

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:	Paul Windmill
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Q1. To which document does this representation relate? (Please tick one box)

- Yes** Cannock Chase Local Plan 2018-2040
- No** Sustainability Appraisal of the Cannock Chase Local Plan 2018-2040
- No** Habitats Regulations Assessment of the Cannock Chase Local Plan 2018-2040

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

Para-graph:	See below	Policy:	See below	Site:	Various housing allocations	Policies Map:	Proposed housing Allocations
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The representation does not fit into the parts described above but follows from the Spatial Strategy.

Q3. Do you consider the Cannock Chase Local Plan is:

- A. Legally compliant Yes:
- B. Sound No:
- C. Compliant with the Duty to Co-operate No: Not yet
(Please tick as appropriate).

For office use	Part B reference	B0040A
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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.

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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.

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The Cannock Chase Local Plan is unsound because it over allocates land for housing.

It is considered that that a clear understanding of the level of new housing required will demonstrate that the scale of the proposals for housing is excessive and request that Inspector recommends changes to take into account:-

1. The number of dwellings already completed in the period 2016 to 2023 - **2540** (SHLAA Table 4.13: CCDC Housing Trajectory)
2. The number of dwellings under construction or with an extant planning permission in April 2023 - **1076** (SHLAA 2023 APPENDIX H: 0-5 YEAR DELIVERABLE SITES)
3. The number of dwellings to be granted permission following the completion of a Section 106 Agreement (i.e. already committed but without planning permission.). None have been identified but this is unusual and the LPA may wish to confirm that there are no sites in this category
4. Other developable sites already identified **1644** (SHLAA APPENDIX I: 6 - 15 YEAR DEVELOPABLE SITES (PLAN PERIOD))

The total of 1.- 2. and 4.- 5. above would be **5260**. (2540+1076+1644)

The requirement identified in the Spatial Strategy is **5808** (Spatial Strategy bullet point 8 in the Regulation 19 document.)

Note:-This does not include the 500 additional houses proposed to meet the needs of other Councils referred to in the Spatial Strategy bullet point 8 in the Regulation 19 document. (This is the subject if a linked representation.)

Related issues.

- a. An unreasonably low allowance is proposed for future 'windfalls'.
(Historic rate of 324 p.a. SHLAA 2023 Table 3.4: Windfalls in Cannock Chase 2014-2023.)
"proposed allowance windfall allowance of 27dpa in future housing land supply estimates..." Paragraph 3.64 of SHLAA 2023.)
- b. No justifiable evidence has been provided to support a non-implementation rate of 18% to be applied over the plan period to 2040.
(SHLAA Appendix G: Cannock Chase - Non-implementation Discount Rates)

Summary:- The proposed Plan appears to be over-allocating housing. This involves the apparently unjustified removal of land from the Green Belt.

The Regulation 19 document states in :-

Local Plan Vision & Objectives

The Spatial Strategy

In the eighth bullet point:-

- The Local Plan will seek to deliver a minimum 5,808 dwellings to meet the district's housing need between 2018 and 2040 at an average rate of 264 dwellings per annum. Further land will be removed from the Green Belt and safeguarded for future housing need, strategic green infrastructure link and infrastructure requirements in the next plan period or early review of the development plan.

Housing Completions 2018 to 2023

Housing completions since the commencement of the plan period of the Regulation 19 Local Plan document Housing completions for the Regulation 19 document taken from Table 14.3 show:-

2018/19	234
2019/20	930
2020/21	319
2021/22	620
2022/23	437
TOTAL	2540

It is not clear from the Regulation 19 document whether, or how, these numbers have been taken into account but if they were considered the number of additional dwellings required to meet Cannock Chase Council's own requirements from 2023 to 2040 (17 years) would be 3368 (5808 minus 2440.) -193 per year.

Land Supply - Strategic Housing Land Availability Assessment 2023

Table 4.14: CCDC Long Term Delivery of Sites – on page 32 shows

Long Term Supply of sites identified in SHLAA as 2739. This appears to relate only to the period 2023 – 2028

It is unclear in the Regulation 19 Document whether, or how, the SHLAA supply expectation has been taken into account.

The Regulation 19 document is considered to be potentially unsound as it does not give evidence of how Completions and SHLAA sites have been taken into account in deciding on the scale of new allocations required. It is requested that this be clarified before the Inspectorate is asked to consider the document.

Windfall Sites

The historic windfall rates achieved the period 2014 to 2023 are set out in Table 3.4 on page 17 of the Housing Land Availability Assessment 2023.

The Table shows Annual Windfall Rate of 324 d.p.a.

Paragraph 3.64 of the Housing Land Availability Assessment reads

“Having regard to all relevant factors set out in paragraph 71 of the NPPF 2021, it is considered appropriate to apply the calculation demonstrated in the above tables and to apply a windfall allowance of 27dpa in future housing land supply estimates.” “This is based on clear evidence of historic windfall delivery in the District since 2014 on sites which will not be reflected elsewhere in future supply (i.e. 1-4 dwellings) and is considered a relatively conservative estimate in light of the previous percentage approach to the windfall allowance. The windfall allowance will not be applied in years 1-3 of future housing land supply to avoid any potential double counting with existing planning permissions.”

No evidence has been presented to explain why windfalls will reduce to only 27p.a. with no allowance at all being made for sites of more than 10 dwellings.

It seems from Table 3.4 of the Housing Land Availability Assessment 2023 that there were 3241 windfall completions in the plan period 2016 – 2023 - and from Table 3.5 that only 600 of the windfalls were on sites of 1 to 9 dwellings.

It is apparent that, with a historic average of 324 p.a., the proposed allowance of only 27p.a. is probably both unsound and unjustified.

New Allocations proposed in the Regulation 19 document

The Regulation 19 document does not appear to give totals for the proposed housing allocations but does give numbers for individual sites. The numbers quoted below are taken from the document.

i have calculated the number of new homes from the site allocations including housing in the Regulation 19 Plan under the breakdown in the document site allocations from Page 158 to 225. (I could not find any totals in the document.)

Local Plan Policy Options - Site Allocations

1. Strategic Sites

Total number of homes indicated 2290

*Representee's note:- One of the sites (Former Rugeley Power Station - SM1) has already been committed by the granting of planning permission and the completion of a section 106 Agreement and perhaps should not be described as a proposed allocation but more appropriately included as a commitment. **This site is to provide 1000 dwellings, it is a redevelopment of previously developed land.***

*Two of the other allocations on strategic sites SO1 and SO2 are on Greenfield land in the Green Belt. **I oppose these proposals as being potentially unnecessary to meet the needs of Cannock Chase..***

2. Table A: Under Construction Sites

Total number of homes indicated 365

Representee's note:- It is suggested that these are more appropriately identified as having commenced - rather than being termed allocations- and counted as commitments.

3. Table B: Proposed allocations which already have planning permission, are already allocated or have a resolution to grant planning permission for housing.

Total number of homes indicated 265

Representee's note:- It is suggested that these are more appropriately identified as having permission or a resolution to grant consent - rather than being termed allocations.

Note:- The allocations in Table 1 and 2 total 630 but do not include all of the sites under construction or with extant planning permission.

The number of dwellings under construction or with an extant planning permission in April 2023 - **1076** (SHLAA 2023 APPENDIX H: 0-5 YEAR DELIVERABLE SITES)

4. Table C: Proposed Allocations – Additional Sites from Development Capacity Study.

Total number of homes indicated 796

Representees' note:- It is suggested that these are correctly identified as allocations as they are not committed by planning permission. in the main the sites are 'brownfield' (Previously Developed Land) sites - which I consider to be preferable to the development of Greenfield sites.

Full details are given on the following pages.

Local Plan Policy Options - Site Allocations

Strategic Sites

Strategic Site Specific Policy - Land south of Lichfield Road, Cannock Site Reference: SH1

Address: South of A5190, Lichfield Road, Cannock.

Proposed Use: The development will deliver in the region of 700 dwellings, and provision for a new primary school and Community Park with primary access from Cannock Road.

The strategic housing allocation will also contribute to the delivery of off-site highway and sustainable travel improvements and associated infrastructure including the Wimblebury Road Relief Road (WRRR). 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: 700 dwellings.

Site Area (Hectares): Total 47.2 hectares.

Net developable area (indicative): 20ha.

Density minimum: 35dph

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 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 400 dwellings

Site Area (Hectares): Total 17.9 hectares.

Net developable area (indicative): 11ha.

Density minimum: 35dph

Strategic Site Specific Policy - Land to the rear of Longford House, Watling Street Site Reference: SH3

Address: Land to the rear of Longford House, Watling Street, Cannock Proposed Use: The development of 45 dwellings with access from Wellington Drive. The development will deliver a mix of housing sizes, types and tenure including affordable housing.

Indicative Dwelling Yield: 45 dwellings

Site Area (Hectares): 2 hectares

Net developable area: 1.18hectares

Density minimum: 38dph

Strategic Site Specific Policy - Former Hart School, Burnthill Road, Rugeley (Hagley Park)

Site Reference: SH6

Address: Former Hart School, Burnthill Road, Rugeley (Hagley Park)

Proposed Use: The development of 145 dwellings with access from Burnthill Lane. The development will deliver a mix of housing sizes, types and tenure including affordable

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housing to ensure that there is a range of housing.

Indicative Dwelling Yield: 145 dwellings

Site Area (Hectares): 4.9 hectares

Net developable area: 3.8 hectares

Density minimum: 35dph

Strategic Site Specific Policy - Land at the Former Rugeley Power Station Site Reference: SM1

Address: Former Rugeley Power Station, Power Station Road, Rugeley Proposed Use:

The site is allocated for a cross-boundary sustainable mixed use development which will have regard to the character of the surrounding area, the topography of the site, the flood zone and ecological interests. The development will provide linkages to services and facilities in Rugeley, Brereton, and Armitage with Handscare (in Lichfield District), and will deliver up to 2,300 dwellings (1,000 in Cannock Chase) including a minimum affordable housing contribution equivalent to 17.6% of units across the whole site, and up to 5 hectares of land for employment uses. The site is also to incorporate an all through school and local facilities and amenities. Indicative Dwelling Yield: up to 1,000 dwellings in Cannock Chase (up to 2,300 whole site)

Site Area (Hectares): 139 hectares (whole site)

Density minimum: 35dph

Total number of homes indicated 2290

Site allocations (non-Strategic)

Policy SA1: Site Allocations The following sites identified on the Policies Map are allocated for development over the plan period. The allocations will be developed in accordance with the specified use and must comply with other development plan policies. Sites which do not have planning permission will be developed in accordance with the specific development considerations set out in the site allocations information.

Table A: Under Construction Sites

H1 Land to the West of Pye Green Road, Hednesford (Northern end of site adj. Pye Green Road) Allocation: Housing. Capacity: 168

H11 108, 102-106 High Green Court, Cannock Allocation: Housing. Capacity: 8

H12 Whitelodge, New Penkridge Road, Cannock Allocation: Housing. Capacity: 2

H17 Land west of Pye Green Road, Hednesford Cannock (Adj. Pye Green Road. Part of larger site) Allocation: Housing. Capacity: 59

H30 Land at Rawsley Road, Hazel Slade Allocation: Housing. Capacity: 60

H44 268, Bradbury Lane, Hednesford Allocation: Housing. Capacity: 10

H55 77 Old Fallow Road, Cannock Allocation: Housing. Capacity: 11

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H57 Unit E Beecroft Court, Cannock Allocation: Housing. Capacity: 20

H25 Main Road, Brereton (between Cedar Tree Hotel and Library) Allocation: Housing. Capacity: 27

Total 365

Table B: Proposed allocations which already have planning permission, are already allocated or have a resolution to grant planning permission for housing.

H16 Land west of Pye Green Road, Hednesford Cannock (Land Northern end of the larger site) Allocation: Housing. Capacity: 51

H18 Land adjacent and to the rear of 419-435, Cannock Road, Hednesford Allocation: Housing. Capacity: 25

H45 23, Walsall Road, Cannock Allocation: Housing. Capacity: 12

H58 Cromwell House, Mill Street, Cannock Allocation: Housing. Capacity: 11

M6 Rugeley Market Hall and Bus Station, Rugeley Allocation: Mixed. Capacity: Up to 50 dwellings

M7 Land at Wellington Drive, Rugeley Allocation: Mixed. Capacity: Up to 20 dwellings

H24 Market Street garages, Rugeley (incorporating BT telephone exchange) Allocation: Housing. Capacity: Up to 28 dwellings

Heron Court, Heron Street, Rugeley Allocation: Housing. Capacity: 10 dwellings

H48 Former Aelfgar School, Taylors Lane, Rugeley Allocation: Housing. Capacity: 58 dwellings

Total 265

Table C: Proposed Allocations – Additional Sites from Development Capacity Study

H29 Land at 521 Pye Green Road, Hednesford, Cannock Allocation: Housing. Capacity: Up to 80 dwellings

M1 Land bound by Ringway, Church Street and Market Hall Street, Cannock Town Centre Allocation: Mixed. Capacity: Up to 70 dwellings

H32/M5 Avon Road/Hallcourt Lane, Cannock Allocation: Mixed. Capacity: Up to 22 dwellings

M3 Beecroft Road Car Park, Cannock Allocation: Mixed. Capacity: Up to 35 dwellings

H34 Land at Chapel Street, Heath Hayes Allocation: Housing. Capacity: Up to 20 dwellings

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ings

H35 Land at Girton Road/Spring Street, Cannock Allocation: Housing. Capacity: Up to 24 dwellings

H36 Park Road Offices, Cannock Allocation: Housing. Capacity: Up to 25 dwellings

H37 Police Station Car Park, Cannock Allocation: Housing. Capacity: Up to 25 dwellings

H38 Land at Walsall Road, Avon Road, Hunter Road, Hallcourt Lane, Cannock Allocation: Housing. Capacity: Up to 24 dwellings

H39 26 - 28 Wolverhampton Road, Cannock Allocation: Housing. Capacity: Up to 25 dwellings

H40 Danilo Road Car Park, Cannock Allocation: Housing. Capacity: Up to 20 dwellings

M4 Backcrofts Car Park, Cannock Allocation: Mixed. Capacity: Up to 20 dwellings

M2 Park Road Bus Station, Cannock Allocation: Mixed. Capacity: Up to 15 dwellings

H43 243, Hill Street, Hednesford, Cannock Allocation Housing. Capacity: Up to 13 dwellings

H60 41, Mill Street, Cannock Allocation: Housing. Capacity: Up to 15 dwellings

H61 Cannock Chase High School, Lower Site, Campus, Hednesford Road Allocation: Housing. Capacity: - *Not specified in table but shown to have area of 4.1 hectares on Page 212*

H62 Springvale Area Service office, Walhouse Street, Cannock Allocation: Housing. Capacity: 10 dwellings

H63 Former Rumer Hill Industrial Estate, Cannock Allocation: Housing. Capacity: Up to 99 dwellings

H65 A Dunford and Son, Brindley Heath Road, Cannock Allocation: Housing. Capacity: Up to 15 dwellings

H66 Land at the Corner of Avon Road and Hunter Road, Cannock Allocation: Housing. Capacity: Up to 18 dwellings

H49 Land at The Mossley, off Armitage Road Allocation: Housing. Capacity: Up to 40 dwellings

H50 Nursery Fields, St Michaels Road, Brereton Allocation: Housing. Capacity: Up to 35 dwellings.

H51 Castle Inn, 141, Main Road, Brereton Allocation: Housing. Capacity: Up to 27 dwellings

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H52 Gregory Works, Armitage Road, Brereton Allocation: Housing. Capacity: Up to 23 dwellings

H53 Land off Lichfield Street , Rugeley Allocation: Housing. Capacity: Up to 20 dwellings

H64 The Fairway Motel, Horsefair, Rugeley Allocation: Housing. Capacity: Up to 17 dwellings

H67 Land at Pendlebury Garage and Petrol Station, 5 Wolseley Road, Rugeley Allocation: Housing. Capacity: Up to 18 dwellings

H68 Land off Norton Hall Lane, Norton Canes Allocation: Capacity: Up to 55 dwellings

H69 272 Hednesford Road, Norton Canes Allocation: Housing. Capacity: Up to 11 dwellings

Total 796 (excluding H61) Each of these sites exceed 10 dwellings in total.

(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

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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.

Initial Request

The Council is requested to produce, a clear statement setting out:-

1. The number of dwellings already completed in the plan period 2016 to 2023
2. The number of dwellings under construction or with an extant planning permission in April 2023
3. The number of dwellings to be granted permission following the completion of a Section 106 Agreement (ie already committed but without planning permission).
4. The proposed number of new dwellings on the allocated sites (i.e. excluding those already completed, under construction or with planning permission)

(This is an unusual request. It is made because in the document, as currently presented, it appears that some of the allocated sites are already partly completed, under construction or have planning permission but are nevertheless included as proposed allocations. This causes confusion, potential 'double counting' and makes it really difficult to establish the number of additional homes being proposed.)

5. For the allocated sites whether they are:-
 - a. Within existing settlements
 - b. On Previously Developed Land (PDL) - or a Greenfield site
 - c. In Green Belt or 'safeguarded land' as currently defined in the adopted plan.
6. Consideration be given to the Long Term Supply of sites - identified in SHLAA as 2739 to the end of the current plan period 2028 by extending this to the end of the plan included in the Regulation 19 document (2040)
7. A clearer statement (in the Regulation 19 document rather than the SHLAA) of a reasoned justification of the allowance to be made for new Windfall sites and why it has reduced from a historic number taken from annual average completions 324 d.p.a. in the period 2014 – 2023 to 27 d.p.a. for the period to 2040 (excluding the first three years).
8. A properly justified assessment of an allowance of 18% for lapsing of planning commitments in the plan period to 2040 - and the evidence on which this is based

If the Council does not produce this information in advance of the Inspectorate receiving the Regulation 19 documents the Appointed Inspector (or the Programme Officer) is asked to request that the Council provides the information to the Inspector and relevant representees well in advance of the opening of the opening of the Public Local Inquiry. This will allow representees to present their cases on common ground and the Inspector to be able to make a fair consideration to the issues raised.

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Modifications requested

Housing Numbers

I believe that a clear understanding of the allocations required may demonstrate that the scale of the proposals for housing is excessive and request that Inspector recommends changes take into account:-

1. The number of dwellings already completed in the period 2016 to 2023 - **2540** (SHLAA Table 4.13: CCDC Housing Trajectory)
2. The number of dwellings under construction or with an extant planning permission in April 2023 - **1076** (SHLAA 2023 APPENDIX H: 0-5 YEAR DELIVERABLE SITES)
3. Other commitments with planning permission but appear not to be included in 3. above. At least on site (Former Rugeley Power Station?) (There may be others that we have not found)
4. The number of dwellings to be granted permission following the completion of a Section 106 Agreement (ie already committed but without planning permission.). Not found
5. Other developable sites already identified **1644** (SHLA APPENDIX I: 6 - 15 YEAR DEVELOPABLE SITES (PLAN PERIOD))

Other issues which I believe should be taken into account

a. A reasonable, justified, allowance for future 'windfalls'.

Historic rate of 324 dwellings p.a. (SHLAA 2023 Table 3.4: Windfalls in Cannock Chase 2014-2023.)

But an unreasonably low "Proposed allowance windfall allowance of 27dpa in future housing land supply estimates..." Paragraph 3.64 of SHLAA 2023.

b. No justifiable evidence has been provided to support the inclusion of a proposed non-implementation rate of 18% to be applied over the plan period. (I think that it is unreasonably high.)

SHLAA Appendix G: Cannock Chase - Non-implementation Discount Rates

This would give a residual number, to be found by proposed allocations.

Strategic Allocations

On the basis of the evidence I question whether a justification can be found for the scale of Strategic Allocations involving the use of Greenfield sites in the Green Belt to meet the requirements of Cannock Chase Council.

No allowance has been made for housing allocations which have been provided to meet the needs of Cannock Chase in the adjacent area's adopted Local Plan

Stafford Borough Council (which immediately adjoins the northern boundary of Cannock Chase Council) states in its current adopted Local Plan:-

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Plan%20for%20Stafford%20Borough/PFSB-Adoption.pdf>

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"6.12 It should be noted that the household projection figure is made up of 'local need' (i.e. natural change: the balance of births over deaths and reduction in average household size) and 'in-migration' elements, with the split for Stafford Borough *being approximately 30% local need and 70% in-migration mainly from surrounding areas, the majority being from Cannock Chase District, South Staffordshire District and the City of Stoke-on-Trent.* The Government, through the NPPF, has stated that local authorities should provide for the locally assessed requirements of their area. Pressures for continued in-migration are likely to remain from neighbouring areas in the short to medium term. In light of meeting objectively assessed needs it is sensible to plan for these, not least because it is consistent with the growth aspirations for Stafford town, and its developing sub-regional role, as set out in the Spatial Vision and Key Objectives earlier. **This approach has also been supported by neighbouring local authorities through Duty to Co-operate cross-border meetings on the Plan for Stafford Borough: Strategic Policy Choices document.** (our emboldening and italicisation)

(More detail regarding meeting the Duty to Co-operate is given in paragraphs 3.7 to 3.12 of the Plan)

Stafford Borough Council's total allocation in its Local Plan is 10,000 new homes and this will, in practice be exceeded.

No evidence has been found in the Cannock Chase Regulation document or the other published documents of how the additional housing allocation of 7000 over a 19 year period in Stafford Borough to meet the needs of adjacent authorities (including Cannock) has been taken into account by Cannock Chase Council.

Additional housing to meet the needs of other Authorities

I recognise that the Council has also included a proposal in its Regulation 19 document to provide an additional 500 dwellings to meet the needs of other Councils.

I have not seen the Letters of Agreement/Statements of Common Ground or similar documents from relevant Authorities under the Duty to Co-operate. I understand that these have been requested but not yet received and published.

I have concerns that the Regulation 19 document plan has been put forward without :-

- justifying the level of additional housing sought
- making clear for which Council(s) it is being provided,
- explaining why the requesting Council cannot provide for its own needs within its own administrative boundary.

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I ask, in accordance with the Spatial Strategy, that the Inspector sets a justifiable level of housing and that this is recommended, as a 'main modification', without which the plan would not be sound.

and

If the Inspector finds the allocations are excessive (as I believe is the case) I ask that proposals on Green Belt sites, which are also Greenfield and are outside the urban areas, be recommended to be reduced or removed (dependant on the numbers involved) - rather than brownfield allocations. Without this being done (unless the Inspector finds that exceptional circumstances are fully evidenced and justified under NPPF December 2023, Paragraph 145.) the plan would not be sound.

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Supplementary Note:-

The Cannock Chase District Strategic Housing Land Availability Assessment 2023

https://www.cannockchasedc.gov.uk/sites/default/files/document-library/Cannock%20Chase%20SHLAA%202023_0.pdf

In:-

'Final Evidence Base for Cannock Chase District'

Table 4.14: CCDC Long Term Delivery of Sites – on page 32

- Shows that in the currently adopted Local Plan period 2006 – 2028 target of 5300 new homes had been exceeded before 2023.
- By March 2023 a total of 5844 new homes had been completed. This has left a negative requirement for the last five years of the plan period.

This significant over-supply does not, of itself, suggest that the Regulation 19 document is unsound but, rather, that the Council has previously underestimated the delivery of housing, particularly of Windfall sites, and over-estimated lapsed permissions.

Note:-

The majority of this representation is the same as, or similar to, the representation of the Campaign for the Protection of Rural England (Staffordshire Branch) - but with the addition of the content of Page 16 of this representation.

(Please continue on a separate sheet if necessary)

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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.

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

(Please tick one box)

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

To participate, contribute to the discussion and to clarify any matters requested by the Inspector(s).

The representations raise questions and issues which go to the heart of the soundness of the plan. For these to be considered without the offer of active participation in relevant parts of the Examination in Public could be seen as being contrary to the rules of natural justice.

(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.

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Signature:	
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Date:	14 March 2024
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