

Planning Policy
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18 March 2024

Dear Sushil

Cannock Chase District - Local Plan Pre-Submission (Regulation 19 Consultation)

Thank you for consulting Staffordshire County Council on your Pre-submission Local Plan.

The Local Plan should provide a platform from which to secure sustainable economic, social, health and well-being and environmental benefits to residents, businesses and visitors of Cannock Chase District.

We have worked collaboratively together throughout the production of the Plan to seek that policies and site allocations are sound, viable and deliverable; and where future development is aligned to the provision of necessary infrastructure that funding and timing of delivery is understood.

The following sections set out our detailed comments by the thematic areas the County Council is responsible for. Identifying support for the approach and suggested modifications where appropriate/necessary.



Education

The School Organisation Team (SOT), Staffordshire County Council generally supports the Cannock Chase District Local Plan Pre-Submission (Regulation 19) Document. However, we do have some minor changes to some specific policies to ensure the education infrastructure mitigation can be delivered.

We acknowledge that Policy SO2.1 seeks to ensure new development contribute towards new community facilities, which includes schools, to meet the needs arising from the development. The Staffordshire Education Infrastructure Contributions Policy (SEICP) was widely consulted on between October and November 2020 and sets out an agreed approach to identifying the impact of new residential development on education infrastructure and the necessary mitigation to make developments acceptable in planning terms. It provides the basis for calculating likely education infrastructure contributions. To reinforce and aid interpretation of Policy SO2.1 reference should be made in the supporting text at paragraph 6.50 toward the SEICP and signpost developers to it. Alternatively, the SEICP could be included in the list of relevant evidence supporting the policy.

The majority of the site-specific policies for housing development include the requirement for provision of an appropriate education contribution as requested by Staffordshire County Council, which is supported. SOT has worked closely with CCDC to ensure the forward planning of future education infrastructure within the Local Plan. The inclusion of the requirement for all sites to provide an education contribution as appropriate will enable SOT to advise CCDC and the developer of any necessary education infrastructure that may be required to mitigate planned new housing when a planning application is submitted.

However, the following site have not had that same policy provision included when they should have:

1. Site Specific Policy SH3 Land to the rear of Longford House, Watling Street needs to be amended to include the following statement: Provide an appropriate Education Contribution as requested by Staffordshire County Council.
2. Site Specific Policy H66 Land at the corner of Avon Road and Hunter Road, Cannock needs to be amended to include the following statement: Provide an appropriate Education Contribution as requested by Staffordshire County Council.

Policy SM1 - site specific policy for land at the former Rugeley Power Station, the wording needs to be amended from 'financial provision for secondary school improvements' to 'financial contributions towards secondary school provision. This is for clarity to as it is new places that are being provided, whereas 'improvements' could be seen to relate to matters not involving increased capacity.

We note that there is a new allocation at Cannock Chase High School, Lower Site Campus for an undetermined number of dwellings. We would wish to be advised at the earliest opportunity of the likely number of dwellings proposed for this site.

Supporting Information

Staffordshire County Council (SCC) has a statutory duty to ensure that there are sufficient school places to meet the needs of the population. The School Organisation Team (SOT) acts on behalf of the Local Authority to carry out this duty and to ensure that resources are used efficiently.

In line with Department for Education (DfE) guidance the School Organisation Team plan school places on a planning area basis; groups of schools based on geographical location, local demographics and other factors such as pupil movement and school phases.

A two-tier education system, with Primary (4-11 years) and Secondary (11-18 years) schools, operates in all areas of Cannock Chase District.

Sixth form provision is offered on site at all secondary schools within the District.

School sizes are referred to as Forms of Entry (FE), which are the number of classes of 30 per school year group. For example, a 2FE school would have 2 classes of 30 pupils in every year group (60 pupils per school year group).

Currently within Cannock Chase District 17 of the 34 schools physically located in the area are Academies or Free Schools. This number is growing all the time as new schools open, or maintained schools convert to or become sponsored academies. Academies and Free Schools are independent from the local authority and the Department for Education/Secretary of State would be the decision maker for significant changes to an academy.

A development or a combination of small developments of 750+ dwellings in a standard pupil yield area may trigger the need for a new primary school and a development or a combination of small developments of 4,000+ dwellings for a new secondary school. In areas where there is a higher pupil yield a development or a combination of small developments of 500+ dwellings may trigger the need for a new primary school. Furthermore, the number of dwellings would be lower than 4,000+ to trigger a new secondary school in a higher pupil yield area.

It should be made clear to prospective developers that where a new school is required developers must provide land for school site(s) in addition to education contributions to mitigate the development.

We would seek assurance from CCDC that where a number of proposed developments in one area necessitate a new school, land would be safeguarded for education provision and that the developers contribute proportionally to the cost of buying the land.

Whilst this is not an exhaustive list, where new schools are required, the sites would need to be of regular shape, level, flat and without significant topographical features that would be considered incongruent with use as a school, free from contaminants and other adverse ground conditions, and suitable for the phase of education proposed. Other site requirements will also be required such as but not restricted to the provision of utility services onto the site, drainage and vehicular access and will be detailed and discussed when appropriate.

There would need to be a vehicular access route from the adopted highway to the school site at least sufficient and suitable for construction vehicles and vehicles for the delivery of materials for the construction of the school on the school site until the school opens at which point the vehicular access needs to be of an adaptable nature. Other site requirements may be required, and these will be detailed and discussed when appropriate.

Additional land adjacent to any new school may also need to be safeguarded as education land to ensure future growth.

Where existing schools have insufficient land to expand on their current site consideration may be given to allocating additional land adjacent to the school to facilitate growth if this is achievable. In addition, any new school proposed may also need to have additional land safeguarded to allow for future growth.

Consideration is also required of the implications of proposed housing developments on school transport. Children in villages and settlements without local schools may be entitled to home to school transport where the catchment or nearest school is over two miles walking distance at primary age or three miles at secondary age. There would be additional implications in terms of coach park capacity, transport costs, logistics and highway constraints around school sites in these circumstances. This could involve education contributions being sought towards additional school places, larger coach parks, transport costs and highway improvements such as crossing points.

Any proposed development where the catchment and nearest schools are all over the reasonable walking distance noted above may increase the cost to the public purse for school transport. Consideration must be given to the ongoing costs both to the developer and the public purse of transport costs for pupils living on such developments, and the sustainability and environmental impacts of the site(s). S106 contributions may be required to offset any additional costs related to new development. However, prior consideration needs to be given before to whether growth in such areas is sustainable as ultimately the public purse will pick up the cost of school transport when any developer subsidy ends.

New settlements and urban extensions should be expected to meet the full education requirement either through new schools, expansions or use of existing capacity. Should it not be possible to increase or provide additional capacity to mitigate housing development it may be necessary to transport pupils to areas where there is capacity or the potential for it to be provided. In such circumstances it would be expected that the developer meets these additional transport costs, along with contributions sought towards additional school places, as the need would have arisen as a direct result of their housing development. Provision of additional school transport in order to provide school places away from the local area impacts on the ability of pupils to use sustainable modes of travel to attend school. This could impact on the local highway infrastructure from the potential increase in vehicles and impacts negatively on proposals to reduce carbon emissions.

Education contributions will be sought towards mitigating the impact of new housing developments where necessary.

Any new primary schools would need to be at least 1FE (210 places) plus nursery provision and require land of 11,415m² to be provided and allocated within the local plan to facilitate this. To deliver a new 1FE Primary School (210 places + nursery provision) would cost in the region of £7.6 million pounds (as at Q2-2022). A 2FE Primary School (420 places + nursery provision) would require land of a minimum of 20,430m² to be provided and allocated within the local plan to facilitate this and would cost in the region of £11.4 million pounds (as at Q2-2022).

Any new secondary schools would need to be at least 5FE (750 places) and require land of 86,076m² to be provided and allocated within the local plan to facilitate this. To deliver a new secondary school of 5FE would cost in the region of £26.6 million pounds (as at Q2-2022).

The costs above are based on estimated new school costs as at Q2 2022. The building cost multiplier and new school costs are due to be updated and it is anticipated that the estimated cost could increase significantly due to current market conditions. This is a minimum cost to deliver any new school and will need to be updated as and when any new school is required.

Delivery of construction projects has become challenging with issues in demand, supply and project risk and opportunity. Commodities prices for copper, steel, and aluminium have all increased. Figures released by the Department for Business, Energy & Industrial Strategy (BEIS) in May 2022 show the Construction Materials Index rising by 3.6% - a 22.9% increase over the last 12 months. With the continued high energy prices, further price increases for heavy side materials should be expected.

There have been major changes in Building Regulations for the first time since 2013 to reflect changes in how buildings are being constructed and the environment, which are expected to further increase the capital cost to deliver construction projects.

The Local Plan should help to ensure that there is sufficient education infrastructure available to mitigate the impact of the proposed new homes in the right place at the right time. CCDC would request that land is allocated for educational infrastructure when considering areas for development. Whether this is land adjacent to existing schools, land within a large, proposed development or land within a number of proposed developments.

In relation to the proposed areas of growth and the housing allocations for other areas we comment as follows:

Proposed Housing Growth – Locality 1 (Cannock/Hednesford/Heath Hayes)

Cannock 1

We note that the site 'Land to the rear of Longford House, Watling Street' is still included in the plan, however, site specific policy SH3 needs to be amended to include the following statement:

Provide an appropriate Education Contribution as requested by Staffordshire County Council.

Since the latest preferred options site list from CCDC which was provided in March 2023 there have been 3 additional sites added in this school place planning area at:

- Cannock Chase High School, Lower Site Campus, Hednesford Rd Boscomoor Lane for an undetermined number of dwellings;
- A Dunford and Son, Brindley Heath Rd, Cannock for 15 dwellings; and
- Land at the corner of Avon Road and Hunter Road, Cannock for 18 dwellings.

H66 - Site Specific policy - Land at the corner of Avon Road and Hunter Road, Cannock – Please note that this site-specific policy wording needs to be amended to include the following statement:

Provide an appropriate Education Contribution as requested by Staffordshire County Council.

There are also 5 sites where the number of proposed dwellings has been amended.

- Land bound by Ringway, Church St and Market Hall St amended from 40 dwellings to 70 dwellings;
- Avon Road/Hallcourt Lane, Cannock amended from 40 dwellings to 22 dwellings;
- Land at Girton Road/Spring Street, Cannock amended from 14 dwellings to 24 dwellings;

- 26-28 Wolverhampton Rd, Cannock amended from 21 dwellings to 25 dwellings; and
- 41 Mill Street, Cannock amended from 12 dwellings to 15 dwellings.

In addition there are 4 sites that are no longer allocated:

- East of John St/Wimblebury Road, 40 dwellings;
- 54 Lloyd Street, Cannock, 12 dwellings;
- St Chads Courtyard, 10 dwellings; and
- Land at Rawnsley Road, Hazelslade, 75 dwellings.

There is 1 safeguarded site which was not been included in the dwelling total as this site is not considered deliverable/developable during the Local Plan period:

- C279b East of Wimblebury Road, Heath Hayes, 190 dwellings.

As a result of these changes there are now 587 dwellings (plus an undefined number at Cannock Chase High School site) proposed in this planning area. The previous dwelling number as of March 2023 was 635 dwellings.

This number of new homes is likely to generate 185 Primary school aged pupils.

As stated in our response of May 2023, this is a large planning area and it is likely that there will be localised pressure for places within the overall planning area as a result of the allocated/safeguarded local plan housing sites. It is considered that additional places may be required to mitigate the impact of the proposed dwellings which are expected to be deliverable across Cannock 1 planning area based on current pupil movement and modelling. This would be dependent upon when the housing came forward.

Cannock 2

Dwelling numbers have been amended for 2 of the sites in this planning area.

- East of Wimblebury Road, Heath Hayes, amended from 410 dwellings to 400 dwellings; and
- Land at Chapel Street, Heath Hayes, amended from 30 dwellings to 20 dwellings.

In addition, there is 1 safeguarded site which has not been included in the dwelling total as this site is not considered deliverable/developable during the Local Plan period;

- Land at Newlands Lane, Heath Hayes, 130 dwellings.

The provision of 1133 dwellings (excluding the safeguarded site) will generate a minimum of 238 primary aged children.

As previously advised, new school provision of at least 1.5FE (safeguarded to 2FE) is required to mitigate the 2 large developments located in this area.

We note that the Reg 19 document includes Policy SH1: site specific policy for land south of Lichfield Road, Cannock which states that the site will provide 2.3 ha of flat, level land of a regular shape with significant road frontage to the adoptable highway to accommodate a new 2FE Primary School.

Policy SH2 (land east of Wimblebury Road, Heath Hayes) states that no substantive housing completions should occur until the funding and phasing of critical infrastructure is agreed by the applicant, Local Planning Authority and Staffordshire County Council. It is imperative that the required primary places can be provided in a timely manner to ensure that both developments can be mitigated regardless of which of the 2 sites (land east of Wimblebury Road or land south of Lichfield Road) commences first.

Dependent upon the timings of the two large development sites in this cluster, temporary primary school places may be required in the short term. Therefore, education contributions towards both permanent and temporary education infrastructure provision may be sought in this planning area.

The delivery of SH1 and SH2 also has transport implications relating to the delivery of on and offsite highway improvements, again timing of delivery will be critical and is discussed further below in the transport section.

Cannock Secondary

Cannock Secondary School Place Planning Area encompasses Cannock 1, Cannock 2 and Norton Canes planning areas. These areas should be referred to for details of individual development site changes.

We note that there is a new allocation at Cannock Chase High School, Lower Site Campus for an undetermined number of dwellings. We would wish to be advised at the earliest opportunity of the likely number of dwellings proposed for this site. The Academy have advised SOT that the consolidation of the Academy onto one site will not result in a reduction in available places at the Academy. Until the number of dwellings is determined, the impact on education infrastructure cannot be identified and may necessitate education contributions.

The provision for 1720 new dwellings (excluding the approved sites in Norton Canes and safeguarded sites) is lower than the 1788 dwellings previously advised (excluding safeguarded sites).

This number of new homes is likely to generate 258 Secondary school aged pupils.

As stated in our response of May 2023, overall, there will be a requirement to provide additional secondary places through expansion to mitigate the proposed number of dwellings in this school place planning area. There will be pressure on specific schools within this area so education contributions will be required.

Proposed Housing Growth – Locality 2 (Rugeley & Brereton)

Rugeley Town

Please note that the Plan states on page 25, Local Plan Vision and Objectives. Rugeley and Brereton: that there are 9 primary schools and 1 secondary school. A new school will be provided on the Rugeley Power Station site.

Please note that due to amending school place planning areas as agreed by DFE **Rugeley Town Planning Area now has 10 primary schools** and 1 secondary school. This is due to the inclusion of an existing rural school on the outskirts of the Rugeley Town planning area.

Since the refreshed response in May 2023, there have been 2 additional sites added in this school place planning area at:

- The Fairway Motel, Horsefair, Rugeley, 17 dwellings: and
- Land at Pendlebury Garage and Petrol Station, 5 Wolseley Road, Rugeley for 18 dwellings.

There is one site where the proposed number of dwellings has been amended:

- Nursery Fields, St Michaels Road, Brereton amended from 38 dwellings to 35 dwellings.

There are also 2 sites which have already come forward as pending applications one with an amended dwelling number:

- Land at The Mossley off Armitage Road amended from 40 proposed dwellings to 43 dwellings in the pending application; and
- Castle Inn, 141 Main Road, Brereton for 27 dwellings (same as the proposed dwelling number in the Reg 19 document).

In addition there is 1 site that is no longer allocated:

- Land East of The Meadows, Armitage Lane, Brereton, 33 dwellings.

The provision for 325 new dwellings (excluding the power station site) is lower than the 343 dwellings previously advised in March 2023.

This number of new homes is likely to generate 68 Primary school aged pupils.

As previously stated in the refreshed response in May 2023, this planning area can accommodate the proposed number of dwellings. However, there may be areas of pressure within the cluster. High level indicative studies suggest that on paper primary school sites in this area can collectively be expanded to provide an additional 3.5FE of provision. There isn't a requirement to provide any additional provision beyond the proposed new all-through school on the Power Station site, however, where there is pressure within the catchment of a specific school there may be a requirement to request contributions based on current pupil movement and modelling.

Rugeley 2

There are no proposed sites in this planning area.

Rugeley Secondary

Amendments to the proposed housing sites are the same as outlined for Rugeley Town.

The provision for 325 new dwellings (excluding the power station site and the 2 pending application sites) is lower than the 343 dwellings previously advised.

This number of new homes is likely to generate 49 Secondary school aged pupils.

As previously stated, there is no capacity at the existing secondary school in this school place planning area. The school is currently unable to accommodate all catchment children wishing to attend the school. The proposed 325 dwellings cannot be mitigated by existing secondary provision in this planning area. An All Through School with 5FE of secondary provision is planned on the power station site. If for any reason the power station site does not come forward, alternative new secondary education provision will be required to serve the Rugeley area. In either scenario, education contributions would be sought towards the new provision.

Policy SM1 - site specific policy for land at the former Rugeley Power Station – The site will provide an appropriate education contribution as requested by Staffordshire County Council, which will deliver either an 'All Through School', or a 2FE Primary School and financial provision for secondary school improvements.

The wording above needs to be amended as below for clarity

The site will provide an appropriate education contribution as requested by Staffordshire County Council, which will deliver either an 'All Through School,' or a 2FE Primary School **and financial contributions towards secondary school provision.**

Proposed Housing Growth – Locality 3 Norton Canes

Norton Canes

Since our refreshed response in May 2023, there are 2 sites added in this school place planning area at:

- Land off Norton Hall Lane, Norton Canes for 55 dwellings
- 272 Hednesford Road, Norton Canes for 11 dwellings

However, both these proposed sites are already approved developments.

In addition, there was 1 safeguarded site which has not been included in the dwelling total as this site is not considered deliverable/developable during the Local Plan period;

- West of Hednesford Road 175 dwellings.

As stated previously, there are expected to be no available places across Norton Canes planning area based on current school capacity, pupil movement and modelling. To mitigate any new housing further educational infrastructure would be required. Of the 2 primary schools in this area, one is an academy and therefore SCC is not the decision maker for any changes to this schools' infrastructure.

Transport

Policy SO5.1: Accessible Development, Page 90

It is noted that Policy SO5.1 requires all developments that generate significant amounts of movements to submit Transport Assessments and Travel Plans. This policy wording should be clear that it applies to any development including smaller residential site allocations and does not just apply to strategic site allocations.

Policy SH1. Strategic Site-Specific Policy – Land South of Lichfield Road Cannock, page 160 & Policy SH2. Strategic Site-Specific Policy – Land East of Wimblebury Road Heath Hayes, page 167

These two sites are reliant on each other for the delivery of education and transport infrastructure. To ensure there are no adverse impacts on highways and school places the development of the two sites and delivery of the requisite infrastructure needs to be coordinated. The Policies for SH1 and SH2 are drafted such that both the school and the Wimblebury Road Relief Road (WRRR) are delivered before there are substantial completions are on either site. This is complicated by the school being delivered on SH1 and the road being delivered on SH2, with different landowners likely to come forward at different times. At this point we have reservations over whether the Policies are sufficient to control and coordinate delivery of the two sites and the infrastructure and development may likely come forward in a piecemeal and

uncoordinated manner. We seek confirmation that the Policy for SH1 and SH2 (with or without modification) is sufficient to deliver the infrastructure at the right time and also seek assurances from the two developers they will work together to bring forward the sites within an agreed phasing/delivery strategy.

Policy SH6. Former Hart School, Burnthill Road, Rugeley (Hagley Park), page 177

145 dwellings. The policy says that a Transport Statement is required. A fuller Transport Assessment and Travel Plan may be required for this level of development.

Policy SE1. Strategic Site-Specific Policy – Kingswood Lakeside Extension, page 186

This site was not in the Preferred Option consultation as an allocated site. However, in the intervening period Atkins has undertaken a High-Level Transport Assessment for the site and SCC is confident the site can come forward in transport terms.

Two points of access are described as required in the policy. This may not be the case and SCC suggests the policy should read that access will be via Blakeney Way with arrangement to be informed by the Transport Assessment.

The site area is incorrect. It should be 14.5ha. in terms of net developable area to support floorspace up to 500,000sqft as per SCC's concept plans. The building floorspace is as described in the High-Level Transport Assessment undertaken by Atkins, on behalf of SCC. This comment is expanded upon by SCC's Property team in their comments.

Policy SE2: Watling Street Business Park Extension, page 190

This site was not in the Preferred Option consultation as an allocated site. SCC has seen no evidence on the likely transport impacts to be able to determine whether the site can be accommodated on the local highway network.

Policy H61: Site Allocation, Cannock High School, page 212

There is no indication as to the approximate number of dwellings for this site therefore it is difficult to consider the transport impacts. The site has potential to accommodate a large number of dwellings and therefore a Transport Assessment/Travel Plan may be required.

Ecology and Environment

Strategic Objective 7, and policies SO7.1, SO7.2, SO7.3, and supporting text are welcomed.

There is a minor typo in heading of POLICY SO7.3 which should read HABITATS SITES.

At Paragraph 6.278 – it may be worth adding specific supporting text around hedgehog habitat connectivity because a third of hedgehogs have been lost in the last 20 years, and one major cause is barriers to foraging behaviour that force them onto roads or other unsuitable places. A viable population needs access to about 90 hectares of connected land. Hedgehogs are listed as a species of Principal Importance under the NERC Act (2006) and classed as 'vulnerable' in England (Mammal Society, 2020). In new development, 13 x13 cm gap should be provided at the base of all barriers between gardens so that all garden space is accessible.

In the policies for the Site Allocations, some include wording such as 'Incorporate existing trees and hedgerows where possible within the proposed development and provide suitable mitigation and/or compensatory measures within the site and green infrastructure connectivity' or similar. This is welcomed, however an overall policy for supporting the retention of existing healthy trees and hedgerows on all sites would be preferable. This could also indicate that where possible retained trees and hedges should be incorporated into green infrastructure, rather than in private curtilages as they can then be cared for better. An overall policy for tree and hedge protection should also refer to the need for Arboricultural Survey and tree protections measures for development in line with BS. 5837:2012: Trees in relation to design, demolition and construction.

In relation to Policy SH1 the second bullet point makes reference to the creation of a new 'Country Park' elsewhere in the Local Plan this is referred to as a 'Community Park'. A Country Park has a specific meaning in regard to the Countryside Act 1968. Whilst in essence the land will perform a function similar to a country park it is not by definition a 'Country Park'. To correct this and for consistency with the rest of the Plan the wording in SH1 needs to be changed to 'Community Park'.

Landscape

POLICY SO7.4: Protecting, Conserving and Enhancing Landscape Character is strongly supported. Within the supporting text, reference is made to Landscape and Visual Impact Assessments, in accordance with the "Guidelines for Landscape and Visual Impact Assessment 3rd Edition" published by the Landscape Institute and IEMA 2013 (or any subsequent revisions to the Guidelines), which is an appropriate approach in relation to major developments and proposed developments which have potential to adversely affect sensitive landscapes.

POLICY SO7.5: Protecting, Conserving and Enhancing the Cannock Chase National Landscape – The proposed wording should reflect the 'Protected Landscapes' Clause 245 of the Levelling Up and Regeneration Act 2023, and the 'Protected Landscapes Targets and Outcomes Framework' (31 January 2024) which strengthens duty and provides new targets in relation to Protected Landscapes. The Cannock Chase National Landscape Joint Committee are providing a separate response in this regard, which we fully support.

Archaeology / Historic Environment

It is welcome that the draft local plan demonstrates a strong awareness of the potential for development to negatively impact or enhance the historic environment, and indeed provides a positive and proactive strategy for conserving and enhancing heritage assets and their setting. The importance given to it, and the understanding provided of the key role that the historic environment plays in creating a sense of place and identity in the local plan area, is reflected in the prominence that the historic environment is given throughout. Likewise, the assertion that the historic environment can be a catalyst for positive regeneration.

The draft local plan is based on a robust historic environment evidence base, including a Heritage Impact Assessment, which has been produced in line with Historic England guidance, and outlines the potential historic environment constraints and opportunities for enhancement in the site allocations, and the aspiration in Strategic Objective 1 to deliver high quality development that protects the historic environment and is appropriate, distinctive, attractive and safe, and protects, conserves and enhances the district's historic environment and the character of its settlements (SO1.1 & SO1.2) is a laudable one.

References to the district's agricultural, industrial, transport, and military heritage, and indeed its archaeological features (for example in 5. Local Plan Vision & Objectives), are very welcome, as they provide a useful framework for understanding the significance and sensitivities of the district's non-designated heritage assets. The ambition to maintain a degree of physical separation between settlements (Section 6.5) is considered to be an important means of ensuring that they retain their distinct characters and identities.

With regards to the Local Plan Policy Options (Section 6), Policy SO1.1 is supported and seems suitably comprehensive and robust (likewise the supporting text). The requirement in SO.1.2 for development proposals to demonstrate that they are sympathetic to local character and heritage, and the requirements for additional information to be submitted with Listed Building Consent applications is welcome. Furthermore, where it is proposed in other Policy Options, such as in SO3.4 that developments should be compatible with heritage assets as well as the physical and visual character of the area, this is very much supported.

The proposed safeguarding of the canal network and abandoned canal network in Policy SO4.4 is supported, as is the specific policy included covering the Hatherton Canal Restoration Corridor (Policy SO5.5), whilst the weighting given to the role of historic environment in Policy SO6.4 regarding Town Centre Design, and the specific town centre policies, such as Policy SO6.5, SO6.6 and SO6.7, is welcome, as is the recognition of the role of the historic environment in the Cannock Chase National Landscape (Policy SO7.5) and in protecting, conserving and enhancing Green Infrastructure (Policy SO7.8).

The Monitoring Framework for SO.1 in Appendix 1 seems suitably robust, however this will be difficult to achieve should the current situation, where the district does not have a dedicated Conservation Advisor, persist.

Public Rights of Way

Overall, POLICY SO5.6: SAFEGUARDING PROPOSED RECREATIONAL FOOTPATH AND CYCLE ROUTES is to be welcomed and should be emphasised each time the District Council engage with developers or applicants –

'The proposed recreational footpath and cycle routes, as shown on the Policies Map, will be protected from development that will prevent the future implementation of the proposed schemes. The Corridors will be protected to enable the development of the footpaths and cycle routes, including any related infrastructure such as highway crossing points and their upgrading to bridleways where there is a shortfall in available access routes. Implementation will provide opportunities for links to active transport links and improved biodiversity along the length of the safeguarded route. The routes should provide an attractive and safe environment that will create a network linking the rural villages and countryside to the main urban areas to provide opportunities for healthy living and enhance wellbeing.'

Public rights of way connectivity is considered for almost all of the sites. This is a key development consideration and whilst it won't be possible for all sites, where it is, developers should be supported from the outset in ensuring this is factored into their plans. A recent study (Now Patient 2023) put Cannock Chase District as having the 7th highest adult obesity levels in the United Kingdom. The rights of way network is key to ensuring people have greater access to areas for recreation and, particularly, connections into the countryside and country park areas. However, any release of greenbelt land is particularly concerning because of its appeal and the benefits to the mental and physical health that such land provides. Quite simply an area which is more rural/greener is likely to receive greater footfall and benefits to those users than paths within a more urban setting.

Objective 5 within the Plan focuses on supporting the provision of sustainable travel with a focus on walking, wheeling and cycling and

making better use of the canal network. Policy SO5.6 primarily focuses on safeguarding of recreational routes and 6.196 states *'the routes are largely former mineral railway lines that carried coal from the coalfields on Cannock Chase to the main line railway for onward distribution to local customers and markets further away. Some routes have been restored as opportunities allow, but the remaining protected routes may, where no longer needed for railway use, provide an opportunity for a wider network of off-road active transport corridors.'* These routes could have a significant benefit for path users and in other parts of Staffordshire reclaimed mineral lines are very popular, particularly as they are relatively flat meaning that they can be accessible to more people. We would be keen to learn more about these routes, their locations and the plans to bring them into use as there may also be opportunities to provide connections to the public rights of way network. Similarly, developments that include access for people with limited mobility or that are in wheelchairs are welcomed as is 6.198 around accessibility i.e. encouraging the Least Restrictive Principle i.e. use of gaps rather than path furniture. Legally, developers cannot install path furniture on public rights of way unless authorised by Staffordshire County Council, but it is important that planning advice makes this clear. It is also important that the character of routes is maintained. Too often developers 'improve' a path removing all of the features that made it an attractive route in the first place – hedgerows, green borders, trees, etc. Path surfaces can be improved without losing the character of the route and, again, Staffordshire County Council can advise on this as required. Point 6.197. does show some recognition of this –

'Many of the routes are now unsurfaced green lanes bordered with hedgerows and trees that form linear green corridors to connect the urban areas with the wider countryside. Many are wide and have a relatively flat gradient. The routes provide opportunity to enhance the health and wellbeing for all residents and sustainable economic tourist growth which promotes the heritage and biodiversity of our district.'

The Plan now mentions equestrians which improves upon the 2021 Plan which did not refer to them. Point 6.199 states –

'The District has a number of livery stables. To support an increase in physical activity and increase the provision for cyclists and horse riders, the creation of bridleways or the upgrading of public footpaths to bridleways where there is currently a shortfall in available access routes and other impacts can be mitigated is supported.'

Some of the developments will provide opportunities to connect to the bridleway network and, in some cases, the possibility of upgrading footpaths to bridleways to improve equestrian provision. Within the Cannock Chase District there are 50 kilometres of recorded public bridleways and, barring one other Borough, this is the least amount of provision within the county. Large parts of the Cannock Chase National Landscape area also fall within the District so, for the wider district, there is not a great deal of provision for equestrians. If there are opportunities to make some of the mineral lines mentioned in 6.196, multi-user i.e. to include provision for equestrians, then this should be considered.

The Plan recognises that any development needs to take appropriate mitigation to ensure the public path network is protected and also that 'non-definitive routes across proposed development sites should be considered by applicants in the overall layout and design of schemes to encourage continued activity and health benefits of walking' (6.198). There is likely to be a number of these routes. Some will already be registered with the County Council under the provisions of s.53 of the Wildlife and Countryside Act 1981 and the Plan makes a positive step in encouraging developers to design schemes that recognise existing use because of the wider benefits such access can bring'. We would add that if any development is likely to affect the path network, either directly or indirectly, Section 106 contribution and/or appropriate planning conditions to improve the path network may be necessary, through liaison with ourselves, at that time. This could be situations where housing development is likely to lead to a rise in usage of the network in the vicinity of the development.

Finally, there are two site specific points that we require more detail on. They are:

- 1) Improvements to transport networks will include improved links to Kingswood Lakeside via a recreational cycle/footpath route and a further crossing route across the A5 to provide a safe recreational cycle/footpath route to Grove Colliery via the Cannock Extension Canal towpath.
- 2) Land to the rear of Longford House - The site will promote active travel providing new or enhanced cycle and footpath linkages, including enhanced connections and alignments to existing public rights of way, where applicable.

In terms of point 1 we are keen to understand the proposed location and how a *safe* route can be provided when crossing the A5. In terms of point 2 there is an existing network of paths north of Longford House and we would like to understand if a connection from the proposed development is possible. This would provide a significant link to the countryside and a real benefit to path users.

Employment

Further to our comments at the Regulation 18 stage of the Plan we acknowledge and support the changes to the provision of employment land, including the provision of two Strategic employment sites at Kingswood Lakeside and Watling Street.

The County Council is promoting the site at Kingwood Lakeside as landowner and our property section will be providing comments separately, which include correcting a number of factual errors in the drafting of the text.

Policy SE1 - Kingswood Lakeside Extension is confusing in relation to provision suggested for enhancements to the environmental quality and

accessibility of remaining Green Belt land insofar as it makes specific reference to creation of a new community park. Policy SO7.6: Protecting and, conserving and enhancing the Green Belt and supporting text paragraph 6.324 make it clear that a new Community Park is to be delivered on land associated with Housing Site SH1 and that there are 'opportunities for enhanced open space at Kingswood Lakeside'. Reference in Policy SE1 to creation of a new community park imply that it should be delivered on site, which is not possible. The proposals at Kingswood Lakeside do provide opportunity to enhance and improve access to green areas that will remain post development and will form part of the development proposal, but there is no scope to deliver a community park. It is assumed that inclusion of the community park in Policy SE1 is a drafting error. Nevertheless, the wording should be removed for avoidance of doubt and as the provision for the community park at SH1 is covered in both Policy SO7.6 and the site-specific policy for SH1.

Economy and Skills

The County Council recognises the importance of access to good jobs for its residents. As such we fully support POLICY SO4.6: PROVISION FOR LOCAL EMPLOYMENT AND SKILLS.

The County has been working with District/Borough, and Stoke-on-Trent City Council colleagues to prepare an Employment and Skills Plan Framework that will provide advice and structure on the preparation of Employment and Skills Plans associated with new development across Staffordshire. Staffordshire District/Borough Directors endorsed this approach earlier this year to provide consistency across the County. However, we note the R19 Plan does not make reference to this. Therefore, we suggest the following changes to the supporting text paragraphs 6.151 and 6.152 to aid interpretation of the Policy and consistency with the County wide model. New text is underlined and deleted text struck through:

- *6.151. Many large companies already engage with the District Council when creating jobs within the District and actively encourage local training and employment creation. The District Council wants to work positively with employers and developers in the area to deliver a local skilled workforce during the construction phase and with future occupiers of premises. As the future occupiers are not always known at the time of submission of the planning application an employment and skills plan prior to commencement for the construction workforce and a separate employment and skills plan will be required for the pre-occupation for the operational workforce. The District Council requests that the Staffordshire Employment and Skills Plan Strategic Framework is adopted for this purpose and the template Employment & Skills Plan featured as Appendix 1 within the framework, is used.*

- *6.152. Employment and Skills Plans provide a targeted approach to both employment & skills and engagement with local businesses. The purpose of the plan is to support the employment and training of residents, provide opportunities for schools, education providers to engage with the project and enhance learning and promote the procurement of goods and services from local suppliers. ~~opportunities to provide local people with available vacancies, through mechanisms such as Jobs Fairs, and enable the FE colleges to ensure that relevant training opportunities and apprenticeships can be promoted.~~*

Public Health

Overall, we are supportive of the Local Plan from a Public Health perspective and acknowledge consistent references to health and wellbeing throughout. We do feel that the Plan would have benefited from a specific Policy promoting/enabling health and wellbeing, but we recognise that the Plan is still sound without such a policy.

We acknowledge and support the Health Impact Assessment of the Local Plan. We would have liked to see this as a specific document rather than embedded/implicit within the Sustainability Appraisal but support nonetheless. It is good to see reference to 'SA Objective 12: Improve public health and ensure public health facilities are accessible for those in need.

We are supportive of the Local Plan Strategic Objectives 2 and 3 and the associated Policies in relation to their coverage Health and Wellbeing. It is positive to see a specific objective regarding the creation of community facilities and healthy living objectives (objective 2 - 1.11) and there is a good list of priorities within. It would be good to see something in here regarding increasing community cohesion, specifically in relation to new community facilities. This may be an opportunity to make reference to co-production regarding meeting specific need according to the data profile.

We would have liked to have seen the Plan make reference to the 'building homes for life' standard. This concept goes beyond just the house itself and refers to creating an environment suitable for people to live their whole lives, including ageing and helps support people for example with dementia and disabilities to be active within their own communities. For example, development extras which create neighbourhoods, community identity and belonging, tailoring developments for the needs and the future needs of communities and providing connectivity between the indoor and outdoor areas. It can also include insight from disabled facilities grants and housing associations regarding the most commonly requested adaptations to enable people to stay in their homes for longer. However, we recognise that Policy

provision in the Plan makes reference to the future production of a Local Design Code/guide. Therefore, we suggest the Local Design Guide incorporates reference to Building Homes for Life and/or adopts the principles behind the standard. Further, we would like to see Local Design Guidance encourage creation of leisure walking/cycling routes within development sites simply for the purposes of activity.

Whilst the Policies under Strategic Objective 2 encourage and support opportunities for Healthy living and activity we do note that there is no specific inclusion on restrictions towards developments that potentially have a negative impact on health and wellbeing. In particular there is no reference to restrictions (either location or opening hours) on Hot Food takeaways in proximity to school to discourage unhealthy eating habits during and immediately after the end of school day.

Housing

We are supportive of Strategic Objective 3 and Policies SO3.2 and SO3.3 in relation to delivery of homes suitable for older persons and people living with disability and/or life limiting conditions.

We acknowledge that the plan at paragraph 6.120 identifies Staffordshire County Council data being used to support the Housing Needs Assessment to support the delivery of a range of housing to meet the needs of all residents of the District, including housing with care and looked after children.

Sustainability & Climate Change

The inclusion of plan objectives and policy statements to address carbon emissions at source (i.e. through new and future development), as well as through improved transport options and infrastructure is clearly welcomed.

The policies themselves are worded such that better standards (e.g. Hone Quality Mark/BREEAM), and therefore potential positive impact, are something to strive for if they can be practically and/or viably achieved but with little detail provided on what this means in practice. However, the Local Plan should be more specific and more certain about what it will require, rather than support and encourage, from developers. Likewise, more certainty on what is meant by 'practically and viably' achievable for low and zero carbon proposals and how this should be evaluated. Amendments to the supporting text would assist in this matter.

More detail could be provided on renewable/sustainable heat and power generation, including issues and requirements related to, for example, photovoltaics as these form a critical role on the route to net zero. There appears to be no mention of the generation potential or decommissioning of such installations at the larger scale, though comment is made on the restricted availability of land for larger schemes, understandably making

wind power schemes difficult to implement. Likewise there is no mention of carbon sinks and sequestration opportunities across the district.

Minerals and Waste

Our comments in relation to Minerals and Waste are contained in the table below.

Policy	SO7.7: AMENDMENTS TO THE GREEN BELT
Soundness	YES
Support	<p>Policy 2.5 of the Staffordshire and Stoke-on-Trent Joint Waste Local Plan (WLP) would not support built development proposals which would unduly restrict operations at a permitted waste facility.</p> <p>There is particular interest, therefore, in the allocation SH1 - Land south of Lichfield Road, Cannock Road (see our separate representation for Policy SH1); and Site Allocation S2 - Land at Newlands Lane, Heath Hayes, Cannock (former golf driving range) due to both sites' proximity to the Poplars Landfill Site and Anaerobic Digestion (AD) facility.</p> <p>Permission SCC/23/0114/VOC requires that landfill operations cease no later than 10 March 2032 and that the site is restored by 10 March 2042 to agriculture, open water and woodland. The AD facility is no longer linked to the duration of landfilling operations (ref: permission SCC/22/0104/FULL-ES).</p> <p>The Site Allocation S2 is to be safeguarded for development requirements beyond 2040 which should ensure that landfilling operations are completed, and the landfill site is substantially restored before development within the allocation takes place.</p>
Proposed Modification	None

Policy	SO8.7: SAFEGUARDING MINERAL RESERVES
Soundness	YES
Support	<p>The supporting text explains why the policy is consistent with national minerals planning policy and with the aims of the Minerals Local Plan for Staffordshire (MLP).</p> <p>The District Council already work with the Mineral Planning Authority to ensure that relevant applications for non-mineral development are considered in accordance with policy 3 of the MLP and supporting paragraph 6.393 refers to the latest standing advice relating to mineral safeguarding. Referring to that advice, the District Planning Authority should have regard to the Coal Authority's updated approach to safeguarding coal as a mineral</p>

	resource.
Proposed Modification	Amend paragraph 6.392 so that “including an area of surface coal and associated fireclays in the southern part of Cannock Chase District” is deleted and first sentence states: “The Minerals Local Plan identifies Mineral Safeguarding Areas and these areas will be safeguarded against needless sterilisation by non-mineral development.”

Policy	SO8.8 MANAGING WASTE
Soundness	YES
Support	As prescribed by regulations, waste operations and uses of land are usually dealt with as “county matters” and would be considered in accordance with the policies found in the WLP. Policy SO8.8 is considered consistent with the National planning policy for waste and the aims of the WLP but it would be expected that the determination of proposals for waste management facilities and the safeguarding of land used for waste management development should accord with the policies found in the WLP or any review of the WLP.
Modification	<p>Amend policy to delete: “Development proposals for waste management facilities will need to demonstrate that the proposals:</p> <ul style="list-style-type: none"> • Are compatible with the objective of moving the management of waste up the Waste Hierarchy. • Will not result in unacceptable direct or indirect impacts on the amenity of existing or proposed neighbouring uses. • Have good access to the principal road network, and where practicable, other modes of transport.” <p>And replace with: “Development proposals for new or extended waste management facilities should accord with the policies in the Staffordshire and Stoke-on-Trent Joint Waste Local Plan (or any subsequent review of those policies).”</p> <p>Similarly, delete: “Non-waste related development proposals on or in the vicinity of the permitted waste management facilities will not be supported, unless there are overriding planning reasons why the non-waste related development should be permitted, including the relocation of waste facilities to alternative sites.”</p> <p>And replace with: “Proposals for non-waste related development on or in the vicinity of all permitted waste management facilities should accord with policy 2.5 (The location of development in the vicinity of waste management facilities) in the Staffordshire and Stoke-on-Trent Joint Waste Local Plan (or any</p>

subsequent review of that policy).”

Policy	SH1: LAND SOUTH OF LICHFIELD ROAD, CANNOCK
Soundness	YES
Support	<p>Policy 2.5 of the Staffordshire and Stoke-on-Trent Joint Waste Local Plan (WLP) would not support housing proposals which would unduly restrict operations at a permitted waste facility.</p> <p>There is particular interest, therefore, in the allocation SH1 - Land south of Lichfield Road, Cannock Road due to the site’s proximity to the Poplars Landfill Site and Anaerobic Digestion (AD) facility.</p> <p>Permission SCC/23/0114/VOC requires that landfill operations cease no later than 10 March 2032 and that the site is restored by 10 March 2042 to agriculture, open water and woodland. The AD facility is no longer linked to the duration of landfilling operations (ref: permission SCC/22/0104/FULL-ES) but is more than 500 metres from the allocation.</p> <p>The Site Allocation SH1 is likely to be developed while remaining landfill operations take place, and the landfill site is restored.</p> <p>The policy acknowledges the need for any housing proposals to assess the need for mitigating the risk of environmental nuisance due to the housing site’s proximity to the landfill site. It would be anticipated that as landfilling progresses that the risks of housing development restricting permitted waste operations will reduce, noting that landfilling with non-hazardous waste is currently required to cease by 2032.</p>
Modification	<p>Amend policy to delete: “An odour assessment will be required to assess the impact of Poplars Landfill on the health and amenity of residents and determine any mitigation required.”</p> <p>And replace with: “Housing proposals should be supported with an assessment to demonstrate that those proposals do not adversely restrict remaining operations at the Poplars Landfill site nor pose a risk of an unacceptable adverse impact on residential amenity having considered the advice of the District Council’s Environmental Health Team and the Environment Agency.”</p>

Flood Risk & SUDS

Policy SO8.4 – Managing Flood Risk

The LLFA believes that broadly and wholly, the general aims, and broad themes outlined in the proposed Cannock Chase Local Plan document are

along the correct lines and are promoting objectives to be commended. However, we would like there to be more specific and explicit prescription for particular policies and practices with regard to flood risk mitigation and management as well as drainage provision.

The LLFA would like CCDC to consider restricting any positive surface water discharge from new development to pre-existing Greenfield rates, whether an undeveloped (Greenfield) site or a previously developed (Brownfield), site. This would provide a great deal of betterment in terms of flood risk and drainage in the District, and should be considered.

The LLFA would like to emphasise that there very often, and in fact in most cases, are multiple benefits to be realised through the provision, implementation and delivery of innovative, best practice 'Blue/green' Sustainable Drainage Systems (SuDs). Indeed linking Policies SO8.4: *Managing Flood Risk* and Policy SO7.2: *Biodiversity Net Gain*, there are numerous, sizeable and obvious multiple, crossover benefits to be realised. Green/Blue SuDs features such as open swales, green open basins, raingardens, tree and other vegetative planting, tree pits, permeable paving etc, offer excellent, and indeed industry best practice, water quantity (flood risk management) control, as well as pollution mitigation. The wider holistic benefits of amenity and biodiversity are no less important and there is a great opportunity to align and cross reference between these policies. The Four Pillars of SuDs (Water quantity, water quality, amenity and biodiversity), are core here. Green open space can offer all of these aspects of SuDs.

Therefore the LLFA would like to recommend that the statement "All Major development should incorporate Sustainable Drainage Systems (SuDS)", is incorporated into Policy SO8.4.

Furthermore, the policy statement moves on to refer to lifetimes of developments. Again, open, green/blue features are much more maintainable, and have a greater prospective lifespan than subterranean, pipes and tanked systems. Therefore the promotion of open 'daylighted' systems, is paramount.

The following text is deemed appropriate:

"All developments will be expected to incorporate appropriate Sustainable Drainage techniques that will manage flow routes on site, limit surface water run off discharge rates to the pre-development (Greenfield), condition and limit or avoid the connection of surface water discharge into the combined sewer network. Sustainable drainage should be considered at an early stage of the design process and be clearly demonstrated and evidenced within the information accompanying planning applications. Development should capitalise on opportunities for incorporating accessible green infrastructure, replicating natural systems and improving biodiversity with SuDS. New development will be required to open up culverted watercourses wherever it is technically feasible, re-

aligning and naturalising watercourses where possible, and to ensure that development does not occur above or adjacent to existing culverts. Development will be permitted where proposals do not have a negative impact on water quality, either directly (through pollution of surface or ground water) or indirectly (through overloading of wastewater treatment works.) Any major development should demonstrate that there is adequate wastewater infrastructure in place to serve the development."

Yours sincerely

James Chadwick
Planning Policy Officer