

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Cannock Chase Council Response
<p>General / Overarching Comments</p>	<ul style="list-style-type: none"> <li>• A number of comments were received regarding the plan period, suggesting it should be extended to 2042 to ensure that the plan covered a period of 15 years on adoption</li> <li>• Many of the statutory consultees provided general advice on policy development and implementation relevant to their specific remit.</li> <li>• A high number of comments from the public objected to the plan as a whole due to proposed residential development in Heath Hayes. The grounds for objections are detailed in the summaries for SH1 and SH2.</li> <li>• Concern that there is no specific reference in the plan with regard to developer contributions to health infrastructure. This would ensure that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements.</li> <li>• It is considered unclear from the policy layout which policies the Council consider strategic and which are not. They need to be clearly identified.</li> <li>• Some considered the plan was too weak in terms of mitigating the impact of climate change, and suggested higher standards should be required in terms of building adaptations and renewable energy, Biodiversity Net Gain and open space provision.</li> <li>• The Heritage Impact Assessment (HIA) raised a number of suitable mitigation and enhancement measures relating to specific site allocations and that these have not been accurately included within the design considerations of the site allocation policies</li> <li>• Would have liked to have seen the Plan make reference to the ‘building homes for life’ standard and suggest this could be included in a future design guide</li> </ul>	<p>The Council identify a 15year period from the point of adoption to be 2025 leading to an end date of 2040 for the Local Plan, it is considered that this is an appropriate calculation for the Plan and to be used in calculating housing and employment land requirements.</p> <p>Whilst it may not be possible to amend policies at this stage, advice on implementation is welcomed and further work and engagement can be undertaken where necessary to address concerns. See response to SH1 and SH2.</p> <p>It was intended that financial contributions to health infrastructure was encompassed in the wording for Policy SO2.2 which states: All major development proposals and all Listed Building consent applications will include a Design and Access Statement that will set out how the proposal will safeguard health and amenity by aligning with the relevant Local Design Guide and the requirements of other relevant Local Plan Policies, particularly by: Safeguarding existing community facilities and ensuring that new development makes sufficient provision for community facilities (of which health facilities, GP surgeries and health centres is listed under the Councils definition of community facilities). The Council would be happy to work with the ICB to ensure any specific infrastructure requirements relating to growth in the Local Plan are recorded in the Infrastructure Delivery Plan which is a ‘living’ document.</p> <p>The Council acknowledge the issue with regards to distinguishing Strategic Policies. It is considered that at this stage it would not be appropriate to alter the policy numbering, however the Council will look to provide a list of the policies considered strategic and non-strategic on submission.</p> <p>The plan has been informed by evidence including the Staffordshire Climate Change Adaptation and Mitigation Report and does incorporate policies which seek to promote more sustainable construction and development. The Council have struck a balance to ensure development can come forward without being unviable and considers the wider context of neighbouring areas and proposals which are likely to be mandated nationally such as the future homes standard. The plan must also balance this with other costs on developers such as the need for affordable homes and for adaptable dwellings for residents with different needs which is considered in the Local Plan Viability Assessment Report.</p> <p>With regards to the site selection, factors relating to the historic environment, such as whether the site was in close proximity to any heritage assets have been provided detailed consideration in the Sustainability Appraisal and Site Selection Methodology in order to make a balanced judgement on the most suitable locations for development.</p> <p>It is appreciated that there is concern regarding some proposed site allocations which are within close proximity to, or could have an impact on, designated sites. The Council seeks to work with Historic England on a satisfactory resolution to enable the Local Plan to be progressed whilst ensure that appropriate mitigation is delivered, if found to be required. It is anticipated this will be set out in a Statement of Common Ground. The appropriate HIAs will be updated where deemed necessary, with regards to the proposed Site Allocations.</p> <p>Consideration will be given to signposting to guidance and best practice when producing the Design Guide.</p>

<p>The District Context</p>	<ul style="list-style-type: none"> <li>• Suggests deletion of references to climate change mitigation (pages 22/23) which exceed building regs requirements contrary to ministerial statement. Suggests deletion of para 4.11 as not justified - the District is able to meet its own housing need.</li> <li>• The Local Plan should be corrected to reflect the adoption of Cannock Wood’s Neighbourhood Plan and a number of factual inaccuracies were noted in the District Profile relating to Cannock Wood.</li> </ul>	<p>The District Profile represents a series of key issues for the District and contains facts and references to evidence to support this. The general support for this section is noted. It is not considered any information in this section, or in the supporting text requires deletion to make the plan sound as it comprises a series of factual statements and general summaries and observations, is accurate based on available information and does not represent policy. The Neighbourhood Plan was approved by the Council for use in planning decisions after the approval of the Local Plan for consultation. The Local Plan references should be updated to take into account the made (adopted) status of the Cannock Wood Neighbourhood Plan. Any factual errors identified can be corrected as minor modifications to the plan.</p>
<p>Vision and Strategic Objectives</p>	<ul style="list-style-type: none"> <li>• Seeks greater clarity over the Vision which should be set out as policy. Should be clear how the objectives will achieve the overall vision by 2040. As part of the Vision and objectives for the district, the delivery of high quality sustainable development and the need to deliver much needed homes should be given greatest priority.</li> <li>• Some considered the strategic objectives were contrary to proposals for development at Heath Hayes (SH1 and SH2), highlighting references such as ‘Retaining and enhancing the distinct and separate character of the District’s settlements’ (SO1) and ‘the highest degree of protection will be given to ... the Green Belt’ (SO7)</li> <li>• The Strategic Objectives are too weak and are therefore not positively prepared, justified or effective as they do not set out particular requirements or exclusions in relation to protection of Green Belt, the environment, promoting Biodiversity Net Gain, prioritising brownfield development and mitigating the impact of climate change. The Vision should make reference to the Councils target date for achieving net zero.</li> <li>• Welcome the comprehensive section in the vision around the District’s strong and distinct local heritage, as well as the reference to the challenges and opportunities that the historic environment can bring to an area, and the inclusion of Strategic Objective 1 for the historic environment and its specific reference for the historic environment at this stage.</li> </ul>	<p>The Vision and Priorities are identified in the Councils Corporate Plan and is documented in Para 4.1 - 4.3. These have informed the Strategic Objectives - and each policy links to these 8 objectives, which ultimately will deliver the Councils Vision. The Vision and Objectives have not been formatted in the same style as the plan policies however they differ in nature as they set out the overarching aims of the plan. SO1 seeks high quality design and SO3 places strong emphasis on housing provision.</p> <p>The Strategic Objectives should be read as a whole although they have been drafted to reflect different topic areas of the plan. The Strategic Objectives present an overview of what the plan seeks to achieve to meet the Vision for the District. New development is required to meet objectively assessed needs for housing and employment and therefore must be balanced with protection of the Green Belt, environment and climate change mitigation. The objectives are not intended to be set requirements but present aims for which the policies should achieve. The Council has created a costed plan to achieve net zero and this has resulted in reconsideration of date targets.</p> <p>Support for references to heritage in the Vision and Strategic Objectives is noted.</p>
<p>Spatial Strategy</p>	<ul style="list-style-type: none"> <li>• Concern is raised with regard to the Spatial Strategy in terms of its status within the plan, and linkages to the rest of the plan with some elements appearing to be like ‘policy’ which is confusing for the reader.</li> <li>• The Strategy should be set out in its own strategic level policy identifying the three settlements which are the most sustainable and their overarching objectives relative to new development including the potential for Green Belt release to deliver sustainable development. Specific reference to development around existing town centres, neighbourhood centres and employment centres is however misleading and not consistent with the proposed direction of growth through the Plan.</li> <li>• There are references to net zero carbon development being prioritised in the Cannock/Hednesford/Heath Hayes section but it is questioned why this is not applied to other locations.</li> <li>• Specific reference to ‘centres’ is not consistent with national policy which supports development within or adjoining settlements. Greater emphasis should be placed on the role of strategic development sites in meeting housing requirements.</li> <li>• A number of comments were made regarding Norton Canes suggesting that its status in the hierarchy was not reflected by development allocated, either for housing or employment. Respondents considered it to be a sustainable location for further growth in terms of services and facilities, and insufficient allocations had been identified. Similar comments were also made regarding Rugeley and Brereton, with further allocations sought to balance the hierarchy.</li> <li>• A number of additions were sought in relation to the Spatial Strategy for Norton Canes. This included support for the relocation of unauthorised Gypsy and Travellers encampments at Stokes Lane and Long Lane, for the provision of specialist housing accommodation for the elderly and for the creation of a network of recreational footpath/cycle routes connecting the urban area with the surrounding Green Belt, rural countryside, and recreational areas</li> </ul>	<p>The Spatial Strategy was not intended to be read as policy but to provide an overview of the spatial distribution of growth set through policies and allocations in the Local Plan.</p> <p>The Spatial Strategy has not been formatted in the same style as the plan policies however it differs in nature as it is designed to provide a context and overview for the policies in the Local Plan. It does however emphasise the most sustainable locations for growth and development.</p> <p>The plan has an overarching policy on Achieving Net Zero Carbon Development (SO8.2) which is applicable District wide. The reference in the Cannock/Hednesford/Heath Hayes section is not binding policy but useful to highlight the priority to achieve net zero development in the location which has the greatest opportunity to be able to do so (simply in terms of the scale of growth proposed).</p> <p>The use of the term centres is a recognisable reference to locations where services and facilities are concentrated and where development should be prioritised. It is also recognised in Para 5.9 that residential and employment sites have been identified within the Local Plan to meet identified needs, these will be within the existing urban area or accessible and sustainable locations within the Green Belt.</p> <p>The Council recognises the Spatial Strategy has developed over time in response to evidence and feedback to public consultations. Whilst Norton Canes does offer opportunities for growth in the longer term, there are current issues with infrastructure provision due to a high level of</p>

		<p>development being delivered prior to adoption of the Local Plan, and it would be unsustainable to allocate more development until this is resolved (and is likely to adversely affect the delivery of sites). Other locations for development such as Brereton have been considered and the sites which have not been allocated have been discounted for reasons outlined in the Site Selection Methodology and Sustainability Appraisal.</p> <p>The occupants of the site at Stokes Lane/Long Lane have not indicated a desire to relocate and no suitable, available and deliverable alternative sites have been identified through the Local Plan for Gypsy and Travellers. The Plan (with the exception of the site(s) already granted planning permission) has not specifically allocated any residential sites for Specialist Housing Accommodation but appropriate applications would be supported in line with policies within the Plan. The Council at Policy SO5.1 identify that development proposal will set out, as appropriate, how and when the development will contribute to sustainable travel options including walking and cycling, and the provision of well-designed safe and convenient routes for active travel. The Council consider that the continued work on this aspect within the NP will assist in guiding developers to providing appropriate contributions to the delivery of the footpath/cycle network.</p>
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STRATEGIC OBJECTIVE 1: DELIVERING HIGH QUALITY DEVELOPMENT THAT IS DISTINCTIVE, ATTRACTIVE & SAFE	<ul style="list-style-type: none"> <li>One comment was received stating the greater emphasis on the historic environment has slightly diluted emphasis on delivering high quality development. The term appropriate development lacks clarity and justification.</li> <li>Support Green Belt release to meet the minimum housing requirement</li> </ul>	<p>Additional emphasis on the historic environment was added following the response at Preferred Options stage, it was not intended that this would result in a dilution of emphasis on delivering high quality development. The term appropriate could be supplemented by additional wording such as appropriate to the context and setting but was kept simple to remain concise.</p>
SO1.1 Protecting, Conserving and Enhancing the Distinctive Local Historic Environment	<ul style="list-style-type: none"> <li>Some considered that the policy was treating all heritage assets in the same way, regardless of their importance or significance inconsistent with national policy.</li> <li>Some sought inclusion/recognition of sensitive/heritage led regeneration</li> <li>It was commented that national planning policy also makes no reference to <i>'artistic or architectural'</i> significance so it should not be included, but others noted general support for the policy as a whole.</li> <li>References to the district's agricultural, industrial, transport and military heritage and archaeological features were supported.</li> <li>Replace wording 'preserve' with 'conserve' in line with national policy and legislation</li> <li>Support references to a Heritage Statement but consider additional detail is required</li> <li>The wording on 'less than substantial harm' should be stronger</li> <li>Policy requires a paragraph on archaeology and the need for relevant assessments and at what stage A clause on enhancement opportunities and the policy actively seeking enhancement opportunities would be welcomed</li> </ul>	<p>This is a local planning policy and therefore does not repeat requirements of the NPPF or legislation. The policy requirements related to non-designated or designated heritage assets seek to conserve and enhance these assets, and as such, applicants should consider the impact on all heritage assets that could be affected by the proposal.</p> <p>The consideration of artistic or architectural significance, which would only be necessary where applicable to the historic significance of the asset.</p> <p>Acknowledge the use of 'preserve' is not in keeping with National Policy and for the change to be considered through the examination process.</p> <p>The inclusion of sensitive/heritage led regeneration within the policy is considered appropriate however it does not explicitly require reference in the policy and is covered by the wording in the third paragraph.</p> <p>With regards to the detailed requirements of Heritage Statements, the policy sets out the parameters of a Heritage Statement if required to be submitted, paragraphs 6.6 and 6.7 further outline the minimum requirements expected of a Heritage Statement. This can potentially be supplemented by additional advice in the Design Guidance documents to be produced to support the plan.</p> <p>The Council consider that the approach towards unavoidable loss has been considered in line with guidance within National Policy.</p> <p>Paragraphs 6.20 and 6.21 of the supporting text set out further details with regards to non-designated archaeology. The policy contains an overview of the requirements relating to archaeology and the supporting text presents more detail of how this works in practice. This is considered appropriate and user friendly.</p> <p>With regards to the clause on enhancement opportunities, whilst the policy does not explicitly seek enhancement opportunities, the policy wording does consider that designated heritage assets and their settings will be conserved and enhanced and given the highest level of protection.</p>
SO1.2 Enhancing the Quality of the Built Environment	<ul style="list-style-type: none"> <li>Some welcome reference to its 'Active Design Guidance' at paragraph 6.24 though it is unclear how the principles are reflected within Policy SO1.2 or its supporting text. Others objected to the reference to Active Design stating that this effectively exceeded national policy requirements through the introduction of non-statutory guidance within policy.</li> <li>proposed development should utilise and reflect the local character and heritage in a positive way</li> <li>The ambition to maintain a degree of separation between settlements was welcomed by some and disputed by others on the basis that not all areas had distinct character to protect or had already merged to a significant extent.</li> <li>concerns that the policy is trying to achieve too much and therefore lacks focus. It may benefit from either being split into more focussed policies, or be made more overarching and be supported by a SPD. Other comments suggested that the policy should be refined further to make clear that different approaches to character may be required depending on the location within the district</li> <li>The policy is repetitive in linking to other policies in the plan and not all of the linked policies will be relevant in all circumstances</li> <li>One comment sought specific reference in the plan to the Building for Life standard</li> </ul>	<p>The policy sets out the requirements for a Design and Access Statement which links to requirements of other relevant policies in the plan to Active Design principles such as SO5.1 Accessible Development. Collectively the plan policies promote the principles of Active Design. Many of the principles of Active Design can be achieved through consideration of design, layout and open space within the development as well as connectivity to areas adjoining the site. The plan has been subject to viability testing and the policy wording does not set explicit requirements which would have a bearing on the viability of any proposal.</p> <p>Policy SO1.2 does cover a range of design parameters including local character and heritage, It also contains a specific clause on major proposals and Listed Building Consents on how the design will respect the local distinctiveness and character of the surroundings in terms of heritage.</p> <p>The requirement to retain and enhance the distinct and separate character of each of the districts settlements is a clause that is considered appropriate to ensure that new developments do not erode the characteristics, design and qualities that make a settlement unique.</p> <p>This policy is intended to be overarching and be supported by a SPD in the form of a Design Guide, as referenced in supporting text. These Guides will be able to provide more detailed</p>

		<p>consideration of character in different areas of the District to aid implementation of the policy. Policy SO1.2 helps signpost the reader to other relevant policies which set requirements for information within Design and Access Statements. This could be moved to the supporting text if the Inspector considers this necessary to make the plan sound.</p> <p>The policy approach is not to be overly prescriptive to one particular design standard but the principles of good design practice can be further considered in the Design Guidance which will support the implementation of the plan</p>
SO1.3 Creating Safe Places which Deter Crime and Reduce the Fear of Crime	<ul style="list-style-type: none"> <li>• A suggestion was put forward on the design and safety of footpaths and cycleways and on providing a safe environment whereby schemes have considered the safety of women and girls</li> <li>• Parking facilities should be developed to Park Mark standards, to ensure a safe and secure environment. Lorry parks should be designed to Park Mark Freight standards, as it has been proven these facilities experience less crime.</li> <li>• The development or refurbishment of venues, shopping complexes, town centres etc which provide a service to the public, will need to meet the standards of proposed Martyn's Law. Martyn's Law will ensure the security and safety provided have taken precautions for acts of terrorism.</li> </ul>	
STRATEGIC OBJECTIVE 2: CREATING COMMUNITY INFRASTRUCTURE AND HEALTHY LIVING OPPORTUNITIES ACROSS THE DISTRICT	<ul style="list-style-type: none"> <li>• Consider that this objective should be refined to make a distinction between the loss of existing community facilities and those elements dealing with the provision of new community facilities associated with development proposals.</li> <li>• The objective should make reference to how major development can contribute to providing new community infrastructure. In addition, the policy should recognise how major development can provide new facilities to help meet the needs of existing and future residents</li> <li>• The objective should be strengthened to include references to Stadia in the list of examples</li> <li>• A suggestion was made that text could be added with regard to increasing community cohesion, specifically in relation to new community facilities.</li> <li>• There is no policy under SO2 that has specific restrictions towards developments that potentially have a negative impact on health and wellbeing.</li> </ul>	<p>It is unclear how it would be beneficial to reword the strategic objective itself. A response relevant to these points is provided in Policy SO2.1.</p> <p>Stadia would not come under the term 'community facilities' but would be applicable to policies regarding sports provision.</p> <p>The plan seeks to promote community cohesion through a number of policy initiatives such as providing for a mix of types, tenures and sizes of dwellings in new residential development, even if not specifically mentioned in the objective.</p> <p>The plan does contain restrictions in relation to harm resulting from pollution or that would have a detrimental impact on residents amenity but in general the plan seeks to take a positive stance where possible, informing applicants what type of development proposals will be permitted rather than restricting uses.</p>
SO2.1 Safeguarding the Provision of New Community Infrastructure	<ul style="list-style-type: none"> <li>• The policy should make reference to the viability of existing community infrastructure where facilities are no longer viable for their existing use. The policy should allow for alternative uses to come forward on a site that is no longer viable for its existing use.</li> <li>• There should be a clearer distinction between those policy provisions dealing with the loss of existing community facilities and those elements dealing with the provision of new community facilities associated with development proposals.</li> <li>• The Policy needs to give greater recognition to the opportunity for major development to contribute towards providing new community infrastructure where no current capacity exists</li> <li>• It is unclear if recreation facilities and sports stadia such as Hednesford Hills Raceway are regarded as community facilities, but this should be included in the list of facilities.</li> <li>• The Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land</li> </ul>	<p>Whilst sub-headings could potentially have helped to clarify the differentiation; the first part of the policy addresses the loss of existing facilities and the second half addresses new facilities. The policy recognises that major development must contribute towards new community facilities to meet the needs arising from the development. Whilst this may benefit existing residents as noted in the representation, the authority can only seek to address the impact of the development - serving the need of new residents and therefore the policy is in accordance with national policy and legislation.</p> <p>Whilst not explicitly mentioned, viability is an aspect which would be considered if an applicant were to undertake an assessment which has clearly shown the facilities or sites to be surplus to requirements.</p> <p>Sports stadiums for motorised vehicles are not classed as a community facility in local planning policy but would be considered as sports and recreational buildings and land.</p> <p>The text states loss will be resisted unless it can be demonstrated that demand can be met from alternative facilities in a suitable and accessible location. It also allows for loss where an appropriate and qualified assessment has been undertaken which has clearly shown the facilities or sites are surplus to requirements. It does not require the development to be reused for alternative community facilities - this is only in the case that the other two policy criteria cannot be satisfied.</p>
SO2.2 Safeguarding Health and Amenity	<ul style="list-style-type: none"> <li>• Provides insufficient detail to be implemented effectively. A requirement for a Health Impact Assessment on significant residential development should be included or this should be the subject of supplementary guidance</li> <li>• Some felt that the policy is repetitive in cross referencing other policies in the plan in the context of the Design and Access Statement and this text should be deleted.</li> </ul>	<p>Consideration will be given to the suggestion of the development of detailed guidance (possibly as part of the wider Design work) to link to the Local Plan policies to aid implementation of policies in the plan related to health.</p> <p>Policy SO2.2 helps signpost the reader to other relevant policies which set requirements for information within Design and Access Statements. This could be moved to the supporting text if the Inspector considers this necessary to make the plan sound.</p>

	<ul style="list-style-type: none"> <li>Some disagreed with the statements made in the policies that were cross referenced</li> </ul>	
SO2.3 Providing Active Leisure and Sport Facilities	<ul style="list-style-type: none"> <li>Reference to the Playing Pitch Strategy (PPS) should be within the supporting text of the policy as opposed to be within the policy itself and a few commented stating that it should be acknowledged that other projects could also come forward which are not identified within the PPS</li> <li>The policy should make reference to the viability of existing community infrastructure. The policy should allow for alternative uses to come forward on a site that is no longer viable.</li> <li>Further comments were made in reference to promoting Active Design in the policy which some felt would have a negative impact on viability, effectively exceeding national policy requirements through the introduction of non-statutory guidance within policy.</li> <li>The wording “Where there are anticipated deficiencies, financial contributions to appropriate projects will be sought...” suggests that it is not directly related to the impact of the development and therefore is inconsistent with national policy and is not justified.</li> <li>It was noted the table in the supporting text had no reference and it was unclear how this related to the policy.</li> <li>The Policy should clarify that in the case of overprovision against one typology there is no basis to seek new provision either on or off site.</li> <li>Specific reference should be made in the policy to Sports stadia</li> </ul>	<p>Reference to the Playing Pitch Strategy and subsequent updates in the plan policy provides certainty to applicants on the source evidence used to determine the identified need. It is recognised that the Playing Pitch Strategy will need to be updated regularly.</p> <p>Whilst not explicitly mentioned, viability is an aspect which would be considered if an applicant were to show the playing fields were surplus to requirements.</p> <p>The policy reads ‘Major development proposals will follow the principles of ‘Active Design’ in order to deliver a form of development that will encourage healthier and more active lifestyles.’ It is unclear how this has a direct or unacceptable impact on viability, as many of the principles can be achieved through consideration of design, layout and open space within the development as well as connectivity to areas adjoining the site. The plan has been subject to viability testing and the policy wording does not set explicit requirements which would have a bearing on the viability of any proposal.</p> <p>There is no intention to seek contributions which are not directly related to development. This is therefore a misinterpretation of the wording which could be rectified with a modification if necessary to make the plan sound.</p> <p>The table aligns with the recommendations of the Open Space Assessment 2023 and is relevant in relation to the wording with regard to local minimum standards in the policy text. References and a table header could be added for clarification as a minor modification.</p> <p>The policy is not intended to be overly prescriptive. The Council will consider the quality of local provision in the area as well as the quantity of open space in considering the application of financial contributions from development to mitigate the impact of new occupants. In some cases improvements to existing spaces in the area could be more appropriate than provision of new space.</p> <p>Sports stadia would be encompassed in the policy wording, and this policy would apply to any proposals for a change of use of such facilities</p>
SO2.4 Allotments and Community Food Growing	<ul style="list-style-type: none"> <li>One site promoter highlighted that their development proposal could provide 2 community orchards.</li> <li>Reference could be given to support being given for new developments, which can deliver additional allotments/community food growing sites. In particular, it is new housing development that is the potential delivery mechanism for new facilities of this type and this ought to be recognised in the policy.</li> </ul>	<p>The policy clearly supports development proposals that will deliver allotments and community gardens for the purpose of growing food, and it is acknowledged this could be part of a wider mix of uses including residential but this is not the only means by which such proposals can come forward.</p>
SO2.5 Providing Opportunities for Healthy Living and Activity	<ul style="list-style-type: none"> <li>Request from an infrastructure provider for amendments to wording to include a clause which would require applicants to take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.</li> <li>Some felt the policy was repetitive and considered the cross referencing to other policies in the plan unnecessary.</li> <li>Some elements of the policy are unclear. One criterion refers to providing infrastructure that will enable sport and physical activity to take place inside and around buildings. It is unclear what this policy criteria is aimed at achieving, particularly the reference to 'around buildings'. This requires further clarification.</li> <li>Further comments were made in reference to promoting Active Design in the policy which some felt would have a negative impact on viability, effectively exceeding national policy requirements through the introduction of non-statutory guidance within policy.</li> <li>Some specifically welcomed the policy approach noting its promotion of healthy living opportunities and alignment with Objective 2.</li> </ul>	<p>It is not considered that any modifications are required to the Policy SO2.5 Providing opportunities for healthy and activity through active design to make the plan sound, as it is noted that this is covered by national policy. However, the advice will be utilised when updating the more detailed local design guides and overarching Design SPD.</p> <p>Policy SO2.5 helps signpost the reader to other relevant policies which set requirements for information within Design and Access Statements. This could be moved to the supporting text if the Inspector considers this necessary to make the plan sound</p> <p>The policy seeks to support the principles of Sport England’s Active Design Guide and therefore aligns some aspects of the local planning policy with these principles. Principle 8 of the Guide promotes active buildings inside and out considering aspects such as convenient cycle parking and making staircases in large developments inviting and integral to the design to discourage use of elevators, for example.</p> <p>The plan has been subject to viability testing and the policy wording does not set explicit requirements which would have a bearing on the viability of any proposal.</p>
STRATEGIC OBJECTIVE 3: PROVIDING FOR HOUSING CHOICE	<ul style="list-style-type: none"> <li>A number of respondents noted that the objective does not reflect the Government's overall objective for housing which is to significantly boost the supply of homes and sought reflection of this in the overall wording of the Strategic Objective 3.</li> </ul>	<p>The Strategic Objectives are designed to deliver the Council’s vision, which in this case is to deliver a sufficient supply of homes to provide for housing choice and ensure all people are able to live in a decent home which meets their needs.</p>
SO3.1 Provision for New Homes	<ul style="list-style-type: none"> <li>A few commented on the detailed figures used to calculate the supply querying figures in the evidence base including the SHLAA and Development Capacity Study and assumptions such as the windfall rate</li> </ul>	<p>Where specific queries have been made, the figures are explained in the response to the individual representation. The figures are evidence based and accurate at the time of</p>

	<p>either suggesting the plan had an oversupply of sites and therefore Green Belt should not be released or an undersupply meaning more sites should be allocated depending on the point of view of the respondent.</p> <ul style="list-style-type: none"> <li>• Some considered that the figures used in the plan to calculate housing supply could be clearer</li> <li>• Some supported the principle of contributing towards the unmet need of the Housing Market Area (HMA), however considered this contribution should be offered to those with an emerging shortfall (within the Black Country) as well as the shortfall identified in an adopted plan (Birmingham)</li> <li>• Others felt the contribution to the HMA was insufficient given the scale of unmet need identified in emerging Local Plans under production by authorities in the Black Country and Birmingham and considered that the Local Plan should deliver more housing to meet this need.</li> <li>• The proposed density assumptions were questioned by some including the high rate of 50dph for urban town centres and whether this was achievable given factors such as BNG.</li> <li>• However others sought an increased density on sites, particularly brownfield land to deliver higher housing rates.</li> <li>• Some respondents suggested that there was too heavy reliance on historical completions in the plan period and that this resulted in issues with the housing trajectory as at points it does not show sufficient supply to meet the annual need or five year supply</li> <li>• Some considered that an uplift to the standard housing calculation was needed to increase delivery of affordable houses as the Councils Viability Assessment demonstrates only a proportion can be delivered on each site before it is not viable which restricts the amount that can be delivered.</li> <li>• A number of respondents raised the issue of the plan period and considered that additional years should be added (at least 2) due to the likely length of the examination period and allowing for the minimum 15 years timeframe after adoption.</li> <li>• Many objected to the policy on the basis that it meant allocation of sites SH1 (land south of Cannock Road) and SH2 (land east of Wimblebury Road) and provided detailed comments on those sites.</li> <li>• Some suggested that the proposed spatial strategy fails to facilitate sufficient residential development in other areas of the District such as Norton Canes despite its sustainable credentials and the economic growth that is directed to it or Brereton, Rugeley where land is available and new residential development could deliver wider benefits to the community.</li> </ul>	<p>developing the Reg 19 plan based on annual monitoring of delivery rates and the database of sites known to the authority. The selected allocations are required to meet the residual housing target for the plan period, after counting all sites permitted and under construction. Cannock Chase seeks to ensure that the contribution offered is clearly required which can only be established where the plan requirement and supply has been subject to independent examination and any shortfall has been agreed in an adopted plan. Should the plan require reformatting or an alternative way of presenting the figures to provide clarity, the Inspector could suggest modifications to the plan should it be necessary to make the plan sound.</p> <p>The Sustainability Appraisal tested growth scenarios above the minimum housing need requirement. The major issue is the extent of Green Belt release required to meet housing need which has negative implications for a number of SA objectives. The 500-dwelling contribution by the Council has been tested through the Plan making process and through Duty to Cooperate.</p> <p>The density requirements were informed by evidence. The approach to density is set out in the Green Belt Topic Paper, and the highest achievable density for each area has been selected to avoid further Green Belt release. Biodiversity Net Gain can take various forms including green roofs and green walls or balconies therefore it does not necessarily impact land requirements, and some brownfield sites will be exempt. The Council will consider any proposal for increased density on brownfield sites to maximise the efficient use of land, provided this does not have an unacceptable impact on other requirements.</p> <p>The trajectory will be tested at Examination and has been developed using the most up to date assumptions on build out rates. The aim is to deliver the right number of homes within the plan period to meet identified need both locally, and with a contribution towards the unmet need of the HMA.</p> <p>The HNA has concluded that there is no justification to deviate from the standard method and maintains that the approach to affordable housing delivery should be pragmatic, delivering as much as is viable on sites in the District.</p> <p>The Council identify a 15year period from the point of adoption to be 2025 leading to an end date of 2040 for the Local Plan, it is considered that this is an appropriate calculation for the Plan and to be used in calculating housing and employment land requirements.</p> <p>Detailed responses to objections to sites SH1 and SH2 are recorded in the site allocations policy for those specific sites.</p> <p>The Council recognises the Spatial Strategy has developed over time in response to evidence and feedback to public consultations. Whilst Norton Canes does offer opportunities for growth in the longer term, there are current issues with infrastructure provision due to a high level of development being delivered prior to adoption of the Local Plan, and it would be unsustainable to allocate more development until this is resolved (and is likely to adversely affect the delivery of sites). Other locations for development such as Brereton have been considered and the sites which have not been allocated have been discounted for reasons outlined in the Site Selection Methodology and Sustainability Appraisal.</p>
SO3.2 Housing Choice	<ul style="list-style-type: none"> <li>• Many commented on the policy saying it was too restrictive with regard to the proposed housing mix and that the wording should be amended to allow for site specific viability considerations to be taken into account. Others stressed that with a marginal land supply, and no consideration of viability or density there is insufficient evidence to justify the policy approach. Some also felt it did not reflect the recommendations of the HNA which support more flexibility in how housing mix is applied.</li> <li>• The published Local Plan and CIL Viability Assessment dated August 2022 should be reviewed to ensure it's based on up-to-date national policy guidance and supporting evidence base. A representation points to elements in the updated HNA and local and national policy which have not been tested through the Viability Assessment.</li> </ul>	<p>The Council have specified that proposals must take the HNA and housing mix table into account - this is not the same as stating they must adhere to the mix. The HNA provides more detailed assessment into the characteristics of areas of the district which may support deviation from the standard mix. The policy also states that the Council will consider evidence set out in Housing Mix Statements in instances where a variation to this mix is sought. There is considered sufficient flexibility in the policy wording.</p> <p>It is acknowledged that the Viability Assessment requires updating to align with the latest evidence and this is in preparation but this is not considered to present an issue with the policy direction, as the policy requirements do not differ substantially</p>

	<ul style="list-style-type: none"> <li>• A few respondents noticed an error in Table E Housing Mix where the calculations of one row added to 105% as opposed to 100%.</li> <li>• Some opposed the overage clause; the requirement to review planning obligations if the site takes longer than 2 years to build out. They considered this unreasonable and restrictive and would delay the delivery of housing.</li> <li>• The specific inclusion of affordable rented homes for older people within the policy is considered unnecessary and a duplication of policy in light of the provisions set out within Policy SO3.3 (Delivering High Quality Housing).</li> <li>• The Council should consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area</li> </ul>	<p>The housing mix table contains an error in column 3 Market Housing where it is meant to state 40% not 45% in line with the HNA. This will be rectified through a modification.</p> <p>The Council would not seek to require more affordable housing than the ratio's set in the policy, and it is important that the right level of affordable housing is delivered where sites are being built out over a number of years.</p> <p>The ratios for affordable rented are based on evidence in the HNA.</p> <p>Comments are noted with regard to the provision of affordable homes for NHS workers. This will be given further consideration in the implementation of policy, and assessment of planning applications</p>
<p>SO3.3 Delivering High Quality Housing</p>	<ul style="list-style-type: none"> <li>• Comments were received with regard to the requirement for buildings to meet Nationally Described Space Standards (NDSS). Some respondents welcomed this requirement whilst others objected. Objections were mainly with regard to the lack of evidence to support the requirement and the negative impact on viability. One respondent considered it could restrict choice in the market for smaller properties and some felt it would reduce affordability.</li> <li>• Many commented that the requirements for M4(2) Accessible and Adaptable dwellings and M4 (3) wheelchair user friendly had not been shown to be viable through the Councils Viability Assessment with some expressing it would have an impact on density. Some felt larger developments should have exceptions.</li> <li>• The requirement to meet M4(2) will be superseded by changes to residential Building Regulations. There is no need for this policy when it will be mandated nationally in due course.</li> <li>• It is not clearly justified why the 'exceptions' defined under this policy are only applicable to minor developments and not major developments.</li> </ul>	<p>The justification for NDSS is provided in the supporting text for the policy (6.115) where it sets out that poor design will not be tolerated, health and wellbeing of residents will be prioritised and it supports working from home which in turn reduces commuting, helping to support net zero carbon objectives. The Local Plan has been subject to viability testing in the Viability Report 2022 and NDSS has been taken into consideration.</p> <p>The policy reflects the evidence in the Housing Needs Assessment which suggests that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. Given the evidence, the Council could consider (as a start point) requiring all dwellings (in all tenures) to meet the M4(2) standards and around 5% of homes meeting M4(3) – wheelchair user dwellings in the market sector (a higher proportion of around a tenth in the affordable sector) (pg 173, HNA).</p> <p>Once adopted, the plan can implement the requirement until the government amends building regulations at the national level.</p> <p>In terms of the exceptions for minor development, small developments are more likely to be constrained, particularly brownfield urban locations and therefore the policy wording provides additional flexibility for these.</p>
<p>SO3.4 Gypsies, Travellers and Travelling Show People</p>	<ul style="list-style-type: none"> <li>• Comments were made in relation to unauthorised GT encampments at Stokes Lane/Long Lane where it was expressed that the living conditions were not satisfactory and the existence of these camps is considered to cause a significant loss of visual amenity in relation to use of the two bridleways.</li> <li>• It was suggested that the existing site for Travelling Showpeople should be relocated to enable the heritage led regeneration of Grove Colliery</li> <li>• Penultimate paragraph should ensure that development appropriately considers the relevant environmental considerations and does not harm heritage assets, including their settings</li> <li>• It was commented that the potential impact of allocated traveller's sites set out in Policy SO3.4 are unlikely to result in highway capacity issues on the Strategic Road Network.</li> </ul>	<p>The occupants of the site at Stokes Lane/Long Lane have not indicated a desire to relocate and unfortunately no suitable, available and deliverable alternative sites have been identified through the Local Plan.</p> <p>It is recognised the existing occupants at Grove Colliery are seeking to relocate which has generated the need reported in the Councils evidence base. The Council are working with the occupant to assist but no confirmed deliverable site has been identified through the Local Plan.</p> <p>The Council considers that Policy SO3.4 does cover the relevant environmental and heritage considerations as it references that proposals should be compatible with landscape, environment, biodiversity and heritage assets as well a physical and visual character of the area.</p> <p>The comments regarding the Strategic Road Network are noted.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Cannock Chase Council Response
STRATEGIC OBJECTIVE 4: CREATING A VIBRANT LOCAL ECOMONY AND WORKFORCE	<ul style="list-style-type: none"> <li>One comment raised support for the overarching policy on the economy.</li> </ul>	
SO4.1 Safeguarding Existing Employment Areas for Employment Uses	<ul style="list-style-type: none"> <li>Raised that the first paragraph wording which refers to “non-town centre offices, industry and warehousing (formerly Class B of the Use Classes Order” as misleading to suggest that these are all formerly Class B as Use Classes B2 (general industry) and B8 (warehousing) remain</li> <li>A comment has raised that the Brereton Business Park Existing Employment Area should be extended to include the existing staff car park of the business to ensure it is also protected under Policy SO4.1 and to include an area of Green Belt land for additional parking for the business park.</li> </ul>	<p>The Council note that the policy wording does not clearly state the Council’s intention with regards to the policy. An amendment to the wording through a minor modification with regards to the wording on use classes to ensure that the Use Class Order is correctly presented without altering the context of the policy as a whole.</p> <p>The Council note the importance of the car park, and it is considered that development on the car park would not be supported at the planning application stage due to the economic implications the loss of the car park would pose to the business, as well as it being a necessary requirement to meet the needs of the business. It is considered that there is no evidence provided to support the expansion of the EEA over an area of Green Belt for the use as an additional car park for the business park. The Council do not consider that there is sufficient evidence forthcoming to alter the boundary of the EEA.</p>
SO4.2 Provision for New Employment Uses	<ul style="list-style-type: none"> <li>Some considered that the 74ha provision of employment land identified should be a higher figure identified in the range within the EDNA</li> <li>One comment sought further detailed modelling to be undertaken to justify the employment land target proposed</li> <li>Concerns were raised with regards to the figures shown in the Employment Topic Paper</li> <li>One comment sought for a review mechanism on supply</li> <li>It was noted that there had been two strategic employment allocations identified since preferred options stage and that this could have an impact on the strategic road network.</li> </ul>	<p>The Council’s identification of a need to provide 74ha (gross) of employment land across the plan period to 2040 sits at the upper range of he net requirement and within the range if losses are replaced at an appropriate rate. The major issue presented by the higher figure considered appropriate in representations is the extent of Green Belt release required to meet employment need and that any additional allocations beyond those identified in the Plan would result in additional Green Belt release as shown within the Local Plan that the presumption has been placed on the identification of brownfield sites first and the further intensification of Existing Employment Areas.</p> <p>The Council has considered reasonable alternatives through modelling different distribution scenarios at earlier stages of the plan process. The only reasonable option is to deliver an employment need target which is evidence based. The source is therefore the range provided in the Council’s EDNA. Modelling different targets within this range is unlikely to have resulted in any significant differences in scores in the SA, as the range is relatively narrow. There are a number of options in how growth can be distributed across the District, some of which are more sustainable than others and this does result in variations in the scores which is shown in the SA. An update to the Employment Topic Paper will be undertaken prior to submission to check the employment land calculations.</p> <p>The authority reports housing and employment land monitoring in the Authorities Monitoring Report. Any major discrepancy between employment need and supply or any significant changes to the local or national economy can be considered at that point, and may trigger a review if the issue us able to be addressed through planning policy.</p> <p>There had been a change to the identified strategic employment allocations and one had not been taken forward since preferred options stage. The Council will work with National Highways to identify the scope of a Strategic Transport Assessment if required.</p>
SO4.3 Intensification of Existing Employment Sites	<ul style="list-style-type: none"> <li>One comment sought a change to the element of intensification planned for Watling Street Business Park and that the existing business park has not been included in the proposed allocation at SE2.</li> </ul>	<p>Whilst the Council recognise that the redevelopment of the existing business park as part of the intended plans for the wider site, as the Watling Street Business Park is an Existing Employment Area it is already accounted for within the Local District for employment purposes and as such has not been included within the policy allocation for the proposed extension of the business park (SE2), the Council consider this to be an appropriate approach within the Local Plan.</p>
SO4.4 Sustainable Tourism and the Rural Economy	<ul style="list-style-type: none"> <li>One comment noted that the significance of Hednesford Hills Raceway to the local tourist economy does not appear to be either recognised or safeguarded</li> <li>Some raised that the reference to Grove Colliery in the supporting text to the policy is insufficient</li> </ul>	<p>Paragraph 6.23 of the Plan identifies that the preparation of a Local List for the District will be taken forward through the Design Guide SPD, if assessed as part of this process and deemed to meet the requirements the sites may potentially form part of the proposed Local List for the District. Further to this, whilst specific named sport facilities are not referenced in the Local Plan,</p>

	<ul style="list-style-type: none"> <li>It was recommended that the supporting text refers to the mitigation for Cannock Chase Special Area of Conservation</li> <li>It was considered that a reference is needed to heritage tourism, historic farmsteads, and the canal network as a heritage asset within the policy</li> <li>The requirement for proposals to demonstrate 'no adverse impacts' on such assets is overly prescriptive and restrictive goes beyond the scope for national policy</li> </ul>	<p>Policy SO2.3 would be used to determine any planning applications which would affect such assets.</p> <p>The Council assessed the Grove Colliery sites in the Site Selection Methodology, the site was not identified for further consideration as part of the allocation process and was deferred to masterplan/neighbourhood plan discussions. The evidence gathered as the Plan developed has not identified a specific need for this type of development (leisure/tourism) within Cannock Chase District and therefore the Council has not sought to make allocations for this use. Paragraph 6.142 of the supporting text for the policy makes reference to the heritage of the area and the heritage sector having an important role in supporting sustainable tourism and the rural economy and Paragraph 6.144 references the reuse of rural buildings and the retention of attractive buildings.</p> <p>The Council considers that when drafting the policy, a balanced approach was undertaken whilst there is reference to the canal network within the policy, it is acknowledged that there is no specific reference identifying it as a heritage asset. Additional references could be added to the policy to express the significance of heritage in tourism and the rural economy, should an Inspector determine such modifications are required to make the plan sound.</p> <p>The policy wording is in line with policies SO7.1 and SO7.3. Further to this Natural England has not raised concerns within their representations over the wording of the policies.</p>
SO4.5 Live Work Units	<ul style="list-style-type: none"> <li>Some raised that the policy should also include reference to the Grove Colliery site as an opportunity for live work units</li> </ul>	<p>The Council is of the opinion that the sustainability of a site with regards to access to public transport, and services and amenities are still required to be considered, and as outlined in paragraph 6.147 of the supporting text the employment use class supported within the policy (E(g)i (offices)) would in general be directed towards town centres, but that within the District there are instances of isolated buildings in employment uses often within largely residential areas which can provide opportunities for live-work accommodation.</p>
SO4.6 Provision for Local Employment and Skills		
STRATEGIC OBJECTIVE 5: SUPPORTING THE PROVISION OF SUSTAINABLE TRANSPORT AND COMMUNICATIONS INFRASTRUCTURE		
SO5.1 Accessible Development	<ul style="list-style-type: none"> <li>The policy could provide guidance on whether additional weight could be afforded to developments that deliver more than 'minimum' and provide significant public benefits through the investment in all forms of infrastructure.</li> <li>Considered that the inclusion of reference to other policies is duplicate and repetitive in nature</li> <li>The policy requirement for all major development proposals to meet certain accessibility requirements that will be clearly less relevant to certain sites is considered inconsistent with paragraph 110a of the NPPF.</li> <li>Support for policy approach to require Transport Assessment and Travell Plans. Support for specific TAs to be submitted in relation to the large-scale strategic site allocations but note that this should also apply to allocation SE2</li> </ul>	<p>All developments will be considered on a case-by-case basis in relation to their location and access/proposed access to sustainable transport modes and other types of infrastructure.</p> <p>Policy SO5.1 helps signpost the reader to other relevant policies and is intended to provide an overview of all the factors which should be considered in proposals for development to make them more accessible. Elements such as the linking policy references could be moved to the supporting text if the Inspector considers this necessary to make the plan sound.</p> <p>The policy seeks to ensure major developments are accessible to local services and facilities to reduce the reliance on the private car. This is captured in the first paragraph and is not considered to be overly prescriptive in nature.</p> <p>Support welcomed with regard to the general policy approach. The Council will ensure the assessments are submitted in compliance with policy, and will suggest a modification if necessary to address any inconsistency in approach for proposed site allocation SE2.</p>
SO5.2 Communication Technologies		
SO5.3 Low and Zero Carbon Transport	<ul style="list-style-type: none"> <li>The wording of the first bullet point is considered to be imprecise and as such to not comply with paragraph 16d) of the NPPF</li> <li>Considered that insufficient evidence has been provided to justify the second bullet point - Part S of the building regulations covers the provision of EV charging infrastructure</li> </ul>	<p>Policy SO5.3 is seeking to ensure that new developments promote low and zero carbon transport. The wording 'support changes to the road network where they are related to the reduction of environmental impacts and the enhancement of public transport' is a general point but developers could consider how the routes within and immediately surrounding the site will minimise congestion and promote walking/cycling and public transport use, by design.</p>

		The provision of electric vehicle charging points and related infrastructure was evidenced in the Staffordshire Climate Mitigation and Adaptation Strategy and has been subject to testing in the Viability Assessment.
SO5.4 Maintaining and Improving the Transport System	<ul style="list-style-type: none"> <li>Considered that there should be a clause relating to the historic environment within this section and how the historic environment will be conserved and enhanced.</li> <li>It is considered that in the context of new development and relationship to transport, that the requirement for proposals to mitigate 'demonstrable' impact seeks to set a lower benchmark and thus goes beyond the scope of national policy</li> <li>Considered that the policy contradicts the approach under separate policies dealing with transport issues (Policy SO5.1) which refers to 'unacceptable impact on the highway network'</li> </ul>	
SO5.5 Hatherton Canal Restoration Corridor	<ul style="list-style-type: none"> <li>The policy would benefit from references to the historic environment within it and the role of the canal in Cannock Chase through history and as a heritage asset</li> </ul>	It is acknowledged that there is no reference to the historic environment within the policy, whilst the supporting text does provide some of the canal's history within Cannock Chase. References could be added to the policy text if the Inspector considers this necessary to make the plan sound.
SO5.6 Safeguarding Proposed Recreational Footpath and Cycle Routes	<ul style="list-style-type: none"> <li>Support is expressed for the policy, and it is raised that the safeguarded land in Norton Canes can play a critical role in supporting the delivery of that proposed recreational footpath and cycle route</li> </ul>	Support for the policy is noted with regard to the potential recreational route. In the longer term, if allocated in a subsequent plan, connectivity with the safeguarded land at Hednesford Road would be supported.
SO5.7 Parking Provision		
STRATEGIC OBJECTIVE 6: CREATING ATTRACTIVE TOWN AND LOCAL CENTRES		
SO6.1: Hierarchy of Town and Local Centres		
SO6.2 Provision of Main Town Centre Uses and Town Centre Services		
SO6.3: Safeguarding Existing Town Centre Services		
SO6.4: Town Centre Design Guide	<ul style="list-style-type: none"> <li>Reference to the historic environment within this policy is welcomed, it is considered that the policy needs to ensure that all heritage assets are protected and opportunities for enhancement sought</li> <li>It is raised that design considerations should be mad to ensure that any new design is appropriate in the context of Conservation Areas and when affecting the significance of heritage assets</li> </ul>	The Council welcomes the support to the reference of the historic environment within the policy. It is considered that in conjunction with other policies within the Local Plan all heritage assets are protected with the requirement for new design to respect and reflect local character and distinctiveness.
SO6.5: Cannock Town Centre Redevelopment Areas	<ul style="list-style-type: none"> <li>The policy should refer to 'heritage assets' rather than 'historic assets'</li> </ul>	The Council acknowledge the request for the reference to heritage assets in place of historic assets and it is considered that this can be undertaken through a minor modification to the plan.
SO6.6: Rugeley Town Centre Redevelopment Areas		
SO6.7: Hednesford Town Centre Redevelopment Areas		

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Cannock Chase Council Response
STRATEGIC OBJECTIVE 7: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT	<ul style="list-style-type: none"> <li>General support for strategic objective and note Green Belt is a policy tool, not a protected landscape.</li> <li>Landscape character and Green Belt should be protected, therefore the proposed developments are not in line with national policy requirements</li> <li>The policy should be renumbered to reflect the importance of the environment</li> </ul>	CCDC welcomes the detailed comments of support to various Strategic Objectives and Policies. The Vision and Priorities identified in the Councils Corporate Plan have informed the strategic objectives. The difference between Green Belt and a protected landscape is noted. Whilst not all policies or proposals in the plan have a positive effect on every objective, they are considered and assessed against reasonable alternative options, and the plan is required to fulfil development needs. It is the Policy wording, not the order of the content that recognises the importance of issues covered.
SO7.1 Protecting, Conserving and Enhancing Biodiversity and Geodiversity	<ul style="list-style-type: none"> <li>Support the general principles but policy is an unnecessary duplication of Chapter 15 of the NPPF on 'Conserving and Enhancing the Natural Environment'.</li> <li>Support for the policy vision but concern at focus on preventing adverse impacts and object to the policy position that development proposals which are likely to result in the loss or deterioration of irreplaceable habitats will be refused</li> <li>Additional weight should be afforded to the public benefits associated with the delivery of ecological enhancement.</li> <li>Make specific reference to swift bricks as per national planning guidance</li> <li>No need to reference Policy SO7.2</li> </ul>	<p>The NPPF is a material consideration in decision making whereas Local Plan policies have full weight and the policy has the flexibility clause stating that such proposals will not be permitted, unless where there are wholly exceptional reasons. The policy is clear that development proposals whose primary objective is to conserve or enhance biodiversity will be supported and the policy says that enhancement features for wildlife within the built environment will be sought where appropriate.</p> <p>The cross reference to Policy SO7.2 is designed to link the policies and aid the reader to know what is expected in terms of BNG.</p>
SO7.2 Biodiversity Net Gain	<ul style="list-style-type: none"> <li>The policy is considered by some to be an unnecessary duplication of national policy and not to reflect the latest policy updates, while others support the emphasis on BNG</li> <li>There are a range of views on the minimum Biodiversity Net Gain (BNG) requirement including support for the 10% minimum target, a fixed 10% amount and that it should be increased to 20% with assessments of viable alternatives to 10%</li> <li>Related points include that developers should pay more for off site provision, ensuring that BNG is provided in a more flexible manner on land that is functionally related to it and that the Council should identify specific sites for the delivery of off-site BNG</li> <li>Clarify BNG is not applied to irreplaceable habitats and to make reference to the Statutory Biodiversity Metric</li> <li>Support policy but object to reference to higher targets in Neighbourhood Plans</li> <li>Include the target date for net zero</li> </ul>	<p>The policy meets the legally required minimum percentage threshold for Biodiversity Net Gain and does not prevent developers from providing a higher % BNG where it is practical and viable - Neighbourhood Plans will require supporting evidence to support a higher target. The percentage is in line with Government requirements, Information in the plan was correct at the time of writing but any factual information is able to be updated through the modifications process</p> <p>The policy aims to set out expectations for development in relation to BNG and to provide this within the Local Plan. The Council will prioritise on site mitigation, but where this is not possible there will be a wide range of potential providers for off site mitigation, including potential improvements on Council sites. Para 6.292 sets out that opportunities for off-site provision will be identified in future guidance to ensure biodiversity net gain is provided within the District where the loss occurs. The policy wording is used to require development is to be provided on site in the first instance, rather than financial penalties.</p> <p>The Council consider the wording of policies to be sound and legally compliant but respects the expertise of Natural England in relation to the natural environment.</p> <p>The Council has published a study to assess the cost of implementing net zero and are reviewing the target date to ensure this is achievable.</p>
SO7.3 Special Areas of Conservation (SAC)	<ul style="list-style-type: none"> <li>Support approach and policy aims, but Policy should reference 15KM zone and supporting text should set out mitigation measures and information required.</li> <li>It is noted that the Habitat Regulations Assessment (at p.63) states that "adverse effects on integrity have not been able to be ruled out in relation to air pollution from vehicles at</li> </ul>	The policy text references the existing Cannock Chase SAC mitigation payment and is worded flexibly in case the scheme is amended to take account of the air quality work. Additional guidance on SAC mitigation payments exists on the Councils website.

	<p>Cannock Chase SAC, but there is also support from several respondents for the nitrogen deposition work and commitment to partnership wide mitigation strategy to protect the SAC. It is noted the plan is not currently sound or legally compliant due to the impacts of increased vehicle movement on air quality in relation to internationally designated nature conservation sites, with wording amendments required once the assessments being undertaken are complete.</p> <ul style="list-style-type: none"> <li>The Policy should recognise other European sites that may be at risk and Ammonia added to the list of identified pollutants.</li> </ul>	<p>The Cannock Chase SAC Partnership has commissioned evidence to ascertain the detail of the issue raised and any actions that may be required to address the issue raised by Natural England - the work is nearing completion. It should also be noted that monitoring in other areas of the District has shown a decrease in pollution and removal of AQMAs. The Council is working with Natural England on this issue and seek to form a Statement of Common Ground as suggested which will set out an agreed approach to address this issue.</p> <p>The policy reflects the recommendations of the Habitats Regulations Assessment. This does not preclude consideration of other European sites or other pollutants in applications, but the policy focuses on the pollutants and sites of greatest relevance to Cannock Chase District.</p>
SO7.4 Protecting, Conserving and Enhancing Landscape Character	<ul style="list-style-type: none"> <li>The policy aims are generally supported</li> <li>Negative impact on landscape character against national and local policies including reducing gap between settlements</li> <li>Object to the requirement to provide sensitive edges to the adjacent areas.</li> <li>Recognise heritage as a component of landscape that needs protecting</li> </ul>	<p>New development will be designed to be locally distinctive and will be subject to a masterplan and design code which should reflect the locality and community aspirations for the sites. It is accepted that for development where there is no impact on the landscape (for example urban infill development) then the policy would not apply.</p> <p>It is considered that in conjunction with other policies within the Local Plan all heritage assets are protected with the requirement for new design to respect and reflect local character and distinctiveness.</p>
SO7.5 Protecting, Conserving and Enhancing the Cannock Chase National Landscape	<ul style="list-style-type: none"> <li>Policy wording is misleading, the supporting text does not adequately reflect the special qualities of the National Landscape and the full list of relevant evidence</li> <li>The policy is not consistent with NPPF paragraphs 176 and 32</li> </ul>	<p>Government legislation and guidance, and guidance produced by other stakeholders are not required to be repeated in Planning Policies and the policy sets out that the National Landscape designated area will receive the highest degree of protection. Local planning policy must be consistent with, but should not duplicate, national policy.</p>
SO7.6 Protecting, Conserving and Enhancing the Green Belt	<ul style="list-style-type: none"> <li>The policy wording is not consistent with national policy</li> <li>Negative impact on Green Belt against national and local policies including reducing gap between settlements</li> <li>Release of green belt land for development will bring opportunities in terms of recreational, biodiversity and landscape enhancements alongside much needed homes</li> <li>Support community parkland south of Lichfield Road, the role in mitigating against the loss of Green Belt should be noted.</li> </ul>	<p>The policy was drafted with the intention it added to national policy and sought protection for the Green Belt. There are exceptional circumstances to support removal of land from the Green Belt and this is a last resort after consideration of all reasonable alternative options.</p> <p>The policy is considered sound as drafted but any modifications such as the suggestions in relation to the use of the term Community Parkland will be considered by the Inspector if required to make the Plan sound.</p>
SO7.7 Amendments to the Green Belt	<ul style="list-style-type: none"> <li>Objection to development which will impact on Cannock Extension canal SAC, pollution impacting user groups and potential for other employment options in non-greenbelt areas. Does not fit NPPF definition of safeguarded land and no exceptional circumstances for greenbelt removal.</li> <li>Objection to proposed safeguarded sites in Norton Canes as unsustainable, flood risk and does not respect natural assets. Pollution, highways issues and lack of amenities are also noted by objectors.</li> <li>There are several objections to new housing in the Heath Hayes area due to the loss of green belt land, loss of land for wildlife and reduced gap between settlements. It is also noted that each household should be given the chance to object to the removal of Green Belt areas</li> <li>Disused industrial sites in the midlands and brownfield sites in Cannock Town Centre are suggested as more suitable for large scale housing developments than the Green Belt</li> <li>It is suggested that if the Planning Inspector finds that the development allocations are excessive then proposals on greenfield Green Belt sites outside the urban areas should be removed as a priority</li> <li>It is considered by some that Green Belt boundary amendments are required to meet the local demand for housing and employment as well as from the GBBCHMA, with some respondents commenting on the accuracy of Green Belt boundaries against physical features on the ground. Some consider discounted sites should be allocated to meet the demand, whilst others consider too many sites have been allocated.</li> <li>Where the authority falls short of meeting it's housing requirements over the Plan period, clear provisions should be made within the policy for the early release of identified</li> </ul>	<p>All development sites have been subject to a site selection process and sustainability appraisal against alternative options and has been considered against the strategic objectives for the Local Plan. Whilst not all policies or proposals in the plan have a positive effect on every objective, they are considered and assessed against reasonable alternative options, and the plan is required to fulfil development needs. Any future iteration of the Local Plan would explore all options for residential development on additional suitable, available and deliverable land. Planning permission for the permanent development of safeguarded land will only be granted following a Local Plan review which proposes the development. At this present time the Council has been unable to identify sufficient sites outside the Green Belt to meet residential development needs and is therefore seeking to safeguard land in line with the provisions in the NPPF. Should a site be allocated in future, surveys will be required to identify potential impacts on local wildlife species and habitats and specific mitigation measures may be required to avoid adverse effects. All development is required to deliver biodiversity net gain. Developer contributions would be required to mitigate the impact of development on local infrastructure, including the highway network and schools. Flood risk would require further investigation. The Council have considered Green Belt release in order to meet development needs and have exhausted all reasonable alternative options before reaching this conclusion, as set out in the Green Belt Topic Paper.</p> <p>There are exceptional circumstances to support removal of land from the Green Belt and this is a last resort after consideration of all reasonable alternative options. The Council has sought to allocate all deliverable brownfield sites and identify sites in urban locations before consideration of releasing land from the Green Belt. The process of exhausting all reasonable options before Green Belt release is set out in detail in the Green Belt Topic Paper. Site that have been assessed</p>

	<p>safeguarded sites which have the capability of delivering sustainable housing developments</p> <ul style="list-style-type: none"> <li>• Grove Colliery has the potential to be a live/work hub in the Green Belt connected to the footpath network</li> <li>• The plan relies on large brownfield sites that may be difficult to deliver and should also consider smaller greenfield sites that will come forward sooner to meet demand</li> <li>• the impact of re-moving land from the Green Belt should be offset by compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land</li> <li>• Wording on mitigation should be flexible to fit context of site.</li> <li>• Concerns are raised about several of the ‘Strategic Residential Site Allocations’ which could potentially impact on designated sites including SACs as a result of increased recreational pressure, water quantity and quality and air.</li> <li>• Green Belt policy is likely to change during the plan period.</li> <li>• For safeguarded site S4, any new access to the SRN would need to comply with the DfT Circular 01/2022 and comply with DMRB standards</li> </ul>	<p>by the Council but have not been selected for allocation have the reasoning detailed in the site selection pro-forma and SA. The SA tested growth scenarios above the minimum housing need requirement. The major issue is the extent of Green Belt release required to meet housing need which has negative implications for a number of SA objectives. Detailed justification for release of Green Belt sites is set out in the Green Belt Topic Paper. Evidence base documents including the SHLAA and ELAA are updated annually to monitor the need for future housing and employment land needs. The plan has been supported by evidence which has informed an appropriate contribution to the HMA shortfall.</p> <p>A reassessment of sites was undertaken and in line with NPPF (September 2023) paragraph 141a the Plan makes as much use as possible of suitable brownfield sites and underutilised land, leading to the Council’s decision to reduce the number of sites to be removed from the Green Belt. It is considered that the Council’s approach to the plan and the inclusion of large strategic sites to meet the housing need is in line with national policy.</p> <p>The Green Belt boundaries where possible use identifiable features including natural ground features, manmade structures and where relevant land ownership. Compensatory mitigation for loss of Green Belt would be considered as part of an application submission in line with Policy SO7.7’s consideration of Green Belt mitigation. The intention was not to be overly prescriptive or restrictive, but to highlight compensatory measures sought - it is acknowledged that not all would apply</p> <p>The Council is seeking to support existing business parks which have potential to expand in future to encourage longer term investment planning and to ensure a future supply of employment land. Any future iteration of the Local Plan would explore all options for employment development on additional suitable, available and deliverable land. Planning permission for the permanent development of safeguarded land will only be granted following a Local Plan review which proposes the development. At this present time the Council has been unable to identify sites outside the Green Belt to meet economic development needs and is therefore seeking to safeguard land in line with the provisions in the NPPF.</p> <p>It is recognised that there are a number of sensitivities relating to development adjacent to Cannock Extension Canal SAC which would require further detailed assessment, and consultation with organisations responsible for protecting the Canal and local residents if the site were to be required for employment development in future. The Council will liaise with Natural England to ensure the appropriate assessments are undertaken for sites close to protected areas and that mitigation strategies in place to avoid any adverse effect.</p> <p>The Council have undertaken consultation events within the Local Area in line with legislation and all documents have been made available at all stages within the local libraries, at the Civic Centre and on the Council’s website in line with the Statement of Community Involvement. The Local Plan will be examined in line with the transitional arrangements set out in the NPPF.</p> <p>Any major development would be required to submit Transport Assessments and Travel Plans. The Council recognise that site S4 would have direct access to the A5 and will work with National Highways on an appropriate junction arrangement.</p>
<p>SO7.8 Protecting, Conserving and Enhancing Green Infrastructure</p>	<ul style="list-style-type: none"> <li>• Support policy, include reference to Natural England green infrastructure standards and Local Nature Recovery</li> <li>• Disagree that all new homes should contribute to sport and recreation where no identified need.</li> <li>• Require public open space in all developments based on an amount per dwelling</li> </ul>	<p>Residents in all parts of the District will use sport and recreation facilities, and existing facilities will also need to be upgraded and replaced. The policy wording provides the basis to use locally defined minimum standards to determine where facilities are required and the relevant contributions towards them. Policy wording is included in the Local Plan and supporting evidence to support green infrastructure and local nature recovery.</p>

<p>STRATEGIC OBJECTIVE 8: SUPPORTING A GREENER FUTURE</p>	<ul style="list-style-type: none"> <li>• General support is expressed for the strategic objective</li> <li>• The policy should be renumbered to reflect the importance of the environment</li> </ul>	<p>The Vision and Priorities identified in the Councils Corporate Plan have informed the strategic objectives. It is the Policy wording, not the order of the content that recognises the importance of issues covered.</p>
<p>SO8.1 Low and Zero Carbon Energy and Heat Production</p>	<ul style="list-style-type: none"> <li>• Support presumption for low and zero technology but concerned tests for renewable energy facilities may impact deliverability</li> <li>• Better energy efficiency of buildings should based on strict viability tests</li> <li>• Encourage green energy in rural areas and district heating systems in urban areas</li> <li>• Provide more information on renewable power, larger scale generation and carbon sinks</li> <li>• Recognise supporting infrastructure including battery storage</li> </ul>	<p>The policy supports the provision of low and zero carbon energy and heat production in all development proposals, and does not exclude energy storage as part of an installation, while Policy SO8.2 ensures that all development should achieve the highest level of building performance standards. The findings of the Staffordshire Climate Change Adaption and Mitigation Strategy have been considered in the development of the final policy approach.</p> <p>The Council will use Design Guidance to support implementation of proposals in the plan.</p>
<p>SO8.2 Achieving Net Zero Carbon Development</p>	<ul style="list-style-type: none"> <li>• Support is given to the promotion of carbon neutral development</li> <li>• Several points are made regarding that the policy is a duplication of national building regulations, that SO8.3 already includes net zero carbon development, and that Local carbon reduction targets are therefore unnecessary and may be technically difficult to deliver.</li> <li>• Standards should be standardised and not set by the Council to reduce costs and complexity for developers</li> <li>• The policy should require all development to use non-fossil fuel heating and the highest level of building performance standards.</li> </ul>	<p>Support for addressing carbon emissions at source in the plan is welcomed.</p> <p>The developments will be required to detail how they will achieve the lowest carbon emissions that can practically and viably be achieved and how they incorporate sustainable design. Policy SO8.1 supports the provision of low and zero carbon energy and heat production in development proposals while Policy SO8.2 ensures that all development should achieve the highest level of building performance standards. This approach is supported through the Staffordshire Climate Mitigation and Adaption Strategy. The policy was drafted with the intention to ensure the most sustainable construction and design is implemented</p> <p>To achieve the policy aims the Council are placing more responsibility on developers to show what is possible, the policy is flexible where viability does not support this approach. The Council consider that the policy has been written in line with the findings of the relevant evidence to support the local plan. It is considered that the viability of the site and the development's accordance with the Local Plan policies would be considered at the Planning Application stage.</p>
<p>SO8.3 Sustainable Design</p>	<ul style="list-style-type: none"> <li>• The policy repeats national policy and has not been subject to a viability assessment.</li> <li>• Objection to the requirement for all major development proposals to incorporate sustainable design</li> <li>• Water standards are best set by Building regulations and not Local Plans</li> <li>• Policy should consider building regulations updates and impacts on viability of affordable housing</li> <li>• Ensure the policy is compatible with the aims of the historic environment</li> </ul>	<p>The policy was drafted with the intention to ensure the most sustainable construction and design is implemented in all new developments to maximise the potential to mitigate the impact of climate change. The Local Plan works alongside other legal frameworks and is not intended to replace them. The plan has been subjected to testing of the financial impact of policies in the Viability Report 2022.</p> <p>It is considered that in conjunction with other policies within the Local Plan all heritage assets are protected with the requirement for new design to respect and reflect local character and distinctiveness.</p>
<p>SO8.4 Managing Flood Risk</p>	<ul style="list-style-type: none"> <li>• The policy is supported but include reference to SUDS in all major development</li> <li>• Policy is only considered necessary in areas at risk of flooding</li> <li>• Concern at age and detail of flood risk assessment</li> <li>• Building on fields potentially causes flooding issues which could worsen with climate change and affects surrounding residents</li> </ul>	<p>All major development will be subject to local and national policy regarding flood risk mitigation. Developments will require a drainage strategy and will be required to incorporate Sustainable Urban Drainage Systems (SUD's).</p> <p>The policy intention is to avoid sites at risk of flooding if there are alternative sites available in areas of lower risk, not to apply the policy to sites where it is not required.</p> <p>Comments by The Environment Agency at the previous consultation stage did not suggest the evidence required updating, it is anticipated that planning applications for strategic sites will require flood and drainage strategies to present a more in depth consideration of potential impacts and mitigation for those sites.</p>
<p>SO8.5 Avoiding Air, Water, Soil, Noise and Light Pollution</p>	<ul style="list-style-type: none"> <li>• The impact of development on the natural environment should be assessed with the provision of waste water removed as it is a separate legal process. There is a need to protect groundwater quality, water efficiency, water quality and drainage and recognise impact of pollution on the historic environment</li> </ul>	<p>The Council does not consider it to be an unreasonable position to seek to avoid unacceptable impact on the natural environment or to seek to avoid pollution through new development. The policy seeks to protect water quality regardless of any separate legal framework.</p> <p>In drafting the policy the Council has used the evidence from the SFRA taking a balanced approach, and has not sought to be overly explicit in terms of the level of detail on each element</p>

	<ul style="list-style-type: none"> <li>The policy is contrary to the NPPF provisions on pollution and AQMAs, while the Council has provided no evidential basis for going beyond national policy for pollution mitigation and AQMAs</li> <li>The policy wording should recognise land instability as a risk to development.</li> <li>There is no definition of best and most versatile (BMV) agricultural land nor high quality agricultural land within the Plan</li> <li>Policy is considered sound but room for improvement on culverts, SUDS and other areas. The Council may seek to update or provide an addendum for the SFRA to confirm that the latest allowances would not represent an increased impact on flood risk on those sites allocated within the Plan.</li> </ul>	<p>highlighted in the representation. Local Plan evidence should be proportionate and therefore it was considered that the SFRA was fit for purpose to support the Local Plan.</p> <p>In drafting the policy the Council has used the evidence from the SFRA and WCS taking a balanced approach</p> <p>Factors relating to sustainability such as whether the site is BMV have been provided detailed consideration in the Sustainability Appraisal and Site Selection Methodology. The Council consider the wording of policies to be sound and legally compliant but respects the expertise of Historic England in relation to the historic environment.</p>
SO8.6 Brownfield and Despoiled Land and Under-Utilised Buildings	<ul style="list-style-type: none"> <li>Support policy but note that viability of brownfield sites will be limited and not deliver community benefits. There should also be a focus on brownfield sites in the Green Belt</li> <li>The policy should emphasise it only relates to previously developed land</li> <li>Support opportunities to remediate unstable land in areas of former mining activity to enable development and support developments that enhance soils and reduce disturbance</li> </ul>	<p>The Council welcomes support for the focus on brownfield sites and notes that many brownfield sites have issues with viability, but re use and redevelopment should still be prioritised to make the most effective use of land in line with national policy. The policy notes that it applies to all sites 'where appropriate' so will not apply to all sites.</p> <p>The Council notes the coal mining legacy and supports work by stakeholders to enable development and the policy is clear that development proposals which will cause unacceptable on-site or off-site risk or harm to human health or the natural environment will not be permitted.</p> <p>The Council note the comments with regards to consideration of brownfield sites within the Green Belt, and these sites have been assessed as part of the Plan process</p>
SO8.7 Safeguarding Mineral Reserves	<ul style="list-style-type: none"> <li>The policy is unnecessary and replicates the Staffordshire Minerals Plan.</li> <li>Support policy with word change regarding removal of reference to specific minerals</li> </ul>	<p>The policy was drafted in support of the Staffordshire Minerals Local Plan, CCDC notes the suggested amendments which add clarity</p>
SO8.8 Managing Waste	<ul style="list-style-type: none"> <li>No specific points raised, except in relation to a site specific policy for a housing site near to waste facility.</li> </ul>	<p>The Policy notes the importance of waste facilities and the need to mitigate against any adverse impacts on their operation.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Cannock Chase Council Response
Site Allocations		
Strategic Site Specific Policy SH1 Land south of Lichfield Road, Cannock	<ul style="list-style-type: none"> <li>• Concerns raised with regards to the strain on local infrastructure including highways network, schools, GPs and Dentists</li> <li>• Concerns raised on the additional traffic that the development would bring and the congestion on the roads and at Five Ways Island</li> <li>• Loss of Green Belt land</li> <li>• Harm to local flora and fauna in particular Deer</li> <li>• Concerns raised that local environmental issues including flooding, could worsen with increased development</li> <li>• Policy should also include a requirement for an assessment of noise and mitigation measures implemented as part of the housing development to ensure there is no impact on the residents from the permitted operations at Poplars</li> <li>• Clarity sought over the 10% BNG requirement and considers that the community parkland should be taken into account</li> <li>• One comment raised that the policy guidance for the site is too inward looking and does not reflect that the site sits within existing ecology, green infrastructure and footpath networks.</li> <li>• One comment raises that the list of proposed sites should fully identify site vulnerabilities in terms of land contamination, ground water vulnerability, proximity to regulated industrial processes/landfill and flood risk from unmodelled watercourses and recommend these be clearly identified for transparency</li> <li>• A number of comments have been raised with regards to Cannock Chase meeting the needs of neighbouring authorities (particularly West Midlands and Birmingham) and that it is considered that there is no obligation to meet the overflow requirements of cities 20 miles away.</li> </ul>	<p>The impact on local infrastructure has been considered with infrastructure providers which has informed the Infrastructure Delivery Plan and the policy requirements for Site Allocations SH1 and SH2. The scale of development proposed will generate contribution to existing services such as GPs and will provide a new 2FE primary school and relief road, as well as improvements to existing junctions.</p> <p>The Council have considered Green Belt release in order to meet development needs and have exhausted all reasonable alternative options before reaching this conclusion, as set out in the Green Belt Topic Paper.</p> <p>The policy requirements for the Site Allocations, require applications to be supported by a Drainage Strategy, and to incorporate new or enhanced attenuation ponds and SuDS features to provide suitable drainage systems on the site and to help flood mitigation. Where possible, porous materials should be incorporated to allow rain to soakaway.</p> <p>Surveys will be required to identify potential impacts on local wildlife species and habitats and specific mitigation measures may be required to avoid adverse effects. All development is required to deliver biodiversity net gain.</p> <p>Policy SH1 already commits to an odour assessment so it is suggested the need for a noise assessment is added to the policy to address the concerns raised.</p> <p>The policy is not explicit with regard to BNG at this stage as this is a newly emerging requirement which will be informed by the habitats and natural features on site.</p> <p>A description of the site is provided prior to Policy SH1 which identifies the sites surroundings and proximity to existing ecology, green infrastructure, and footpath network. The policy intention was to identify site specific criteria that developers would require to consider alongside the wider Local Plan as part of the application process.</p> <p>The Council have used evidence to inform the development considerations of policy and therefore where known, the policies do identify site vulnerabilities in the relevant text.</p> <p>The contribution towards the existing unmet needs of the GBBCHMA is based on the collective evidence set out in the Joint Growth Strategy which presented options including the 500 dwelling figure. The study outlined that if all authorities meet the minimum contribution recommended through the study then the shortfall could be met, although it is acknowledged the position is changing. The CCDC contribution was based on an understanding that under the Duty to Cooperate all authorities in the HMA would exhaust options to accommodate the shortfall, including through Green Belt reviews.</p>
Strategic Site Specific Policy SH2 - Land east of Wimblebury Road, Heath Hayes	<ul style="list-style-type: none"> <li>• Concerns raised with regards to the strain on local infrastructure including highways network, schools, GPs and Dentists</li> </ul>	<p>The impact on local infrastructure has been considered with infrastructure providers which has informed the Infrastructure Delivery Plan and the policy requirements for Site Allocations SH1 and SH2. The scale of development proposed will generate contribution to existing services such</p>

	<ul style="list-style-type: none"> <li>Concerns raised on the additional traffic that the development would bring and the congestion on the roads and at Five Ways Island</li> <li>Loss of Green Belt Land</li> <li>Harm to local flora and fauna</li> <li>Some comments raised concerns with the proposed relief road and that it will increase the heavy congestion not to mention the pollution levels of more cars in the area</li> <li>Some comments raised concerns with regards to the historic mining in the area and whether it is sensible to build housing on the land</li> <li>One comment raised that the land allocated for the relief road for the development uses land that has been safeguarded and queries whether it is the intention to actually allocate this land anyway</li> <li>A number of comments have been raised with regards to Cannock Chase meeting the needs of neighbouring authorities (particularly West Midlands and Birmingham) and that it is considered that there is no obligation to meet the overflow requirements of cities 20 miles away.</li> </ul>	<p>as GPs and will provide a new 2FE primary school and relief road, as well as improvements to existing junctions.</p> <p>The Council have considered Green Belt release in order to meet development needs and have exhausted all reasonable alternative options before reaching this conclusion, as set out in the Green Belt Topic Paper.</p> <p>Surveys will be required to identify potential impacts on local wildlife species and habitats and specific mitigation measures may be required to avoid adverse effects. All development is required to deliver biodiversity net gain.</p> <p>Staffordshire County Council Highways Team have undertaken modelling with regards to the sites individual and cumulative impacts on the surrounding highways network and the introduction of the relief road as part of the required infrastructure for the developments. Further to this, the Policy requirements for the Site Allocations require a Transport Assessment and Travel Plan to support the application.</p> <p>The developer will be required to undertake site surveys and the site layout or construction plan may need to account for ground constraints.</p> <p>The relief road is a significant infrastructure requirement to be brought forward to enable the development of sites SH1 and SH2, whilst the relief road does pass through an area of Safeguarded Land within the Plan (Site S1) this allocation safeguards the land for future residential development beyond the Plan period and would not prevent the strategic infrastructure route coming forward prior to the release of this land for development.</p> <p>The contribution towards the existing unmet needs of the GBBCHMA is based on the collective evidence set out in the Joint Growth Strategy which presented options including the 500 dwelling figure. The study outlined that if all authorities meet the minimum contribution recommended through the study then the shortfall could be met, although it is acknowledged the position is changing. The CCDC contribution was based on an understanding that under the Duty to Cooperate all authorities in the HMA would exhaust options to accommodate the shortfall, including through Green Belt reviews.</p>
<p>Strategic Site Specific Policy SH3 Land to the rear of Longford House, Watling Street</p>	<ul style="list-style-type: none"> <li>One representation sought a higher density figure and suggested the developable area was too restrictive, however they supported the principle of the allocation.</li> </ul>	<p>The density is expressed as a minimum based on what is generally appropriate for different areas in the district. The policy does not restrict higher densities if supported by evidence. This is also the case for the developable area of the site which has been based on evidence provided to date.</p>
<p>Strategic Site Specific Policy SH6 Former Hart School, Burnthill Road, Rugeley (Hagley Park)</p>	<ul style="list-style-type: none"> <li>One comment raised that the site would result in the loss of playing field land and that no details have been submitted demonstrating that the playing field land is surplus to requirement.</li> </ul>	<p>It should be noted that the school closed in 2018 and the pitch has not been utilised the closure, also since the closure of the school there has been improvements to the facilities at the adjacent Leisure Centre and the ongoing commitments for provisions at the All Through School on the Former Rugeley Power Station site.</p>
<p>Strategic Site Specific Policy SM1 Land at the Former Rugeley Power Station</p>	<ul style="list-style-type: none"> <li>One comment raised that the development will be developed following site-specific criteria in the guidance on development close to NGET Assets</li> <li>One Comment raised that the sports provision identified within the policy is not aligned to that proposed to be delivered at the site through planning permission (Lichfield District Council: 19/00753/OUTMEI)</li> <li>One comment raised that there is a discrepancy between the figure stated at Table F of the consultation document (3.5ha) and policy SM1 (5ha)</li> <li>Raised that the changes identified to the scheme should be adopted to ensure that there is sufficient scope for development to come forward under the allocation and respond to the potential for amendments to the outline planning permission to be made and sufficient flexibility for the approval of reserved matters</li> </ul>	<p>Guidance regarding NGET Assets and how to ensure development does not adversely impact on essential infrastructure is welcomed. National Grid have been consulted throughout the plan process to ensure that none of the site allocations would compromise operation of the electricity network. The planning application stage would ensure that development has been designed in consideration of the NGET Design Guide and Principles.</p> <p>Any factual inaccuracies regarding the site were unintentional and can be corrected through modifications to the plan.</p> <p>The figure at Table F is correct an amendment to the figures shown in Policy SM1 can be undertaken through a minor modification to the plan</p> <p>The policy was formed on the basis of the approved outline planning permission for the site, which does not include the changes proposed within the representation, any proposed changes by the applicant to the approved plans would need to be subject to a revised or new planning application for the site.</p>
<p>Strategic Site Specific Policy SE1 Kingswood Lakeside Extension 2, Norton Canes</p>	<ul style="list-style-type: none"> <li>Some comments raised that the link to Norton Canes is important for the sustainability of the site and that the existing public footpath running from the south-west of Norton Canes towards Kingswood, exits on to Washbrook Lane requires realignment and improvement.</li> </ul>	<p>The policy identifies that provision of a network of pedestrian, cycle and vehicular ways to connect to and integrate with the existing employment site and Norton Canes should be considered as part of any application submitted for the site, whilst the Council recognise that this</p>

	<ul style="list-style-type: none"> <li>• One comment identified that the development site crossed or is in close proximity to NGET assets. It is raised that the policy should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure.</li> <li>• One comment raised some factual inaccuracies in the description of the site as well as further details considered appropriate for the Policy to consider</li> <li>• One comment raised that the reference to a new community park is incorrect and that there is no capacity for this but that the aim is to improve the SBA and publicly accessible area</li> <li>• It is raised that the site allocations proximity to designated features could potentially impact on them as a result of increased recreational pressure, water quantity and quality and air, and that specific assessments and mitigation measures are likely to be required to ensure habitats are protected and air and water quality are not adversely affected by development. It is considered that these have not always been listed in the policy wording.</li> </ul>	<p>is not in relation to the specific improvements identified, the scope of improvements provided by a site should be reasonable and evidenced where necessary.</p> <p>Guidance regarding NGET assets and how to ensure development does not adversely impact on essential infrastructure is welcomed. National Grid have been consulted throughout the plan process to ensure that none of the site allocations would compromise operation of the electricity network. The planning application stage would ensure that development has been designed in consideration of the NGET Guide and Principles.</p> <p>Any factual inaccuracies regarding the site were unintentional and can be corrected through modifications to the plan. Some of the information will have been derived from GIS mapping data held by the council so the policy addresses constraints which may require consideration at or prior to the planning application stage.</p> <p>The reference to community park was a reflection of the part of the site which is publicly accessible open space which should be enhanced through the development as compensatory mitigation for the loss of Green Belt land. The label 'community park' did not infer any additional enhancements beyond those agreed through joint working and can be removed if considered necessary by the Inspector to make the Local Plan sound.</p> <p>It is appreciated that there is concern regarding some proposed site allocations which are within close proximity to, or could have an impact on, designated sites. The Council will liaise with Natural England to ensure the appropriate assessments are undertaken and mitigation strategies in place to avoid any adverse effect. It is considered these requirements are explicit in the Local Plan, and that any recommendations through the Integrated Impact Assessment have been incorporated in the plan text. The strategic site allocation wording clarifies to landowners and developers the detailed work required to deliver the relevant proposed allocations.</p>
<p>Strategic Site Specific Policy SE2 Watling Street Business Park Extension</p>	<ul style="list-style-type: none"> <li>• A number of comments raised that the policy gives no indication of what the compensatory improvements for the release of the Green Belt land might be.</li> <li>• Some comments raised that the policy says nothing about the need to connect with Norton Canes, to pick up the crossing of the A5 from the Spatial Strategy and make the site sustainable, or to connect with local green infrastructure, the canal network and heritage assets at the former Grove Colliery, with these being linked to the potential release of the safeguarded site S4 at Para 6.335 of the Plan.</li> <li>• One comment raised that the parcel of land adjoining to the proposed allocation should be included within it to enable full delivery of an employment site to allow for employment to be delivered on an appropriate site within the Green Belt, rather than additional land being allocated elsewhere. Further to this, it is considered that this parcel of land can be an employment allocation which offers a mixed use element including the relocation a Travelling Showpeople site on to the parcel of land.</li> <li>• One comment raises that the boundary to the site should be altered to incorporate the existing business park and the existing pond to the east</li> <li>• One comment raised some factual inaccuracies in the description of the site as well as further details considered appropriate for the Policy to consider</li> </ul>	<p>The Green Belt Topic Paper and relevant policy set out compensatory mitigation where known at the time of writing, negotiations are still ongoing with regards to final mitigation requirements and would be considered as part of an application submission in line with Policy SO7.7s consideration of Green Belt mitigation and in line with national requirements.</p> <p>The concern is noted to the crossing at the A5 being connected to the safeguarded land site S4. The Council are in continuing discussions with County Highways and the agents for site SE2, it is considered that the examination process offers the appropriate forum for consideration of details suggestions, if the Inspector consider ant necessary to make the plan sound.</p> <p>The Council assessed the identified land adjacent to the site allocated as part of a wider site in the site selection methodology, after further review of the site it was not taken forward into the Reg 19 Plan for allocation. It is also noted that no evidence has been provided to demonstrate that the owners of site SE2 have been contacted regards to the required access to the identified site which would reduce the deliverability of this site at this stage.</p> <p>The request for the boundary change is acknowledged, it is considered that the site boundary is appropriate and in line with previous submissions by the representee with regards to the site allocation of SE2. The existing Watling Street Business Park is not considered by the Council to form part of the SE2 site allocation and is identified as a redevelopment of an existing employment area safeguarded under policy SO4.1 of the Plan.</p> <p>Any factual inaccuracies regarding the site were unintentional and can be corrected through modifications to the plan. Some of the information has been derived based on the combined allocation of SE2 and the redevelopment of the Existing Business Park, this is incorrect as site allocation SE2 does not comprise the redevelopment of the Watling Street Business Park.</p>
<p>Site Specific Policy E14 Hill Farm, 84 Hayfield Hill, Cannock Wood</p>	<ul style="list-style-type: none"> <li>• One comment raises that the site boundary of E14 to extend the red line boundary to align with the land ownership boundary for Hill Farm and alter the site area to read 0.62ha.</li> <li>• It has been asked for a change to the address to show Hill Farm, 82 Hayfield Hill</li> </ul>	<p>The boundary of the site is based on the site boundary within the ELAA promoted through either a Planning Application and/or Call for Sites Submission. The Council used the most up to date information to date to attribute the site boundary and in turn the site area, but it is acknowledged that this may change over time and that an update to the site boundary is being proposed through this representation. If a modification is required to update the site boundary and site area it is considered that this can be undertaken through the examination process.</p>

**Schedule 1:** High-level of summary of the key issues raised including those of soundness, legal compliance and compliance with the duty to co-operate within the duly-made representations received on the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan

Site Specific Policy H52 Gregory Works, Armitage Road, Brereton	<ul style="list-style-type: none"> <li>One comment raised that the proposed housing use of the site should be broadened to allow for its potential use in meeting care and the site is readily available and deliverable</li> </ul>	The site specific policy for H52 provides an indicative dwellings yield of 23 dwellings. It does not state the type of housing to be provided on the site and does not prevent the provision of specialist housing on the site, so no changes are required to the policy.
Site Specific Policy H35 Land at Girton Road/Spring Street, Cannock	<ul style="list-style-type: none"> <li>One comment raised that the proposal is sited on playing field land, and that there should be a criteria within the policy stating that the land shall not be developed upon unless it has been demonstrated that the playing field land is surplus to requirement or replacement field land is secured and delivered in line with proposed local plan policy SO2.3</li> </ul>	The Council consider the wording of the policy to be sound and legally compliant but respects the expertise of Sports England. The examination process offers the appropriate forum for consideration of detailed suggestions, if the Inspector considers any necessary to make the plan sound.
Site Specific Policy H61 Cannock Chase High School, Lower Site Campus, Hednesford Road	<ul style="list-style-type: none"> <li>One comment raised that the proposal is sited on playing field land, and that there should be a criteria within the policy stating that the land shall not be developed upon unless it has been demonstrated that the playing field land is surplus to requirement or replacement playing field land is secured and delivered in line with proposed local plan policy SO2.3</li> </ul>	The Council consider the wording of the policy to be sound and legally compliant but respects the expertise of Sports England. The examination process offers the appropriate forum for consideration of detailed suggestions, if the Inspector considers any necessary to make the plan sound.
Site Specific Policy H50 Nursery Fields, St Michaels Road, Brereton	<ul style="list-style-type: none"> <li>One comment raised that the proposal is sited on playing field land, and that there should be a criteria within the policy stating that the land shall not be developed upon unless it has been demonstrated that the playing field land is surplus to requirement or replacement playing field land is secured and delivered in line with proposed local plan policy SO2.3</li> </ul>	The Council consider the wording of the policy to be sound and legally compliant but respects the expertise of Sports England. The examination process offers the appropriate forum for consideration of detailed suggestions, if the Inspector considers any necessary to make the plan sound.
Policy SA1: Site Allocations	<ul style="list-style-type: none"> <li>One comment raised that the capacity in Table B of the policy relating to site E14 requires including along with the address being amended</li> <li>Support regarding certain policy clauses relating to the natural environment</li> <li>One comment raises a factual inaccuracy with the address for site GT1</li> </ul>	It is considered that a minor modification can be undertaken for both of these elements within the policy CCDC welcomes the detailed comments of support to various Strategic Objectives and Policies as the Council sought to ensure the natural environment is provided appropriate consideration, protection and enhancement throughout the Local Plan. Any factual inaccuracies regarding the site were unintentional and can be corrected through modifications to the plan.