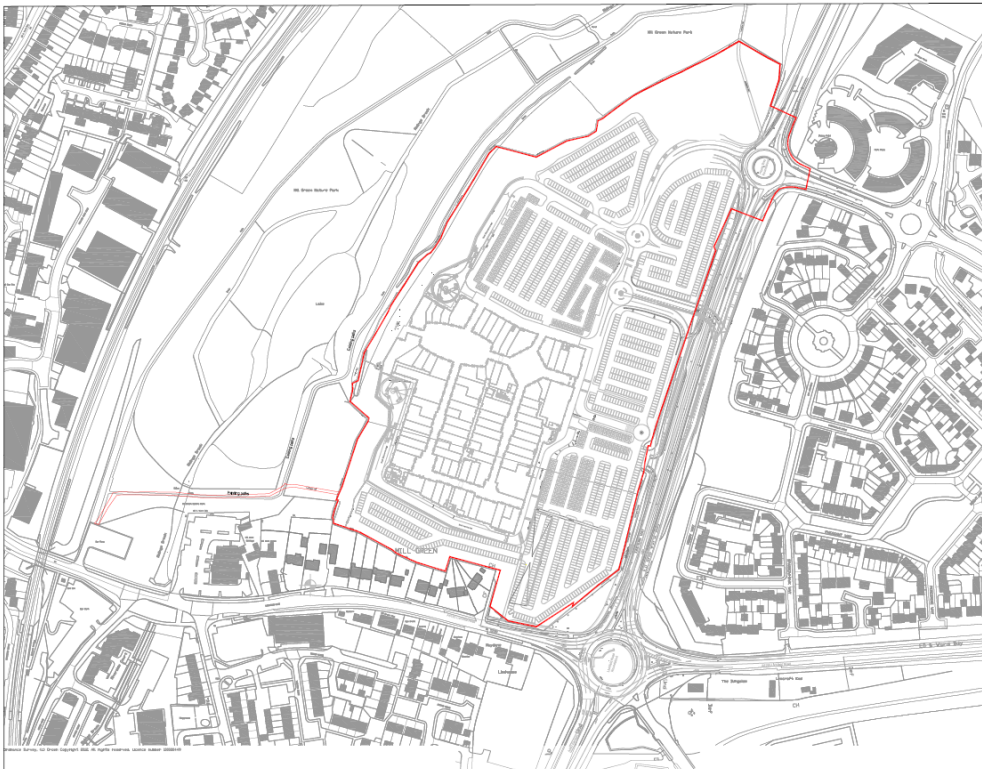
Site Allocations (p.156 – 231)

We suggest that MGDOWM is designated as a Designer Outlet offering a specialist retail / leisure destination in the Local Plan. It is important that the specialist offer is maintained so that it complements town centres in the District. This will assist in MGDOWM being recognised as one of the District's key visitor and tourism destinations and is able to be supported through planning policy to ensure that the Local Plan is positively prepared in accordance with requirement a) of NPPF paragraph 35.

We therefore propose the following should be incorporated into the Local Plan site allocations:

McArthurGlen Designer Outlet West Midlands

The area shown below is designated for the purposes of specialist retailing and as a leisure destination in accordance with planning permission CH/21/0197.



(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.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to

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participate.

- No, I do not wish to participate in hearing session(s)
 Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Please continue on a separate sheet if necessary)

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature:	
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Date:	15 th March 2024
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