

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



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

Part B: Representation Form

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

Part B: Representation

Name and Organisation: Eric Henderson	Staffordshire County Council
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Q1. To which document does this representation relate? (Please tick one box)

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

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

Para- graph:		Policy:	SO4.2 / SE1	Site:	King- swood Lakeside	Policies Map:	
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Q3. Do you consider the Cannock Chase Local Plan is:

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

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.

There are a series of issues which have been fully detailed in the SCC letter dated 14th March 2024 which was submitted this morning (18th March 2024) by email. The letter will be submitted again in conjunction with this document.

(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.

As with the preceding section, the issues have been fully detailed in the SCC letter dated 14th March 2024 which was submitted this morning (18th March 2024) by email. The letter will be submitted again in conjunction with this document.

(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)

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(Please tick one box)




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

As the issues are fully detailed in the SCC letter submitted, and assuming the issues at fault will be corrected, there is no need for me to participate in a separate hearing.

(Please continue on a separate sheet if necessary)

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

Signature:	
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Date:	18 th March 2024.
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Local Plans Team
Cannock Chase District Council
Civic Centre
Beecroft Road
Cannock
WS11 1BG

Email: 

Date 14 March 2024

Via Email only

Re: Cannock Chase Local Plan Review – Pre Submission Regulation 19 Consultation – Kingswood Lakeside Extension

Dear ,

As you will be aware, the County Council has previously made Cannock Chase District Council aware of our long-term ambitions and support for the extension of the Kingswood Lakeside Employment site, building on the huge success of previous phases which will have created in the order of 2,500 jobs when the businesses on site reach their full employment potential.

We are pleased to see the proposed extension land identified as a Strategic Employment Allocation as part of Policy S04.2 (Provision for new employment sites) within the Regulation 19 Document and this letter provides further detail, as a landowner in respect of the current consultation in addition to the wider response from Staffordshire County Council.

As you will be aware, the entirety of the land identified for the proposed extension to Kingswood Lakeside is in the ownership of Staffordshire County Council and through this letter we are reconfirming our commitment as the landowner to bring forward the site for employment uses, building on our strong track record of previous phases of delivery at Kingswood Lakeside and more widely across Staffordshire.

The extension land is highly deliverable and is ideally located to accommodate sustainable economic growth, via existing and planned infrastructure within the area and provides an accessible and high-quality setting to attract significant investment into the Cannock area.

Vehicular access to the site will be provided from Blakeney Way which also provides existing public transport and active travel connectivity to local communities.

Although we recognise that the site does have some geotechnical challenges (similar to the existing Kingswood Lakeside site) these can be successfully overcome, and quality businesses can be attracted to the site. This is verified through continued commercial interest expressed by potential occupiers which in turn would obviously drive additional business rates, support the local economy and further economic regeneration to the area.

Notwithstanding these challenges, the extension site is highly deliverable within the Local Plan period and the County Council as landowner is fully committed to bringing it forward.


Beyond the successful delivery of commercial development and its employment potential, the extension site being promoted will also realise environmental enhancement within the surrounding green space and the adjacent Site of Biological Importance.

The County Council's team has the in-depth knowledge required to bring the site forward within this Local Plan period and intends to work in partnership with the private sector to establish a viable scheme which responds to local and sub regional economic needs.

We look forward to maintaining the strong working relationship with Cannock Chase District Council to promote the future economic prosperity of Cannock via this important project.

Having reviewed the policy wording included within the policy in the Reg 19 plan consultation we have identified a number of areas of inaccuracy and clarification which we have included as an addendum to this letter. The CCC original text remains in black, the SCC responses are in blue text.

Yours sincerely,



John Flynn

Head of Physical Regeneration and Strategic Projects

Staffordshire County Council.

6. Local Plan Policy Options

Site Allocations

Strategic Site Specific Policy - Kingswood Lakeside Extension, Norton Canes.

Site Reference: SE1

Address: Land to the East of Kingswood Lakeside, Norton Canes

Proposed Use: The development of up to 500,000sqm of employment floorspace and provision of a community park

Indicative Floorspace: Up to 500,000sqm. *This is incorrect, the figure of 500,000 is correct but the units should be ft² not m².*

Site Area (Hectares): 21.5

Net developable area (Hectares): 8.6 *This is incorrect; the correct figure is 14.54Ha giving a developable area which then matches the Site Boundary and the Concept Design plans. The allocation of the correct 14.54Ha would facilitate delivery of the full scheme which would in turn realise the maximum employment potential. CCC has previously been advised several times of this inaccuracy but, unfortunately, it has not yet been incorporated. The incorrect 8.6Ha has come from a very early indicative layout plan, rather than from part of the County Council's formal submission.*

Description of Site

The site is located on the urban edge of Cannock and is therefore in accordance with the Spatial Strategy of the Local Plan being identified as one of the priority areas for new residential and commercial development.

The proposed allocation (ELA ref: SE1) lies to the east of the existing Kingswood Industrial Estate and to the north of Kingswood Lakeside Employment Park and is bounded by the existing Kingswood Lakeside Business Park to the west, and Norton Lane to the east. The site presents a unique opportunity to extend the existing business park, however this will result in release of land from the Green Belt.

To compensate for the loss of land from the Green Belt, a new community park will be created which will enhance the existing habitats and increase biodiversity on site whilst providing public access for recreation and leisure use. *This suggests that 'a new community park' will be created as part of the*

Kingswood Lakeside Extension scheme which is incorrect. There is no physical capacity for the creation of a new community park in addition to all the publicly accessible space. One of the aims of the project is for the enhancement of the existing publicly accessible area and of the adjacent Site of Biological Importance (SBI). The County Council believes the new community park being referenced is part of CCC Local Plan policy SH1, which is being delivered in Health Hayes.

The site is sustainably located and promotes active travel; A bus route serves the existing employment site. A public right of way also crosses the site. This is incorrect, there are no public rights of way across the Kingswood Lakeside Extension site. Public Rights of Way are present on the existing business park, but they do not cross the proposed site.

The northern part of the site lies within an area of Historical Contamination (Historic Landfill). The land will be subject to remediation. There is a historic landfill site, but it lies to the north of Norton Lane, i.e., outside the Kingswood Lakeside Extension site. There have been no known importation landfill operations at the Kingswood Lakeside Extension site. Therefore, it is unlikely that historic landfill remediation works will be required in this context.

The site is located within a SSSI Impact Zone. Development will be subject to the adopted charge which supports management of the SAC.

This site will be released from the Green Belt for an extension to the existing employment land, with a net developable area of circa 8.6 ha (40% of site). As noted earlier, this is not correct as the developable area is 14.54Ha. Therefore the 40% reference is therefore also incorrect as 14.54Ha is 67.6% of the 21.5Ha gross site area.

6. Local Plan Policy Options

Site Allocations

Site Boundary



POLICY SE1: KINGSWOOD LAKESIDE EXTENSION 2, NORTON CANES

Land at Kingswood Lakeside, shown as SE1 on the Policies Map, is allocated for employment floorspace up to 500,000sqm. [This is incorrect. Please see the 'Net Developable Area' explanation in the site particulars.](#)

A Sustainability Statement will be required to set out how the development will maximise opportunities for on-site production and use of low and zero carbon energy and heat, how the development will incorporate and/or link, to low and zero carbon energy and heat systems, and to take account of projected changes in temperature, rainfall and wind to ensure that the development remains resilient to the effects of climate change.

Vehicular access will be via Blakeney Way, with a minimum of two primary points including access to the development from Blakeney Way. A Transport Assessment and Travel Plan will be required to support the application. **For clarification, the proposal is for a single access road joining Blakeney Way to the development plateau(x) but with multiple accesses from that access road onto the development area. This is the arrangement which has been shown in all submitted plans.**

Vehicle parking will be provided as an integral part of the scheme, with provision for electric vehicle charging and generous planting to limit impact on visual amenity and ameliorate impact on climate change.

Provision of a network of pedestrian, cycle and vehicular ways to connect to, and integrate with the existing employment site and Norton Canes.

A bus stop on Blakeney Way to serve new employees will be delivered, subject to feasibility and viability considerations with the network provider. Applicants must demonstrate this option has been fully explored as part of the Design and Access Statement. **Paragraph 4 of the 'Description of Site' section already states that the site has bus service provision. There are already two bus stops on Blakeney Way, one for either direction, within 100m of the anticipated junction location of the access road to the proposed Kingswood Lakeside Extension scheme. Further provision could not provide additional functionality.**

Redevelopment on any part of the site which is previously developed and considered to be subject to contamination will need to be supported by an assessment and remediation statement.

In accordance with national planning guidance, the impact of removing land from the Green Belt should be offset compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. **This is ethos of the Kingswood Lakeside Extension scheme, the delivery of which is planned through the enhancement of the existing publicly accessible areas and the adjacent SBI.**

A Landscaping Strategy will be required to ensure that the development form and layout minimises the adverse visual impact on the remaining Green Belt and is designed taking into account site topography and existing defining features of the landscape.

The design, layout and landscaping of the site is required to limit the perception of coalescence between Heath Hayes and Norton Canes and to minimise adverse impacts on the settings of both settlements.

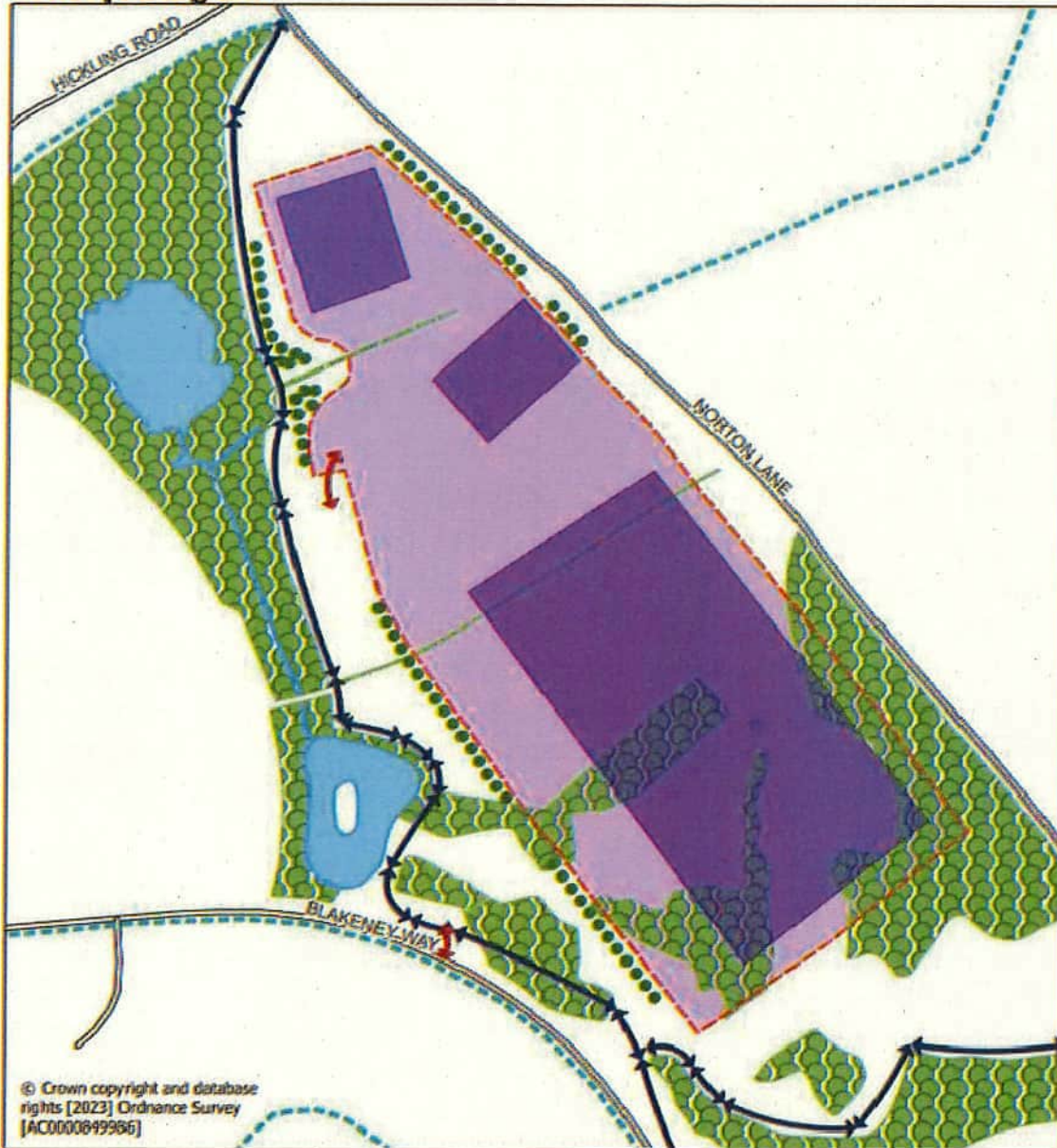
A new community park will be created, enhancing existing habitats and ecological features on sites including the ponds and woodlands. Public access will be retained to existing open space and enabled to less ecologically sensitive areas of the site. Opportunities to link with wider green infrastructure corridors and to expand connectivity with ecological corridors will be identified through the proposal. **As previously, it is assumed the reference to 'a new community park' is referring to the new facility detailed in Policy SH1.**

A Biodiversity Net Gain Assessment will be required to ensure a minimum of 10% net gain in biodiversity as a result of the site development, in accordance with Policy SO7.2. An Ecological Impact Assessment also will be required in accordance with Policy SO7.1.










The development will incorporate new or enhanced attenuation ponds and SuDS features to provide suitable drainage systems on the site, subject to the findings of a site-specific flood risk assessment. **In a similar approach to the landscaping, the principle is for a hydrological management scheme which enhances the current hydrologically linked features existing within the wider Kingswood Lakeside site. The development will be informed by both a drainage strategy & a geotechnical assessment which would then influence sympathetic drainage measures linked to the overall benefit of the wider Kingswood Lakeside site.**

If over 50 full time equivalent jobs will be created during the construction phase and by future occupiers, the development proposals will be accompanied by an Employment and Skills Plan to demonstrate how the development will contribute to the training and employability of local residents, especially young people.

Concept Diagram



Key

- | | |
|--|--|
|  Site Boundaries |  Potential Active Travel Routes&Connections |
|  Existing Streets |  Indicative Location for Enhanced Screening |
|  Existing PRoWs |  Indicative Location for Employment Use |
|  Existing Area of Woodland |  Indicative Location for Additional Employment Infrastructure |
|  Indicative Vehicular Access Points | |

The 'potential active travel access routes' indicate will be informed by a transportation assessment as part of the development which will confirm possible linkages to existing residential areas & routes which are just of a recreational nature within the site.