

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



Name of the Local Plan to which this representation relates:

Cannock Chase Local Plan

Please return to:

planningpolicy@cannockchasedc.gov.uk or:
Planning Policy, Cannock Chase Council, Civic Centre, PO Box 28,
Beecroft road, Cannock, Staffordshire, WS11 1BG

Please return by:

5:00pm on Monday 18 March 2024 (late forms will not be accepted)

Part A: Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)*
	*If an agent is appointed, please provide client Title, First Name, Last Name, Organisation (if applicable) and Post Town in column 1 and provide full contact details for the agent in column 2.	
Title		Mr
First Name		Adrian
Last Name		Kearley
Post Town		
Organisation (where relevant)	TODD ENGINEERING LIMITED,	QED Planning
Address Line 1	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	
	[REDACTED]	

Do you consent to be notified about progress of the Cannock Chase Local Plan?

Yes No

Notifications: If you consent to be notified about progress on the Local Plan your details will be added to the consultation database. Your personal data will be held securely and processed in line with our privacy notice www.cannockchasedc.gov.uk/privacynotices. Contact will be limited to information regarding planning policy

For Office Use	Part A Reference	
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Part B: Representation Form

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

Part B: Representation

Name and Organisation:	Adrian Kearley QED Planning
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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:		Site:	H52	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).*

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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.

Please see covering letter

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(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.

Not applicable

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

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

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

(Please tick one box)


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Para- graph:		Policy:	SO3.2	Site:		Policies Map:	
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CANNOCK CHASE DISTRICT LOCAL PLAN PRE-SUBMISSION (REGULATION 19)

REPRESENTATIONS SUBMITTED ON BEHALF OF TODD ENGINEERING LIMITED

Introduction

These representations are submitted on behalf of Todd Engineering Limited in response to the Cannock Chase District Pre-Submission (Regulation 19) Local Plan.

By means of background, Todd Engineering Limited are the owners of the Gregory Works site in Rugeley. This site has been put forward as a proposed housing allocation within the Pre-Submission Local Plan (Site Allocation H52).

Todd Engineering Limited are in advanced discussions with a preferred operator to deliver a new care home on the site. The preferred operator is Lovett Care who develop and operate industry-leading residential, dementia and nursing care homes and specialist retirement housing schemes. They have a portfolio of 9 existing care homes across the UK with further developments planned and in progress. The proposed care home on the Gregory Works site will deliver significant local benefits, including:

- Delivering much needed and high-quality care home accommodation for local older people including the provision of specialist dementia services.
- Providing exemplar care facilities in terms of the quality of the buildings and in the provision of support and care, thereby promoting resident well-being and reducing isolation and loneliness.
- Contributing directly to the Council's housing numbers and the 5-year housing land supply shortfall.
- Freeing up other sectors of the housing market by releasing much needed and often under-occupied accommodation.
- Creating local employment opportunities including jobs for local people – the proposed care home on the Gregory Works site would generate between 60 and 80 full-time equivalent jobs.
- Creating indirect employment opportunities, for example, during construction, in supporting local retailers and businesses and through associated facilities and services.
- Fostering a sense of community cohesion through the shared use of the communal facilities within the new care homes.

Policy SO3.1 (Provision for New Homes) and Policy SO3.2 (Housing Choice)

Although Todd Engineering Limited fully supports the Council's approach of delivering a wider choice of housing to meet the needs of existing and future residents, as currently drafted Policy SO3.1 and SO3.2 do not provide a sufficiently clear recognition of the need for older persons housing and care provision in the Cannock Chase area.

The elderly UK population is set to grow dramatically over the coming years and the increasing divide between demand and supply has resulted in what the Government has defined as a 'critical' housing need. National Planning Policy Guidance (ID: 63-001-20190626) states that:

Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking

In considering how the housing requirements of particular groups of people can be addressed in Local Plans, the guidance further states at paragraph 006 that:

"Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period."

In considering which groups to plan for, the most recent version of the NPPF (December 2023) strengthens the importance attached to the provision of older persons housing and notes that this encompasses retirement housing, housing-with-care and care homes.

At a local level, paragraph 6.112 of the Submission Local Plan states that the level of demand for older persons housing within the district is currently unknown and can be addressed through delivering high quality housing as set out in Policy SO3.3 (Delivering High Quality Housing). Although Policy SO3.3 outlines factors to be taken into consideration when assessing the suitability of proposals for housing which cater to specific needs, the focus of the policy is on the quality of housing rather than its delivery. We consider that the delivering of housing choice for older people would be better addressed either through additional support within the wording of Policy SO3.2 or within a separate new policy relating to specialist housing provision. This approach will provide a positive context for developers and operators of older persons housing and care schemes and, most importantly, may allow them to compete within the general residential market.

In progressing an update to the existing policies relating to older persons housing and care, we would recommend that consideration be given to the following:

- A recognition in Policy SO3.1 that the proposed housing site allocations may accommodate specialist housing provision where suitable for such a use. This approach would be entirely consistent with the Council's wider housing delivery objectives and the delivery of care and older persons housing plays an essential part in realising the Council's housing numbers and in delivering balanced communities. This would not be to the detriment of the Council's 5-year housing supply targets as National Planning Policy Guidance clearly acknowledges that *"Plan-making authorities will need to count housing provided for older people against their housing requirement"* (Paragraph: 016a Reference ID: 63-016a-20190626).
- Either within Policy SO3.2 (or within a new policy) a clear statement should be provided that specialist housing schemes will be supported subject to meeting the factors currently outlined in Policy SO3.3. This policy should address each of the older housing persons typologies referred to in the Framework and should include a 'minimum' target in terms of numbers of care home places and homes for older persons accommodation to be delivered within the plan period, preferably with an indicative annualised benchmarks against which delivery can be monitored. This will allow the Council to plan for the right type of accommodation in the district and for this provision to be regularly monitored and reviewed. Although independent analysis undertaken by Lovett Care indicates the demand to be substantial, it is acknowledged that the Council has not yet undertaken its own demand assessment. As such, the policy could refer to the intention to set levels or benchmarks in a future review of the plan. In the meantime proposals should be informed by an independent assessment of demand.
- With regards to the application of the Council's affordable housing policies to older persons provision, it is recommended that the existing text relating to housing mix in Policy SO3.2 be extended so that it reads as follows:

"The housing mix and affordable housing thresholds in Table E will not be applied to developments falling within Class C2 of the Use Classes Order."

Site H52 - Gregory Works, Armitage Road, Brereton

Support

Todd Engineering Limited fully support the proposed allocation of the Gregory Works site on Armitage Rod for an alternative residential-type use. The site is in a sustainable location within the defined settlement boundary, it is not subject to any other local plan allocation or designation, there are no landscape or environmental constraints to redevelopment and the site is readily available and deliverable.

However, we consider that the proposed housing use of the site should be broadened to allow for its potential use in meeting care and older persons housing requirements. This could either be addressed through expanding the range of uses permissible under the proposed site allocation, or as referenced above, by ensuring that Policy SO3.1 (Provision for New Homes) explicitly acknowledges that the proposed housing site allocations may accommodate specialist housing provision where they are suitable for such a use.