



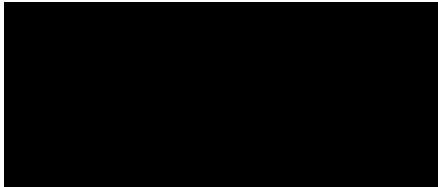
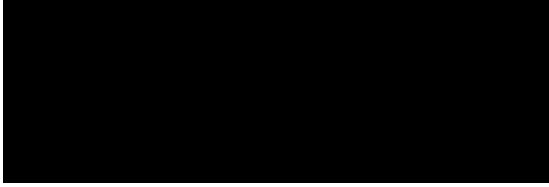
Statement of Common Ground between  
Cannock Chase District Council and Indurent  
in relation to WATLING STREET BUSINESS  
PARK EXTENSION

Cannock Chase Local Plan (2018-2040)  
November 2024

## 1. Parties Involved

- Cannock Chase District Council (CCDC)
- Indurent / RPS

## 2. Signatories

<b>Signed:</b> 	<b>Signed:</b> 
<b>Name:</b> Dean Piper	<b>Name:</b> Jacob Bonehill
<b>Position:</b> Head of Economic Development & Planning	<b>Position:</b> Associate Director - Planning
<b>Organisation:</b> Cannock Chase District Council	<b>Organisation:</b> RPS on behalf of Indurent
<b>Date:</b> 28/11/2024	<b>Date:</b> 27/11/2024

## 3. Purpose of Statement of Common Ground

This SoCG sets out details of the agreement between Cannock Chase District Council (CCDC) and Indurent in relation to the proposed strategic allocation in the Local Plan, referred to as Watling Street Business Park Extension (SE2). Both parties have worked jointly on the proposed allocation and are committed to delivering quality development over the Plan period.

## 4. Planning Area Covered by SoCG

This Statement of Common Ground (SoCG) covers land to the south of the existing Watling Street Business Park which is included as the proposed strategic allocation as Watling Street Business Park Extension (SE2). The land is shown on the attached proposed Concept Diagram and currently comprises agricultural land in the Green Belt.

## 5. Background

The site allocation comprises of land under the control of Indurent to the south of Watling Street Business Park. Indurent promoted the land for allocation through the initial call for sites at the start of development on the Local Plan Review.

The site featured as part of one of a number of locations identified as 'Areas suggested for possible Green Belt sites – other options' under Options C1 and C2 considered for the Strategy for Meeting Overall Employment Needs Policy Options in

the Issues and Options consultation document published in May 2019. Option C related to Green Belt Sites, with Option C1 being:

“In combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt sites. Prioritise extensions to Kingswood Lakeside followed by extensions to other existing employment sites.”

And Option C2 being:

“In combination with the options for the Urban Areas and former Rugeley Power Station consider all Green Belt site options across the District with no prioritisation to Kingswood Lakeside.”

The site was not identified for development in the Preferred Options consultation document published in March 2021. Indurent submitted representations to this consultation promoting the site for allocation. On consideration of the available evidence, the Council considered the site to be suitable for allocation and subsequently sought to identify the site as safeguarded land for employment in the Reg 19 version of the Local Plan which was presented to Cabinet in August 2022. This version of the plan was not subject to consultation and was superseded by the final Reg 19 plan. Evidence to support the final plan included the update to the Employment Development Need Assessment (E7) which indicated additional need for employment land.

The site was subsequently identified as a proposed allocation in the Regulation 19 Proposed Submission consultation document published December 2023 accompanied by a site-specific policy SE2, concept diagram in addition to be referenced in Policy SO7.7 Amendments to the Green Belt. This has provided opportunities for public engagement as well as comments from statutory consultees including infrastructure providers over the course of the development of the Local Plan.



*Figure 1 – Local Plan Reg 19 Policies Map Extract – indicating site SE2 in purple cross hatch*

## **6. Engagement**

Meetings have been held between the two parties to discuss strategic matters over the course of development of the Local Plan.

Further meetings have been held between CCDC and RPS/Indurent between April and October 2024 to discuss preparatory work for the next stages including submission of the plan, preparation of the SoCG and potential pre-application steps. Correspondence has continued outside formal meeting dates via email and phone calls and both parties have been open to discussion and engagement throughout the latter stages of development of the Local Plan.

## **7. Agreed Strategic Matters**

### **Land use principles**

Both parties agree that the proposed allocated site SE2 can deliver employment development of up to 43,000 sqm of floorspace. The site will deliver new employment floorspace, associated infrastructure and biodiversity net gain either on or off site. Variations to the quantum and location of development in the indicative Concept Diagram may be required. Subject to the outcome of the Local Plan process, these will be justified and determined through the development management process.

### **Access**

The general location of the highway access point on the Concept Diagram is agreed with CCDC, Indurent and SCC as local highway authority. Whilst the access links

through the existing Watling Street Business Park has not been shown on the Concept Diagram, it is agreed that access to Watling Street will be through the existing Business Park.

Additional traffic movements on the local highway network can be mitigated.

### **Deliverability**

Land required for the proposed allocation Watling Street Business Park Extension (SE2) is available and can be delivered over the Plan period. All of the draft allocated land (SE2) and the entirety of the existing Watling Street Business Park is owned by Indurent, who are committed to delivering development in this location.

Indurent have prepared an extensive technical evidence base to support the proposal that has been included within its Regulation 19 Representations. This includes the reports addressing the following:

- Transport and Accessibility
- Noise
- Air Quality
- Utilities
- Flood Risk and Drainage
- Archaeology and Heritage
- Landscape
- Ecology
- Green Belt Impact
- Viability

Indurent are also committed to the early delivery of the site. EIA screening will shortly be submitted to CCDC. Pre-application details will be submitted and associated meetings will be held prior to the submission of any planning application. Initial discussions in advance of a formal pre-application have included dialogue with SCC Highways, National Highways, and representatives from Norton Canes Parish Council.

## 8. Agreed proposed modifications

Page	Section/ para/ policy	Proposed Change	Reason
189	SE2 Supporting Text 'Site Area (Hectares)	Amend wording in supporting text under heading Site Area (Hectares): 9	Factual correction
189	SE2 Supporting Text 'Net Developable Area'	Amend wording in supporting text under heading Net Developable Area: 7.36 hectares .	Factual correction
189	SE2 Supporting Text	Include new section 'Indicative Floorspace: 43,000 sqm' after 'Net Developable Area:7.36 hectares'	Factual correction
189	SE2 Supporting Text 'Description of Site'	Amend first paragraph: "The proposed allocation comprises <u>up to 5043,000sqm</u> of industrial and logistics floorspace (Use Classes E(g)(iii), B2 and B8. This will comprise <u>redevelopment of the existing site (with the retention of two existing employment units on the existing employment site) and new development on land within the wider allocation. Proposals for the redevelopment of the adjacent existing Watling Street Business Park will be supported in accordance with Policy SO4.1. Any redevelopment of the existing Watling Street Business Park will be additional to the allocation provision.</u>	Factual correction
190	Policy SE2	Amend first paragraph:  "Land to the south of the existing Watling Street Business Park, shown as SE2 on the Policies Map, is allocated for employment floorspace up to <u>5043,000sqm.</u> "	Factual correction

## 9. Matters of disagreement (uncommon ground)

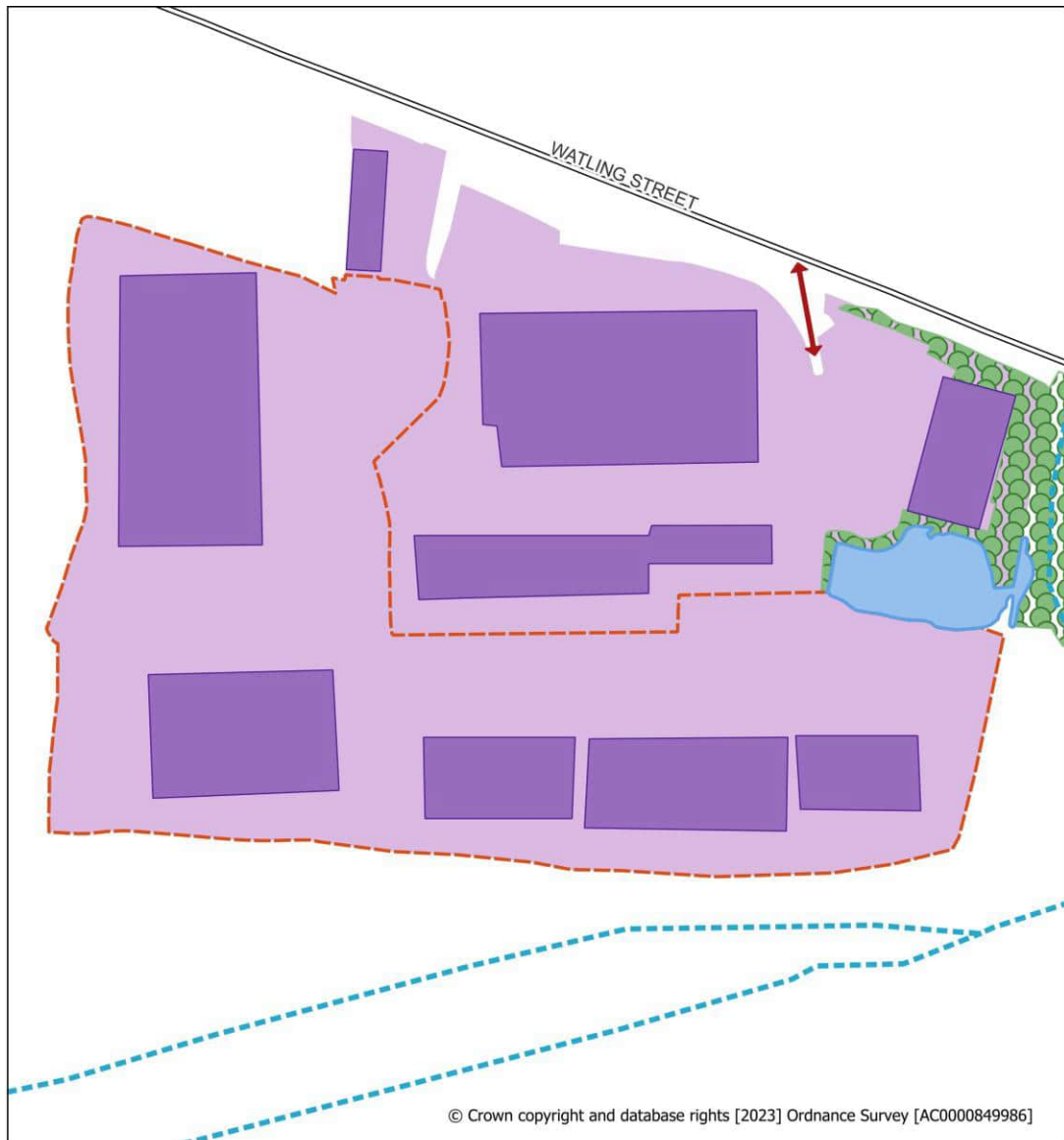
RPS on behalf of Indurent have made 21 detailed representations on the Local Plan (A0081 BO108A-AO108U inclusive). Many of the representations concern local planning policies within the Plan that are relevant to the site requirements. Modifications have been suggested by Indurent to address a number of points of

objection. This SoCG does not address all the representations made, except for representation BO108S which specifically concerns proposed Policy SE2.









The Council has provided a response to each of the points raised in the representation which was published at a meeting of Cabinet on 22nd August 2024. The Council's summary of the representation and response to representation BO108S has been appended to this SoCG for clarity (Appendix 1).

CCDC does not agree that all of the suggested modifications by Indurent are required in order for the policy to meet the tests of soundness detailed in the NPPF. Any areas where agreement cannot be reached can be considered through the Examination.

Figure 2 Concept Diagram (Cannock Chase Local Plan Pre Submission Reg. 19, Policy SE2)



Key

- |   |  |
|---|--|
|  Site Boundaries           |  Existing PRoWs   |
|  Existing Streets          |  Indicative Vehicular Access Points                           |
|  Existing Area of Woodland |  Indicative Location for Employment Use                       |
|  Existing Pond             |  Indicative Location for Additional Employment Infrastructure |



**Appendix 1: CCDC Summary of Indurent representation B0108S and response to issues raised.**

Respondent						
St Modwen Logistics C/O RPS - Mr Jacob Bonehill						
<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>
Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate
A0108	B0108S	Local Plan	SE2	Yes	No	Yes
<b>8</b>						
Summary of Main Issue(s) Raised Within the Representation						
<p>The submission is accompanied by a number of technical reports to support the suitability and deliverability of the policy, which are listed at the bottom of the representation and also appended to the submission.</p> <p>RPS would welcome further engagement with the Council on the matters raised in the submission, with a view to preparing a Statement of Common Ground which then would be submitted as part of the examination process.</p> <p><b>Site Area</b> It is considered that the site area is comprise of the existing business park, the expansion land and the existing pond to the east. The overall site area for this is around 15.5ha.</p> <p><b>Net Developable Area</b> They consider the net developable area quoted to be incorrect. The expansion land has a gross area of 8.99ha and a net developable area of 7.36ha. As the existing employment park is already developed it does not make any direct contribution to the net development area, but as set out in Appendix A its redevelopment will provide a further circa 7,000sqm.</p> <p><b>Description of Site and Site Boundary</b> The description of the site in the introductory text before the policy is stated in the representation.</p> <p>RPS note that the existing business park is not included within the site boundary, and that as worded this section could be interpreted as implying either 50,000sqm will be achieved on the Site Boundary as currently proposed, or that it will be achieved through the redevelopment of the existing site. This is considered unclear and unjustified given that as shown in Appendix A that just over 50,000sqm is only achievable with the partial redevelopment of the existing business park and the additional expansion land. RPS suggest that the site boundary should be amended to reflect the red line boundary shown on Appendix B.</p> <p>RPS recommend that the introductory text is also amended. In relation to the first paragraph of the policy wording the imposition of an up to or, a specific figure for the floorspace is not justified, and this introductory text should be amended as a consequential change.</p> <p>It is considered that the reference to the retention of the two existing employment units to be unjustified. For the purposes of the current emerging proposals it has been assumed that these units will be retained due to some of the existing tenancies being on long leases. Should the tenants leave earlier then the redevelopment of these units could be included as part of the wider scheme. As such it is considered that seeking their retention would be inefficient, unjustified and therefore unsound.</p> <p>RPS propose amending the description as shown in the modification section.</p>						

RPS also note the references in the second paragraph to BNG and various sustainability standards. While St Modwen are broadly supportive of these requirements. They suggest that in relation to the wording it should be amended as shown in the modifications section.

#### **First Paragraph - Quantum of Development**

The first paragraph of the policy is quoted.

RPS objects to the cap on new employment floorspace (up to 50,000sqm) proposed under this policy. It is considered no clear evidence is provided to demonstrate that such a limit is justified on this site. Information submitted based on the emerging illustrative masterplan set out in the promotional document appended to the submission (Appendix A) shows that the overall indicative layout, including the land within the existing business park, is capable of delivering slightly more than 50,000sqm of additional floorspace.

It is considered that the reference 'up to 50,000' is not justified and runs a counter to the wider economic objectives of the Plan and does not reflect the ongoing shortfall in employment land provisions in the district. It is considered to not be soundly based and that the wording should be amended (see modifications section).

#### **Second Paragraph - sustainability**

St Modwen have a strong track record of delivering sustainable development and are supportive of this section of the policy.

#### **Third Paragraph - Vehicular Access**

St Modwen are not supportive of the proposed wording. It is considered that at this stage the restriction to a specific access solution is overly restrictive and unjustified. It is considered that it has been demonstrated that a suitable access can be provided, but the specific form that the access takes should be considered when more detail is available as part of a future planning application and following engagement with National Highways. See Appendix D for further details. It is suggested that the wording should be amended (see modifications section).

#### **Fourth Paragraph**

The requirements of this section are broadly supported. As set out in relation to the earlier description of development RPS suggest an amendment for clarity (see modifications section).

#### **Fifth Paragraph**

The requirements of this paragraph are supported. As set per pages 26 and 27 of the vision document a package of potential sustainable transport measures have been identified.

#### **Sixth Paragraph**

The requirements of this section are supported.

#### **Seventh Paragraph**

In order to facilitate the development ascribed to the policy, the land must first be released from the Green Belt. This has been resolved through Policy SO7.7. for the expansion land and RPS welcomes and supports this. RPS also notes that the proposed policies map indicates that both the expansion land and existing Business Park are to be removed from the Green Belt.

The development of site SE2 is inherently linked to the redevelopment of land within the boundary of Watling Street Business Park. Adopted Local Plan CP8 supports proposals for redevelopment of employment sites located within the Existing Green Belt, including Watling Street Business Park. Policy SO4.3 does not include such provisions and it is assumed that the adopted policy will be superseded. The two land parcels are intended to come forward together through a single, comprehensive development [proposal. To leave part of the total land area within Green Belt, and part outside it, is illogical and would result in an inconsistent framework that could ultimately delay

progress in bring forward the site. As such, it is considered that plan is not soundly-based (not effective) unless a modification is made.

RPS recommends that the existing business park should be released from the Green Belt. RPS notes that the policies map indicates that this is the case and has also recommended an amendment to policy SO7.7 accordingly.

Consequential to the proposed modification to incorporate the existing pond into the site allocation boundary is the need to remove the pond from the Green Belt. As detailed in the representation incorporating the pond into the site allocation will enable the delivery of part of the SuDS strategy required under the policy. The Green Belt Assessment appended to the submission is considered to demonstrate that the release of the pond would not comprise the wider purposes of the Green Belt in this part of the district. The plans is not soundly-based (not effective) unless this modification is made. RPS recommends that the area of Green Belt that encompasses the existing pond is released through the main modifications process.

#### **Eighth Paragraph**

The importance of landscaping strategy is recognised.

The draft criteria would require ‘new or enhanced attenuation ponds and SuDS features’ to be provided as part of the drainage system in order to achieve a policy-compliant development on the site. The draft allocation boundary and the concept diagram currently excludes the existing pond which lies to the east of the existing business park and the proposed allocation site. The reasons for excluding the pond are understood from an employment development perspective, it is considered difficult to see how new or enhancement of existing SuDS features can be implemented without incorporating the existing pond. As such it is considered the draft policy is not effective and so is not soundly based.

RPS are broadly supportive of the proposed allocation boundary, but contents that this modification to incorporate the new pond (and remove it from the Green Belt) is required to ensure the policy can be complied with on adoption of the Plan in order to make the policy effective.

#### **Ninth Paragraph**

RPS are broadly supportive of this section of the policy.

#### **Tenth Paragraph**

It is anticipated that the proposed development will create more than 50 full time equivalent jobs during both the construction and operation stages as set out in Appendix I. Accordingly St Modwen would welcome discussions with the Council on the form and format of the proposed Employment and Skills Plan.

#### **Additional Supporting Information**

A list of Additional Supporting Information in support of the proposed allocation and development at Watling Street Business Park as well as other documents submitted in response to other proposed policies is provided within the representation.

Remove the word ‘extension’ from the policy name.

The wording of the first paragraph should be amended as follows:

“Land to the south of the ~~The~~ existing Watling Street Business Park and land to the south, shown as SE2 on the Policies Map, is allocated for employment floorspace of around ~~up to~~ 50,000sqm. ~~Should the retained units become available their redevelopment will be supported over and above the around~~ 50,000sqm floorspace.”

The wording of the third paragraph should be amended as follows:

~~“Vehicular access will be via the existing access onto the A5. The existing access will however be amended to only allow entry and exit from the westbound carriageway of the A5.”~~

The wording of the fourth paragraph should be amended as follows:

“Vehicle parking will be provided as an integral part of the scheme, with provision for a minimum of 20% of the car parking spaces for electric vehicle charging and generous planting to limit impact on visual amenity and ameliorate impact on climate change.”

Other modifications:

Remove the word extension from the first line on page 189 as labelled to reflect inclusion of existing business park.  
Site area - amend to 15.5ha

Net Developable Area - amend to 7.36ha

Amend the site description as follows:

“The proposed allocation comprises around 50,000sqm of industrial and logistics floorspace (Use Classes E(g)(iii), B2 and B8. This will ~~comprise~~ include redevelopment of the existing site (with the retention of two existing employment units on the existing employment site) and new development on land within the wider allocation. Should the retained units become available their redevelopment will be supported over and above the around 50,000sqm floorspace.”

“The proposed site will provide a minimum of 10% Biodiversity Net Gain through a mix of on and off site provision. In regards to Sustainability, a minimum of 20% of car parking spaces will be for EV Charging, with all units meeting the EPC A rating, with associated PV charging points and SuDS.”

Release the existing pond from the Green Belt and as a result modify the policies map to include the area that comprises the existing pond adjacent to the eastern boundary of the proposed site allocation and existing business park - see red line boundary Appendix BA showing the extent of the proposed site boundary.

Modify the draft concept diagram (on page 91) to include the area that comprises the existing pond adjacent to the eastern boundary of the proposed site allocation and the existing business park in the site boundary. See red line boundary Appendix B showing the extent of the proposed site boundary.

## 10

### Cannock Chase Council Response

- The Council note the discrepancy in the Site Area. The Council have allocated the part of the site which is suitable for development for employment, however the wider land area may be suitable for other uses such as biodiversity net gain. This area totals 9ha.
- The NDA should be representative of the site allocation only
- The Proposed Use of the site allocation should not reference the 50,000sqm, an Indicative Floorspace section should have been included in the policy in line with SE1 for the 43,000sqm floorspace
- The description of the site is factually inaccurate and should identify the additional contribution from the redevelopment of the existing Watling Street Business Park as separate and additional to the site allocation provision
- The request for the boundary change is acknowledge, it is considered that the site boundary is appropriate and in line with previous submission by the representee with regards to the site allocation of SE2. The existing Watling Street Business Park is not considered by the Council to form part of the SE2 site allocation, and is identified as a redevelopment of an existing employment area safeguarded under policy SO4.1 of the Local Plan.

Any factual inaccuracies regarding the site were unintentional and can be corrected through modifications to the plan. Some of the information has been derived based on the combined allocation of SE2 and the redevelopment of the Existing Business Park, this is incorrect as site allocation SE2 does not comprise the redevelopment of the Watling Street Business Park.

**First Paragraph**

The floorspace of the site should be identified as up to 43,000sqm in consideration of the capacity of the allocation site boundary. The Council used the most up to date information to date to attribute the site capacity, but it is acknowledged this is always approximate prior to detailed site assessments through a planning application.

**Third Paragraph**

The Council will consider the issues raised in the representation with regards to the vehicular access to the site. The Council require written advice from organisations with highways expertise (Highways Authority or National Highways) before considering removing this requirement.

**Seventh/Eighth Paragraph**

The existing Watling Street Business Park has been removed from the Green Belt as part of the amendments undertaken through the Local Plan Review, and is shown as no longer within the Green Belt on the Policies Map to be adopted alongside the Plan.

The Council do not consider that there is exceptional circumstances to remove the existing pond from the Green Belt for the purposes of SuDS and/or an attenuation pond. It is considered that there should not be any significant hard standing/buildings in relation to this provision and as such that the boundary for the site is appropriate.

**11**

Proposed Minor Modification(s)

**Admin**

Officer Ascribed Policy

SE2