

# **Cannock Chase Council**

## **Examination of the Cannock Chase Local Plan 2018-2040**

### **Schedule of Matters, Issues and Questions for the Examination (Version 2)**

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## Introduction

Following my initial examination of the Cannock Chase Local Plan 2018-2040 (the Plan) and the supporting material, I set out below the main Matters, Issues and Questions regarding the soundness of the Plan. These should be read in conjunction with the Guidance Note for people participating in the examination (Version 2) issued on 4 April 2025.

As highlighted within the Guidance Note, participants should be aware that the Council have published several additional documents to their evidence base which are located on the examination webpages and which representors may wish to consider in their responses below. The Council have also produced a Schedule of Minor Modifications to the Plan and Policies Map (Document refs: 'SD15' and 'SD16') as well as the Council's Response to the Regulation 19 Detailed Consultation Summary (Document ref: 'SD13'). Agendas for individual hearing sessions will be issued before the hearings commence.

The questions identified below concerning soundness are primarily focused on the Plan's policies. Insofar as they relate to the Plan's soundness, other elements of the Plan including the supporting text will be considered as part of the discussion of the relevant policies. Apart from the Council, there is no obligation for participants to produce hearing statements. **You should only do so if there is something to add to your original representation – please do not repeat what is in your original representation, just provide a cross reference to it where necessary.** I will determine the way discussions take place at the hearings. As identified within the Guidance Note (Version 2), all references below to the National Planning Policy Framework are to the September 2023 version. Where respondents answering the following questions identify a deficiency in the submitted Local Plan they should make clear how it should be changed in order to make it sound.

## **Matter 1: Legal and procedural requirements**

***Issue: Have the relevant legal and procedural requirements been met, including the duty to cooperate, in the preparation of the Plan and is the Plan therefore legally compliant?***

### **Questions**

#### **Duty to Cooperate**

- 1.1 Overall, has the Plan been prepared in accordance with the 'duty to cooperate' imposed by Section 33A of the Planning & Compulsory Purchase Act 2004 (the PCPA), as amended?
- What are the strategic, cross-boundary issues of relevance to the Plan and how does the Plan's strategy address them?
  - What has been the nature of the cooperation undertaken and on what issues has this focused?
  - What actions have been taken in relation to the 'duty to cooperate'?
  - In preparing the Plan did the Council engage constructively, actively and on an on-going basis with neighbouring authorities and other relevant organisations on cross-boundary issues in respect of the 'duty to cooperate'?
  - What evidence is there in terms of the outcomes of the actions taken in relation to the 'duty to cooperate'?

*In responding to the above questions, the Council is asked to provide detailed evidence to support its position with reference to timing and preparation of the Plan.*

#### **Sustainability Appraisal and Habitats Regulations Assessment (Integrated Impact Assessment)**

I note that the Council's Integrated Impact Assessment (IIA) includes the Sustainability Appraisal (SA) (SD3) and the Habitats Regulations Assessment (HRA) (SD5).

- Is the SA undertaken suitably comprehensive and satisfactory and has it sufficiently evaluated reasonable alternatives? Did it adequately assess options for sustainable growth and the spatial strategy?
- Has the SA provided adequate consideration and testing of reasonable alternatives across all policies and proposals in the Plan?
- Does the SA adequately and appropriately assess the likely environmental, social and economic effects of the Plan?
- Are the findings of the SA of the Issues and Options (R2) and Preferred Options (R3) properly reflected in the SA of the submitted Plan and is it clear how the SA has informed and influenced the submitted Plan?
- Has the formulation of the Plan been based on a sound process of SA?
- Has the Plan been formulated on a sound Habitat Regulations Assessment (HRA) process?
- Has Natural England confirmed that the information and evidence presented, and the assessments set out in the HRA are sufficient, robust and justified and that the conclusions reached in this respect are supported and what evidence is there to support this?
- Has the IIA overall, including the SA and HRA, been undertaken in accordance with all the relevant Regulations (including the Conservation of Habitats and Species Regulations 2010) and National Planning Policy Guidance?
- Are these assessments, their conclusions and the application of those conclusions within the Plan justified, effective and consistent with national policy?
- Overall, is the IIA adequate in its expression of how and why the Plan's strategy and policies were selected as an appropriate and justified approach?

## Other legal requirements

- 1.12 Is the Plan legally compliant in terms of how it seeks to address climate change?
- 1.13 Does the Plan include a strategy and policies designed to secure the development and use of land in the District which contributes to the mitigation of, and adaptation to, climate change as required by Section 19(1A) of the PCPA?
- 1.14 Taken as a whole, does the Plan include strategic policies - or a spatial development strategy which contains policies - to address the identified strategic priorities of the Plan area, in accordance with Section 19(1C) and (1D) of the PCPA and if not, why?
- 1.15 Are any strategic policies of the Plan clearly identified and set out within it? Is there a clear distinction between strategic and non-strategic policies within the Plan, both in terms of presentation and explanation?
- 1.16 Has the Plan been prepared in accordance with the Council's Statement of Community Involvement (SCI) (SD8) and met the minimum consultation requirements in the relevant Regulations?
- 1.17 Does the Plan accord with the Council's Local Development Scheme (LDS) (SD9) and has the consultation carried out during its preparation been adequate and met all requirements?
- 1.18 Is the geographical illustration of all relevant policies and proposals within the Plan adequately and correctly shown on the submission Policies map?

## Matter 2: Vision, strategic objectives and spatial strategy

***Issues: Does the Plan clearly identify a vision and spatial strategy for the Plan area that is sound having regard to the needs and demands of the District, Government objectives and the evidence base? Are the strategic objectives for Cannock Chase sound having regard to the presumption in favour of sustainable development and the trends and challenges within the District? Has the Plan been positively prepared?***

### Questions

- 2.1 Is the vision of the Plan and how the strategic objectives will achieve that vision by 2040 clearly set out, explained and justified by evidence?
- 2.2 Are the strategic objectives consistent with all development proposals identified within the district and, in particular, development proposals at Heath Hayes?
- 2.3 Are the objectives sufficiently strong and robust to set the specific requirements for development proposals identified to come forward in the Plan period?
- 2.4 Is the spatial strategy applied consistently across all areas of the District within the Plan?
- 2.5 Should the spatial strategy of the Plan be set out in its own strategic level policy? By not doing so, does this make the Plan unsound?
- 2.6 Will the spatial strategy satisfactorily and sustainably deliver the new development and infrastructure needed over the Plan period?
- 2.6 Does the Plan have a 'key diagram' to set out a clear and effective illustration of the Council's strategic development vision and spatial strategy for the district? If not, why?
- 2.7 In assessing the viability of the Plan, has sufficient account been taken of all the relevant standards in the Plan and the implications of CIL?

### **Matter 3: Delivering high quality development that is distinctive, attractive and safe**

***Issues: Does the Plan take a justified and suitably evidenced-based approach to the delivery of high-quality development? Does the plan clearly set out how the high-quality development to be delivered will be distinctive, attractive and safe? Are the policies for achieving this justified, effective and deliverable and consistent with national policy?***

***[Policies SO1.1, SO1.2 and SO1.3]***

#### **Questions**

##### **Policy SO1.1: Protecting, conserving and enhancing the distinctive local historic environment**

- 3.1 Does the wording of policy SO1.1, using terms such as 'preserve' and 'artistic or architectural significance' suitably accord with and build upon relevant national policy?
- 3.2 In terms of policy SO1.1 and paragraphs 6.6 and 6.7 of the supporting text within the Plan, is additional detail on the impact and mitigation of a proposal on the historic environment beyond that required by a Heritage Statement justified and necessary to make the Plan sound?
- 3.3 Does the emphasis on the historic environment in the way set out within the Plan dilute the emphasis on delivering high quality development? Does this represent a positively prepared approach that is suitably justified, effective and consistent with national policy?
- 3.4 Is the wording of policy SO1.1 in terms of '*where development proposals will lead to less than substantial harm*' sufficiently robust to be effective in delivering the high-quality development the Plan seeks to achieve?
- 3.5 Does policy SO1.1, as submitted, sufficiently address archaeology and associated matters in terms of development proposals within the Plan area?
- 3.6 Is the policy repetitive of national policy and if so, is that necessary and in accordance with national policy and has this approach been applied consistently throughout the Plan?
- 3.7 Are links to other policies within the Plan (signposting) required and has this been applied consistently across the Plan?
- 3.8 Are any changes to the policy required for reasons of soundness?

##### **Policy SO1.2: Enhancing the quality of the built environment**

- 3.9 How are the principles of Active Design Guidance, as referenced in paragraph 6.24, reflected within policy SO1.2 or its supporting text and is the inclusion of the principles of Active Design Guidance in the Plan necessary for soundness?
- 3.10 With regard to the local design guides referred to in policy SO1.2, are these guides integral to the Plan's approach to enhancing the quality of the built environment? If so, when is it envisaged that these guides will be produced and in place and who will produce these guides?
- 3.11 Has the policy had sufficient regard to the National Design Guide (2021) and National Model Design Code (2021)?

##### **Policy SO1.3: Creating safe places which deter crime and reduce the fear of crime**

- 3.12 Should the provisions of *Martyn's Law* be incorporated into policy SO1.3 or the Plan more broadly? Does a lack of such provision within the Plan result in it being unsound? If so, how?
- 3.13 Is policy SO1.3 positively prepared, justified and effective in terms of meeting the aim of creating safe places across the district and is the policy consistent with relevant national policy and guidance, including the National Design Guide (2021), the National Model Design Code (2021) and Secured by Design?

**Matter 4: Creating community Infrastructure and healthy living opportunities across the district**

***Issues: Does the Plan take a justified and evidenced approach to creating community infrastructure and healthy living opportunities across the district? Is the Plan, and its relevant policies in this matter sufficiently positive and effective in terms of implementation and consistent with national policy?***

***[Policies SO2.1, SO2.2, SO2.3, SO2.4 and SO2.5]***

**Questions**

- 4.1 Should Strategic Objective SO2 include a recognition of how major development can provide new community infrastructure and facilities to help meet the needs of existing and future residents?
- 4.2 Is such an amendment to the strategic objective necessary to ensure soundness of the Plan? If so, how?
- 4.3 Should SO2 be refined to make a distinction between the loss of existing community facilities and those elements dealing with the provision of new community facilities associated with development proposals and is this distinction necessary to make the Plan sound?
- 4.4 It is noted that text could be added to SO2 regarding increasing community cohesion, specifically in relation to new community facilities. Is such an addition to SO2 necessary for soundness reasons and if so, what text would be considered suitable or appropriate?
- 4.5 It is noted that no policy under SO2 has specific restrictions towards development proposals that potentially have a negative impact on health and well-being. Is such a policy necessary to make the Plan sound and would the inclusion of such a policy result in the Plan being positively prepared?

**Policy SO2.1: Safeguarding the provision of community facilities**

- 4.6 Should policy SO2.1 allow for alternative uses to come forward on a site that is no longer viable for its existing use?
- 4.7 In this regard, should the policy refer to the viability of existing community facilities where such facilities are no longer viable in their existing use?
- 4.8 Would such an amendment provide clarity and make the policy more effective and is such an amendment to the policy necessary for soundness?
- 4.9 Should policy SO2.1 provide greater recognition of the opportunity for major development to contribute towards providing new community facilities where no current capacity exists?

**Policy SO2.2: Safeguarding health and amenity**

- 4.10 Is it necessary, for reasons of soundness, to include a requirement for a health impact assessment on significant residential developments within policy SO2.2, or alternatively, could supplementary guidance be produced in this regard?
- 4.11 Would the exclusion of the requirement make the policy ineffective and unsound? If so, how?
- 4.12 Does policy SO2.2, as submitted, provide sufficient detail to be effective in terms of safeguarding health and amenity?
- 4.13 Is the policy being unnecessarily repetitive in cross-referencing other policies within the Plan, particularly in the context of the Design and Access Statement and if so, should this text be deleted from the policy?
- 4.14 Would this result in any reduction in clarity for, and signposting of, the reader within the Plan to other policies and therefore make the Plan and this policy less effective?
- 4.15 Would the removal of this text from the policy and into, for example, the supporting text result in any less repetition within the Plan?
- 4.16 Would doing so, in respect of this policy and all other relevant policies, result in the Plan being unsound? If so, how?

- 4.17 Is policy SO2.2 positively prepared, justified and consistent with national policy? If not, what amendment to the policy would be required to make it sound?

Policy SO2.3: Provision of open space, sports and recreational buildings and land, including playing fields

- 4.18 Should reference to the Cannock Chase Playing Pitch Strategy (PPS) (LR4) be retained within policy SO2.3 or is it be more appropriate, for soundness, to be referenced within the supporting text of the policy?
- 4.19 Is the inclusion of the PPS within the policy justified, does it make the policy effective and is it necessary for soundness?
- 4.20 Should policy SO2.3 make specific reference to the viability of existing community infrastructure?
- 4.21 Should the policy allow for alternative uses to come forward on a site that is no longer viable?
- 4.22 Does the promotion of 'Active Design' within policy SO2.3 result in a negative impact on viability in terms of effectively exceeding national policy requirements through the introduction of non-statutory guidance within policy?
- 4.23 Would the removal of the reference to 'Active Design' result in the policy being positively prepared, justified, effective and sound?
- 4.24 How would the removal or retention of the term 'Active Design' in policy SO2.3 impact on viability?
- 4.25 Is policy SO2.3 suitably and clearly worded regarding anticipated deficiencies and financial contributions to appropriate community projects being sought?
- 4.26 It is suggested in representations that the above is not directly related to the impact of the development and, as such, the policy is inconsistent with national policy and is not justified. Is this correct and if so, how can this be resolved to ensure that the policy is justified, effective, sound and consistent with national policy?
- 4.27 Does the table of minimum local standards set out within the supporting text for policy SO2.3 (p.57-58 of the Plan) require a reference and a clearer relationship with policy SO2.3 for reasons of the effectiveness of the Plan? If so, what could be done to resolve this and to ensure the Plan is sound in this regard?
- 4.28 Is it necessary, in soundness terms, for the policy to clarify that in the case of overprovision against one typology there is no basis to seek new provision either on or off site? If so, how should this be done?
- 4.29 Overall, as submitted, is policy SO2.3 positively prepared, justified, effective and consistent with national policy?

Policy SO2.4: Allotments and community gardens

- 4.30 Does policy SO2.4 provide sufficient clarity in its purpose to be effective in its implementation?
- 4.31 Are the local standards relating to the size and distance of provision of allotments and community gardens, as set out in the table within the supporting text to the policy, based on relevant national guidance and standards and are they consistent with them?
- 4.32 Is the policy subject to any proposed amendment that would result in its potential soundness being adversely affected? If so, what and how?
- 4.33 Is policy SO2.4, as submitted, positively prepared, justified, effective and consistent with national policy? If not, how and why?

Policy SO2.5: Providing opportunities for healthy living and activity through Active Design

- 4.34 Should policy SO2.5 include a clause requiring applicants to take a comprehensive and co-ordinated approach to development including respecting site constraints such as utilities situated within sites and is such an addition to the policy necessary to make it effective and sound?

- 4.35 Is policy SO2.5, as submitted, repetitive and are the cross references to other policies within the Plan necessary for soundness?
- 4.36 Does the promotion of 'Active Design' within policy SO2.5 result in a negative impact on viability in terms of effectively exceeding national policy requirements through the introduction of non-statutory guidance within policy?
- 4.37 Would the removal of the reference to 'Active Design' result in the policy being positively prepared, justified, effective and sound?
- 4.38 How would the removal or retention of the term 'Active Design' in policy SO2.5 impact on viability?
- 4.39 As submitted, is policy SO2.5 positively prepared, justified, effective and consistent with national planning policy? If not, how and why?

## **Matter 5: Providing for housing choice**

***Issues: Are the policies for housing growth, including choice and affordable housing justified by evidence, deliverable and consistent with national policy? Is the housing target, the distribution and location of new housing justified? Is the overall target for affordable housing and type of tenure justified? Has the level of housing required by the Plan been arrived at in accordance with national policy and is it justified by the evidence? Will the Plan be effective in providing a sufficient and ongoing five-year supply of deliverable housing sites to meet the housing requirement? Are all identified housing needs addressed effectively and justified within the Plan and its policies?***

### **[Policies SO3.1, SO3.2, SO3.3 and SO3.4]**

#### **Questions**

- 5.1 Does Strategic Objective SO3 reflect the Government's overall objective for housing which is to significantly boost the supply of homes and is it, therefore, justified, effective, consistent with national policy?

#### **Policy SO3.1: Provision for new homes**

- 5.2 Is the evidence and detailed figures used to calculate the housing supply provided by the Council in supporting documents, including the SHLAA (H1) and the Cannock Chase Development Capacity Study 2023 (H11), as well as the assumptions such as the windfall rate, sufficiently robust and clearly justified and presented within the Plan?
- 5.3 Is the objectively assessed local housing need for Cannock Chase District of a minimum of 5,808 dwellings for the period 2018 – 2040 (264 dwellings per annum) based on robust and up-to-date evidence and the Government's standard methodology?
- 5.4 Is the Council's additional identified contribution to unmet housing need in the Housing Market Area (HMA) (500 dwellings) appropriate, reasonable and realistic?
- 5.5 Should the Cannock Chase additional housing contribution be offered to other areas within the HMA where an emerging housing shortfall is identified (i.e. within the Black Country and Birmingham)?
- 5.6 Is the Cannock Chase contribution to the HMA sufficient given the scale of unmet need identified in emerging Local Plans in production by authorities within the HMA in the Black Country and Birmingham? Has this contribution been based on sound evidence?
- 5.7 Should the Plan deliver more housing to meet the wider need within the HMA?
- 5.8 Are the proposed housing density assumptions, including the high rate of 50dph for urban town centres, appropriate and achievable, particularly when considering other factors such as biodiversity net gain?
- 5.9 In terms of the housing trajectory, is there too great a reliance on historical completions in the early years of the Plan period and is this why it appears to have led to points within the trajectory where there is an insufficient supply to meet the annual need or five-year supply?



- 5.10 Will the Plan provide a 5-year supply of deliverable sites against the Plan target of 264 dwellings per annum (287 per annum with the additional housing for the HMA)?
- 5.11 Were the allocated housing sites in the Plan selected according to a process that was robust, consistent and based on sound evidence?
- 5.12 What evidence is there to show that the allocated sites in the Plan are deliverable and developable, according to the definition in the NPPF Glossary?
- 5.13 Is there compelling evidence to show that windfall (small) sites will provide a reliable source of supply as anticipated in the Plan?
- 5.14 The Council's viability evidence demonstrates that only a proportion of affordable housing can be delivered on each site before it is not viable. Does this significantly restrict the amount of affordable housing that can be delivered?
- 5.15 Does this restriction result in an adverse impact on the effectiveness of the Plan to deliver affordable housing? If so, should an uplift to the standard housing calculation be included to increase the delivery of affordable housing?
- 5.16 Is a reassessment and recalculation of housing viability necessary to make the Plan both effective and sound in this regard?
- 5.17 Does the proposed spatial strategy facilitate sufficient residential development in other areas of the district, such as Norton Canes, Brereton and Rugeley where, for example, land is available and new development could deliver wider benefits to the community?
- 5.18 Is the Council's approach taken to distributing residential development in the district reasonable and justified?
- 5.19 Are any amendments to the proposed housing provision strategy or the policy necessary to ensure the soundness of the Plan?
- 5.20 As submitted, is policy SO3.1 positively prepared, justified, effective and consistent with national policy?

#### Policy SO3.2: Housing choice

- 5.21 Is policy SO3.2 overly restrictive in relation to the proposed housing mix and should the wording of the policy be amended to allow for site-specific viability considerations to be taken account of?
- 5.22 Are Housing Mix Statements, to be provided in cases where a variation to the standard mix is sought, an appropriate and effective means to assess housing mix in proposals?
- 5.23 Does the wording of the policy provide enough flexibility to be effective? If not, why and how?
- 5.24 It is noted that the viability assessment evidence (EC9, EC9a and EC10) is dated August 2022 and November 2024. Is policy SO3.2 based on the most up-to-date viability evidence and guidance and has the supporting evidence relied upon been appropriately tested?
- 5.25 Is the inclusion of an overage clause within policy SO3.2 to review planning obligations where the site takes longer than two years to build out reasonable?
- 5.26 Would the clause be too restrictive, and would it result in delaying housing delivery?
- 5.27 Would the clause be necessary to make the policy effective and sound?
- 5.28 Policy SO3.2 specifically includes affordable rented homes for young families and older and disabled people. Is the inclusion of this type of development necessary to make the policy effective and sound?
- 5.29 Would this inclusion result in a duplication of policy when the provisions set out within policy SO3.3 are also considered?
- 5.30 Does policy SO3.2 sufficiently consider and incorporate self-build and custom-build housing into the delivery of housing choice in the Plan area?
- 5.31 Overall, as submitted, has policy SO3.2 been positively prepared and is it appropriately justified, effective and consistent with national policy?

#### Policy SO3.3: Delivering high quality housing

- 5.32 Has the consideration to meet the Nationally Described Space Standards (NDSS) within the policy been reasonably and appropriately considered and is the supporting evidence for

- meeting NDSS sufficient to justify the policy and to make it effective in its implementation to meet the NDSS when viability is considered?
- 5.33 What effect would the NDSS within policy SO3.3 have on housing choice for smaller properties in the market and on affordability?
- 5.34 Would the inclusion or removal of the NDSS in relation to policy SO3.3 result in an issue of soundness?
- 5.35 Is policy SO3.3 clearly justified in terms of why the 'exceptions' defined in the policy are only applicable to minor developments and not major developments? Does the policy allow sufficient flexibility to allow for its effective implementation?
- 5.36 Is the inclusion of references to M4(2) and M(3) standards within the policy, and the defined percentages of housing on major development sites to be suitable for wheelchair users, necessary for reasons of effectiveness and soundness or does the policy simply repeat Building Regulation requirements?
- 5.37 Is policy SO3.3, as submitted, positively prepared, justified, effective and consistent with national planning policy and therefore, is the policy sound?

Policy SO3.4: Gypsies, travellers and travelling showpeople

- 5.38 Is the policy approach based on robust and up-to-date evidence of need and an assessment of appropriate available sites for accommodation in the local area (i.e. Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2019 (GTAA) (H6) and the related Topic Paper – December 2023 (H7))?
- 5.39 The overall need for such accommodation within the Plan area is proposed to be met, initially, by existing authorised sites and site allocations GT1 (3 pitches) and GT2 (2 pitches) in the first five years of the Plan period, with further sites to be identified in the later phases of the Plan period to meet the identified additional need for 13 pitches for Gypsies and Travellers and 10 plots for Travelling Showpeople. Should the Plan identify a supply of specific, deliverable sites or broad locations for growth for years 6-15 of the Plan period, in accordance with paragraph 10 of 'Planning Policy for Traveller Sites' (Dec 2024) (PPTS) and to meet the need identified in the GTAA 2019?
- 5.40 Paragraph 11 of the PPTS refers to the criteria-based policies to provide a basis for decisions on applications where there is no identified need. As a need for pitches and plots does exist, is this part of the policy justified?
- 5.41 Are the detailed criteria set out in the policy fair and reasonable and is the requirement to meet identified need consistent with national policy?
- 5.42 It is noted that there are unauthorised sites presently accommodating Gypsies, Travellers and Travelling Showpeople within the Plan area. Have these been incorporated into the calculation of, and approach to, future need for suitable sites?
- 5.43 Does policy SO3.4 cover the relevant environmental and heritage considerations in relation to the land provision to be made (e.g. Green Belt) for such accommodation and does it seek to prevent harm to heritage assets, including their settings?
- 5.44 Overall, has policy SO3.4 been positively prepared and is it justified, effective and consistent with relevant national policy including 'Planning Policy for Travellers Sites' (PPTS)?

## **Matter 6: Creating a vibrant local economy and workforce**

***Issues: Are the policies in relation to employment needs justified, effective, deliverable and consistent with national policy? Are the policies relating to tourism and the rural economy sufficiently positive, clear and consistent with national policy objectives?***

**[Policies SO4.1, SO4.2, SO4.3, SO4.4, SO4.5 and SO4.6]**

### **Questions**

- 6.1 The Employment Development Needs Assessment (EDNA) 2019 (EC5) recommends that a range of employment land of 46 – 69 hectares (net) including flexibility is made available during the period 2018-2038. However, policy SO4.2 clearly sets out that up to 74 hectares of land for office, manufacturing and distribution employment will be provided during the Plan period to 2040. What is the employment land need of the district over the full Plan period 2018 - 2040? How has this amount of land been calculated as being appropriate?
- 6.2 Has sufficient land been identified within the Plan to meet both the short-term and long-term employment needs of the district over the Plan period? Is the approach taken justified, effective and consistent with national policy?
- 6.3 Is the amount of employment land and its proposed distribution consistent with the evidence base and is the approach taken sound and based on robust and up to date evidence?

### **Policy SO4.1: Safeguarding existing employment areas for employment uses**

- 6.4 Is the wording of policy SO4.1 clearly set out and consistent with, for example, the Use Classes Order and does the policy clarify and clearly convey the Council's intentions in terms of identifying and safeguarding existing employment areas and uses?
- 6.5 Is policy SO4.1 positively prepared from a basis of clear, robust and up-to-date evidence and is the policy justified, effective and consistent with national planning policy?

### **Policy SO4.2: Provision for new employment uses**

- 6.6 It is noted that the provision of 74 ha for employment land, as set out in policy SO4.2, has been queried in representations and it is considered that this amount should be higher within the range identified in the Council's Economic Development Needs Assessment (EDNA) 2019. How has the figure identified within the policy been determined and is it justified based on clear, up-to-date and robust evidence?
- 6.7 Has the latest EDNA Update 2024 (EC7) informed the 74ha employment land figure set out within policy SO4.2?
- 6.8 Is this level of employment land (74ha) appropriate to meet the identified employment needs for the Plan period and Plan area?
- 6.9 How has that figure for employment land within the Plan area during the Plan period been selected rather than a higher (or lower) figure?
- 6.10 It is noted that queries have been raised about the figures presented in the Council's Employment Topic Paper (EC11) on the employment land calculations. Have these figures been checked and amended, as necessary and have the most up-to-date figures now been provided to the Examination through an update (EC11a) to the submitted Topic Paper? If so, are they clearly explained and based on clear and robust evidence?
- 6.10 Is the removal of site allocation SE1 from the Green Belt justified and clearly reasoned?
- 6.11 Is the distribution of employment land and the types of employment envisaged justified and will it be effective?
- 6.12 Overall, has policy SO4.2 been positively prepared and is it justified, effective and consistent with national policy?

Policy SO4.3: Intensification of existing employment sites

- 6.13 Is the approach set out within Policy SO4.3 based on clear, robust and up-to-date evidence?
- 6.14 Will the intensification of the existing employment sites listed in policy SO4.3 be effective in delivering additional employment development and is there any evidence that this has taken place previously?
- 6.15 Is the expectation that around 16 hectares of additional employment land can be achieved on the existing sites identified by means of intensification realistic?
- 6.16 Has the policy been positively prepared, and is it justified, effective and consistent with national policy?

Policy SO4.4: Sustainable tourism and the rural economy

- 6.17 Is the wording of policy SO4.4 sufficiently clear and does it set out effectively what the policy seeks to achieve and how that is to be done?
- 6.18 Has the policy, as submitted, been positively prepared and is it justified by robust and up-to-date evidence that is clearly set out and is it effective and consistent with national policy?
- 6.19 Is the policy requirement for proposals to demonstrate 'no adverse impacts' on heritage assets necessary for the soundness of the policy?
- 6.20 Is such a requirement an overly prescriptive and restrictive approach and does it go beyond the scope of national policy?
- 6.21 Are there any amendments to the policy necessary for reasons of soundness? If so, what changes to the policy should be made and why?

Policy SO4.5: Live work accommodation

- 6.22 Has the policy, as submitted, been positively prepared, is it supported by clear and robust evidence and is it justified, effective and consistent with national policy?
- 6.23 Does policy SO4.5 require any amendment for reasons of soundness? If so, what and how?

Policy SO4.6: Provision for local employment and skills

- 6.24 What is the justification for identifying within policy SO4.6 the threshold of proposals creating 50 FTE jobs being required to provide an Employment and Skills Plan?
- 6.25 The supporting text for the policy states at paragraph 6.154 of the Plan that further good practice guidance will be prepared by the Council on the production of an Employment Skills Plan. When is that likely to be produced and in place?
- 6.26 Has the policy, as submitted, been positively prepared? Is the policy supported by clear and robust evidence and is it justified, effective and consistent with national policy?

## **Matter 7: Supporting the provision of sustainable transport and communications infrastructure**

***Issues: How Is the Plan's approach to strategic transport, communications infrastructure and its delivery across the district justified and robustly evidenced? Is the Plan and its policies on strategic transport and communications sufficiently positive and consistent with national policy and how effective are these relevant policies in terms of implementation? Are the policies based on suitably robust evidence-based viability assessments?***

**[Policies SO5.1, SO5.2, SO5.3, SO5.4, SO5.5, SO5.6 and SO5.7]**

### **Questions**

#### **Policy SO5.1: Accessible Development**

- 7.1 Within policy SO5.1 is the inclusion of references to other policies within the Plan (signposting) necessary for soundness? Is this approach consistent across all relevant policies within the Plan? Is it too repetitive in nature?
- 7.2 Policy SO5.1 requires all major development proposals to meet certain accessibility requirements that may be less relevant to certain sites. Is this consistent with Paragraph 110a of the NPPF and, if so, how?
- 7.3 Overall, is the policy as submitted, positively prepared, justified by robust evidence, effective and consistent with national policy?

#### **Policy SO5.2: Communication technologies**

- 7.4 Has policy SO5.2, as submitted, been positively prepared and is it justified by robust evidence, effective and consistent with national policy?

#### **Policy SO5.3: Low and zero carbon transport**

- 7.5 Is the wording of Policy SO5.3, particularly the first bullet point, sufficiently precise to ensure that the policy is effective? In this regard, does the policy comply with Paragraph 16d of the NPPF?
- 7.6 Is the policy supported by clear and robust evidence to justify the requirement within the second bullet point relating to electric vehicle charging points and other related infrastructure for low and zero carbon transport options?
- 7.7 Is the inclusion of the requirement for electric vehicle charge points set out in the second bullet point of the policy necessary as the provision of such infrastructure is covered by Part S of the Building Regulations?
- 7.8 Overall, has policy SO5.3, as submitted, been positively prepared, justified by robust evidence and is it effective and consistent with national policy?

#### **Policy SO5.4: Maintaining and improvement the transport system**

- 7.9 Should policy SO5.4 include a clause relating to the historic environment and how it will be conserved and enhanced? Is the inclusion of such a clause necessary to make the policy sound?
- 7.10 It is noted in representations that in the context of new development and the relationship to transport, the requirement within the policy to mitigate 'demonstrable' impact seeks to set a lower benchmark and as such, goes beyond the scope of national policy. Is this correct and if so, is the approach set out within policy SO5.4 and the Plan justified in this regard? What evidence is there to support this?
- 7.11 Is policy SO5.4 consistent with policy SO5.1, which refers to 'unacceptable impact on the highway network', when dealing with transport issues?

- 7.12 Overall, has policy SO5.4 been positively prepared and is it justified by clear and robust evidence, effective and consistent with national policy?
- 7.13 Does the policy require any amendment to it for reasons of soundness? If so, how and why?

Policy SO5.5: Hatherton Canal Restoration Corridor

- 7.14 Would the inclusion of references to the historic environment, including the role of the canal in Cannock Chase through history and as a heritage asset, within policy SO5.5 be necessary for reasons of soundness?
- 7.15 Has policy SO5.5, as submitted, been positively prepared and justified by robust and clear evidence? Is the policy effective and consistent with national policy?

Policy SO5.6: Safeguarding proposed recreational footpath and cycle routes

- 7.16 Has policy SO5.6, as submitted, been positively prepared and justified by robust and clear evidence? Is the policy effective and consistent with national policy?

Policy SO5.7: Parking provision

- 7.17 Paragraph 6.202 in the supporting text for policy SO5.7 states that the provisions of the policy will be used to inform further guidance standards for provision of lorry parking and associated provision of facilities for drivers. When is such guidance to support policy SO5.7 envisaged to be produced and published?
- 7.18 Has policy SO5.7, as submitted, been positively prepared and justified by robust and clear evidence? Is the policy effective and consistent with national policy?

**Matter 8: Creating attractive town and local centres**

***Issues: Does the Plan take a justified and suitably evidence-based approach to creating attractive town and local centres? Does it adequately consider design, heritage and culture in terms of creating attractive town and local centres? Is the Plan and its policies regarding town and local centres sufficiently positive, clear and consistent with national policy? How will these policies be effective in their implementation?***

**[Policies SO6.1, SO6.2, SO6.3, SO6.4, SO6.5, SO6.6 and SO6.7]**

**Questions**

Policy SO6.1: Hierarchy of town and local centres

- 8.1 The Plan continues, through policy SO6.1, to perpetuate an existing hierarchy of centres of Cannock as the Strategic / District Centre with Rugeley and Hednesford as Town Centres. How has this approach been chosen, and this decision reached?
- 8.2 Have other options been considered and assessed?
- 8.3 Is the approach presented and continued in the submitted Plan the most appropriate?
- 8.4 Has policy SO6.1, as submitted, been positively prepared and justified by robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO6.2: Provision of main town centre uses and town centre services

- 8.5 Policy SO6.2 identifies floorspace thresholds relating to the need for proposals for new retail and leisure uses to provide impact assessments. These thresholds (500 sqm and 200 sqm) have been informed by the Cannock Chase Retail and Town Centre Uses Study (January 2021) (EC12a, b, and c) which reviewed the existing evidence and several other current sources of information on each of the centres within the district. Given that the Study is dated

2021, is this the most up-to-date evidence available and are the thresholds identified fully justified, consistent with national policy and the most appropriate?

- 8.6 Does the Plan, and policy SO6.2, adequately assess the function and role of the town centre and its capacity to accommodate new town centre development, uses and services?
- 8.7 What impact has the West Midlands Designer Outlet (WMDO) development had on main town centre uses and services?
- 8.8 What assessment of this impact has been undertaken to understand the effect of the WMDO on existing centres within the Plan area?
- 8.9 Has policy SO6.2 been worded with regard to the potential impact and effects of the WMDO?
- 8.10 Has policy SO6.2, as submitted, been positively prepared and justified by robust and clear evidence and Is the policy effective and consistent with national policy?

Policy SO6.3: Safeguarding existing town centre services

- 8.11 Has policy SO6.3, as submitted, been positively prepared and justified by robust and clear evidence? Is the policy effective and consistent with national policy?

Policy SO6.4: Town Centre Design Guide

- 8.12 Should specific reference be made within policy SO6.4 to ensure that all heritage assets are protected and opportunities for their enhancement are sought?
- 8.13 Is such an amendment necessary for the purposes of making the policy and the Plan sound?
- 8.14 Has policy SO6.4, as submitted, been positively prepared and justified by robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO6.5: Cannock Town Centre Redevelopment Areas

- 8.15 Has policy SO6.5, as submitted, been positively prepared and justified by robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO6.6: Rugeley Town Centre Redevelopment Areas

- 8.16 Has policy SO6.6, as submitted, been positively prepared and justified by robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO6.7: Hednesford Town Centre Redevelopment Areas

- 8.17 Has policy SO6.7, as submitted, been positively prepared and justified by robust and clear evidence and is the policy effective and consistent with national policy?

## **Matter 9: Protecting and enhancing the natural environment**

***Issues: Does the Plan provide a reasonable and appropriate approach to protecting and enhancing the natural environment, including the Green Belt, landscape character, biodiversity, geodiversity and green infrastructure? Are there exceptional circumstances that warrant altering Green Belt boundaries? Is the approach set out in the Plan and its policies suitably evidence-based, positively prepared, justified, effective and consistent with national policy and relevant guidance?***

**[Policies SO7.1, SO7.2, SO7.3, SO7.4, SO7.5, SO7.6, SO7.7 and SO7.8]**

### **Questions**

#### **Policy SO7.1: Protecting, conserving and enhancing biodiversity and geodiversity**

- 9.1 In light of representations and concerns raised, is the policy an unnecessary duplication of national policy, in this case Chapter 15 of the National Planning Policy Framework?
- 9.2 Is the reference to policy SO7.2 on biodiversity net gain within policy SO7.1 necessary for effectiveness and for reasons of soundness?
- 9.3 Has policy SO7.1, as submitted, been positively prepared and justified by robust and clear evidence and is the policy effective and consistent with national policy?

#### **Policy SO7.2: Biodiversity net gain**

- 9.4 Does policy SO7.2 represent an unnecessary duplication of national policy?
- 9.5 Does the policy reflect the latest policy updates in relation to biodiversity net gain?
- 9.6 Is the identified minimum biodiversity net gain requirement target of 10% reasonable, justified, effective and viable?
- 9.7 Would a 20% target be viable, reasonable, appropriate, effective and justified?
- 9.8 Should the Plan, and policy SO7.2, identify specific sites for the delivery of off-site biodiversity net gain where on-site delivery is not possible?
- 9.9 Is it necessary for reasons of soundness to clarify, either in the policy or supporting text, that biodiversity net gain is not applied to irreplaceable habitats and to refer to the Statutory Biodiversity Metric?
- 9.10 Is the reference to policy SO7.1 (signposting) within policy SO7.2 necessary for effectiveness and for reasons of soundness?
- 9.11 Has policy SO7.2, as submitted, been positively prepared and justified by robust and clear evidence and is the policy effective and consistent with national policy?

#### **Policy SO7.3: Special Areas of Conservation (SAC) / (Habitats sites)**

- 9.12 It is noted that the Habitat Regulations Assessment (HRA) [pg.63] (SD5) states that, 'adverse effects on integrity have not been able to be ruled out in relation to air pollution from vehicles at Cannock Chase SAC'. Does the policy reflect the recommendations of the HRA?
- 9.13 Is the policy supported by Natural England?
- 9.14 Is the Plan sound and legally compliant having regard to the impacts of increased vehicle movement on air quality in relation to internationally designated nature conservation sites?
- 9.15 Does the Statement of Common Ground (October 2024) (SOCG8) provide the latest update on this matter? If not, what is?
- 9.16 Has policy SO7.3, as submitted, been positively prepared, justified by up-to-date robust and clear evidence and is the policy effective and consistent with national policy?



Policy SO7.4: Protecting, conserving and enhancing landscape character

- 9.17 Is it necessary for soundness to recognise heritage within the policy as a component of landscape that needs protecting?
- 9.18 Has policy SO7.4, as submitted, been positively prepared, justified by up-to-date robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO7.5: Protecting, conserving and enhancing the Cannock Chase national landscape

- 9.19 Has policy SO7.5, as submitted, been positively prepared, justified by up-to-date robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO7.6: Protecting, conserving and enhancing the Green Belt

- 9.20 Has policy SO7.6, as submitted, been positively prepared and justified by up-to-date robust and clear evidence? Is the policy effective and consistent with national policy?

Policy SO7.7: Amendments to the Green Belt

- 9.21 What are the exceptional circumstances that warrant altering the Green Belt boundaries as indicated within policy SO7.7?
- 9.22 Does the policy propose the safeguarding of land within the Green Belt in line with the provisions of the NPPF?
- 9.23 Have the proposed Green Belt boundaries been defined clearly, using physical features that are readily recognisable and likely to be permanent?
- 9.24 Noting the key characteristics of openness and permanence and the five purposes of the Green Belt, is the Council satisfied that the Green Belt boundaries will not need to be altered at the end of the Plan period?
- 9.25 Is the wording of policy SO7.7 in terms of appropriate mitigation sufficiently flexible to adapt to the context of each site?
- 9.26 Has policy SO7.7, as submitted, been positively prepared and justified by up-to-date, robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO7.8: Protecting, conserving and enhancing green infrastructure

- 9.27 Is it necessary for soundness reasons for the policy to include reference to Natural England's green infrastructure standards and Local Nature Recovery?
- 9.28 Has policy SO7.8, as drafted, been positively prepared and justified by up to date robust and clear evidence? Is the policy effective and consistent with national policy?

**Matter 10: Supporting a greener future**

***Issue: Are the policies for supporting a greener future justified, deliverable, effective and consistent with national policy?***

**[Policies SO8.1, SO8.2, SO8.3, SO8.4, SO8. 5, SO8.6, SO8.7 and SO8.8]**

**Questions**

Policy SO8.1: Low and zero carbon energy and heat production

- 10.1 Has policy SO8.1 been prepared having regard to the viability of potential developments and the potential viability impact of low and zero carbon technology and renewable energy facilities?
- 10.2 Has the policy has regard to the physical and environmental impact of supporting infrastructure for the installation of development proposals, including energy storage?

- 10.3 Has policy SO8.1, as submitted, been positively prepared and justified by up-to-date robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO8.2: Achieving net zero carbon development

- 10.4 Does the policy duplicate national building regulations and therefore, is it necessary, justified and effective?
- 10.5 Are local carbon reduction targets therefore necessary as they may duplicate national targets and may be technically difficult to deliver?
- 10.6 Policy SO8.3 includes net zero carbon development and therefore policy SO.8.2 duplicates this requirement and is it therefore not necessary for soundness reasons? How do the two policies differentiate from each other?
- 10.7 Is policy SO8.2 sufficiently flexible to be effective where viability, or any other material consideration, does not support the inclusion of low and zero carbon development?
- 10.8 Has policy SO8.2, as submitted, been positively prepared and justified by up-to-date robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO8.3: Sustainable design

- 10.9 Does the policy effectively duplicate national policy and if so, is it necessary, justified and effective?
- 10.10 Has the policy been developed with regard to appropriate viability assessment evidence that is up-to-date and robust?
- 10.11 Is it a reasonable requirement of policy SO8.3 that all major development proposals must incorporate sustainable design
- 10.12 Does the policy have sufficient flexibility to respond to changes in relevant building standards and updates to building regulations?
- 10.13 Overall, has policy SO8.3, as submitted, been positively prepared and justified by up-to-date robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO8.4: Managing flood risk

- 10.14 It is noted that the flood risk assessment, dated October 2019, relied upon for this policy is now of some age. Is the policy based on the most up-to-date and robust evidence?
- 10.15 Is it necessary for soundness reasons to include a reference within the policy stating that sustainable urban drainage systems will be required in all major development proposals?
- 10.16 Overall, has policy SO8.4, as submitted, been positively prepared and justified by up-to-date robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO8.5: Avoiding air, water, soil, noise and light pollution

- 10.17 What evidence is there for the Plan, and policy SO8.5, to go beyond national policy for pollution mitigation and AQMAs?
- 10.18 Is it necessary for soundness reasons to have a reference within the policy to recognise land instability as a risk to development?
- 10.19 Overall, has policy SO8.5, as submitted, been positively prepared and justified by up-to-date robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO8.6: Brownfield and despoiled land and under-utilised buildings

- 10.20 Overall, has policy SO8.6, as submitted, been positively prepared and justified by up-to-date robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO8.7: Safeguarding minerals reserves

- 10.21 Does policy SO8.7 duplicate elements of the Minerals Local Plan for Staffordshire 2015-2030 (February 2017) and if so, is the policy necessary, justified and effective?
- 10.22 Overall, has policy SO8.7, as submitted, been positively prepared and justified by up-to-date robust and clear evidence and is the policy effective and consistent with national policy?

Policy SO8.8: Managing waste

- 10.23 Is policy SO8.8 consistent with the Staffordshire and Stoke-on-Trent Joint Waste Local Plan 2010-2026 (adopted 2013) and the waste hierarchy as it is presented in the National Waste Strategy?
- 10.24 Overall, has policy SO8.8, as submitted, been positively prepared and justified by up-to-date robust and clear evidence and is the policy effective and consistent with national policy, including the Planning Policy for Waste?

**Matter 11: Site allocations: strategic site-specific allocations**

***Issues: Are the policies and site allocations, both strategic and site-specific, identified within the Plan justified and deliverable within the Plan period, having regard to any constraints and consistent with national policy? Is there sufficient detail on form, scale, access and quantum of development?***

**Questions**

- 11.1 In relation to all the proposed site allocations contained within the Plan:
- a) Are the criteria in the allocations policy necessary, relevant and deliverable?
  - b) Is the approach taken to identifying site capacity appropriate and consistent across all site allocations?
  - c) Is it clear that the capacity figures are indicative only and is it clear how these figures have been arrived at?
  - d) Is the capacity accurately reflected on the housing trajectory?
  - e) Is the allocation justified by the evidence base?
  - f) Is the extent of each site correctly identified?
  - g) Are the detailed requirements for each site clear and justified?
  - h) Is the allocated site deliverable?
  - i) Have all the site constraints, development mix and viability matters been considered?

*In order to provide a comprehensive response for each of the site allocations, it is requested that the Council respond to each of the above points a) to i) for each site allocation identified. It is acknowledged that all of the above questions may not apply to all sites listed in Tables A, B and C of Policy SA1 given the different stages that the development of the identified sites may have reached. As a result, an element of discretion should be applied to the responses depending upon the status of each site allocation. All responses should be supported by reference to the evidence base as appropriate.*

*In addition, the following questions are asked:*

**SH1: Land south of Lichfield Road, Cannock**

- 11.2 Have the local infrastructure needs and facilities been considered appropriately and realistically both on and off site and regarding existing and future infrastructure provision?
- 11.3 Should policy SH1 also include a requirement for an assessment of noise and mitigation measures implemented as part of the housing development in relation to any impact on residents from the permitted operations at Poplars?

- 11.4 What are the exceptional circumstances that warrant and justify removing this site from the Green Belt?

SH2: Land east of Wimblebury Road, Heath Hayes

- 11.5 Have the local infrastructure needs and facilities been considered appropriately and realistically both on and off site and regarding existing and future infrastructure provision?
- 11.6 What are the exceptional circumstances that warrant and justify removing this site from the Green Belt?

SH3: Land to the rear of Longford House, Watling Street

- 11.7 Have the local infrastructure needs and facilities been considered appropriately and realistically both on and off site and regarding existing and future infrastructure provision?
- 11.8 What are the exceptional circumstances that warrant and justify removing this site from the Green Belt?

SH6: Former Hart School, Burnthill Road, Rugeley (Hagley Park)

- 11.9 Have the local infrastructure needs and facilities been considered appropriately and realistically both on and off site and regarding existing and future infrastructure provision?
- 11.10 Site SH6 includes an area of playing field land which would be lost through development of the site. Is there any evidence to demonstrate that the playing field land is surplus to requirement, notwithstanding the improvement to the facilities at the adjacent leisure centre?
- 11.11 Should the policy include a criterion stating that the land shall not be developed upon unless it has been demonstrated that the playing field is surplus to requirements or replacement playing field land is secured and delivered in line with proposed policy SO2.3?
- 11.12 What are the exceptional circumstances that warrant and justify removing this site from the Green Belt?

SM1: Land at the former Rugeley Power Station

- 11.13 Have the local infrastructure needs and facilities been considered appropriately and realistically both on and off site and regarding existing and future infrastructure provision?
- 11.14 It is noted that the development details of the allocation in the Plan, in relation to sports provision for example, do not align with the related approved outline planning permission (ref: 19/00753/OUTMEI) by Lichfield District Council, upon which the allocation was based. Furthermore, it is noted that there is a discrepancy between the employment land figure of 3.5ha stated in Table F of the consultation document and policy SM1 (5ha). Considering these observations, are the figures and details set out within policy SM1 in the submitted Plan up-to-date and correct and if not, what amendments are required?

SE1: Kingswood Lakeside Extension 2, Norton Canes

- 11.15 Have the local infrastructure needs and facilities been considered appropriately and realistically both on and off site and regarding existing and future infrastructure provision?
- 11.16 It is noted that Site SE1 is crossed by, or is close to, National Grid Electricity Transmission (NGET) assets. Is National Grid satisfied that the proposed allocation for development at SE1 would not compromise operation of the electricity network and, equally, would not adversely affect or encumber the development proposed?
- 11.17 Are the figures and details set out within policy SE1 in the submitted Plan up-to-date and correct and if not, what amendments are required?
- 11.18 What are the exceptional circumstances that warrant and justify removing this site from the Green Belt?

SE2: Watling Street Business Park Extension

- 11.19 Have the local infrastructure needs and facilities been considered appropriately and realistically both on and off site and regarding existing and future infrastructure provision?
- 11.20 Policy SE2 does not reference the need to connect with Norton Canes, the crossing of the A5 within the spatial strategy to make the site sustainable or to connect with local green infrastructure, the canal network and heritage assets at the former Grove Colliery with these being linked to the potential release of the safeguarded site S4 at paragraph 6.335 of the Plan. Should these be addressed within the policy and if so, how?
- 11.21 Are the figures and details set out within policy SE2 in the submitted Plan up-to-date and correct and if not, what amendments are required?
- 11.22 What are the exceptional circumstances that warrant and justify removing this site from the Green Belt?

**Matter 12: Site Allocations: site-specific allocations**

SA1: Site Allocations

- 12.1 Are Tables A, B and C within the policy accurate and complete and if not, how are any identified factual amendments to the policy and the site allocations to be addressed and rectified?
- 12.2 More broadly throughout the Plan, it is noted that the Heritage Impact Assessment (HIA) raised several suitable mitigation measures relating to several specific site allocations. These do not appear to have been accurately included within the design considerations of the site allocation policies, particularly regarding sites near to, or that may have an impact on, designated areas or assets. Why is this?
- 12.3 Have these heritage-related mitigation measures been considered and included elsewhere in the preparation of the Plan? If so, where? If not, why not?

E14: Hill Farm, 84 Hayfield Hill, Cannock Wood

- 12.4 Have the local infrastructure needs and facilities been considered appropriately and realistically both on and off site and regarding existing and future infrastructure provision?
- 12.5 Has the site boundary of Site E14 been correctly drawn within the submitted Plan?
- 12.6 Are any amendments to the figures and details within the policy required for accuracy and if so, what and how?

H52: Gregory Works, Armitage Road, Brereton

- 12.7 Have the local infrastructure needs and facilities been considered appropriately and realistically both on and off site and regarding existing and future infrastructure provision?

H35: Land at Girton Road / Spring Street, Cannock

- 12.8 Site H35 includes an area of playing field land which would be lost through development of the site. Is there any evidence to demonstrate that the playing field land is surplus to requirement?
- 12.9 Should the policy include a criterion stating that the land shall not be developed upon unless it has been demonstrated that the playing field is surplus to requirements or replacement playing field land is secured and delivered in line with proposed policy SO2.3?

H61: Cannock Chase High School, Lower Site Campus, Hednesford Road

- 12.10 Site H61 includes an area of playing field land which would be lost through development of the site. Is there any evidence to demonstrate that the playing field land is surplus to requirement?

- 12.11 Should the policy include a criterion stating that the land shall not be developed upon unless it has been demonstrated that the playing field is surplus to requirements or replacement playing field land is secured and delivered in line with proposed policy SO2.3?

H50: Nursery Fields, St Michaels Road, Brereton

- 12.12 Site H50 includes an area of playing field land which would be lost through development of the site. Is there any evidence to demonstrate that the playing field land is surplus to requirement?
- 12.13 Should the policy include a criterion stating that the land shall not be developed upon unless it has been demonstrated that the playing field is surplus to requirements or replacement playing field land is secured and delivered in line with proposed policy SO2.3?

**Matter 13: Delivery and monitoring**

***Issues: Does the Plan have a clear framework and effective mechanisms for the delivery and monitoring of its policies? How will the effectiveness of the Plan be measured and assessed against its strategic objectives? When and how will the Plan be reviewed?***

**Questions**

- 13.1 How will the effectiveness of the Plan's policies, the identified quantum of development, the associated infrastructure requirements of the Plan's strategy and its delivery be monitored, assessed and managed?
- 13.2 How will the performance of the Plan and its policies against its strategic objectives be monitored and reviewed? What mechanisms will be in place to do this and inform any necessary action to update the Plan or its policies?
- 13.3 Does the Plan contain an appropriate monitoring framework that contains relevant and measurable indicators, and will it be effective?
- 13.4 When, and under what circumstances, will a review of the Plan and its policies take place or be triggered?

**Infrastructure Delivery**

- 13.5 Is the Plan positively prepared in terms of meeting future infrastructure needs and has there been a robust assessment of needs in this regard?
- 13.6 Does the Plan make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it and how it relates to the anticipated rate and phasing of development?
- 13.7 Is the evidence on infrastructure funding and delivery suitably robust and does it demonstrate that necessary infrastructure will be delivered when and where needed to support the Plan?
- 13.8 Does the Plan provide sufficient certainty in this respect?
- 13.9 What is the Council's approach regarding developer contributions and is it sufficiently clear and robust in the Plan?
- 13.10 Is the approach supported by reasonable, realistic and effective policies within the Plan and other relevant strategies, such as an infrastructure delivery plan and infrastructure funding schedule?
- 13.11 Should the Plan make specific reference to developer contributions towards healthcare infrastructure – and if not, why?
- 13.12 Does the inclusion or otherwise of this within the Plan impact on its overall soundness?