



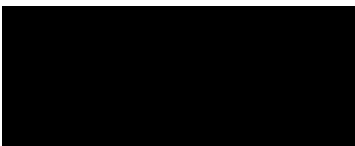
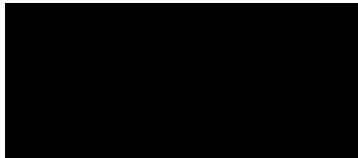
Statement of Common Ground between
Cannock Chase District Council and Taylor
Wimpey in relation to Land east of
Wimblebury Road

Cannock Chase Local Plan (2018-2040)
November 2024

1. Parties Involved

- Cannock Chase District Council (CCDC)
- Taylor Wimpey UK Ltd / RPS

2. Signatories

Signed: 	Signed: 
Name: Dean Piper	Name: Paul Hill
Position: Head of Economic Development & Planning	Position: Senior Director
Organisation: Cannock Chase District Council	Organisation: RPS on behalf of Taylor Wimpey UK Ltd
Date: 21.11.2024	Date: 21.11.2024

3. Purpose of Statement of Common Ground

This SoCG sets out details of the agreement between Cannock Chase District Council (CCDC) and Taylor Wimpey (TW) in relation to the proposed strategic allocation in the Local Plan, referred to as Land east of Wimblebury Road, Heath Hayes (SH2) and proposed safeguarded site East of Wimblebury Road, Heath Hayes (southern site) (S1). 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 two parcels of land to the east of Wimblebury Road, Cannock; the area included as the proposed strategic allocation as Land east of Wimblebury Road, Heath Hayes (SH2) and proposed safeguarded site East of Wimblebury Road, Heath Hayes (southern site) (S1) in the Local Plan. 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, in part, land that was previously safeguarded in the 1997 Local Plan and which was also similarly identified in the Cannock Chase Core Strategy adopted in 2014 as safeguarded land, as well as an additional parcel of land described as 'East of Wimblebury Road' which lies to the east of the safeguarded land. Taylor Wimpey has owned this land since 2011 and promoted the

land for allocation through the initial call for sites at the start of development on the Local Plan Review.

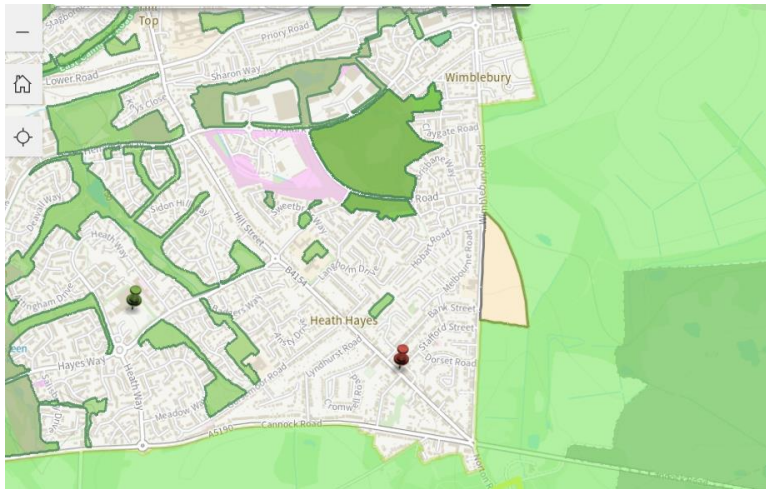


Figure 1 – Local Plan (Part 1) Policies Map Extract – indicating Safeguarded Land

The site featured as part of an indicative wider area for growth mark as ‘Option C2 areas suggested as possible Green Belt urban extensions at Cannock/Hednesford/Heath Hayes & Norton Canes’ in the Issues and Options consultation document published in February 2018. It was identified as ‘preferred option SH2’ in the Preferred Options consultation document published in March 2021. Finally, the site was subject to proposed allocation in the Reg 19 Proposed Submission consultation document published December 2023 accompanied by a site-specific policy SH2, concept diagram in addition to identification of safeguarded site S1 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 2 – Local Plan Reg 19 Policies Map Extract – indicating sites SH2 and S1 and WRRR

6. Engagement

Meetings have been held between the two parties to discuss strategic matters over the course of development of the Local Plan culminating in a wider meeting with Richborough Estates; representatives of the other proposed strategic allocation for residential development in Heath Hayes at Land south of Lichfield Road (SH1) as well as representatives from the education and highways departments of Staffordshire County Council (SCC) on 23rd November 2023. This enabled discussion of the cumulative infrastructure impacts and issues such as timing of delivery and policy clauses prior to finalising the Reg 19 document for consultation.

Further meetings have been held between CCDC and RPS/Taylor Wimpey 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 SH2 can deliver residential development of approximately 400 dwellings at a minimum density of 35dph. The proposals for the site include the Wimblebury Road Relief Road (WRRR) with access between Wimblebury Road and Cannock Road. The site will deliver market and affordable housing, open space, infrastructure and biodiversity net gain either on or off site as well as any necessary financial contributions to mitigate the impact of the development. Variations to the mix, 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 locations of highway access points on the Concept Diagram are agreed with CCDC, TW and SCC as local highway authority. Whilst the access links within the site have not been shown on the Concept Diagram, it is agreed that the WRRR will link the external points of access to the local roads serving the site.

CCDC and TW have worked collectively with SCC and Richborough to consider the cumulative impact of site proposals SH1 and SH2 on the local highway network. 'The Impact of Preferred Option Developments on Five Ways Roundabout – Revised Report with Lower Levels of Housing (Draft Regulation 19 Local Plan Sites)' [T7] dated 3rd October 2022 is an agreed evidence base to inform mitigation proposals, which demonstrates the delivery of the WRRR provides appropriate highway mitigation for the cumulative impact from both sites

Additional traffic movements on the local highway network can be mitigated. The parties are committed to working with SCC and other stakeholders including developers acting for proposed allocation SH1 to ensure necessary improvements to the Five Ways junction are delivered at the earliest possible opportunity.

Infrastructure

It is acknowledged by both parties that Land east of Wimblebury Road forms part of the wider growth proposals for Heath Hayes alongside Land south of Lichfield Road and that both the provision of a new school on site SH1 and provision of the WRRR on site SH2 are critical infrastructure items necessary to realise the full potential for growth across both sites.

As noted in Figure 2 above, a critical element of infrastructure relates to the delivery of the WRRR. It is noted that part of the WRRR will pass through land remaining in the Green Belt (i.e. not proposed for removal through SH2 and S1 allocations). It is agreed between the parties that the WRRR would not represent inappropriate development in the Green Belt, being compliant with paragraph 155 of the NPPF. This sets out that certain forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These include, indent 'c', local transport infrastructure which can demonstrate a requirement for a Green Belt location.

Additionally, CCDC and TW have been engaging on how the scheme can deliver compensatory improvements to the accessibility and environmental quality of the remaining Green Belt land (NPPF 146). This process would ultimately be delivered through the development management process, but the initial discussions have centred around improvements to Green Belt land at:

- Heath Hayes Park in the ownership of CCDC including formalising and enhancing car parking and new/enhancements to children/teens play areas and community garden areas;

- Enhancements to the woodland in TW ownership with the potential for improving the environmental quality of that area of remaining Green Belt;
- Enhancements to public rights of way from the site to the wider countryside and improving accessibility to the remaining Green Belt.

TW will continue to engage constructively with CCDC over the timing of delivery of critical elements of infrastructure. CCDC will coordinate discussions with TW, SCC and Richborough through the progression of planning applications with the aim to align infrastructure provision and avoid potential short term capacity issues wherever possible.

TW and Richborough are working on a collaboration agreement to ensure costs are shared between both parties to ensure the school is delivered on SH1 and the WRRR is delivered on SH2.

It is agreed that all parties will work together positively and expeditiously to agree an appropriate mechanism for equitable and timely infrastructure delivery.

The woodland adjacent to the site is to be retained as Green Belt and has been subject to consideration as to the extent to which this could provide compensatory improvements to the environmental quality and accessibility of the Green Belt. The proposed public open space on the development site will link to existing Public Rights of Way through the woodland, extending the path so that it can be used as a circular walking route and potentially enabling improvements to the existing pathways. The indicative masterplan shows that a significant proportion of the north-eastern corner of the site will be laid out as public open space, which would help strengthen the boundary between new urban development and the remaining Green Belt to reduce the likelihood of any harm being caused to the wider Green Belt in line with recommendations in the LUC Green Belt Harm Assessment.

Deliverability

Land required for the proposed allocation east of Wimblebury Road, Heath Hayes (SH2) is available and can be delivered over the Plan period. All of the land SH2, S1 and the entirety of the route of the WRRR is owned by TW, who are committed to delivering development in this location.

TW 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
- Education
- Landscape
- Ecology

- Green Belt Impact
- Viability

TW are also committed to the early delivery of the site. EIA screening has been undertaken with CCDC in September 2024 and pre-application submission and associated meetings have already been held prior to the submission of an outline application. These pre-application discussions have included dialogue with SCC Highways, SCC Education, and representatives from all relevant CCDC teams.

It is intended that a planning performance agreement to scope the level of support for each stage and identify key officers and resources will also be drawn up between CCDC and TW. This will ensure that the planning process aids delivery of the site.

Trajectory

Based upon submission of an early planning application, TW are confident the whole site can be delivered well within the plan period. TW is a national housebuilder with extensive experience of delivering housing throughout the West Midlands and previously within Cannock Chase District.

Based on current Local Plan timescales, it is estimated a start date for development will be in year 2027/28. It is conservatively estimated that 50 houses will be completed per annum. Building will be phased over a 9-year period in line with the delivery trajectory below.

	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36
Delivery (dpa)	0	0	25	50	50	50	50	50	50	50	25

Viability

The Reg 19 Local Plan policy wording for proposed allocation SH2 aims to achieve a policy-compliant application concerning elements such as general housing mix, affordable housing provision, and other requirements like high-quality, energy-efficient design.

The latest iteration of the Council's Local Plan Viability evidence, produced by Aspinall Verdi and published in 2024 (after the Reg 19 document was subject to consultation), presents different conclusions and recommendations from the original evidence produced in 2022. The Council acknowledges that build costs have risen and other factors have decreased the viability of development across the District at this time.

The original 2022 Viability Assessment [EC9] recommended affordable housing targets that varied according to the area of the District and site type (brownfield or greenfield). The updated 2024 Viability Assessment [EC10] recommends that for development to be viable, considering all factors including policy requirements in the

Reg 19 Local Plan, the targets for affordable housing will need to be lowered across all categories of site types and locations in the District.

The Examination will be the appropriate forum for considering the implications of the updated evidence base and the implications for infrastructure delivery and affordable housing provision.

Figure 1 Concept Diagram (Cannock Chase Local Plan Pre Submission Reg. 19, Policy SH2)

Concept Diagram



- | Key | |
|------------------------------|------------------------------------------------------------|
| Site Boundaries | Indicative Vehicular Access Points |
| Existing Streets | Indicative Strategic Infrastructure Route |
| Existing Urban Area | Indicative Active Travel Access Points |
| Existing Area of Woodland | Indicative Active Travel Routes & Connections |
| Existing Areas of Open Space | Indicative Location for Residential Development |
| Existing Pond | Indicative Location for Areas of Blue-Green Infrastructure |
| Existing PRoWs | |

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[2023] Ordnance Survey
[AC00008499865]

8. Agreed proposed modifications

Page	Section/ para/ policy	Proposed Change	Reason
165	SH2 Supporting Text	Amend wording in supporting text under heading Indicative Dwelling Yield: up to <u>approximately 400 dwellings</u>	To enable flexibility
169	Policy SH2	Add additional word to last line of fourth paragraph: ‘...with particular to impact on the Five Ways junction and mitigation of any <u>significant</u> adverse impact on air quality and traffic congestion’.	Align with NPPF
167	SH2 Supporting Text ‘Description of the site’	Amend wording in 2 nd paragraph under the supporting text sub-heading ‘Description of site’: The second element of the allocation comprises land required as indicatively shown on the policies map for the delivery of the WRRR which will connect from the roundabout at Wimblebury Road to a new junction on the A5190 Cannock Road, east of Five Ways junction. The WRRR WWWR is designed to divert traffic from the congested Five Ways junction.	Factual correction
168/169	Policy SH2	Amend wording of 10 th paragraph of Policy SH2: “ <u>Where viable and feasible</u> , new surfaced walking/cycling routes should be created to facilitate recreational use of the site, <u>and</u> connect any new green spaces and must . <u>These should</u> be accessible to all users with alignment to the existing Public Rights of Way network.”	Align with NPPF
169	Policy SH2	Amend wording in 1 st paragraph of Policy SH2: Land east of Wimblebury Road, shown as SH2 on the Policies Map is allocated for residential development. Development of site SH2 is subject to provision of the Wimblebury Road Relief Road (WWWR) linking Wimblebury Road to Cannock Road, as shown on the Policies Map:	Factual correction
170	Policy SH2	Amend wording in 5 th paragraph of Policy SH2: Development proposals at the outline planning application stage will be accompanied by a phasing strategy and	Factual correction

		<p>details of a proportionate funding mechanism to deliver the necessary infrastructure to address the cumulative impact of site allocations SH1 and SH2 in combination, on the local transport network (including facilitating the delivery of the WRRRWWWR in site SH2) and with regard to education provision (including delivering a new 2FE primary school in site SH1).</p>	
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9. Matters of disagreement (uncommon ground)

RPS on behalf of Taylor Wimpey have made 29 detailed representations on the Local Plan (**A0081** BOO81A-AOO81CC inclusive). Many of the representations concern local planning policies within the Plan that are relevant to the site requirements. Modifications have been suggested by Taylor Wimpey to address a number of points of objection. This SoCG does not address all the representations made, except for representation BOO81BB which specifically concerns proposed Policy SH2. There are still outstanding points of disagreement with Policy SH2.

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 BOO81BB has been appended to this SoCG for clarity (Appendix 1).

CCDC does not agree that all of the suggested modifications by Taylor Wimpey 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.

Appendix 1: CCDC Summary of TW representation B0081BB and response to issues raised.

Respondent						
Taylor Wimpey RPS						
1	2	3	4	5	6	7
Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate
A0081	B0081BB	Local Plan	SH2	Yes	No	Yes
8						
Summary of Main Issue(s) Raised Within the Representation						
<p>The allocation is supported, however the respondent presents a number of soundness concerns relating to the draft policy wording and supporting text.</p> <ul style="list-style-type: none"> • The site capacity should be ‘approximately 450 dwellings’ to reflect the Reg 19 housing mix and provide flexibility. • References to Green Belt release should be amended to reflect adopted plan (and the fact part of the site is not in the Green Belt). • WWRR reference is incorrect and should be WRRR. • Clarity over Sites of Biological Importance affected by site or this point should be deleted. • Concerned that the reference to indicative net developable area is too prescriptive. • Site area is 18ha, not 17.9ha. • Seeks reference to ‘indicative’ route of WRRR to avoid policy being too prescriptive. • Concern that the delivery of the WRRR could be impeded by having to demonstrate Very Special Circumstances as it is in the Green Belt • Objects to safeguarding of site S1 on the basis that the site is deliverable for housing and can help to meet housing need now. • Reference to minimum density is not necessary and not compliant with para 125a which makes clear minimum densities should be considered where there is a shortage of land. • Suggests a site specific housing mix which would also ensure policy compliant level of affordable housing. • References to building performance standards are a duplication of other policies and not required. Wording is vague and ambiguous. • Reference is made to addressing ‘any adverse impacts’ rather than significant adverse impacts with regard to air quality and congestion and therefore is not compliant with the NPPF. The representation summarises the work undertaken by the developer with the County Council and representatives for site SH1 which show the impacts of the development on the transport network have been considered. • Raises concerns about lack of specific reference to Early Years or Special Educational Needs and Disabilities (SEND) in terms of contributions to education. • Reference is made to addressing ‘any adverse impacts’ rather than significant adverse impacts with regard to landscape impact (settlement coalescence) and therefore is not compliant with the NPPF. • The policy as drafted assumes there is some recognised value in maintaining a separation between Heath Hayes and Norton Canes settlements. However, the Council provides no evidence to substantiate that the land proposed for allocation (comprising the previously safeguarded land or the newly released site) has any relevance in this regard. • Suggest deletion of requirement for 10% biodiversity net gain to reduce repetition in the plan. • Clarity required to support any open space contribution to Heath Hayes Park and Allotments. Current wording is not based on robust, up to date evidence and not compliant with the NPPF. 						

- Changes need to take place to the Concept Diagram. This is addressed in Transport and Accessibility Report. The Concept Diagram doesn't show the vehicular access point from the spine road to development on the eastern side of the spine road.

The representation is appended by a number of technical reports to support the deliverability of the site:

1. Green Belt Assessments for SH2 and S1 (Appendix 1a and 1b - RPS)
2. Noise Assessment Report (BWB)
3. Air Quality Report (BWB)
4. Utilities Report (BWB)
5. Flood Risk and Drainage Report (BWB)
6. Transport and Accessibility Report (DTA)
7. Archaeological and Heritage Assessment Report (EDP)
8. Education Report (EFN)
9. Landscape and Visual Matters Report (Randall Thorpe)
10. Viability Report (Savills)
11. Ecology Report (TEP)

9

Summary of Main Proposed Modification(s)

The draft Policy SH2 and supporting text should be modified in light of the soundness objections set out above, as follows:

Strategic Site Specific Policy - Land east of Wimblebury Road, Heath Hayes

Site Reference: SH2

Address: East of Wimblebury Road at Bleak House, Wimblebury Road

Proposed Use: The development of approximately ~~400~~ **450** dwellings, public open space and access from Wimblebury Road to Cannock Road. The development will deliver the Wimblebury Road Relief Road (WRRR) and contribute to off-site highway and sustainable travel improvements and associated off-site infrastructure including a primary school. The development will deliver a mix of housing sizes, types and tenure to ensure that there is a range of housing including affordable housing.

Indicative Dwelling Yield: ~~up to~~ approximately ~~400~~ **450** dwellings

Site Area (Hectares): Total ~~17.9~~ 18 hectares.

Net developable area (indicative): 11ha **(final NDA to be determined at the planning application stage)**

Density minimum: 35dph

Description of Site

The proposed allocation comprises:

- The site covers a total area of ~~17.9~~ **18** hectares and extends along the eastern side of Wimblebury Road as indicated on the policies map. This site SH2 comprises an area of land previously outside the Green Belt and designated as safeguarded land for development in the Local Plan 2014 (6.4ha), and a further 11.5ha of greenfield land to its immediate east previously located within the Green Belt. The site is enclosed on its northern and eastern boundaries by woodland and adjoins Heath Hayes Park on its southern boundary. ~~The entire site is released from the Green Belt for residential development, and associated infrastructure.~~

- The second element of the allocation comprises land required as indicatively shown on the policies map for the delivery of the WRRR which will connect from the roundabout at Wimblebury Road to a new junction on the A5190 Cannock Road, east of Five Ways junction. The ~~WRRR~~ **WRRR** is designed to divert traffic from the congested Five Ways junction.

... The Chasewater and the Southern Coalfield Heaths SSSI lies close to the site's eastern boundary. ~~The site is close to 2 locally designated Site of Biological Importance.~~ The site is...

POLICY SH2: LAND EAST OF WIMBLEBURY ROAD, HEATH HAYES

Land east of Wimblebury Road, shown as SH2 on the Policies Map is allocated for residential development. Development of site SH2 is subject to provision of the Wimblebury Road Relief Road (~~WWR~~WRRR) linking Wimblebury Road to Cannock Road, as shown on the Policies Map:

- Approximately ~~400~~ **450** dwellings will be located on 17.9ha ~~18ha~~ of land which comprises 6.4ha of safe-guarded land identified in the 2014 Local Plan and an adjacent 11.5ha of land will be released from the Green Belt.
- The WRRR will connect Wimblebury Road and Cannock Road. The route indicated on the Policies Map will connect site SH2 and the allocated ~~Safeguarded~~ Site identified as S1.

CCDC will work with the site promoter to agree an illustrative masterplan for the site alongside the broad parameters shown on the Concept Diagram, including a design code for the site. A planning performance agreement to scope the level of support for each stage and identify key officers and resources will also be drawn up between CCDC and the site promoter.

Residential development will be delivered at a minimum density of 35dph and provide the appropriate mix of housing types (**see below**) and tenure, including affordable housing and adaptable housing in compliance with local and national housing policies.

The provision of housing delivered on the site will accord broadly to the following dwelling mix:

1-bed dwellings - 5% 2-bed dwellings - 30% 3-bed dwellings - 45% 4-bed dwellings - 20%

CCDC will work with the site promoter to agree an illustrative masterplan for the site alongside the broad parameters shown on the Concept Diagram, including a design code for the site. A planning performance agreement to scope the level of support for each stage and identify key officers and resources will also be drawn up between CCDC and the site promoter.

Residential development ~~will~~ should be delivered at an ~~minimum~~ average density of 35dph and provide the appropriate mix of housing types and tenure, including affordable housing and adaptable housing in compliance with local and national housing policies.

~~Development should include the highest level of building performance standards for cooling, ventilation and energy use and achieve the lowest viable carbon emissions that can practically and viably be achieved.~~

... 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 Any agreement on funding and phasing of critical infrastructure will be agreed between the applicant, Local Planning Authority, and Staffordshire County Council at the planning application stage . Development will be subject to proportionate early years, primary, and secondary, and Special Education Needs and Disabilities (SEND) contributions, as requested by Staffordshire County Council, where evidenced by need. Planning obligations sought for education should be commensurate to the development's net impact towards new education provision, where it can be evidenced that there is a need that fulfils the tests of Community Infrastructure Levy Regulation 122 (2).

A Landscape Strategy will be required to ensure the development form and layout minimises any significant adverse visual impact on the remaining Green Belt and is designed taking into account site topography and existing defining features of the landscape. This Landscape Strategy will also address any requirement for

new native woodland planning on the north-eastern and eastern boundaries where appropriate to assist with the site's visual containment.

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

*The development will be required to contribute to new and/or enhanced open space, sports and recreational provision, including playing fields and allotments to meet locally defined minimum standards and bench-marks in line with policies (SO2.3, SO2.4). The Council will work with the developer to determine whether this should comprise improvements to Heath Hayes Park and allotments immediately south of the site. ~~Where viable and feasible, New surfaced walking/cycling routes will~~ **should** be created to facilitate recreational use of the site and connect any new green spaces. These ~~must~~ **should** be accessible to all users with alignment and **should connect** to the existing Public Right of Way network.*

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. The Planning Application should demonstrate consideration of how the accessibility of the Public Rights of Way in the adjacent surrounding woodland will be improved or enhanced.

Development should have no significant adverse impact on the environmental quality of the Chasewater and Southern Coalfields Heaths SSSI or the water quality of Cannock Extension Canal SAC. The Planning Application will be supported by a Habitats Regulation Assessment and a Drainage Strategy which will outline necessary mitigation measures to avoid significant adverse impacts. ~~Development proposals will also support the protection of habitats in adjacent Areas of Biological Importance. ...~~

Also presents modifications to the concept diagram for site SH2.

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Cannock Chase Council Response

- The capacity of the site is initially based on a methodology developed for the SHLAA and is modified based on evidence/constraints/discussions with site developers. In this case, the site capacity had previously been 410 dwellings but was indicated by the promoter to be lower based on the configuration of the WRRR. 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.
- The reference to release of Green Belt is factual to clarify the change in the status of the site and is considered to be helpful to the reader
- The reference to WRRR can be amended through a minor modification.
- Hednesford Brickworks Site of Biological Importance lies approximately 290m west of the site and Norton Pools Site of Biological Importance is situated approximately 450m south of the site.
- The word indicative has been used to ensure the reference to net developable area is not prescriptive.
- It was intended that any reference to the route of the WRRR to be shown or referred to as indicative. If this is not clear then a minor modification should be able to clarify this point.
- The policy criteria, supported by the IDP demonstrate that the WRRR is required to deliver the proposed housing allocation and therefore the very special circumstances test will be met on adoption of the Local Plan.
- The Local Plan has sufficient allocations to meet the Objectively Assessed Housing Need and there is no further justification to allocate site S1 at this stage.

- There is a shortage of land which has resulted in release of Green Belt land. The Green Belt Topic Paper summarises how site densities have been maximised accordingly (in line with the tests in the NPPF) and the density averages are evidence based.
- Evidence to support a variation to the housing mix set out in the HNA will be considered.
- The policy does not intend to present a duplication to other Local Plan policies but in some cases includes reference to them to be clear what is being sought on strategic development sites.
- The wording in relation to ‘adverse impacts’ of development was not intended to require a developer to go beyond national policy requirements but was written to highlight potential issues to be addressed. If the current wording presents uncertainty in the nature or scope of work required, then this may be able to be corrected by modifications.
- It is agreed that funding will be required towards any type of educational provision which the County Council highlight is directly impacted by the development, usually calculated by estimates of increases in pupil numbers. The current wording is considered sufficient to cover this point.
- Evidence informed the wording with regard to coalescence, primarily from the Councils Green Belt Assessment. The policy wording ensures that the design and layout of any development will be mindful of landscape impact. In any case the impact of development on the wider remaining Green Belt land will have to be considered.
- The intention with regard to open space was to provide flexibility in the policy, in the instance that the detailed work undertaken to support a planning application showed that it would be more beneficial to make improvements to adjacent existing open space than for the equivalent provision on site. The Council will work with the developer on any outstanding infrastructure required to support new development which will be detailed in the IDP.
- The concept diagram is an indicative presentation of how the development could be laid out and is not binding or prescriptive.

11

Proposed Minor Modification(s)

Admin

Officer Ascribed Policy