



Statement of Common Ground between
Cannock Chase District Council and Historic
England

Cannock Chase Local Plan (2018-2040)

February 2025



Parties involved

- Cannock Chase District Council
- Historic England

Signatories

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between Historic England and Cannock Chase District Council.

The parties agree that subject to agreed modifications to the Cannock Chase Local Plan (2018-2040) that it is sound and legally compliant.

Signed: 	Signed: 
Name: Dean Piper	Name: Kezia Taylerson
Position: Head of Economic Development and Planning	Position: Historic Environment Planning Adviser
Organisation: Cannock Chase District Council	Organisation: Historic England
Date: 06 March 2025	Date: 16 February 2025

Introduction

1. This Statement of Common Ground (SoCG) has been prepared by Cannock Chase District Council (CCDC) and Historic England (HE), hereafter referred to as “the parties” to inform the submission of the Cannock Chase Local Plan (2018-2040).
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties with regard to the Cannock Chase Local Plan and any areas which remain subject to further discussion. This Statement of Common Ground covers the following matters:
 1. Proposed site allocations in the Local Plan;
3. Cannock Chase District Council published consultation material and invited comments relating to its Local Plan process at the following stages:

Stage	Timeframe
Issues and Scope	2 nd July - 28 th August 2018
Issues and Options	13 th May - 8 th July 2019
Preferred Options (Regulation 18)	19 th March -30 th April 2021
Pre-Submission (Regulation 19)	5 th February - 18 th March 2024

4. Historic England were consulted at each stage and responded as they considered appropriate.

Geography covered by Statement of Common Ground

5. This SoCG covers the Local Authority area of Cannock Chase District Council.

Scope of this SoCG

6. This Statement focuses on the issues and objections made by Historic England in representations made on the Reg 19. Cannock Chase Local Plan reference A0103.
7. Historic England made detailed comments on a number of general Local Plan policies including more in-depth comments on Policy SO1.1 which is the main policy for heritage in the Local Plan. This SoCG does not address every comment made by Historic England on the Local Plan but it does resolve the key issues raised as detailed below:
 - HE raised issues with the wording of Policy SO1.1 Protecting, Conserving and Enhancing the Distinctive Local Historic Environment
 - HE objected to proposed site allocations where evidence in the form of a HIA was not provided and therefore there was insufficient evidence to determine the impact of proposed development on heritage assets.
 - HE objected to proposed site allocations where a HIA had been undertaken but the recommendations were not adequately incorporated into the proposed site allocation policies.
 - HE queried how has the Council considered the cumulative impacts of developments [in Cannock Town Centre] and can the harm be overcome?
 - How has the impact on the setting of Scheduled Monuments and other archaeological assets been assessed?
8. The purpose of the SoCG is to present an agreement between the parties on the resolution to these issues.

Policy SO1.1 Protecting, Conserving and Enhancing the Distinctive Local Historic Environment

9. Policy SO1.1 forms the principle local planning policy for heritage in the emerging Local Plan. Whilst the Council made improvements to the policy following Preferred Options stage Historic England had further detailed comments in the representation B0103B.
10. Whilst the Council considers the policy to be sound, there is scope to improve the policy which will aid implementation, particularly in regard to the detail required from Heritage Statements and archaeological assets. The Council and Historic England agree to the following modifications to Policy SO1.1¹

POLICY SO1.1: PROTECTING, CONSERVING AND ENHANCING THE DISTINCTIVE LOCAL HISTORIC ENVIRONMENT

Development proposals which protect and enhance the significance of designated and non-designated heritage assets and conserve them in ways such as that will contribute to the economic vitality, local character and distinctiveness of local communities will be supported.

Designated heritage assets (including Conservation Areas, Listed Buildings, and Scheduled Monuments) and their settings will be conserved and enhanced and given the highest level of protection. Non-designated heritage assets (including locally listed buildings and features, and locally important parks and gardens) and their settings will also be conserved and enhanced.

Sensitive/heritage led regeneration will be supported. Development proposals which recognise that the historic environment can be a catalyst for positive regeneration, and which ~~preserve~~ conserve and enhance heritage assets and their setting ~~to enhance or better reveal their significance~~ will be supported.

Development proposals which affect heritage assets should maximise opportunities for enhancement by considering measures including:

- public access and interpretation
- increasing understanding through research and recording
- Repair/regeneration of heritage assets
- Removal from Heritage at Risk Register
- Better revealing of significance of assets

Development proposals affecting, or likely to affect, any heritage asset or its setting will be accompanied by a Heritage Statement which will:

- Identify all heritage assets that could be affected and explain their historic, archaeological, artistic or architectural significance. Consider whether there is a relationship between identified heritage assets in terms of their wider setting.

¹ Underlined text represents new text, strikethrough text represents deletion of text

- Consider how the development site contributes to the significance of the heritage asset
- Determine the potential impact of proposed development on the asset/s and their setting, this includes secondary effects resulting due to the proposal such as increased traffic movements
- Reference the Staffordshire Historic Environment Record and other relevant sources such as landscape character and Conservation Area appraisals and management plans.
- Provide, where required, archaeological survey or historic building and landscape investigations. In the case of major development proposals, the Heritage Statement will form part of the Design and Access Statement.

Heritage Statements will be required for site allocations which reference heritage as part of the key development considerations.

In the case of archaeological heritage; a desk based assessment and/or field evaluation should be undertaken to consider the potential impact on the heritage. Factors to consider include significance, location and density of assets, their likely condition and their vulnerability to proposed change, as well as any enhancement opportunity presented by that change. It should include identifying assets for which significance could be harmed by development in their setting.

Development proposals that will lead to substantial harm to (or total loss of significance of) a designated heritage asset and its landscape and town scape setting will be refused, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or that other exceptional circumstances apply.

Where development proposals will lead to less than substantial harm to existing, or potential, designated and non-designated heritage assets and their landscape and townscape settings, ~~they must be justified by evidence of~~ the harm should be weighed against:

- The public benefits of the development; and
- The action that will be taken to mitigate and minimise the harm.

~~Non-designated archaeology will require an appropriate desk based or field evaluation setting out how development proposals affecting archaeology interests will be considered.~~

Heritage Impact Assessment - Background and approach

11. Preliminary heritage impact assessment work started in house by the Council 2017 prior to plan review.
12. In 2019 CCDC sought to appoint consultants to undertake the Heritage Impact Assessment. A brief was prepared and shared with Historic England.

Historic England supported the brief in principle and provided some detailed comments and suggestions in an email dated 14/10/2019.

13. AECOM was appointed following a successful tender process in April 2020.
14. The HIA was split into two stages. The initial stage comprised of a scoping exercise of all sites followed by a second stage which involved a detailed assessment of sensitive sites.
15. Stage 1: Sites were assessed using a RAG rating and categorized according to their potential impact on heritage assets. 440 sites were assessed and categorized accordingly sourced from the 2018 Strategic Housing Land Availability Assessment and 2018 Employment Land Availability Assessment. Sites for which no significant impact on heritage would occur as a result of development (apart from the possibility of undiscovered archaeology) were screened out of the assessment. Sites for which it was considered development could result in impact on heritage assets, either physically or as a result of change to setting, were taken through to the next stage.
16. Of the sites assessed, 142 were taken through to the second stage. Prior to the second stage assessment the following site types were removed from the assessment:
 - Completed sites;
 - Sites located within a conservation area or within the setting of a conservation area, but with no other heritage constraints; and
 - Sites containing non-designated built heritage assets of very low or negligible significance.
17. The consultants advised that for sites located within a conservation area or within the setting of a conservation area, but with no other heritage constraints the requirements for new development set out in the relevant Conservation Area Management Plan Supplementary Planning Document should be brought to bear for all applications.
18. A total of 72 SHLAA sites and eight ELAA sites were taken through to the second stage of the assessment.
19. Stage 2: A proforma was prepared for each of the 72 sites. These contained the following details:
 - Identification of heritage assets;
 - Significance and contribution of setting to significance;
 - Potential impact of allocation on significance;
 - Maximising enhancement and mitigating harm; and
 - Conclusions and recommendations.

Heritage Impact Assessment - Issues raised

20. Historic England wrote to the Council during the consultation on the Preferred Options Local Plan on 21st April 2021 with queries regarding the HIA relating to a number of sites.

21. CCDC responded to this letter on the 27th April 2021 explaining why some sites had not proceeded to stage 2 according to the HIA methodology; either because these had been rated as Green - no heritage constraints present or because it was within a Conservation Area or its setting where, in accordance with the methodology for the HIA these were screened out. Some more detailed explanation was provided for sites which were duplicates or had been missed.
22. During the Preferred Options consultation, Historic England submitted a representation which noted that whilst the HIA was produced in accordance with guidance, there were reasons why the sites in and around Conservation Areas should be subject to detailed assessment:
23. *'Historic England considers that in omitting these sites from assessment within the HIA it is not clear how the impact on the significance of the relevant Conservation Area has been assessed and how the Council envisages development would take place in respect of the historic environment. The NPPF (Para 185) requires that a positive approach to the historic environment should be demonstrated as part of the Plan process. Since this is not clear at this time Historic England recommends that these matters are addressed in relation to the above sites, prior to the Regulation 19 stage, so as to avoid any issues over the soundness of the Plan'.*
24. Their representation was supplemented by Appendix A. This contained a list of proposed allocations in the plan with comments on Cannock Chase's Heritage Impact Assessment and Approach. For some sites, Historic England recommended HIA was undertaken and for others it was requested that wording from the HIA conclusions were applied in the draft policy. The representation was resubmitted along with final representations at Reg 19 stage (please see Examination Library A0102).
25. Regrettably, the points of difference were not fully resolved prior to the publication of the Reg 19 consultation. This resulted in Historic England raising issues of soundness regarding some of the proposed allocations in the Local Plan.

Heritage Impact Assessment - Resolution

The Council resolved to undertake further Heritage Impact Assessments for sites identified by Historic England. It is agreed that further HIA's are not required for sites which have been removed from the Plan, or where the site has planning permission. These actions were agreed as a result of meeting between CCDC and HE at a meeting held 12/09/24.

The following table includes the sites identified by Historic England in their representation and a commentary on how these have been considered by the Council. The agreed action highlights the result of cooperative working following the end of the Reg 19 consultation period to resolve the issues identified in the representation made by Historic England (A0102).

Table 1 - Suggested modifications for site allocations

Area of Plan	Historic England comments	CCDC response	Agreed Modification
<p>Site Land South of Lichfield, Cannock SH1 (HIA ref: C116a)</p>	<p>Amend 'recommends' with 'requires', as the HIA noted that this was an important mitigation consideration to prevent harm to the Grade II heritage asset and as such the policy should ensure that is occurs at planning application stage. There also needs to be reference within the policy to the heritage asset and the need to protect this heritage asset and the relevant mitigation measure that is required and why.</p>	<p>The supporting text clarifies that the woodland is outside of the site boundary and therefore will be unaffected by development and will continue to screen the site from New Hall Farmhouse. The Council will ensure this point is raised in any discussions with the developer but it cannot be a requirement of policy if it affects land beyond the site boundary. Amending the supporting text from 'the HIA recommends' to 'the HIA requires' in the supporting text will result in no material change to the plan, although the importance is understood. Agree to modification of the policy to acknowledge the importance of screening and reference to the setting of the Listed building.</p>	<p>Add additional clause to Policy SH1 after wording in section headed 'Parcel C116a' paragraph 7: <u>'New development should conserve and enhance the setting of the grade II listed New Hall Farmhouse. Consideration should be given to further screening by planting along the south side of the A5190 Lichfield Road'</u>.</p>
<p>Site Land rear of Longford House, Watling Street.</p>	<p>We made these comments at the previous stage – <i>'Development of the site has the potential to impact the setting of</i></p>	<p>Support noted</p>	<p>No change required.</p>

	<p><i>Longford Lodge Grade II and to a lesser extent Longford House (non-designated). HE welcomes the approach recommended by the HIA of locating access off Wellington Drive and retaining planting to the north-east of the asset, plus demolition of modern buildings on the site and advises that these requirements should be included in any policy specification/site development considerations for this allocation. HE also advises that a Heritage Statement will be necessary to fully appraise any impacts and suggests that this is also encompassed in the site requirements’.</i></p> <p>We welcome the inclusion of these requirements in the policy.</p>		
<p>Site Specific Policy M1 Land bound by Ringway, Church Street and Market Hall Street, Cannock Town Centre</p>	<p>The policy would benefit from incorporating the mitigation and enhancement measures set out in the Heritage Impact Assessment, to ensure that the heritage assets are appropriately safeguarded. As well as ensuring that a Heritage Statement is</p>	<p>The site has outline planning permission and a Heritage Statement has been produced. The policy includes the requirement to ‘Design the buildings to respect the setting of the adjacent listed buildings including St Lukes Church and the Cannock Town Centre Conservation Area’. Due to the significance of the site to the</p>	<p>Policy M1, Key Development Considerations - proposed additional new text: <u>‘Consideration should be given to setting back the building line from the west side of Church Street to mirror the green space at the northern end of the churchyard on the east side of the road. A set-back should be</u></p>

(HIA ref: C504)	supplied at planning application stage.	regeneration of the town centre, it is considered appropriate not to be more prescriptive in the policy approach to enable more detailed assessment through the current application. However, more wording could be added to reflect points of consideration.	<u>considered on the south side of Ringway to soften the 'cliff edge' effect of the current development. Consideration should be given to whether development could be stepped up from the building line to the south-west corner of the site to minimise impact. The site can accommodate a contemporary architectural style, but its proximity to the conservation area and church requires the use of high quality design and materials.'</u>
Site Avon Road, H32 Avon Road/Hallcourt Lane, Cannock (HIA ref: C86)	The policy would benefit from incorporating the mitigation and enhancement measures set out in the Heritage Impact Assessment, to ensure that the heritage assets are appropriately safeguarded. As well as ensuring that a Heritage Statement is supplied at planning application stage.	The existing policy clause regarding heritage assets states: 'Design the buildings to reflect the prominent location on the approach to Cannock Town Centre and to respect the setting of views towards Cannock Town Centre Conservation Area'. The Council has suggested a modification if necessary to ensure the non-designated assets are recognised in the development considerations for site H32 but it should be noted that it is not possible to control development beyond the site boundary. The HIA refers to a car park on the western boundary which has since been developed, therefore there is likely to be limited impact of development of	Policy H32, Key Development Considerations - proposed additional new text: <u>'Any scheme should have regard to the non-designated heritage asset: Electric Picture House and its setting including 6-10 (even) and 14-22 (even) Walsall Road. A sensitive approach should be used on the western boundary of the site on Avon Road'.</u>

		these remaining smaller parcels on the western boundary. Heritage Statements will be required in accordance with Policy SO1.1.	
Site Beecroft Road Car Park M3 (SHLAA ref: CE40)	The policy would benefit from incorporating the mitigation and enhancement measures set out in the Heritage Impact Assessment, to ensure that the heritage assets are appropriately safeguarded. As well as ensuring that a Heritage Statement is supplied at planning application stage.	HIA undertaken 2024/5	Policy M3 Key Development Considerations - proposed additional new text: <u>The design, height and massing of any proposed development should conserve the attractive streetscape of Allport Road and should not visually intrude or oversail the traditional properties. New development which takes inspiration from the locally distinctive design and materials of Allport Road will be supported.</u>
Site Park Road Offices, H36 (HIA ref: C509)	We made these comments at the previous stage – 'Development of the site has the potential to impact the setting of the Cannock Town Centre Conservation Area and two Grade II Listed Buildings located to the south of Park Road – Congregational Chapel and Manse (Vicarage) immediately south of Congregational Chapel. HE advises that a Heritage Statement will be necessary to fully appraise any impacts and suggests that this requirement is	It is recognised that links to heritage assets have not been included in the current policy wording and therefore it is agreed that a modification should be proposed to address this omission. Heritage Statements will be required in accordance with Policy SO1.1. It is considered the HIA is too prescriptive in its recommendations as it notes development only has potential for low impact on the setting of the Conservation Area, Congregational Chapel and very low impact on the Manse yet the recommendations for maximising enhancement would mean	Insert text as one of the key development considerations in Site Specific Policy: H36: <u>'The design, height and massing of any proposed development should take consideration of the original character of this location using traditional materials such as red brick or render. Development should be set back to the existing building line. New development should conserve and enhance the setting of Cannock Town Centre Conservation Area, the Grade II</u>

	<p>encompassed in any policy specification/site development considerations for this allocation. HE also recommends that the suggestions for maximising enhancement and mitigating harm should be encompassed in the specific site requirements for this allocation’.</p> <p>There is no reference to heritage assets within this policy and we consider that this needs to be amended to ensure that any harm to heritage assets are fully mitigated within the Local Plan.</p>	<p>the existing buildings were required to be retained with the regularisation of existing doors and windows. A balance has been taken in the Councils proposed modifications to mitigate harm but not to restrict redevelopment of the site.</p>	<p><u>Listed Congregational Chapel and Manse (Vicarage).</u>’</p>
<p>H37: Police Station Car Park Cannock</p>	<p>We requested a HIA be undertaken of this site, at the previous stage of consultation. We note that this has not been undertaken and that there is the potential for harm to the Cannock Town Centre Conservation Area. We require this evidence base in order to make a judgement about the suitability of this site as an allocation within the Plan.</p>	<p>HIA undertaken 2024/5</p>	<p>Policy H37 Key Development Considerations - proposed additional new text: <u>Development should conserve and enhance the Cannock Chase Conservation Area, eleven listed buildings and two scheduled monuments including the grade II* Church of St Luke, and the White House and their setting.</u> <u>The design, height and massing of any proposed development should take consideration of the original character of this location.</u> <u>Development which respects and draws inspiration from the</u></p>

			<p><u>character of the houses on the south side of Queen Street will be supported. The design of development should consider the use of locally distinctive details and features such as polychrome brick and wrought iron canopies to continue the sense of high quality, traditional street scenes.</u></p>
<p>Site Walsall Road, H38 (HIA ref: C511)</p>	<p>The policy would benefit from incorporating the mitigation and enhancement measures set out in the Heritage Impact Assessment, to ensure that the heritage assets are appropriately safeguarded. We would welcome the retention of the non designated heritage asset to be included within the policy text. As well as ensuring that a Heritage Statement is supplied at planning application stage.</p> <p>We raised these comments at the previous stage –</p> <p><i>'Development of the site has the potential to impact the setting of adjacent Cannock Town Centre Conservation Area and the setting of Grade II* Parish Church of St. Luke (plus Grade II</i></p>	<p>The Council agree to propose a modification which will ensure that the designated and non-designated assets are recognised in the key development requirements, in addition to the current wording with regard to the Conservation Area.</p> <p>It is preferable not to require the retention of the non-listed heritage asset through the policy wording to provide more flexibility for any planning application. At this stage the condition of the building is unclear, although it is important more evidence is gathered to determine the significance of the asset and whether it merits retention as part of any scheme.</p> <p>Heritage Statements will be required in accordance with Policy SO1.1</p>	<p>Insert text as one of the key development considerations in Site Specific Policy: H38:</p> <p><u>'Development should conserve and enhance the setting of Grade II* Parish Church of St. Luke (plus Grade II church railings & gates). Any scheme should have regard to the non-designated heritage asset: Electric Picture House and its setting including 6-10 (even) and 14-22 (even) Walsall Road. A sensitive approach should be used on the western boundary of the site on Avon Road'.</u></p>

	<p><i>church railings & gates). The non-designated Electric Palace Picture House and several late 19th century houses lie within the site. HE advises that a Heritage Statement will be necessary to fully appraise any impacts and suggests that this is encompassed in any policy specification/site development considerations for this allocation. HE also recommends that the suggestions for maximising enhancement and mitigating harm should be encompassed in the specific site requirements for this allocation, particularly the retention of buildings, including the Electric Palace Picture House and consideration of this building for local listing’.</i></p>		
<p>Site Wolverhampton Road, H39 (HIA ref: C152)</p>	<p>We raised these comments at the previous stage – <i>‘No Designated Heritage Assets on/near to the site, but HE notes that the HIA includes both 26 & 28 Wolverhampton Road as being</i></p>	<p>The site has previously been subject to planning permission for 21 flats which retained the existing buildings on site CH/15/0078. The Council agree to a proposed modification to retain the existing buildings.</p>	<p>Insert text as one of the key development considerations in Site Specific Policy: H39: <u>Any scheme should retain the non-designated heritage asset: 26-28 Wolverhampton Road and should maintain a gap between the asset</u></p>

	<p><i>of historic interest as part of Cannock's 19th century growth, adding interest to the street scene, and recommends their retention. Based on these findings HE suggests that this is encompassed in any policy specification/site development considerations for this allocation and that the suggestions for mitigating harm could also be encompassed in the specific site requirements for this allocation'.</i></p> <p>We would welcome the inclusion of these considerations within the policy text.</p>		<p><u>and any new development to protect its setting.</u></p>
<p>Site Danilo Road, H40 (HIA ref: C507)</p>	<p>We raised these comments at the previous stage –</p> <p><i>'HE notes that the HIA concludes that due to the distance from the site to the Cannock Town Centre Conservation Area and lack of intervisibility to the Listed Buildings located to the north-east (The Council House, Grade II* & 79 High Green, Grade II), there is the potential for only low impact. However, HE advises that a Heritage Statement, to</i></p>	<p>The existing text has reflected the recommendations in part: 'design the site and buildings to respect the views towards and setting of the nearby Cannock Town Centre Conservation Area'.</p> <p>The Council agree to propose a modification which will ensure that the development takes into account the additional recommendations from the HIA.</p> <p>Heritage Statements will be required in accordance with Policy SO1.1</p>	<p>Insert text as one of the key development considerations in Site Specific Policy: H40:</p> <p><u>'The design, height and massing of any proposed development should take consideration of the character of this edge of centre location. Proposals should have regard to the Conservation Management Plan and Appraisal for Cannock Town Centre to ensure the character of the area and impact on sensitive buildings is considered. Consideration should</u></p>

	<p><i>fully appraise any impacts, should be encompassed in any policy specification/site development considerations for this allocation and also the recommendations to mitigate harm set out in the HIA'.</i></p> <p>These comments remain relevant and we would welcome the specific details being included within the policy text. We are particularly concerned to ensure that the buildings which lie just outside of the Conservation Area along Walsall Road and are identified as significant buildings with positive impact in the Management Plan, are retained and considered in any HIA in how they contribute to the character of the Conservation Area and relate to the listed buildings nearby.</p>		<p><u>be given to using traditional materials such as brick or render and tiled roofs.</u></p>
M4: Backcrofts Car Park, Cannock	<p>We requested that a Heritage Impact Assessment was undertaken for this site. We cannot find any information relating to an updated HIA after 2020.</p>	HIA undertaken 2024/5	<p>Policy M4 Key Development Considerations - proposed additional new text: <u>Development that respects, or takes inspiration from, the character of the Conservation Area</u></p>

	<p>Please can we have sight of any additional heritage impact assessment for this site so that we are able to make a judgement about its suitability as a site allocation.</p>		<p><u>as described in the council's Cannock Conservation Area character appraisal and management plan will be supported.</u> <u>The height and massing of any proposed development should take consideration the potential impact on the setting of the Conservation Area and views from the Churchyard. New development should not oversail the buildings to the south side of Market Place.</u> <u>Any three storey buildings within the site should be constructed with regard to sight lines from the north side of Market Place and the churchyard.</u></p>
<p>Site M8</p>	<p>We requested that a Heritage Impact Assessment was undertaken for this site. We cannot find any information relating to an updated HIA after 2020. Please can we have sight of any additional heritage impact assessment for this site so that we are able to make a judgement about its suitability as a site allocation.</p>	<p>Site not allocated in Local Plan. No further action</p>	<p>Site not allocated in Local Plan. No further action</p>

<p>Site M2 Park Road Bus Station (HIA ref: C505)</p>	<p>We raised these comments at the previous stage –</p> <p><i>‘Development of the site has the potential to impact the setting of the Cannock Town Centre Conservation Area and three Listed Buildings located on the opposite side of Stafford Road - Congregational Chapel and Manse (Vicarage) immediately south of Congregational Chapel, both Grade II, and The Council House, Grade II*. However, it is noted that the site is currently a car park and makes no contribution to the significance of the Conservation Area or the heritage assets, and that there are opportunities to enhance the setting of the Conservation Area and the Congregational Chapel and Manse. HE advises that a Heritage Statement will be necessary to fully appraise any impacts and suggests that this is encompassed in any policy specification/site development considerations for this allocation. HE also recommends that the suggestions for maximising enhancement and mitigating</i></p>	<p>Policy M2 includes the clause: ‘The design of the site and buildings should respect the setting of the listed buildings and Cannock Town Centre Conservation Area’.</p> <p>A further clause is proposed to reflect the recommendations of the HIA.</p>	<p>Add additional clause to Policy M2: <u>‘In line with the recommendations of the Heritage Impact Assessment; support will be given to schemes that set back from Stafford Road and mirror planting on the western side of the road. The height and massing of any proposed development should be in keeping with surrounding development and designed in either traditional or contemporary style using high quality design and materials’.</u></p>
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	<p><i>harm set out in the HIA should be encompassed in the specific site requirements for this allocation’.</i></p> <p>We would welcome the specific mitigation details being incorporated into the policy text.</p>		
H60: 41 Mill Street, Cannock	<p>We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation.</p>	HIA undertaken 2024/5	<p>Policy H60 Key Development Considerations - proposed additional new text: <u>‘Development should respect the height and massing of the surrounding developments. In designing new development; attention should be paid to scale and materials, and in particular to the fenestration and detailing of the façade to Mill Street to create an attractive and cohesive streetscape’</u></p>
Site Springvale Area offices, H62	<p>We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation.</p>	<p>Discussed at meeting held 12/09/24. Distant from any heritage assets, conversion of existing buildings from office to residential use will have no change in visual impacts.</p>	No further action

<p>Site corner of Avon Road and Hunter Road, H66</p>	<p>We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation.</p>		
<p>H49: Land at the Mossley, off Armitage Road (HIA ref R18)</p>	<p>We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation. We have previously requested this information.</p>	<p>HIA undertaken 2024/5</p>	<p>Policy H49 Key Development Considerations - proposed additional new text: <u>Archaeological investigation must be undertaken prior to development to identify any surviving buried archaeological remains relating to the non-designated heritage asset; a levelled Ridge and Furrow, North of Armitage Road Rugeley (MST23736) which is within the boundary of the site.</u> <u>Any new buildings should use appropriate materials and styles to remain in keeping with the character of the area.</u> <u>Consideration should be given to screening using vegetation between the development and canal to minimise setting changes to the Trent and Mersey Conservation Area.</u></p>

<p>Site Nursery Fields, St. Michaels Road Brereton. H50 (HIA ref: R25)</p>	<p>We raised these comments at the previous stage –</p> <p><i>‘A small part of the site, fronting Main Road, lies within the Brereton Conservation Area, whilst the rest of the site lies adjacent to the Conservation Area, and within the setting of the Grade II Listed Church of St. Michael. HE notes that the Council’s HIA also includes reference to non-designated buildings 1-9 Old School Mews; a re-developed former school dating from the 19th century. HE advises that a Heritage Statement will be necessary to fully appraise any impacts on these heritage assets and suggests that this requirement is encompassed in any policy specification/site development considerations for this allocation. HE also recommends that the suggestions for mitigating harm through sensitive development on the road frontage and screening to the eastern boundary should be encompassed in the specific site requirements for this allocation’.</i></p>	<p>The current policy wording reads: ‘The design of the site and buildings should respect the setting and structures within the Main Road, Brereton Conservation Area including the adjacent Church of St Michael. The Heritage Impact Assessment sets out potential mitigation measures to ensure the heritage asset is not harmed by new development’.</p> <p>It is agreed that it would be helpful to clarify the HIA recommendations in the policy text as opposed to directing to an external document. As such, a modification is proposed to address this.</p>	<p>Add to existing clause under key development considerations in Policy H50:</p> <p>‘The design of the site and buildings should respect the setting and structures within the Main Road, Brereton Conservation Area including the adjacent Church of St Michael. <u>In line with the recommendations of the</u> The Heritage Impact Assessment sets out potential mitigation measures to ensure the heritage asset is not harmed by new development’. <u>screening should be employed along the rest of the eastern boundary of the site. The height of buildings in keeping with the surrounding area and designed in either traditional or contemporary style.</u></p>
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	The policy text should set out what the specific mitigation measures are that are required to overcome the harm. This should be clear in the policy text.		
Site Castle Inn, H51	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation. We have previously requested this information.	Planning application CH/21/0023 - approved.	No further action.
H52: Gregory Works, Armitage Road, Brereton (HIA ref R22)	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation. We have previously requested this information.	HIA undertaken 2024/5	Policy H52 Key Development Considerations - proposed additional new text <u>The design, height and massing of any proposed development should respect the original character of this location.</u>
H53: Land off Lichfield Street, Rugeley (HIA ref R189)	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can	HIA undertaken 2024/5	Policy H53 Key Development Considerations Delete existing text The design of the site and buildings should respect the setting of the Talbot

	<p>make a judgement about its suitability as a site allocation. We have previously requested this information.</p>		<p>Street/Lichfield Street, Rugeley Conservation Area and the adjacent St Joseph & Etheldreda Catholic Church. Replace with new text: <u>'New development should conserve and enhance the Church of St Joseph and St Etheldreda and the Talbot Street and Lichfield Street Conservation Area and their setting. Archaeological evaluation is required prior to development of the site as there is potential for below ground archaeological remains within the conservation area. Where possible, the community centre should be retained as well as the vicarage and church boundary walls/ railings. New buildings should use appropriate materials and styles to remain in keeping with the conservation area in accordance with the Talbot Street and Lichfield Street Conservation Area Management Plan.</u></p>
<p>Site The Fairway Motel, H64</p>	<p>We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can</p>	<p>Planning application CH/22/0098 - approved. Site also covered by HIA Proforma R144</p>	<p>No further action</p>

	make a judgement about its suitability as a site allocation.		
H67: Land at Pendlebury Garage and Petrol Station, 5 Wolseley Road, Rugeley (HIA ref R227)	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation. We have previously requested this information.	HIA undertaken 2024/5	Policy H67 Key Development Considerations Delete existing text The design of the new development should respect the setting of the nearby listed buildings in particular the partially adjoining Listed Building at 9 Wolseley Road, Rugeley. Replace with new text: <u>Development should conserve and enhance Church Street Conservation Area, the Trent and Mersey Canal Conservation Area and the Grade II Listed Building 9 Wolseley Road.</u> <u>Removal of the petrol station building and replacement with built development which respects the design, height and massing of heritage assets will be supported.</u>
Site Norton Hall Lane, H68	We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation.	Planning application approved CH/22/0318	No further action.

<p>Site Hednesford Road, H69</p>	<p>We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation. We have previously requested this information.</p>	<p>HIA undertaken 2024/5</p>	<p>Policy H69 Key Development Considerations - proposed additional new text: <u>New development should complement the scale, height and massing and materials of surrounding buildings in this semi-rural location, in particular those fronting Hednesford Road.</u></p>
<p>E6: Land at the Academy Early Years (Former Talbot Public House), Main Road, Brereton (HIA ref RE29)</p>	<p>We cannot find a Heritage Impact Assessment for this site. Please can we have sight of the relevant heritage evidence base for this site so that we can make a judgement about its suitability as a site allocation. We have previously requested this information.</p> <p>We raised these comments at the previous stage –</p> <p><i>‘Site lies within the Brereton Conservation Area and opposite the Grade II* Listed Brereton Hall, and Grade II Listed Barn to the rear of the Hall. HE therefore advises that a Heritage Impact Assessment is undertaken prior to the allocation of this site within the Local Plan, to inform the impact of the proposed allocation</i></p>	<p>HIA undertaken 2024/5</p>	<p>Policy E6 Key Development Considerations - proposed additional new text: <u>Development should conserve and enhance the Main Road Brereton Conservation Area. New development should use appropriate materials and styles to remain in keeping with the conservation area to minimise impact to character of the heritage settlement. Appropriate heights would be two or three storeys and materials would include brick frontages.</u></p>

	<i>on the significance of the designated heritage assets'.</i>		
Site E12	We raised concerns about this site at a previous stage – is this site no longer going ahead? If it is, we would request an understanding of the local archaeology service views on the non designated archaeology and any suitable mitigation measures to be incorporated into policy.	Site not allocated in Local Plan. No further action	Site not allocated in Local Plan. No further action

Cumulative Impact Statement

26. This Statement has been produced to demonstrate how the cumulative impact of development proposals in the Local Plan on Heritage Assets in Cannock Town Centre has been considered in response to representations made by Historic England;
27. *“We are concerned about the cumulative impact of a number of developments in the same area and how these may impact the Grade II* St Luke’s Church and the Cannock Chase Town Centre Conservation Area. How was the Council considered the cumulative impacts of these developments and can the harm be overcome? This is something that the HIA process can address”.*
28. Representation from Historic England dated 18th March 2024.

Background

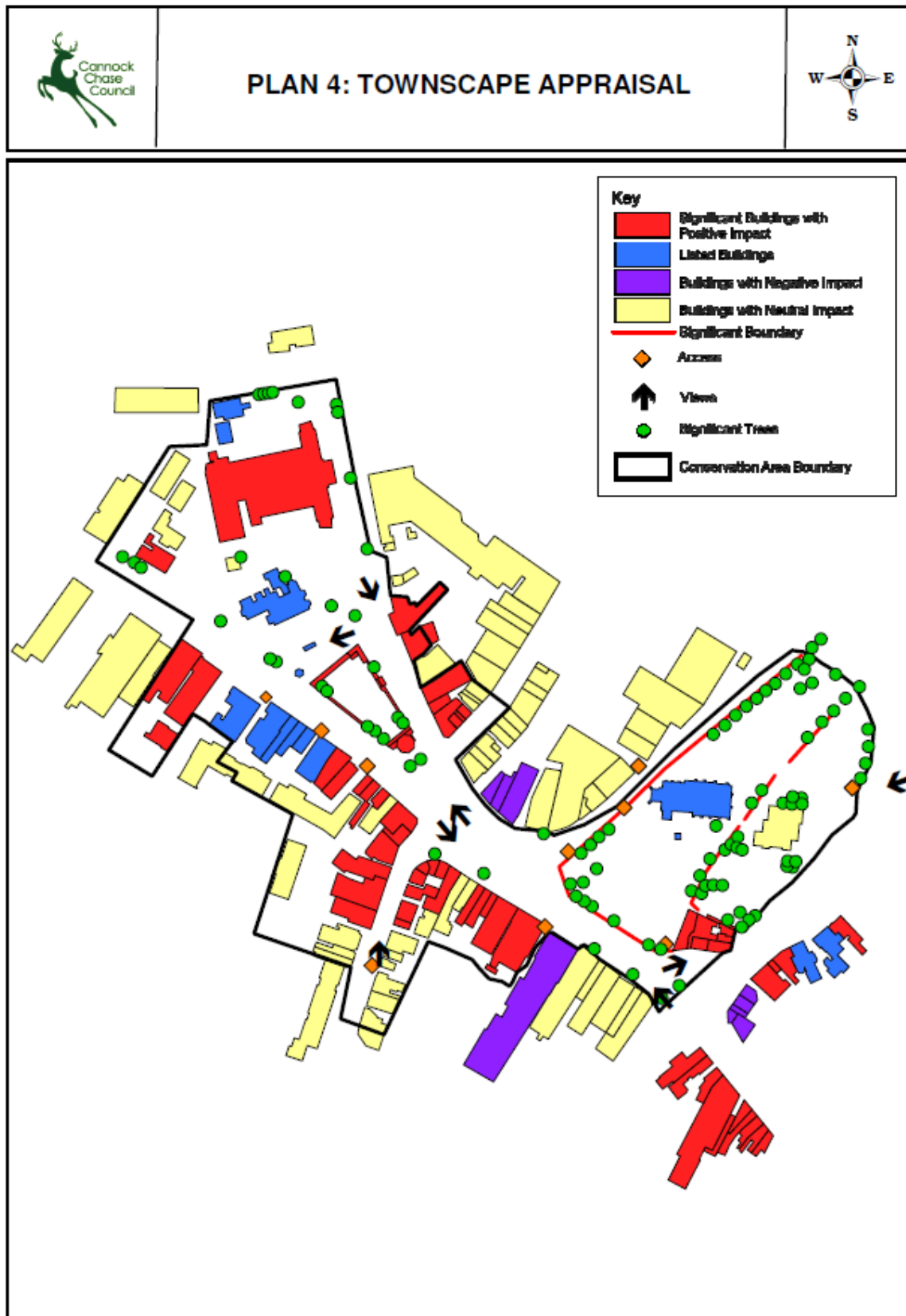
29. Cannock Town Centre dates back to the medieval era. Some significant 18th Century buildings create distinctive features of the town centre, though much of it appears to date from the 19th and 20th Century during the period of Cannock’s main expansion as coal mining developed. Cannock experienced two decades of expansive growth in the 1970’s and 1980’s with a thriving high street, and the town centre was closed to cars in the 90’s which improved the local environment and shopping experience.
30. Cannock Town Centre Conservation Area was designated in November 1991 and covers the historic core of the town. The town centre has a historic medieval street layout based upon a broad market place and features two prominent green focal points of the bowling green and churchyard enhanced by mature tree planting.
31. Like many town centres, in the past two decades Cannock’s High Street has struggled to compete with changing retail habits becoming less attractive to retail occupants. Although the town centre is pedestrianised and closed to traffic, until very recently there was still a legacy of car dominance including a large disused multi storey car park and subway access from the north-east. There is also a range of building styles, condition and quality, with not all development in the town centre currently presenting a positive contribution to the townscape and historic environment.
32. Vacancy rates for retail units in Cannock is the highest of all the centres in the District remaining at 25% for the past 2 years.
33. The Council aspires to enhance the town centre, improve the public realm and increase footfall. A Development Prospectus for the town centre was produced in 2019 which intended to ensure that the town built on the success of the McArthur Glen Retail Outlet which opened in April 2021 [Cannock Town Centre Development Prospectus | Cannock Chase District Council](#) This identified potential opportunity sites for redevelopment and informed proposed allocations in the Local Plan.

34. Cannock Chase Council was allocated £20m from the Government's Levelling Up Fund (LUF) in October 2021. In November 2023 outline permission was granted for a scheme to create a leisure and cultural hub based around the Prince of Wales Theatre and Church Street affecting land bounded by Ringway, Church Street and Market Hall Street. The original regeneration scheme aimed to deliver a mixed-use leisure and cultural hub, the refurbishment of the Prince of Wales Theatre, a new cafe/bar/restaurant premises within the theatre, business workspace and a new Northern Gateway into the town centre and associated public realm improvements. The operational future of the Prince of Wales Theatre is currently under consideration. Work to improve the accessibility for pedestrian and cyclists is near to completion.
35. Cannock's historic environment is an asset that improves the attractiveness and local distinctiveness of the town centre and therefore should be enhanced through regeneration. As noted in the Development Prospectus; Cannock as a historic market town has a number of key attributes that form a positive base for investment in the Town Centre, especially the potential to enhance the independent retail offer, improve the shopping environment with its heritage assets, and deliver more town centre housing and commercial floorspace through the development sites.

Heritage Evidence

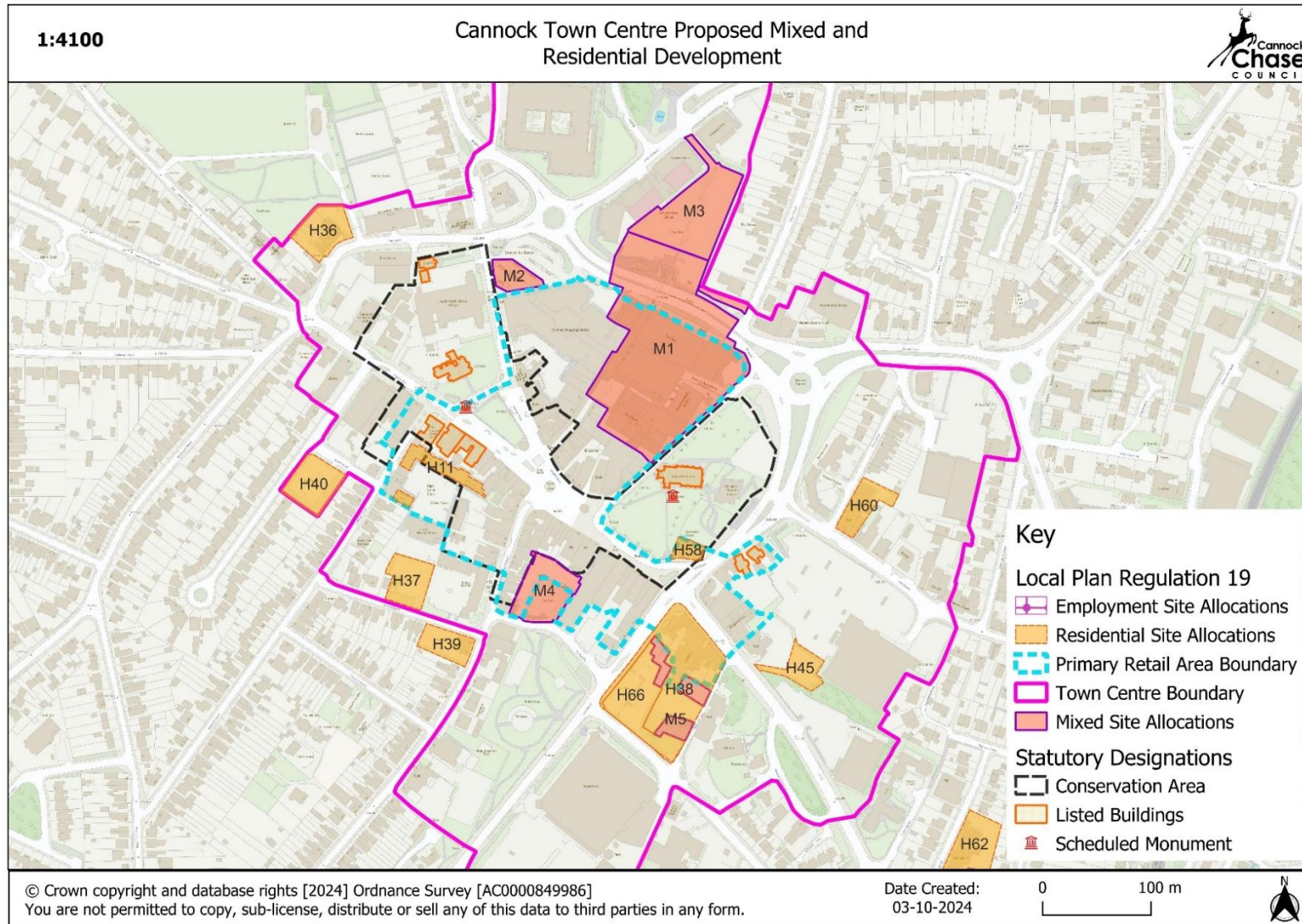
36. Cannock Town Centre Conservation Area Management Plan Supplementary Planning Document (SPD) adopted in April 2014 follows from the Council's Conservation Areas Management Plan which sets out the package of measures available to the Council to apply to all Conservation Areas within the district. Whilst the document is dated 2014 there has been little change in the town centre over the past decade as the focus for retail development has been the creation of the separate McArthur Glen site and developing proposals and gaining funding for the town centre. As such, planned regeneration to the town centre is only starting to take place. Therefore, the SPD is still a useful, relevant guide to help consider impact on the historic environment.
37. The Management Plan sets some guiding principles for consideration in the section on the treatment of new development. The SPD contains a Townscape Appraisal (figure 1 shown overleaf) which rates the impact of buildings on the historic environment:
 - Significant buildings with a positive impact (red)
 - Listed Buildings (blue)
 - Buildings with negative impact (purple)
 - Buildings with neutral impact (yellow)
38. For comparison figure 2 shows the proposed site allocations in the Cannock Chase Local Plan.

Figure 1 Townscape Appraisal, Cannock Town Centre Conservation Area Management Plan SPD 2014



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Figure 2 Map showing site allocations proposed in the new Local Plan



Consideration of cumulative impact on heritage

39. Aside from the focal mixed use proposal for Site M1, most are small scale redevelopment opportunities and most are sited on the periphery of the centre outside the boundary of the Conservation Areas (except sites H11 and H58) but within the setting of the Conservation Area and/or Listed Buildings.
40. The only site which will have result in a change to the built environment which will be visually prominent from the Town Centre Conservation Area is site M1 which comprises the town centre regeneration site which has outline planning permission (CH/23/0131). This site is rated as 'neutral impact' on the historic environment in the Management Plan Townscape Appraisal (figure 1) and therefore there is potential for new development to enhance heritage assets with a high-quality regeneration scheme. A heritage statement has been produced as part of the outline application and the HIA sets further recommendations for the design of the site to maximise enhancement.
41. Sites H11 (rated neutral impact) and H58 (rated positive impact) within the Cannock Town Centre Conservation Area boundary are sites containing existing buildings that will be retained and have been allocated on the basis of proposals for change of use to residential. Therefore these allocations will not have any cumulative impact on heritage assets as there will be no change in the visual appearance of the building exterior.
42. All of the sites have been subject to consideration in the Councils Heritage Impact Assessment (2020) reference HIS2, or addendum (2025) and therefore have individual recommendations to inform key development considerations detailed in the site allocations policies (either through existing text or proposed modifications).
43. Sites on the southern periphery of the town centre including M4, H27, H39, H40 as well as H45 to the east and M5 to the north are all car parks which are only viewable from the backs of premises in the town centre. None form significant gaps within the Conservation Area as they are all beyond the limits of the boundary, almost entirely screened from view by the existing built environment and therefore the most significant consideration is views towards and from the Conservation Area. This has been considered by the HIA in terms of recommendations for building heights on these sites, as well as specific recommendations for each site relating to build design and quality.
44. Should the town centre continue to change and open views towards or from these sites in future from the conservation area, provided these sites have been developed sensitively with policy compliant schemes, no harm should arise as a result of replacing car parks with built development, and will add to the vibrancy and viability of the centre by increasing residents and workers within close proximity to the centre.
45. Site M4 is also a car park directly adjacent to the Conservation Area sited behind buildings rated as having either positive, neutral or negative impact on the historic environment in the Townscape Appraisal. Whilst this is in closer

proximity to the setting of the Conservation Area than some of the other car park sites, the site is entirely screened by the built environment, therefore provided the site is developed in line with recommendations set in the HIA and through the Local Plan including limits to building heights, there is opportunity for enhancement.

46. Sites H36, H38 and M5 are underutilised spaces on a site where the site frontage to the A4601 facing the town centre (formerly a car park) has been recently developed for a new Care Home 'Coronation Court'. The other areas are effectively screened by this new development, although the HIA recommends consideration of the non-designated 'Electric Picture House' on site which has been highlighted in the proposed amendments to the key development considerations for those sites.
47. Site H60 is visible from the conservation area but separated from it by the A4601 and intervening modern development. These intervening buildings on the corner of the A4601 and Mill Street adjacent to the site are marked as having a negative impact in the townscape appraisal. The disused nightclub on site H60 has been demolished in preparation for redevelopment. A heritage statement has been prepared as part of the planning application which has not been determined. This considers the wider impact on town centre heritage assets and Listed Buildings.
48. Site H62 is distant from the other sites, screened from heritage assets by intervening built development and is of a distance that it is not considered to contribute to any cumulative impact on the town centre.
49. Site M2 comprises part of the bus station for the town centre. This is a prominent position where the height, design and set back are all important considerations in the HIA and Local Plan key development criteria for the site. The development of this site in combination with M1 (town centre regeneration site) and M3 (car park) is likely to result in a change to the approach to the town centre from the north. However, this area has been dominated by urban transport infrastructure including the Ringway dual carriageway, large 4 and 5 arm roundabouts, bus station, multistorey car park (M1), surface car park (M3) and a subway access for pedestrians. The existing infrastructure does not represent a positive addition to the historic environment.
50. The HIA (2025) notes for sites M3 that development here will have little or no impact on the conservation area, as the setting has already been changed by the bus station and shopping centre. Proposals for the redevelopment of sites M1 and M2 could alter the view from Site M3 towards the Conservation Area, but ultimately this provides the opportunity to enhance the approach to the Conservation Area at key locations, provided development is in line with recommendations set out in the HIA.
51. Works to provide dedicated cycle lanes, remove the subway and demolish the multistorey car park are in progress. The proposals for these development sites in combination with access improvements would result in an

improvement to the town centre gateway for users accessing the centre from the north. The cumulative impact of proposals also provides opportunity for enhancement to heritage as the built form currently lacks identity in terms of design and materials (brick and concrete) and there is potential to consider planting, viewpoints and better quality design when delivering new development which would be more complementary to the Conservation Area and key Listed Buildings including St. Lukes Church (Grade II*).

52. Photos of the key sites are provided for reference.

Photos of Mixed Use Town Centre Development Sites

Site M1



The photos above show the existing buildings on the left forming site M1 from Church Street looking north-east. The Church of St Lukes and church yard is on the right.



The photo above all shows a viewpoint towards the main regeneration site M1 from the north on the Ringway dual carriageway.

Site M2 and M3



These sites along with site M1 form part of the gateway to the town centre from the north.

Site M4



Site M4 currently Backcrofts Road Car Park showing the current view towards the Cannock Town Conservation Area (backs of properties in the north and west part of the photo) with building which makes a negative contribution to the east.

Scheduled Ancient Monuments and archaeological assets statement

54. This Statement has been produced to demonstrate how the assessment of Scheduled Monuments and other archaeological assets has been considered in the development of the plan in response to representations made by Historic England;

55. *We raised some concerns at Regulation 18 stage about the assessment of Scheduled Monuments and other archaeological assets. How has this been addressed? This remains a concern.*

We raised these comments at the previous stage –

Assessment of potential development should fully consider the impact on the setting of Scheduled Monuments, including the landscape views from Castle Ring (e.g. for development to the north in Rugeley), as well as, and, assets which are outside of the District (e.g. the setting of the Saucer barrow on Spring Hill, or Shugborough Registered Park & Garden)'.

Representation from Historic England dated 18th March 2024.

Heritage Evidence

56. The Heritage Impact Assessment (HIA) for the Cannock Chase Local Plan produced by AECOM published 25th September 2020 (examination reference HIS2) assessed potential development site options to inform the site selection process.

57. The HIA utilises the Staffordshire Heritage Environment Record (HER) data in addition to Designated Heritage Asset information, locally Listed Buildings, Conservation Areas and Chase through time mapping as sources of data which is explained in the methodology.

58. The methodology set out on pages 1 - 4 of the HIA included sites for which it was considered development could result in impact on heritage assets, either physically or as a result of change to setting. It states this includes sites where:

- A designated asset or assets (listed building or scheduled monument) was present within the site boundary;
- The site was within a conservation area;
- The site was within the setting of a designated heritage asset (listed building, scheduled monument or conservation area);
- There was a non-designated built heritage asset within the site boundary;
- There was significant non-designated archaeology within or close to the site boundary; or
- The site formed an essential part of the setting of a significant non-designated asset.

59. From the list above, it is clear that the setting of designated monuments were taken into account, and this was not limited in the scope of geographical area.

This therefore includes heritage assets beyond the boundary of the Local Authority (where relevant to the site).

60. Of the 453 sites assessed, 142 fell into one or more of these categories. A proforma was produced to facilitate the second stage of the assessment which contained five sections to be completed as follows:
 - Identification of heritage assets;
 - Significance and contribution of setting to significance;
 - Potential impact of allocation on significance;
 - Maximising enhancement and mitigating harm; and
 - Conclusions and recommendations.
61. The proforma clearly records information regarding the potential impact of development on a site on both the significance and the setting of a heritage asset.
62. It is recognised that there may be potential for undiscovered archaeology in the District. Policy SO1.1 Protecting, Conserving and Enhancing the Distinctive Local Historic Environment (with suggested modifications) sets out general considerations relating to development proposals and requirements with regard to production of Heritage Statements and desk based or field evaluations.
63. The Council considers that the impact on the setting of Scheduled Monuments and other archaeological assets has been fully evaluated in the development of the Local Plan.