

Cannock Chase Council: Cannock Chase Local Plan Representation Form



and your data will not be shared. You may unsubscribe at any time by email or writing to us using the details on this form. Data will only be held until adoption of the Cannock Chase Local Plan.

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

Part B: Representation Form

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

Part B: Representation

| | |
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| Name and Organisation: | Stantec on behalf of Rugeley Power Limited (RPL) |
|------------------------|--|

Q1. To which document does this representation relate? (Please tick one box)

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

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

| | | | | | | | |
|-------------|--|---------|---------------------------------|-------|--|---------------|--|
| Para-graph: | | Policy: | General Comments on plan period | Site: | | Policies Map: | |
|-------------|--|---------|---------------------------------|-------|--|---------------|--|

Q3. Do you consider the Cannock Chase Local Plan is:

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

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

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Paragraph 22 of the National Planning Policy Framework (NPPF), December 2023, provides that strategic policies should look ahead over a minimum 15-year period from adoption. The Local Development Scheme for Cannock Chase, December 2023, anticipates adoption Summer 2025.

It is encouraging that the Council intend on submitting the Draft Plan for examination in Summer 2024, but the overall timeline may not be realistic. There is likely to be an election this year (2024) and further reforms to the planning systems seem a reasonably likely prospect in the immediate future. Changes being even more likely should there be a change in government. Equally, there is no allowance for any revisions to the Draft Plan that may be sought by the Inspector following examination.

(Please continue on a separate sheet if necessary)

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

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We therefore consider the evidence base and Plan period should be extended until at least 2042 to reflect potential delays to the adoption of a new Local Plan

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

Yes, I wish to participate in hearing session(s)

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We consider that it is necessary to attend the hearing sessions. Rugeley Power Station is a significant component of the Council's spatial strategy and therefore RPL can assist the examination process by responding to site specific matters and how the Site has potential to achieve higher levels of growth than currently planned for.

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Signature: [REDACTED]

Date: 26.03.2024

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| Para-graph: | | Policy: | POLICY SO3.1 PROVISION FOR NEW HOMES | Site: | | Policies Map: | |
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Policy SO3.1 provides an overarching strategy for the delivery of housing over the plan period (2018-2040). A minimum of 5,808 dwellings are to be distributed in accordance with the spatial strategy and site allocations within the Draft Plan.

The Draft Plan states this figure has been calculated using the standard methodology for calculating housing which is consistent with paragraph 61 of the NPPF and the PPG which advises that the standard method should form the starting point for establishing the housing requirement for an area.

In addition, 500 dwellings are proposed to meet the unmet need of the GBBCHMA, specifically the Black Country's unmet need of 28,239 dwellings, which brings the total minimum number of dwellings to be delivered up to 6,308.

The most recent addendum to the Greater Birmingham and Black Country Housing Market Area Housing Need and Housing Land Supply Position Statement, published April 2023, provides that the Black Country shortfall was calculated using data which extended to April 2021. Therefore, it does not take into account the 35% uplift for Birmingham required under the new standard method.

It is acknowledged that following Dudley Metropolitan Borough Council's withdrawal from the Black Country Plan in October 2022 and subsequent cessation of work on that plan there may be as yet unknown impact on housing need. It appears likely that this will result in a reduced collective contribution from the previously involved authorities to the unmet housing need in the Black Country.

However, this does not diminish the requirement under paragraph 11b) of the NPPF that 'strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...'.

We note the Duty to Co-operate Statement of Compliance (December 2023) provides that the figure of 500 dwellings was arrived at by virtue of the policy constraints in CCDC. It should also be noted that this figure was a matter of uncommon ground between the authorities in the GBBCHMA with a number of authorities contending that CCDC could accommodate a greater proportion of the unmet housing need from the Black Country.

Discussions between the GBBCHMA authorities on the release of Green Belt showed a divergence in approach between them. Dudley Metropolitan Borough Council has clarified it does not intend on releasing land from the Green Belt to meet housing or employment needs and other authorities are reviewing their position following the updated NPPF in December 2023.

We submit that given the relationship between CCDC and the Greater Birmingham housing market area further justification is required why a higher proportion of the unmet need from the Black Country cannot be met by CCDC. Consideration should be given to densification of development on previously developed land particularly where those sites are located outside of the Green Belt.

In light of the Government's ongoing consultation on strengthening planning policy for brownfield development, due to close on the 26th of March, the Draft Plan should make further provision for development on previously developed land.

While the proposed change to the wording of paragraph 129c) of the NPPF may not be adopted in the form currently consulted on it is illustrative of wider changes in national policy which place a strong emphasis on maximising the density of development delivered on previously developed land.

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



Policy SO3.1 goes on to state that development will achieve an average site density of 50dph in Cannock, Rugeley and Hednesford town centres and 35dph in the suburban areas. No comment is offered on whether these densities are appropriate for those locations, but it is considered that the policy would benefit from taking a supportive stance in relation to the delivery of higher densities where it can be shown to be appropriate and justified by suitable evidence. We firmly believe that opportunities for higher densities on sustainable previously developed sites should be taken and this is undoubtedly the direction of travel of government policy.

We welcome the recognition within Policy SO3.1 of the role the redevelopment of Rugeley Power Station will play in meeting housing needs on previously developed land.

The Government's ongoing consultation states local planning authorities should give significant weight to the benefits of delivering as many homes as possible, especially where this involves land which is previously developed land. It goes on to state that local planning authorities should take a flexible approach in applying planning policies or guidance relating to the internal layout of development to ensure that densities are maximised.

In relation to the OPP, the areas of the Site within the CCDC boundary are predominantly areas of higher density (75dph) but the developable area is limited by a cap on land use which limits the built footprint to 30% of the area identified for residential development. Policy SO3.1 should provide express support for maximising not only the density of development within the developable area of a site but also ensuring that the developable area of sites is maximised and build on the approach currently set out at paragraphs 123, 124 and 129 of the NPPF. This could enable a higher level of housing delivery on the Rugeley Power Station Site.

(Please continue on a separate sheet if necessary)

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Increase the contribution to meeting the identified shortfall in housing provision in the Black Country.

Positively acknowledge and support the potential to deliver higher densities on sites where it can be shown this appropriate.

Given that the new Local Plan is unlikely to be adopted until 2026 the plan period should be extended to 2042 to ensure it covers the necessary 15-year period.

(Please continue on a separate sheet if necessary)

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**Cannock Chase Council:
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Signature: [REDACTED]

Date: 26.03.2024

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

| | | | | | | | |
|-------------|--|---------|---|-------|--|---------------|--|
| Para-graph: | | Policy: | POLICY SO3.3: DELIVERING HIGH QUALITY HOUSING | Site: | | Policies Map: | |
|-------------|--|---------|---|-------|--|---------------|--|

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Policy SO3.3 provides guidance in relation to the design of new development and requires development to meet the Nationally Described Space Standards and encourages consideration of a range of housing options which may be suitable for those with health problems and disabilities.

Policy SO3.3 requires all new build housing to meet Category M4(2) (Accessible and Adaptable dwellings) of Approved Document M: access to and use of buildings, unless it is built to M4(3) standards. With At least 5% of housing on major development sites must be wheelchair user dwellings equivalent to M4(3) of the Building Regulations. This should increase to 10% of affordable housing delivered for wheelchair users.

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While RPL welcome the substance of Policy SO3.3 insofar as the needs of all future occupiers should be recognised and supported through the delivery of appropriate housing options. We are concerned that the viability of these measures has not been tested. Policy SO3.3 relies on the Cannock Chase District Council Housing Needs Assessment, January 2024.

Cannock Chase District Strategic Housing Land Availability Assessment 2023 provides that the District can currently demonstrate a housing land supply of 4.02 years, which would likely fall as a result of the cost and density implications of the proposed policy. This falls short of the five-year supply required until a new Local Plan is adopted, triggering the provisions of paragraph 226 of the NPPF which reduce the requirement to a four year supply where a Local Plan has been adopted within five years. However, even if a new Local Plan were adopted the current housing land supply would be marginal.

For SO3.3 to be considered sound it must be supported by proportionate evidence. In the context of a marginal housing land supply figure and no consideration of the impact on viability or density it is considered that the evidence to justify the policy is insufficient and therefore the policy cannot be considered sound. Further, the consequence of the policy as currently written would be that the housing land supply position would worsen given the likely impact on density and viability.

Until either a proportionate justification of the potential impact on housing densities or the suggested change to its wording is adopted Policy SO3.3 is considered unsound.

(Please continue on a separate sheet if necessary)

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

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|-----------------|--|---------|---|-------|--|------------------|--|
| Para- graph: | | Policy: | POLICY SO4.2: PROVI- SION FOR NEW EM- PLOY- MENT SITES | Site: | | Policies Map: | |
|-----------------|--|---------|---|-------|--|------------------|--|

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Policy SO4.2 provides that CCDC will provide for up to 74 hectares of employment land to meet the future needs of the District. 22.81 hectares are identified by the policy as allocations with the remaining need to be met by windfall sites appropriate for the type of employment use identified. Guidance is offered in relation to the characteristics that are looked for in relation to different types of uses and how they should be distributed in accordance with the spatial strategy.

We note that Policy SO4.2 in the Draft Plan states that the need for employment land has increased when compared to that identified by the policy in the Preferred Options (Regulation 18) Consultation.

The uplift is from up to 50 hectares to up to 74 hectares. The uplift is justified in relation to updates to the evidence base, specifically the Economic Development Needs Assessment Update, January 2024, (the 'EDNA Update'). The EDNA Update considered eight scenarios which assess changes in the local labour market and wider market considerations, which included the long-term effects of Covid 19 and BREXIT along with changes in employment demand more broadly.

Of these eight scenarios only one identified a need for 74 hectares of employment land, and this represented the highest level of need of any of the scenarios considered. The EDNA update concluded that the employment need for the District ranged between 43 hectares and 74 hectares with the exact level of need being correlated to the labour supply.

The EDNA Update cautions against misalignment between housing targets and employment land targets as the former will directly impact the labour supply and will have an effect on the need for employment land.

Specifically, the EDNA Update notes that 'The SM2+ 500 dwelling Scenario 4 sits towards the lower end of this range. If the Council were to pursue this housing target in its Plan, then the level of employment land that would equate to Scenario 4 would be 46 ha net, 68 ha gross.'

For clarity, Scenario 4 is defined as the 'Current SM figure, plus 500 dwellings for unmet Black Country needs (287 dpa, or 6,308 dwellings over 22 years)'. This functionally represents the approach to housing need adopted by the CCDC in Policy SO3.1 of the Draft Plan.

This represents an apparent discrepancy between what can be justified by the evidence base relied on and the Policies proposed for adoption. We suggest that CCDC review the recommendations of the EDNA Update and undertake the detailed modelling recommended to justify the employment land target proposed under SO4.2.

Should this not be reviewed it is difficult to see how SO4.2 can be considered justified, effective, or consistent with national policy. In its current form the Policy is cannot be considered sound.

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The sites allocated for employment include the Site (SM1) for 3.5 hectares of employment land. Specific comments on the allocation will be made in relation to the site-specific policy SM1.

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| Para-graph: | | Policy: | POLICY SO5.1: ACCESSIBLE DEVELOPMENT | Site: | | Policies Map: | |
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Policy SO5.1 provides how the CCDC will seek to secure sustainable development by requiring all development to set out how and when the development will contribute towards the creation of infrastructure or implementation of measures that facilitate accessible development and sustainable transport options. Under the Policy a number of objectives and requirements are set out along with thresholds at which different levels of evidence to justify development will be sought.

The overall goal of the policy, and the plan objective it supports, are commended and supported. In particular the policy's recognition of the value and benefits associated with delivering walking and cycling routes in conjunction with green and blue infrastructure. Access routes integrated with green and blue infrastructure are more likely to be used therefore the public benefits associated with both are maximised.

However, the policy could provide guidance on whether additional weight could be afforded to developments that deliver more than the 'minimum' and provide significant public benefits through the investment in all forms of infrastructure. The approach suggested is considered to be a reasonable alternative and one consistent with national policy, specifically section 8 of the NPPF, and its adoption would assist in ensuring the policy is considered sound.

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

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

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

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



participate.

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

(Please tick one box)

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

We consider that it is necessary to attend the hearing sessions. Rugeley Power Station is a significant component of the Council's spatial strategy and therefore RPL can assist the examination process by responding to site specific matters and how the Site has potential to achieve higher levels of growth than currently planned for.

(Please continue on a separate sheet if necessary)

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

Signature: [REDACTED]

Date: 26.03.2024

Part B: Representation Form

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

Part B: Representation

| | |
|------------------------|--|
| Name and Organisation: | Stantec on behalf of Rugeley Power Limited (RPL) |
|------------------------|--|

Q1. To which document does this representation relate? (Please tick one box)

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

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

| | | | | | | | |
|-------------|--|---------|--|-------|--|------------------|--|
| Para-graph: | | Policy: | POLICY SO7.1: PRO- TECT- ING, CON- SERV- ING, AND EN- HANC- ING BIO- DIVER- SITY AND GE- ODIVER- SITY | Site: | | Policies Map: | |
|-------------|--|---------|--|-------|--|------------------|--|

Q3. Do you consider the Cannock Chase Local Plan is:

A. Legally compliant Yes: No:

B. Sound Yes: No:

C. Compliant with the Duty to Co-operate
(Please tick as appropriate). Yes: No:

| | | |
|----------------|------------------|--|
| For office use | Part B reference | |
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Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

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

Policy SO7.1 details the importance of protecting, conserving, and enhancing the natural environment. Development is required, under the policy, to demonstrate that it has identified ecologically sensitive or important sites and taken appropriate account for any potential impact on them, where possible and appropriate enhancements are to be secured.

This includes biodiversity net gain (BNG), but this is subject to Policy SO7.2 which we provide separate comments on.

We support the policy's vision but are concerned that it is focused on preventing adverse impacts. The policy provides that:

'Development proposals whose primary objective is to conserve or enhance biodiversity will be supported.

Opportunities to improve biodiversity in and around the development will be considered as part of the design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate. Biodiversity enhancement opportunities include the retention, enhancement and creation of habitats and ecological networks, and the creation of 'stepping stones' and wildlife corridors, following the application of the mitigation hierarchy. Enhancement features for wildlife within the built environment will be sought where appropriate from all scales of development.'

No comments are provided on the weight or support to be afforded to development proposals that include the enhancement of the natural environment as secondary objectives in the context of the wider delivery of development to meet the District's objectively assessed needs.

For policies to be considered justified and effective they must look at alternative strategies and how strategic matters can be addressed during the plan period. Clarifying that development that includes, whether as a primary or secondary objective, meaningful improvements to the natural environment will be supported and additional weight afforded to the public benefits associated with the delivery of ecological enhancement.

(Please continue on a separate sheet if necessary)

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

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan legally compliant or sound. It will be

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



helpful if you are able to put forward your suggested revised wording of any policy or text.
Please be as precise as possible.

For policies to be considered justified and effective they must look at alternative strategies and how strategic matters can be addressed during the plan period. Clarifying that development that includes, whether as a primary or secondary objective, meaningful improvements to the natural environment will be supported and additional weight afforded to the public benefits associated with the delivery of ecological enhancement.

(Please continue on a separate sheet if necessary)

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

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

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

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

Yes, I wish to participate in hearing session(s)

(Please tick one box)

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

We consider that it is necessary to attend the hearing sessions. Rugeley Power Station is a significant component of the Council's spatial strategy and therefore RPL can assist the examination process by responding to site specific matters and how the Site has potential to achieve higher levels of growth than currently planned for.

(Please continue on a separate sheet if necessary)

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

Signature: [REDACTED]

Date: 26.03.2024

Part B: Representation Form

Cannock Chase Council: Cannock Chase Local Plan Representation Form



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

Part B: Representation

| | |
|------------------------|--|
| Name and Organisation: | Stantec on behalf of Rugeley Power Limited (RPL) |
|------------------------|--|

Q1. To which document does this representation relate? (Please tick one box)

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

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

| | | | | | | | |
|-----------------|--|---------|---|-------|--|------------------|--|
| Para- graph: | | Policy: | POLICY SO7.2: BIODI- VER- SITY NET GAIN | Site: | | Policies Map: | |
|-----------------|--|---------|---|-------|--|------------------|--|

Q3. Do you consider the Cannock Chase Local Plan is:

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

| | | |
|----------------|------------------|--|
| For office use | Part B reference | |
|----------------|------------------|--|

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

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

Cannock Chase Council: Cannock Chase Local Plan Representation Form



Policy SO7.2 requires the delivery of mandatory BNG pursuant to the Environment Act 2021. All qualifying development is to provide a minimum 10% measurable BNG to be delivered as a consequence of the development. It goes on to state that the 10% net gain must be evidenced through a Biodiversity Gain Plan and the evidence provided of pre- and post-development biodiversity values. Development proposals which do not deliver or cannot evidence a net gain of at least 10% will be refused.

To ensure that net gain targets can be met across the District the Council should identify specific sites for the delivery of off-site BNG. This not only acts as a safeguard that ensures BNG targets are achieved but creates the opportunity for a more cohesive and efficient approach to the delivery of new habitats to be adopted. Not all sites have the capacity to achieve a net gain of 10% and limiting development to sites that are capable of doing so is likely to limit the delivery of small sites and have a negative impact on the ability of the District to meet its objective assessed needs.

Overall, we support the vision of the Policy but are concerned that it is framed in terms of preventing inappropriate development rather than supporting sustainable development. This is clearest where it states that development that does not achieve the required net gain threshold will be refused. No comment or support is afforded to development that exceeds the net gain threshold and therefore an opportunity to encourage further net gains has not been realised.

The policy would be better justified, and therefore more likely to be considered sound, where alternative approaches have been considered. We therefore suggest the following revised wording to the relevant section of the policy.

(Please continue on a separate sheet if necessary)

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

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

The policy would be better justified, and therefore more likely to be considered sound, where alternative approaches have been considered. We therefore suggest the following revised wording to the relevant section of the policy.

'Proposals which do not demonstrate that the post-development biodiversity value will exceed the pre development value of the onsite habitat by a 10% net gain will be refused. Additional weight will be afforded to development proposals that demonstrate that the post-development biodiversity value will exceed the pre development value of the onsite habitat by more than 10%, the additional weight to be afforded to the proposals will be proportionate to level of net gain above 10% that can be demonstrated.'

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



modification(s). You should not assume that you will have a further opportunity to make submissions.

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

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

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

Yes, I wish to participate in hearing session(s)

(Please tick one box)

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

We consider that it is necessary to attend the hearing sessions. Rugeley Power Station is a significant component of the Council's spatial strategy and therefore RPL can assist the examination process by responding to site specific matters and how the Site has potential to achieve higher levels of growth than currently planned for.

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Signature: [REDACTED]

Date: 26.03.2024

Part B: Representation Form

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Part B: Representation

| | |
|------------------------|--|
| Name and Organisation: | Stantec on behalf of Rugeley Power Limited (RPL) |
|------------------------|--|

Q1. To which document does this representation relate? (Please tick one box)

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

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

| | | | | | | | |
|-------------|--|---------|--|-------|--|---------------|--|
| Para-graph: | | Policy: | POLICY SO8.1: LOW AND ZERO CARBON ENERGY AND HEAT PRODUCTION | Site: | | Policies Map: | |
|-------------|--|---------|--|-------|--|---------------|--|

Q3. Do you consider the Cannock Chase Local Plan is:

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

| | | |
|----------------|------------------|--|
| For office use | Part B reference | |
|----------------|------------------|--|

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Cannock Chase Council: Cannock Chase Local Plan Representation Form



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

Policy SO8.1 supports development proposals for low and zero carbon (LZC) energy generation where it can be shown that the impact of the development, individually and cumulatively, can be appropriately mitigated.

We support the inclusion and vision of the policy and recognise the value of LZC energy generation to the transition towards sustainable energy. However, we note the policy does not extend to the infrastructure required for the effective function of many forms of LZC energy production, in particular battery energy storage systems (BESS). It is considered that the Rugeley Power Station site represents an ideal location for essential infrastructure such as a BESS given the position of a 400kv substation on the Site.

In order to ensure the LZC can be delivered flexibly we suggest the policy is expanded to include development proposals for infrastructure that supports the delivery LZC generation.

Policy SO8.1 provides support for the installation of LZC energy generation into existing development, subject to demonstrating the impact is acceptable. We support the broad approach adopted by this limb of the policy, particularly the objective to 'allow for adaptability to new LZC technologies that may emerge'. However, we consider it could be strengthened.

The transition to LZC energy generation would be better supported if the policy afforded weight to proposals that integrate LZC generation, without making it a requirement to do so. This would create an incentive for development to support the transition to LZC energy but would ensure that sufficient flexibility is retained to balance other material planning considerations such as viability and visual impact.

(Please continue on a separate sheet if necessary)

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

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Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

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

Yes, I wish to participate in hearing session(s)

(Please tick one box)

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

We consider that it is necessary to attend the hearing sessions. Rugeley Power Station is a significant component of the Council's spatial strategy and therefore RPL can assist the examination process by responding to site specific matters and how the Site has potential to achieve higher levels of growth than currently planned for.

(Please continue on a separate sheet if necessary)

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Signature: [REDACTED]

Date: 26.03.2024

Cannock Chase Council:
Cannock Chase Local Plan
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Part B: Representation Form

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Part B: Representation

| | |
|------------------------|--|
| Name and Organisation: | Stantec on behalf of Rugeley Power Limited (RPL) |
|------------------------|--|

Q1. To which document does this representation relate? (Please tick one box)

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

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

| | | | | | | | |
|------------|--|---------|---|-------|--|---------------|--|
| Paragraph: | | Policy: | STRATEGIC SITE SPECIFIC POLICY-LAND AT THE FORMER RUGELEY POWER STATION SITE REFERENCE: SM1 | Site: | | Policies Map: | |
|------------|--|---------|---|-------|--|---------------|--|

Q3. Do you consider the Cannock Chase Local Plan is:

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

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

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

Draft Policy SM1 reflects the development approved under the OPP and provides that the Site is allocated for:

- Up to 1,000 dwellings to be located within the District.
- Up to 5 hectares of employment land.
- Infrastructure requirements including education provision and local community facilities.

Firstly, it is important to stress that the 5 hectares of employment use covered by the OPP is across Lichfield District and Cannock Chase District. It is not envisaged that this amount of employment will be delivered in Cannock District. On this basis draft Policy SM1 needs to be amended to reflect the OPP and the figure stated at Table F of the consultation document (i.e. 3.5 hectares).

The areas of the Site within CCDC identified for residential development total approximately 24.6 hectares split between 18.8 hectares at 75dph and 5.8 hectares at 50dph. This equates to a capacity of 1,700 houses (1,410 and 290 respectively) at currently permitted densities. Realising this increased capacity should be left open by removing the limiting words 'up to' in relation to the 1,000 dwellings currently proposed within CCDC. This is consistent with the approach to increasing densities on previously developed land noted in relation to Policy SO3.1.

RPL are promoting part of the Site as a battery energy storage system (BESS). This will provide essential infrastructure that will help facilitate the transition to a renewable and low carbon future. It is therefore suggested that the allocation makes allowance for a BESS, taking advantage of the existing 400kv substation and solar panels approved by the OPP. It is considered that this use (the BESS) is compatible with other land uses permitted by the OPP and would support Objective 8 of Draft Plan and be consistent with the comments made in relation to Policy SO8.1.

Notably the draft policy goes on to take the details approved under the OPP as the starting point for the allocation but affords a level of flexibility appropriate to the scale of the development. For instance, the allocation requires a minimum of two primary access points but does not set a maximum; this enables the development to respond to changes in need and reflect local circumstances, as shown by the approval of a third primary access for the Site.

This is a question of ensuring that where the allocation references the OPP or associated approved documents it includes wording that clarifies that subsequently approved documents should supersede previously approved documents. For instance, where the section 106 agreement is referenced it should include the words, 'as varied'.

Cannock Chase Council: Cannock Chase Local Plan Representation Form



While we note the value of the Rugeley Power Station Development Brief SPD it was adopted in February 2018 and is out of date in many respects. It references the first (2012) iteration of the NPPF and a number of other supersede national and local guidance documents. We therefore question the weight it can be afforded when more recent documents are available and suggest that further justification be provided as to the level of weight the SPD should be afforded and on which matters it should be considered in relation to.

We support the overall approach adopted by Policy SM1 but suggest the identified changes are adopted to ensure that there is sufficient scope for development to come forward under the allocation that responds to the changing needs of the District over the plan period, and to respond to the potential for amendments to the OPP to be made and sufficient flexibility for the approval of reserved matters. We also consider that there is the potential to include a battery energy storage system on site and the policy should be amended to include this essential energy infrastructure.

(Please continue on a separate sheet if necessary)

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

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It is important to stress that the 5 hectares of employment use covered by the OPP is across Lichfield District and Cannock Chase District. It is not envisaged that this amount of employment will be delivered in Cannock District. On this basis draft Policy SM1 needs to be amended to reflect the OPP and the figure stated at Table F of the consultation document (i.e. 3.5 hectares).

It is suggested that the allocation makes allowance for a BESS, taking advantage of the existing 400kv substation and solar panels approved by the OPP.

We support the overall approach adopted by Policy SM1 but suggest the identified changes are adopted to ensure that there is sufficient scope for development to come forward under the allocation that responds to the changing needs of the District over the plan period, and to respond to the potential for amendments to the OPP to be made and sufficient flexibility for the approval of reserved matters. We also consider that there is the potential to include a battery energy storage system on site and the policy should be amended to include this essential energy infrastructure.

(Please continue on a separate sheet if necessary)

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

After this stage, further submissions may only be made if invited by the Inspector,

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



based on the matters and issues they identify for examination.

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

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

Yes, I wish to participate in hearing session(s)

(Please tick one box)

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

We consider that it is necessary to attend the hearing sessions. Rugeley Power Station is a significant component of the Council's spatial strategy and therefore RPL can assist the examination process by responding to site specific matters and how the Site has potential to achieve higher levels of growth than currently planned for.

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Signature: [REDACTED]

Date: 26.03.2024

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



Part B: Representation Form

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Part B: Representation

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|------------------------|--|
| Name and Organisation: | Stantec on behalf of Rugeley Power Limited (RPL) |
|------------------------|--|

Q1. To which document does this representation relate? (Please tick one box)

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

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

| | | | | | | | |
|-------------|--|---------|--|-------|--|---------------|--|
| Para-graph: | | Policy: | SA1. PROTECT AND ENHANCE BIODIVERSITY, FAUNA AND FLORA AND GEODIVERSITY. | Site: | | Policies Map: | |
|-------------|--|---------|--|-------|--|---------------|--|

Q3. Do you consider the Cannock Chase Local Plan is:

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

| | | |
|----------------|------------------|--|
| For office use | Part B reference | |
|----------------|------------------|--|

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

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

An uncertain minor negative effect is identified as a result of increased recreational pressure on the Cannock Chase Special Area of Conservation ('SAC'). We consider this to take insufficient account of the OPP and the mitigation approved as part of this.

The OPP proposes a 20% biodiversity net gain and creation of a riverside park. This exceeds the requirements of local and national guidance and in the context of reserved matters having been approved for the riverside park these benefits are not uncertain.

We suggest that while there may be an increase in recreational pressure a minor positive effect will be achieved overall.

(Please continue on a separate sheet if necessary)

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

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-

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

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

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

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

We consider that it is necessary to attend the hearing sessions. Rugeley Power Station is a significant component of the Council's spatial strategy and therefore RPL can assist the examination process by responding to site specific matters and how the Site has potential to achieve higher levels of growth than currently planned for.

(Please continue on a separate sheet if necessary)

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

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| Date: | 26.03.2024 |
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Part B: Representation Form

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

Part B: Representation

| | |
|------------------------|--|
| Name and Organisation: | Stantec on behalf of Rugeley Power Limited (RPL) |
|------------------------|--|

Q1. To which document does this representation relate? (Please tick one box)

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

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

| | | | | | | | |
|-----------------|--|---------|---|-------|--|------------------|--|
| Para- graph: | | Policy: | SA2. MINI- MISE POLLU- TION AND PRO- TECT AND EN- HANCE AIR, WA- TER, AND SOILS. | Site: | | Policies Map: | |
|-----------------|--|---------|---|-------|--|------------------|--|

Q3. Do you consider the Cannock Chase Local Plan is:

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

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| For office use | Part B reference | |
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Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

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

A minor positive/uncertain minor negative effect is identified as a result of uncertainty over whether adverse impacts on residential amenity can be mitigated. Though there is recognition of the benefits that arise from remediation and redeveloping a very large brownfield site.

The OPP requires and provides clear mechanisms (CEMPs etc.) for the control of potential impacts during all phases of development. The assessment under SA2 should be revised to reflect the significant positive effect the development of the Site will have on the SA objective this would be consistent with the assessment carried out in relation to SA3.

(Please continue on a separate sheet if necessary)

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

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

-

(Please continue on a separate sheet if necessary)

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

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

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

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

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

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

We consider that it is necessary to attend the hearing sessions. Rugeley Power Station is a significant component of the Council's spatial strategy and therefore RPL can assist the examination process by responding to site specific matters and how the Site has potential to achieve higher levels of growth than currently planned for.

(Please continue on a separate sheet if necessary)

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

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| Date: | 26.03.2024 |
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Part B: Representation Form

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

Part B: Representation

| | |
|------------------------|--|
| Name and Organisation: | Stantec on behalf of Rugeley Power Limited (RPL) |
|------------------------|--|

Q1. To which document does this representation relate? (Please tick one box)

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

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

| | | | | | | | |
|------------|--|---------|---|-------|--|------------------|--|
| Paragraph: | | Policy: | SA7. MAKE SUS- TAINA- BLE USE OF RE- SOURC ES AND MINI- MISE WASTE GENER- ATION. | Site: | | Policies Map: | |
|------------|--|---------|---|-------|--|------------------|--|

Q3. Do you consider the Cannock Chase Local Plan is:

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

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Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

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

A minor uncertain positive effect is identified. The positive effect arising from the change in land use and the uncertainty from whether opportunities are taken to minimize waste during construction.

This affords insufficient weight to the benefits of redeveloping a brownfield site of this size and does not account for the requirements of the OPP in relation to design and construction which ensure that waste is minimised and the resulting developed achieves a high standard of energy efficiency.

The assessment should be revised to reflect the significant positive effects of the development.

(Please continue on a separate sheet if necessary)

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

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

The assessment should be revised to reflect the significant positive effects of the development.

(Please continue on a separate sheet if necessary)

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

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

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

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

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



Yes, I wish to participate in hearing session(s)
(Please tick one box)

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

We consider that it is necessary to attend the hearing sessions. Rugeley Power Station is a significant component of the Council's spatial strategy and therefore RPL can assist the examination process by responding to site specific matters and how the Site has potential to achieve higher levels of growth than currently planned for.

(Please continue on a separate sheet if necessary)

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

Signature: [REDACTED]

Date: 26.03.2024

Part B: Representation Form

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

Part B: Representation

| | |
|------------------------|--|
| Name and Organisation: | Stantec on behalf of Rugeley Power Limited (RPL) |
|------------------------|--|

Q1. To which document does this representation relate? (Please tick one box)

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

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

| | | | | | | | |
|-------------|--|---------|---|-------|--|---------------|--|
| Para-graph: | | Policy: | SA8. EN-COUR-AGE AND FA-CILI-TATE THE USE OF SUS-TAINA-BLE MODES OF TRANSP ORT. | Site: | | Policies Map: | |
|-------------|--|---------|---|-------|--|---------------|--|

Q3. Do you consider the Cannock Chase Local Plan is:

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

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Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

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

A minor positive effect is identified due to the sustainable location of the Site, its proximity to the existing railway station, and the potential for improvements to the pedestrian and cycle network.

While we support this positive assessment of the Site it does not account for the OPP which secures significant improvements to sustainable transport options, in particular a new pedestrian and cycle route (the Railway) across the entire Site (CCDC and LDC) and new bus connections.

(Please continue on a separate sheet if necessary)

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

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

The assessment should be revised to reflect the significant positive effects of the development.

(Please continue on a separate sheet if necessary)

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

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

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

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

We consider that it is necessary to attend the hearing sessions. Rugeley Power Station is a significant component of the Council's spatial strategy and therefore RPL can assist the examination process by responding to site specific matters and how the Site has potential to achieve higher levels of growth than currently planned for.

(Please continue on a separate sheet if necessary)

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Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

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

An uncertain significant positive effect is identified. The uncertainty resulting from the potential loss of open space from the loss of the golf course.

Again, this fails to reflect the details of the OPP and reserved matters approval for the riverside park. There will be a substantial increase in the availability of public open space and the design of the development is reasonably certain at this stage.

(Please continue on a separate sheet if necessary)

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

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

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(Please continue on a separate sheet if necessary)

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

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

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form

(Please tick one box)



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

We consider that it is necessary to attend the hearing sessions. Rugeley Power Station is a significant component of the Council's spatial strategy and therefore RPL can assist the examination process by responding to site specific matters and how the Site has potential to achieve higher levels of growth than currently planned for.

(Please continue on a separate sheet if necessary)

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

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| Date: | 26.03.2024 |
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Cannock Chase Council:
Cannock Chase Local Plan
Representation Form

(Please tick as appropriate).



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

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

The Site is assessed as having an uncertain minor positive effect on SA14. Though, it is not clear what makes this impact uncertain. The Site is acknowledged as being well related to existing community services and facilities and these will be further supplemented by the OPP.

(Please continue on a separate sheet if necessary)

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

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In the absence of a clear justification for the minor positive impact to be considered uncertain it should be revised to a minor positive impact.

(Please continue on a separate sheet if necessary)

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

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

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Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

Yes, I wish to participate in hearing session(s)

(Please tick one box)

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

We consider that it is necessary to attend the hearing sessions. Rugeley Power Station is a significant component of the Council's spatial strategy and therefore RPL can assist the examination process by responding to site specific matters and how the Site has potential to achieve higher levels of growth than currently planned for.

(Please continue on a separate sheet if necessary)

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

Signature: [REDACTED]

Date: 26.03.2024

Part B: Representation Form

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Part B: Representation

| | |
|------------------------|--|
| Name and Organisation: | Stantec on behalf of Rugeley Power Limited (RPL) |
|------------------------|--|

Q1. To which document does this representation relate? (Please tick one box)

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

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

| | | | | | | | |
|-----------------|--|---------|--|-------|--|------------------|--|
| Para- graph: | | Policy: | SA16. Enhance the town centres in order to protect and im- prove their vi- tality and viability. | Site: | | Policies Map: | |
|-----------------|--|---------|--|-------|--|------------------|--|

Q3. Do you consider the Cannock Chase Local Plan is:

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

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

Cannock Chase Council: Cannock Chase Local Plan Representation Form



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

A neutral score is given because the Site is located outside of the town centre and is therefore considered not to impact its vitality or viability.

This assessment does not reflect the impact of the development will have on the town centres of Rugeley and Bretherton through a significant increase in housing in the area and improvements to transport connectivity. This will likely result in an increase in footfall and consequently contribute to the viability and vitality of both town centres.

(Please continue on a separate sheet if necessary)

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

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We therefore consider it appropriate for the score to be revised to either a minor positive impact, or an uncertain minor positive impact.

(Please continue on a separate sheet if necessary)

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

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

(Please tick one box)

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

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



We consider that it is necessary to attend the hearing sessions. Rugeley Power Station is a significant component of the Council's spatial strategy and therefore RPL can assist the examination process by responding to site specific matters and how the Site has potential to achieve higher levels of growth than currently planned for.

(Please continue on a separate sheet if necessary)

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