

**PROPOSED CHANGES TO HEDNESFORD NEIGHBOURHOOD PLAN
PRE-SUBMISSION VERSION IN RESPONSE TO COMMENTS FROM CONSULTEES**

CONSULTEE	SUMMARY OF COMMENTS	PROPOSED CHANGES
Cannock Chase AONB Unit	<p>Suggest additional wording at foot of page 26 "These principles apply to the AONB and areas of land adjoining the boundary of the designated area which comprise the setting of the AONB, including Hednesford Hills."</p> <p>Add AONB Joint Committee to list of consultation bodies at appendix 3 page 49.</p>	<p>Agree to make both the changes requested.</p>
Cannock Chase District Council	<p>Quality of map reproduction not as good as in previous version.</p> <p>It would be helpful to have paragraphs numbered.</p> <p>Add references to evidence utilised in the formulation of the plan and note that the SHLAA has recently been updated.</p> <p>Explain meaning of S106 and SHLAA the first time these terms appear in the plan.</p>	<p>Agree this will be pursued with the printing company.</p> <p>Agree paragraphs will be numbered.</p> <p>List all relevant evidence in chapter 10 with cross references in the main text of the relevant chapters. Update SHLAA to 2017 version.</p> <p>Move text explaining S106 agreements from second paragraph on page 17 to bottom of page 10.</p> <p>At item E on page 12 preface existing wording with " The District Council, in consultation with developers, identifies sites with potential for housing development to ensure a continuous supply of land</p>

	<p>Some of the policies stray into areas which may serve better as explanatory text.</p> <p>Might be helpful to have an implementation section or schedule to identify projects for use of S106 and CIL funding.</p> <p>Explain the tests for requiring developers to complete S106 agreements prior to the grant of planning permissions and consider that the process is not open to negotiation.</p> <p>Omit reference to specific numbers of vacant shop units which may change during the period of the plan</p> <p>Need more context to the reference to the Cannock Chase SAC and the need to mitigate impact from additional visitors arising from housing growth.</p> <p>Make reference to the agreed</p>	<p>to deliver the required numbers of dwellings in the Local Plan via an annual Strategic Housing Land Availability Assessment (SHLAA). Discuss further with CCC in context of specific changes to policies proposed in their later comments.</p> <p>Agree to add as an appendix with cross references in main policy text.</p> <p>Reference to negotiation in policy TC3 relates to use of exiting S106 funds collected from major town centre shopping schemes which are identified for town centre improvements but specific projects for use of these funds have not yet been identified. Could use the word representations instead of negotiation in this context.</p> <p>Agree but substitute wording to emphasize the need to minimize vacancies by adopting a flexible approach to alternative uses.</p> <p>Add reference to the adopted guidance document in chapter 10 and add wording at page 18 as suggested.</p>
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	<p>process for providing financial contributions to mitigation and suggest additional paragraph on page 18 to say “Any development which results in a net increase in dwellings in the Neighbourhood Area will be required to mitigate for its impacts on the Cannock Chase SAC in line with Policy CP13 of the Local Plan Part 1 in accordance with the provisions of the policy and any associated guidance, or any replacement policy associated with a review of the adopted Local Plan.”</p> <p>Policy TC1 would benefit from being split into a list of criteria to assist with clarity and help identify individual tests for the decision makers.</p> <p>List of uses in Policy TC2 seems rather prescriptive. Would be helpful to refer to NPPF adding examples of other uses and in order to give clarity to the decision making process say that such uses would be supported in principle and considered on their merits subject to normal planning considerations.</p> <p>In relation to residential use of upper floors it would give more certainty to say this will be permitted where a good standard of amenity can be assured.</p>	<p>Include specific cross reference to the descriptions of the relevant features of buildings it is wished to preserve and enhance, which are listed on page 15 , third paragraph. Policy already lists all relevant use classes appropriate to the ground floors of town centres but can add gyms to the list and make clear that any other uses attracting footfall not already listed would also be supported in principle. The policy identifies the main planning criterion for assessing their merits – i.e. maintaining an overall mix of uses where retail, food and drink predominate. Change of use to up to 2 flats of floors above a</p>
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	<p>Policy TC4 wording could be tightened to provide clarity e.g. " Development of areas of land between market Street, Victoria Street and off Cardigan Place as identified on the Proposals Map Shall:</p> <ul style="list-style-type: none"> • Enhance the vitality and viability of market Street. • Enhance the appearance of the area. • Improve pedestrian/cycle links between the two streets and Hednesford Park • Include space for a retail market • Encourage tourist accommodation <p>Then go on to say that this will be delivered via production of a development brief/masterplan" Policy TC 5 delete reference to "the train operating company" and replace with "West Midlands Trains and West Midlands Rail". The Heart of Hednesford operates for the benefit of the town and is more than just a station adoption group. Could there be a brief/masterplan approach to this project.</p>	<p>wide range of use classes is already permitted development – amend wording of policy to make reference to this and add reference to supporting change of use in other cases where an appropriate standard of amenity can be provided. Agree in principle to his form of wording but policy needs to mention potential for residential development as well (as it currently does) and the areas of the two sites need to be retained in the policy in order to give potential developers a clear idea of the scale of development potentially achievable.</p> <p>Amend description of train operating company as suggested. It is understood that the Hednesford Station Adoption Group is a specific sub-group of the Heart of Hednesford. Agree that</p>
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	<p>Policy TC6 – see comments re CIL/S106 but support in principle subject to evidence of demand.</p> <p>Policy TC7 This could be tightened by separating out policy and delivery elements, should be cross referenced to the map with Policy H3. Policy OS1 would benefit from splitting policy and delivery elements including reference to CIL funds as possible delivery mechanism. Wording may raise expectations of what is realistically deliverable. Suggest alternative wording re. encouraging improvements and also bringing policy into line with Local Plan Policy CP5 which has a general presumption against loss of Green Space Network sites unless there are wider sustainability benefits or appropriate mitigation.</p>	<p>brief/masterplan approach would be appropriate jointly in relation to implementation of policies TC5 and TC6. Noted no further changes required.</p> <p>Agree to cross reference with Policy H3 and refer to the map which accompanies this policy.</p> <p>The open spaces covered by this policy fall into three broad categories –</p> <ul style="list-style-type: none"> • Green spaces/play spaces owned by Cannock Chase Council sited within housing estates. • Highway verges. • Green corridors alongside the Ridings Brook and former canal. <p>We think that in relation to the sites within housing estates the existing policy wording is broadly fit for purpose in relation to the presumption in favour of retention unless there is a proposal for comprehensive estate redevelopment. In relation to future proposals for</p>
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	<p>The ordering of the Built Environment section is a little confusing – the explanatory text and policy wording needs to be located together not separated by the maps.</p> <p>Terminology needs to reflect that in para. 135 of the NPPF which talks about a balanced judgement when considering impact on a non-designated heritage asset taking account of the scale of harm or loss and the significance of the asset.</p> <p>Make clear whether it is intended that the buildings be included in the District Council’s Local List when this is produced.</p> <p>In relation to Policy BE1 what is the evidence supporting retention. Some alterations and extensions will be “Permitted Development” so policy should say alterations and extensions should rather than must respect the original character.</p>	<p>enhancement we already talk about consultation with landowners (including CCC) and CIL funds appear to be an appropriate delivery mechanism.</p> <p>We agree that the list of open spaces in appendix 6 could be enhanced by a brief description of the current function of each of them.</p> <p>Agree to change order as suggested.</p> <p>Expand explanatory evidence to explain that an extensive survey of the whole of the Town has identified buildings which are of significant quality and importance as key examples which reflect the character of the development of Hednesford through its major growth phases in Victorian and Edwardian times, together with some later landmark buildings. Add reference to NPPF wording indicating that because these buildings are important to the history of Hednesford that there would be significant harm resulting from the loss of these buildings, but that the approach to flexibility of future uses should enable alternative viable uses to be found, should they become</p>
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	<p>Policy BE2 split the policy aspect from the explanatory text.</p> <p>Housing policies section Second paragraph on page 37 refers to 125 units at Keys Park but this figure is in an as yet undetermined planning application</p> <p>The third paragraph on page 37 needs updating as the Housing and Planning Bill has been enacted.</p> <p>Policy H1 needs to show the clear chain of conformity with Local Plan Part 1 Policy CP7 which is focused on delivering a balanced housing market. The reference to viability is essential and further justification and evidence is vital in order to show how the threshold of 25 units has been set and the figure of 10% bungalows has</p>	<p>redundant in their current use.</p> <p>It is intended that these buildings should be candidates for inclusion in the District Council's Local List.</p> <p>In relation to policy wording BE1 amend to change "must" to "should"</p> <p>Move final paragraph of the policy which describes the key features of the buildings into the supporting evidence section.</p> <p>Substitute "should" for "must" in the first sentence of paragraph two of the policy.</p> <p>123 is now the number of units proposed in the application.</p> <p>Change to refer to Housing and Planning Act</p> <p>There is evidence of demand for bungalows (see attached brief paper) which could be summarized in the introduction to the policy. Unfortunately in the SHMA bungalows and houses are lumped together in one of the key tables in the document. We may not</p>
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	<p>been arrived at. Should this evidence be provided it must be clarified that this must not be at the expense of the delivery of 20% affordable housing nor other developer contributions set out in adopted Local Plan policy.</p> <p>The reference to mobility standards is already covered by the Building Regulations. References to the Design SPD are welcomed.</p> <p>In relation to withdrawal of Permitted Development Rights, the District Council would consider each case on its merits, but the principle is supported in that it could help retain bungalows for their intended market i.e. the ageing population.</p> <p>The use of a 15 sq.m. limit on extensions is arbitrary and should not be used.</p> <p>Policy H2 – similar comments apply to H1 above. Instead of “priority will be given” it should say “the building of bungalows will be supported where need is identified.” This also needs to be considered in the context of Local Plan Policy C7 Housing Choice, which is focused upon achieving a balanced housing market delivering a variety of needs as identified in the SHMA.</p> <p>Policy H3 is supported</p> <p>Policy EMP1 needs to say “subject to normal planning considerations”. It would be helpful to have a map showing</p>	<p>be able to specifically justify the 25 unit and 10% figures but could agree to change the policy wording to say that 10% should be an aim on all sites which are suitable for the construction of bungalows.</p> <p>Where bungalows are specifically designed for the elderly rather than families it is important that that they are retained in this form so the withdrawal of PD rights should be a presumption in these cases. 15 square metres is considered to be an appropriate upper limit, particularly as these properties will be built on small plots with limited garden areas.</p> <p>The point is that the balanced housing market should include bungalows which are not specifically mentioned in Local Plan Policy, hence the need to make specific reference in the Neighbourhood Plan.</p> <p>Add to end of first sentence the wording suggested. Include maps of the areas referred to.</p>
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	<p>areas referred to.</p> <p>Further discussions required on timetable.</p>	<p>Agree to remove suggested timetable from the plan at this stage until agreement is reached on key issues including appointment of Inspector, timing of examination and referendum.</p>
The Coal Authority	<p>Explain their statutory role, any allocations need to take account of impact of past mining activity and potential sterilization of minerals.</p>	<p>Potential developers will be responsible for any site investigations when submitting planning applications. There are no major allocations in the plan which would sterilize coal reserves. No changes required.</p>
Environment Agency	<p>Point out that there is little reference to environmental issues in the plan.</p> <p>From a flood risk point of view support the protection of the open space alongside the Ridings Brook from Nuffield Health Club to the town boundary.</p> <p>Recommend consulting Staffordshire County Council as Lead Local Flood Authority on areas at risk from surface water flooding.</p> <p>Point out the need to direct new development away from areas of highest flood risk i.e. towards Flood Zone 1 and need for SUDS in connection with new development including small scale infill. Relevant planning applications should be accompanied by site-specific flood risk assessments.</p>	<p>Support noted.</p> <p>Recommend consultation at submission stage. SCC as a LPA already consulted.</p> <p>These issues are already covered in CCC adopted Local Plan policies, The adopted Design SPD and/or planning application validation requirements. Could include cross reference to these?</p>

	<p>Need for assessments of potential impact of contamination or land stability issues in connection with relevant planning applications. Encourage sustainable water consumption in development proposals.</p> <p>Recommend additional text in last paragraph of Policy OS1 – “ Those open spaces which function as water storage/conveyance, local visual amenities and wildlife corridors will be maintained and enhanced for these purposes in consultation with landowners.”</p>	<p>Agree to add wording but varied to specify “ Seek to enhance when opportunities arise.....</p>
<p>Highways England</p>	<p>Note that major housing developments in Pye Green Valley and west of Pye Green Road totaling 1320 dwellings will create approximately 800 vehicle trips which may impact on the strategic road network and would need to be considered as part of the planning process.</p>	<p>Most of these dwellings are already committed by the grant of planning permission and highways impacts have already been considered and mitigated for in S106 agreements.</p> <p>The potential addition of a further 200 dwellings on land west of Pye Green Road to increase the capacity of the site to 900 will need to be the subject of a further planning application accompanied by an appropriate transport assessment.</p> <p>The Neighbourhood Plan is accepting these schemes as commitments from the Local Plan.</p>

Historic England	Supports both the content of the document and the vision and objectives set out in it. The emphasis on the conservation of local distinctiveness and variations in local character through good design and the protection of locally significant buildings and townscape character including important green spaces is to be applauded. The excellent Design Guidance Statement at Appendix 2 will no doubt prove invaluable as a context and guide for future development. Overall the plan is well written, eminently fit for purpose and takes an exemplary approach to the historic environment.	Support for the plan is noted. It is acknowledged that the Design Guidance Statement at Appendix 2 was produced by Cannock Chase Council.
National Grid	Set out details of the role of the organization and the need to consult on site-specific proposals that could affect infrastructure.	Noted
Natural England	Provide generic advice on the context for the Plan comprising the National Character Area (NCA) 67 Cannock Chase to Cank Wood and The Cannock Chase Special Area of Conservation (SAC). Reference is made to key sources of information on natural environment issues and the opportunities available for improving the natural environment.	The impact of plan proposals on the SAC has already been covered in response to CCCs comments. Examples of opportunities to improve the natural environment can be included in the supporting text relating to policies ROW1 and OS1.
Network Rail	Note the statutory requirements for consultation with Network Rail. Note the likely increase in footfall and the need for parking at railway	The plan already covers these matters at Policies TC5 and TC6.

	<p>stations and recommend consideration be given to use of developer contributions via CIL or S106 to provide funding for enhancements such as car parking at the station.</p>	
<p>RPS on behalf of St. Modwen Developments Ltd.</p>	<p>Criticise the lack of engagement on the Neighborhood Plan so far and request dialogue before the plan is advanced any further.</p> <p>Point out that Neighbourhood Plan must be in general conformity with the strategic policies of the Local Plan which includes in Policy CP6 a strategic site allocated for an urban extension on land west of Pye Green Road for 750 new houses with potential to increase to 900.</p> <p>Whilst most of the site is the subject of planning consent there is concern that subsequent applications will be subject to policies and proposals in the plan. This would cause difficulties particularly in relation to the policy H1 requiring the building of bungalows which would have an adverse impact on viability and deliverability. This policy does not meet the appropriate tests and is not based on up to date evidence.</p> <p>In the circumstances it is suggested that the Neighbourhood Plan either omits the site or makes specific reference that none of the policies and proposals relate to the site covered in Policy CP6.</p>	<p>We hadn't specifically consulted St. Modwen on the content of the Neighbourhood Plan because we had assumed that the development of land west of Pye Green Road was a commitment and reference to it was only meant to be context, not to be the subject of any policy requirements. However on reflection the final 150 dwellings do not currently have planning permission and could therefore be covered by the bungalows policy. Suggest we make it clear that policy would not apply to the permitted 750 units but could apply to the final 150.</p> <p>The same point about evidence of need for bungalows already covered in response to CCCs comments is relevant here.</p>

Severn Trent	Set out their responsibilities in relation to water supply and sewage treatment capacity for future development. Encourage developers to consider SUDs solutions and take account of water quality and water efficiency issues.	As already noted, these matters are handled by adopted Local Plan policies, the CCC Design SPD and application validation requirements.
Staffordshire County Council	<p>Policies TC3, TC5 and TC6 read more as statements of intent than policies and most of the wording should be moved to supporting text.</p> <p>Objective to meet housing needs of an ageing population is supported but focus on bungalows may not provide sufficient scope – two storey houses which are adaptable for ground floor living should also be considered.</p> <p>Public realm works should look to be informed by areas historic character and in general should look to de-clutter the area. Refer to Historic England document entitled “Streets for All: West Midlands”.</p> <p>Support policy BE1, may wish to include development within the setting of local listed buildings also.</p> <p>Support policy BE2</p>	<p>Amendments to these policies already agreed in response to CCCs comments.</p> <p>Discuss with Housing Strategy at CCC before responding.</p> <p>Noted – consider guidance in any public realm improvements which may come forward, but no need for new policy.</p> <p>Add reference to consideration of impact on setting at end of first sentence in policy.</p> <p>Noted.</p>
Councillor Paul Woodhead	<p>Where information is given about specific features on specific buildings to be retained to maintain character, this could be developed to have a wider purpose in relation to new development.</p> <p>If the specific detailed developments are taken forward in the short term the</p>	<p>Already covered in Policy BE2. Add wording to Policy TC4 about development respecting the scale and character of existing development in Market Street and Cardigan Place.</p> <p>If the redevelopment proposals in the plan are implemented quickly</p>

	<p>plan will no longer have a purpose.</p> <p>Object to singling out certain businesses/types of business as unwelcome and whilst supporting improvement of business premises and associated land this should not exclude any businesses which operates in a legal manner.</p> <p>A number of green spaces are listed for protection but there is no corresponding list of green spaces which are not protected and might be supported for development.</p> <p>Proposes specific standards for energy efficiency in new developments which are higher than existing Building Regulations, sustainability checklist covering ecological requirements and SUDs.</p> <p>In addition to housing provision for older persons there is also a need for social/affordable housing for younger people.</p> <p>Could rights of way chapter</p>	<p>then this would be a sign of success, but would not detract from the overall purpose of the plan.</p> <p>It is a fact that some business areas have visually unattractive features, but it should not be inferred that there is an issue with lawfully operating businesses continuing to thrive. The purpose of the policy is to seek improvements to these areas if redevelopment opportunities present themselves.</p> <p>There are no existing green spaces excluded from this policy apart from the ones already protected by adopted Local Plan policy.</p> <p>The Neighbourhood Plan must be in general conformity with the adopted Local Plan and it would not be appropriate to introduce new standards in these areas which go beyond the requirements of Local Plan policies.</p> <p>Housing for the elderly is specifically addressed in the Neighbourhood Plan because there is evidence of unmet need. Social/affordable housing for young people is more specifically covered by existing Local Plan Policy.</p> <p>Adopted Local Plan Policy</p>
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	look to encourage walking and cycling and links to public transport as well as the heritage trail, cycle storage, access to leisure activities on the Chase and a statement regarding electric vehicle charging points.	already covers all of these matters apart from electric vehicle charging points, which are covered in the District Council's adopted Design SPD.
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