

APPENDIX 1:
Indicative Site Plan

To Leisure Centre,
Primary School,
Academy

Allotments, Cemetery,
Community Centre and
Library

TIER 1

Cheslyn Hay








To M6
(600m)



Indicative Masterplan to be read in conjunction with Storyboard prepared by Peacock + Smith

LEGEND

-  Landywood Station on the Chase Line
-  Proposed footpath connections to Tier 1 Cheslyn Hay services and facilities
-  Potential higher density zone
-  Green corridors
-  Forest of Mercia Way - access to Campions Wood, Plum Wood, Strawberry Wood and to trains

Cheslyn Hay - Indicative Site Layout

Project No: 8725 Drawing No:8725-BOW-A0-00-DR-A-0003

Do not scale from this drawing. This drawing is the property of Bowman Riley Architects ©
P:\8725 - Cheslyn Hay\8725 - 04 Graphics\01 PSD

Scale: 1:2500@A2

Date: 23.09.22

Drawn By: cb

Revision: P3

Date: 24.10.22

Drawn By: cb



APPENDIX 2:
Storyboard document



Storyboard - High Court Judgement

Masterplanning - plans and planning policies



2001 STRUCTURE PLAN **£110m public transport investment** in electrification upgrade of the Chase Line completed 2019



the only Station in South Staffs in this key rail corridor into the West Midlands conurbation for commuters

- STRUCTURE PLAN Para 7.21** : *“...the existence of commuting is accepted and particular regard has been paid when considering **development options**, to the existence of (or of the potential for) **regular public transport, especially rail links, to enable access to the West Midlands Conurbation and other main employment centres**”.*
- STRUCTURE PLAN Para 7.27** : **THE STRUCTURE PLAN SEES GREAT WYRLEY/CHESLYN HAY AS:**
*“a location with existing employment, retail, recreation and entertainment facilities, **both locally and in neighbouring Cannock** combined with good transport links (bus and rail) to the West Midlands Conurbation”.*
- LOCAL PLAN POLICY DS3** : *“an integral part of the Strategy will be to ensure that growth is distributed to the District’s **most sustainable locations**”... “and have access to key rail corridors into the adjacent towns and ..cities upon which the district relies for its higher order services and employment”*
- NPPF Para 11(a)** : *“all plans should promote a sustainable pattern of development... align growth and infrastructure... mitigate climate change...”*
- NPPF Para 92(c)** : *“planning policies should aim to achieve, healthy, inclusive and safe places... accessible Green Infrastructure... allotments and layouts that encourage walking and cycling”*
- NPPF Para 105** : requires a *“genuine choice of transport modes”* (bus and rail)



Promoted Site ref: 116, 131 and adjacent land

- TIER 1 CHESLYN HAY- a sustainable, healthy, inclusive and safe place to live, *“a location with existing employment, retail, recreation and entertainment facilities both locally and in neighbouring Cannock”*
- Encouraging walking/cycling GREEN Infrastructure connecting to TIER 1 - mitigating climate change accessing Champions Wood and the Forest of Mercia Way and Local Nature Reserve
- CHASE LINE, KEY RAIL CORRIDOR - Landywood Station public transport within 1.4km of Site
- WITHIN URBAN BUS ZONE public transport- bus routes radiating out from BUS STATION HUB
- NEIGHBOURING CANNOCK (within 5km/10-15 minutes) Sub-Regional Shopping Centre & Regional McArthur Glenn Designer Outlet accessible to all age groups and mobilities and to those who cannot or do not choose to drive, by instead using convenient public transport either bus or rail NPPF Para 105

Contents – Images 2.0 - 15.0

- 1.0 Storyboard – High Court Judgement re: Essington
Masterplanning – plans and planning policies
The initial stages of masterplanning analyses the context of the Promoted Site.
- 2.0 A housing allocation capable of accommodating over 1,000 homes adjacent to TIER 1 CHESLYN HAY also within the urban catchment of NEIGHBOURING CANNOCK TOWN CENTRE will deliver a Forest of Mercia woodland amenity/ nature conservation area of great value to the (existing) TIER 1 community ref: 1996 LOCAL PLAN POLICY R6 “*through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land*” ref: NPPF Para 142 and “*open space provision for recreational use*” ref: 2018 SHELAA encouraging walking/cycling, benefitting physical and mental health.
- 3.0 Existing Planning Consents, previous developments. Quarry, Golf Course, Driving Range. GREEN Infrastructure Access to allotments & Leisure Centre, Core Strategy 11.20 and NPPF Para 92(c) using existing safe Green Infrastructure (car-free) and open spaces for walking/ cycling/ recreation/ health NPPF Para 98 and Core Strategy 11.3... “*reducing the need to travel and ensuring a range of provision and opportunities are available locally*”, TIER 1 CHESLYN HAY allotments & Leisure Centre.
- 4.0 Proposed access to Warstone Road A421 - M6 J11 accessible within 600 metres of Promoted Site. Strategic Road Network transport infrastructure M6 - M6 Toll - M54 LINK ROAD
- 5.0 1996 LOCAL PLAN POLICY R6 QUARRY RESTORATION SCHEME (ROMP) “*creating an attractive amenity / nature conservation area of great value to the community*”
Linking to the Forest of Mercia Way Local Nature Reserve. 
- 6.0 TRANSPORT INFRASTRUCTURE, 3 motorways via M6 J11 within 600m, M6 - M6 TOLL - M54 LINK ROAD, the Chase Line, A KEY RAIL CORRIDOR and BUS STATION HUB see IMAGES 9 & 10 “*offering a genuine choice of transport modes and maximising sustainable transport solutions*” ref: NPPF Para 105
- 7.0 Car free Green Infrastructure within the adjacent TIER 1 Village encouraging walking/cycling, mitigating Climate Change. “*Planning policies should encourage... walking and cycling*” NPPF Para 92(c). “*Green space networks connecting residential areas with recreational sites including allotments and Leisure Centres...*” ref: Core Strategy 11.20.
- 8.0 TEN Education Establishments and TWO NHS GP Surgeries and THREE NHS Hospitals with access to educational and medical support services/employment opportunities
- 9.0 NPPF Para 105 requires a “*genuine choice of transport modes*” (bus and rail)
NPPF Para 142 “*first consideration*” to land “*well-served by public transport*”. LANDYWOOD STATION and electrified rail public transport on the Chase Line, a KEY COMMUTER CORRIDOR for employment opportunities, leisure, shopping, services and facilities, with a wider range of other employment opportunities in RUGELEY, HEDNESFORD, CANNOCK, BLOXWICH, WALSALL, GBHMA and BIRMINGHAM CITY CENTRE connecting to Metrolink Tram, HS2 and International Airport.
- 10.0 NPPF Para 105 requires a “*genuine choice of transport modes*” (bus and rail)
NPPF Para 142 “*first consideration*” to land “*well-served by public transport*”
CANNOCK BUS STATION HUB and CANNOCK urban BUS ZONE public transport bus routes radiating out from BUS STATION HUB including to CHESLYN HAY (with Promoted Site), CANNOCK, BLOXWICH, WALSALL, GBHMA and B’HAM CITY CENTRE for leisure, shopping, services, facilities and employment.
- 11.0 NEIGHBOURING CANNOCK is a Sub-Regional Shopping Centre with Regional McArthur Glenn Outlet
- Numerous supermarkets and many convenience stores are within 5km/ 10-15minutes

12.0 - Retail Parks are numerous within 4km/10 minutes

13.0 - Numerous Leisure Facilities are within 3km/5-10 minutes

14.0 - Numerous Leisure Facilities are within 300 seconds

15.0 - Numerous Leisure Facilities are within 200 seconds



APPENDIX 1 – 2002 HIGH COURT JUDGEMENT re: Essington

APPENDIX 2 – 2001 STRUCTURE PLAN references

APPENDIX 3 – S106 AGREEMENT, South Staffs Council & Hepworth Building Products ACCESSING WOODLAND

The High Court Judgement is highlighted yellow in APPENDIX 1 for convenience.

The highlight conveys a quick summary of the single issue raised by South Staffordshire District Council for the Court to remove Essington by name from the STRUCTURE PLAN (for housing) because the District Council considered it to be an unsustainable location

refer to para 32 “(a) there is no station to serve the village” (b) and (c) also apply.

refer to para 40 “people on the whole will not walk for more than about 2km but will choose a car for journeys in excess of that”.

THE FULL JUDGEMENT IS APPENDED

1. The STRUCTURE PLAN included Cheslyn Hay, Great Wyrley and Essington as potentially sustainable areas for housing.
2. South Staffordshire District Council **did not agree**, it commenced proceedings to have Essington removed because it is **not** a sustainable location.
3. All parties to the proceedings agreed Cheslyn Hay/Great Wyrley is a sustainable location “with public transport links (bus and rail) to the West Midlands conurbation” para 8.
4. “Valiant” attempts were made in the evidence produced on behalf of the defendant to the STRUCTURE PLAN to suggest that Essington is close enough to a railway station to qualify in its own right as a sustainable location.
This argument was rejected by the Court as “not altogether impressive” para 40.
5. The High Court Judgement is that Essington is **not** a sustainable location for housing. Essington was excluded by the Court from the STRUCTURE PLAN.
South Staffordshire District Council won the day; Essington is **not** a sustainable location.
Para 32 “(a) there is no station to serve the village” (b) and (c) also apply.

JUDGEMENT

Para 2: “the inclusion (as a potential housing allocation area) of the village of Essington was irrational”

Para 3: “they (Cheslyn Hay and Great Wyrley) abut indeed they appear essentially to be joined on to the edge of Cannock, which itself is a substantial town”

Para 7: “there are two defendants here, the Stoke-on-Trent City Council and the Staffordshire County Council, because this is a joint structure plan which covers the whole of Staffordshire”

Para 8: “Areas immediately adjoining Great Wyrley/ Cheslyn Hay, and extending towards Essington are seen as meeting many of the basic criteria for achieving long term sustainability. The presence of existing employment, retail, recreation and entertainment facilities both locally and in neighbouring Cannock, combined with public transport links (bus and rail) to the West Midlands Conurbation, suggest that the protection of Green Belt should be overridden in this general area in the interests of providing required housing in an accessible location.”

Para 9: “On the face of it, what was there being proposed **was a development immediately around Great Wyrley and Cheslyn Hay** but extending in a southwesterly direction towards the village of Essington, and that appeared to be why it was considered appropriate to include Essington in the policy.”

Para 11: “The claimant (South Staffordshire District Council) objected to that policy and, following the statutory provisions, an inquiry by an independent panel was held. That inquiry took place in October 1999. The County Council submitted a statement to that panel in which they stated:

“Great Wyrley/Cheslyn Hay/ Essington has been selected as a focus for major development as it is considered that this area offers the best prospect of accommodating growth in a sustainable manner.”

Para 12: *“Thus the focus seemed to be upon the area stretching from Cheslyn Hay and Great Wyrley towards Essington. That was expanded in this way, in the more detailed explanation given by the defendant, in paragraph 1.4:*

*“It is considered that the choice of Great Wyrley/Cheslyn Hay/Essington as a focus for major development offers the best prospect within South Staffordshire District of meeting the requirements for development in a sustainable manner. **The settlement of Cheslyn Hay/Great Wyrley has a combined population of over 18,000 and is located at upon a major public transport corridor.***

A railway connection within the settlement provides a service to the West Midlands Conurbation, an area in which approximately 50% of the employed residents of Great Wyrley/Cheslyn Hay work. The area also has the benefit of frequent bus services to Cannock, Hednesford, Walsall and Birmingham.”

Para 13: *“It will be apparent from that that the intention behind the policy in question appears to be focused on Great Wyrley and Cheslyn Hay, because it is where there was already a substantial population, and it is located upon the major transport corridor and so has the advantages.”*

Para 14: *“It would only on the whole make sense if there was some ready access to the facilities that are necessary. That is why this particular provision was looking to Cheslyn Hay and Great Wyrley.”*

Para 17: “we conclude that a significant level of development within or immediately adjoining Great Wyrley/Cheslyn Hay would accord with the principles of sustainable development.”

Para 18: *“It then goes on to consider a question of electrification and the improvement of the Walsall/Cannock railway line...*

“We consider that the locational guidance should be restricted to mentioning Great Wyrley/Cheslyn Hay.

***We do not feel it is appropriate** to mention Essington in the title, since Essington is a separate village about 3km away.”*

Para 24: *“4.4 The inclusion of Essington in the Structure Plan as a named location with potential for more development is not seen as appropriate due to a combination of factors:*

- (i) the lack of a railway station,*
- (ii) Essington's location away from a Staffordshire settlement but close to the conurbation in a sensitive Green Belt area, and*
- (iii) a potential reduction in resources available (as a result of dispersal of proposals) to provide infrastructure and community services to serve major development”*

Para 26: “Indeed, one could take it further and wonder whether any particular area by a village in South Staffordshire should not be identified if Essington was to be identified.”

Para 31: *“it does seem to me that it is difficult to follow how the inclusion of Essington can be said to be in broad conformity with the sequential approach.”*

Para 32: "Essington

The Council [that is to say South Staffordshire District Council] objects to the inclusion of Essington as a named strategic location and the rejection of the Panel's recommendation not to delete Essington from Policy H1, Table 2 and paragraph 7.26 of the explanatory memorandum.

The Council consider that the inclusion is not appropriate for the following reasons:

- (a) there is no station to serve the village,***
- (b) Essington is separate from Great Wyrley/Cheslyn Hay, and lies in a sensitive area of the Green Belt,***
- (c) development could potentially reduce the resources available as a result of the dispersal of proposals to provide infrastructure and community services to serve major development in the area.***

The Council consider reference to Essington is contrary to the Panel's recommendation and the revised PPG 3. The reintroduction of Essington would require evidence of all possible development locations having been systematically subjected to the sequential test in terms of their sustainability credentials and impact on the Green Belt."

Para 34: *"The response and the reasons for rejecting the objections were as follows:*

"The inclusion of Great Wyrley, Cheslyn Hay and Essington in the area of search within the catchment of the stations on the Walsall — Cannock railway does not predetermine the allocation of development to any or each of the settlements, it is for the District Council to undertake a robust urban capacity study and follow the sequential approach as set out in PPG 3 when identifying specific housing provision through the review of the local plan. No change."

Para 35: *"The point is made that those reasons do not really meet the objections which have been raised, in particular the separation of Essington from Great Wyrley and Cheslyn Hay by some 3km, and its distance as a result from the railway line and the good communications which exist at Cheslyn Hay and Great Wyrley."*

Para 40: *"Valiant attempts have been made in the evidence produced on behalf of the defendant to (the) Structure Plan suggest that Essington is close enough to the railway station to qualify in its own right as a sustainable location.*

As the crow flies it may be that it is about 2km or so from the nearest railway station but, unfortunately, it is not possible to take a route that the crow might take, and if one needs to go on land, whether on foot or bicycle or by car, it is, I gather, a minimum of about 4km, possibly something more. Of course it is possible to walk 4km but studies suggest (and this is contained in PPG 13) that people on the whole will not walk for more than about 2km but will choose a car for journeys in excess of that.

The suggestion is made that one might bicycle. So one might, but there are not that many people who still make use of the bicycle, and there are many of course for whom it would not be easy to bicycle.

The attempts to suggest that Essington really can be regarded in the same way as Cheslyn Hay and Great Wyrley, so far as sustainability is concerned, are not altogether impressive."

Para 43: *"Structure Plan in my view, it follows that Essington ought not to be included in either the policy or the memoranda that go with it. That being so, I shall now ask counsel to address me on any appropriate relief."*

STORYBOARD - Masterplanning – plans and planning policies

The initial stages of Masterplanning analyses the context of the Promoted Site.

This storyboard functions similar to an Executive Summary, comprising 14 IMAGES (2.0-15.0) of visual representations making reference to local and national policy. It captures previous consultation submissions and Freedom of Information requests/responses. It respects the High Court Judgement.

We have set out in our previous consultation submissions why the Council's approach to national and local policy and the underlying evidence base is deficient and the **EMERGING LOCAL PLAN FLAWED AND UNSOUND**, prejudicing site allocation.

***The inclusion in the emerging LOCAL PLAN of Essington is in conflict with the HIGH COURT JUDGEMENT.**

The Judgement (sought by South Staffs District Council) removed Essington from the Structure Plan as a housing allocation precisely because it is **not** a sustainable location.

Judgement para 32 refers to the District Council's evidence, "*(a) there is no station to serve the village*".

***This storyboard respects the District Council's evidence in 2002 and High Court Judgement.**

The District Council needs to comply with NPPF Para 142 release of Green Belt land first which is:

"well-served by public transport". There is still no Railway Station to serve Essington (or Coven).

NPPF Para 105 requires a "genuine choice of transport modes" (bus and rail)

The most sustainable sites, "well-served by public transport", are by definition adjacent to a TIER 1 key village with "access to key rail corridors" and in a BUS ZONE see IMAGE 10

The TIER 1 village/settlement definition is set out in the Settlement Hierarchy strategy.

see page 7 for definition, extract from **POLICY DS3 – The Spatial Strategy to 2038**

POLICY DS3 STATES GROWTH WILL BE: "*located at the most accessible and sustainable locations in accordance with the Settlement Hierarchy*"

The Council as the "*strategic policymaking authority*" acknowledge that the District is (with the exception of "*the District's most sustainable*" TIER 1 locations):

"poorly serviced by public transport" (IDP 2021, page 7)

with

"existing high car usage" (Sustainability Appraisal, para 6.8.4)

It is for this reason that the Council has produced a Settlement Hierarchy strategy to identify appropriate locations for sustainable development which are... "*well-served by public transport*".

TIER 1 settlements are by definition "*the most accessible and sustainable locations*" with "*access to key rail corridors*".

The Council has acknowledged **IN THE HOUSING SITE TOPIC SELECTION PAPER** that an opportunity at Site 131 exists to accommodate over 1,000 homes owing to its large scale, able to provide biodiversity off-setting or Green Belt "*compensatory improvements*". It accesses 3 woodlands & Local Nature Reserve satisfying NPPF Para 142. This approach will be introduced as part of a development.

Site 131 will be developed alongside Site 116 (a Quarry) with opportunity for more biodiversity off-setting or "*compensatory improvements*" referable to the Quarry restoration ref 1996 LOCAL PLAN POLICY R6 which will "*create an attractive amenity/nature conservation area of great value to the community*", described on the following IMAGES also referable to the 2018 SHELAA for "*open space – and recreational use*" and the Quarry with additional houses will become part of the overall development scheme accommodating over 1,000 homes on the Promoted Site.

The Council consider the location to be "*potentially suitable*" to accommodate additional housing, but is "*subject to policy constraints - Green Belt*" (SHELAA 2021, Appendix 6, Locality 3).

Our consultation submissions have evidenced site refs: 116, 131 & adjacent land are suitable for development if Green Belt land is released because we have evidenced that this location is sustainable, "*well-served by public transport*" (bus & rail, NPPF Para 105 requires a "*genuine choice of transport modes*") and should be released first, compliant with NPPF Para 142 see IMAGES 9A & 9B and 10.

NPPF Para 142 – release of Green Belt Land is prescriptive

To release Green Belt land “first” NPPF Para 142 requires that the District Council should give “first consideration” to the “District’s most sustainable locations” **POLICY DS3** (see page 7).

The District’s TIER 1 settlements are the “most sustainable locations”, they:

“have access to key rail corridors into the adjacent towns and cities upon which the district relies for its higher order services and employment”.

Para 142 concerning the release of Green Belt land is prescriptive. It makes it clear to the District Council as the “strategic policymaking authority”:

“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.

Tier 3-5 settlements as defined Essington (site ref: 486c) and Coven (site ref: 646a&b) are **not** sustainable developments, they do **not** have access “to key rail corridors” and they do **not** have access to “higher order services and employment”. **That is why they are identified as Tier 3-5** They will continue to depend on “existing high car usage” (Sustainability Appraisal Para 6.8.4) which will exponentially increase (with the addition of 2,400 houses) if there is to be significant development in Essington and Coven as currently proposed by the District Council.

Significant development in Essington and Coven (identified as Tier 3-5) in these least sustainable locations would be in conflict with the Council’s Settlement Hierarchy strategy and national policy and in conflict with the 2002 High Court Judgement sought and won by the District Council.

Tier 3-5 has **no** “rail corridor into adjacent towns and cities upon which the District relies for its higher order services and employment”.

THIS TIER 1-5 HIERARCHY IS INFORMED BY THE HANSEN SCORES & RURAL SERVICES AND FACILITIES AUDIT WHICH SHOULD INFORM THE RELEASE OF GREEN BELT LAND COMPLIANT WITH NPPF PARAS 142 & 105

The following storyboard 14 images (2.0 – 15.0) referable to the Promoted Site 116, 131 and adjacent land sets a benchmark for local and national policy compliance providing evidence and justification for the allocation and release of Green Belt land for development “first” satisfying the three requirements of NPPF Para 142, which are:

1. “well-served by public transport” (bus & rail, NPPF Para 105 requires a “genuine choice of transport modes”) and which
2. “can be off-set through compensatory improvements to the environmental quality” and with
3. “accessibility of remaining Green Belt land”

BY DEFINITION the Promoted Site 116, 131 and adjacent land are “well-served by public transport” because TIER 1 Cheslyn Hay has access to a key rail corridor, the Chase Line into the GBHMA. see IMAGE 9B This storyboard evidences that we satisfy all three above NPPF Para 142 requirements.

POLICY DS3: *The district’s Tier 1 settlements are Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley. These settlements hold a wider range of services and facilities **and have access to key rail corridors into the adjacent towns and cities upon which the district relies for its higher order services and employment.*** see IMAGE 9A & 9B

The Promoted Site is also in the CANNOCK TOWN CENTRE BUS ZONE which ZONE extends into the GBHMA West Midlands conurbation for higher order services and employment. see IMAGE 10

POLICY DS3, SETTLEMENT HIERARCHY STRATEGY – “an integral part of the strategy”

POLICY DS3 AND STRUCTURE PLAN require access to a key rail corridor, this demonstrates consistency and continuity in Strategic Planning with Policy DS3 and the Structure Plan recognising that Cheslyn Hay / Great Wyrley has access via Landywood Station to the Chase Line, a key rail corridor into the GBHMA West Midlands conurbation for commuters/employment with an electrification/capacity upgrade completed 2019.

LOCAL PLAN *“an integral part of the Strategy will be to ensure that growth is distributed to the District’s **POLICY DS3:** most sustainable locations”... “and have access to key rail corridors into the adjacent towns and cities upon which the district relies for its higher order services and employment”*

2001 STRUCTURE PLAN Para 7.21: *“...the existence of commuting is accepted and particular regard has been paid when considering development options, to the existence of (or of the potential for) regular public transport, especially rail links, to enable access to the West Midlands Conurbation and other main employment centres”.*

2001 STRUCTURE PLAN para 7.27:

The Structure Plan sees Great Wyrley/ Cheslyn Hay as: *“a location with existing employment, retail, recreation and entertainment facilities, both locally and in neighbouring Cannock combined with good transport links (bus and rail) to the West Midlands Conurbation”.*

2001 STRUCTURE PLAN para 7.30:

“improvement to the services and infrastructure on the Walsall – Cannock – Rugeley railway line will provide access to the West Midlands Conurbation”

2001 STRUCTURE PLAN para 8.65:

“Walsall - Cannock - Hednesford - Rugeley railway line (Railtrack 2000 Management statement for Great Britain) identifies electrification and improvement in line speed and journey times as an option for further improvements in capability between Walsall and Rugeley. The County Council support any improvement in capacity along this line, which will provide improved services for major development sites at Rugeley and Great Wyrley/Cheslyn Hay (see Policy H1).”

continued ... Extract from **POLICY DS3 – THE SPATIAL STRATEGY TO 2038**

*An integral part of the Strategy will be to ensure that growth is distributed to the district’s **most sustainable locations**, avoiding a disproportionate level of growth in the district’s less sustainable settlements, whilst also recognising that very limited growth in less sustainable areas may be appropriate in limited circumstances... (underlining is our emphasis)*

● **“The District’s most sustainable locations”... do have a train Station**

*The district’s **Tier 1 settlements** are Penkridge, Codsall/Bilbrook and Cheslyn Hay/Great Wyrley. These settlements hold a wider range of services and facilities **and have access to key rail corridors into the adjacent towns and cities upon which the district relies for its higher order services and employment**. The sustainable growth of these larger rural settlements will be delivered through appropriate allocations made in the Local Plan. These Tier 1 settlements will continue to support windfall housing growth, employment development and service provision, where it is consistent with other Local Plan policies. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC6, in a manner which reflects their role and function.*

● **“The District’s less sustainable areas”... do not have a train Station**

*The district’s **Tier 3 settlements** are Essington, Coven, Featherstone, Shareshill, Wheaton Aston, Pattingham and Swindon. These settlements hold a smaller range of services and facilities than Tier 1 and 2 settlements and as such are given a lesser level of growth. Limited growth in these smaller rural settlements will be delivered through appropriate allocations made in the Local Plan. The district’s Tier 3 settlements will continue to support limited windfall housing and employment growth to assist in meeting local needs, where it is consistent with other Local Plan policies. Employment development will be small in scale and aim to maintain the vitality and viability of these communities. Proposals for retail and small-scale office development should be directed into the centres identified in Policy EC6, in a manner which reflects their role and function.*

The location of our Promoted Site ref: 116, 131 and adjacent land complies with the Council's Rural Services and Facilities Audit (2019).

Paragraph 3.16 and paragraph 3.17 from the document are set out below with the Table showing the average number of trips per person per year:-

Para 3.16:

'Department for Transport Research (Appendix 1) shows that, aside from shopping, the next most significant generator of trips is commuting journeys. Furthermore, the NPPF encourages that an integrated approach is used in considering the location of housing, employment uses and community facilities and requires plans and decisions to ensure developments that generate significant movements are located where the need to travel will be minimised and use of sustainable transport modes can be maximised.'

Average number of trips (trip rates) per person per year by trip purpose:
England, 1995/97 to 2016

Source: Rural Services and Facilities Audit 2019

Trip purpose	Number of trips per person in 2016
Shopping	183
Commuting	144
Education	118
Personal business	89
Entertainment/public activity	56
Sport: participate	14

Para 3.17:

'Therefore it is important that villages provide sustainable transport access to employment opportunities, or otherwise risk causing unsustainable commuting patterns. The availability of public transport access to employment is particularly important in South Staffordshire, which has relatively few employment opportunities within its existing settlements when compared to the centres of adjacent towns / cities which border the District. As such, a settlement's relative level of employment access via public transport is given great weight in the final settlement hierarchy.

The District Council is proposing unsustainable commuting patterns in the proposal for 1,200 homes at Essington (ref: 486c) and the proposal for another 1,200 homes at Coven (ref: 646a&b).

These proposals are for least sustainable Tier 3-5 Settlements notwithstanding that Para 3.17 makes it clear that *'settlement's relative level of employment access via public transport is given great weight in the final settlement hierarchy.'* With Tier 1 Settlements being the most sustainable settlements with access to rail corridors and Railway Stations which Tier 3-5 Settlements do not have,

● **TIER 3-5, ESSINGTON - site ref: 486c – proposed allocation 1,200 houses**

The proposed 1,200 houses at **Essington (site ref: 486c)** is within a Tier 3-5 least sustainable rural location and on this basis significant development in any Tier 3-5 least sustainable location could take place and the Settlement Hierarchy become redundant. The hierarchy would serve no purpose. It is **not** within the **NEIGHBOURING CANNOCK TOWN CENTRE** urban catchment area of a Sub-Regional Shopping Centre or Regional McArthur Glenn Designer Outlet. **No public transport** train services, no Railway Station (see High Court Judgment). It is **not** within a TOWN CENTRE BUS ZONE, it is remote. It is **not** within proximity of a BUS STATION HUB with bus services to many other destinations. It does **not** have access to a railway station within convenient walking distance (4.9km by car). It relies heavily on the private motorcar. It will **not** deliver sustainable growth, it's Tier 3-5. It will **not** mitigate climate change because it is **not** "well-served by public transport", it's Tier 3-5. It is "poorly served by public transport" (IDP 2021, pg 7) with "existing high car usage" (Sustainability Appraisal, para 6.8.4) which is why the Sustainability Appraisal designates it as a Tier 3-5 "less sustainable area". There will continue to be "existing high car usage" which will exponentially increase if significant development (1,200 houses) is allocated in conflict with the District Council's Tier 3-5 Settlement Hierarchy strategy ref: RURAL SERVICES AND FACILITIES **AUDIT** prepared by the District Council, the "strategic policymaking authority". It is **not** a TIER 1 settlement where sustainable growth should be directed by a "strategic policymaking authority" to accommodate the 79% of the working population who commute out of the District for their employment which has increased from 50% in 2002 (High Court Judgment, para 12).

The District Council in the High Court challenged the 2001 STRUCTURE PLAN, it succeeded in its legal challenge preventing the allocation of houses at Essington because "there is no station to serve the village". It was a least sustainable location then in 2002 and it is still a least sustainable location now (Tier 3-5 of the Settlement Hierarchy strategy) as defined by the District Council, the "strategic policymaking authority".

● **TIER 3-5, COVEN - site ref: 646a&b – proposed allocation 1,200 houses**

The proposed 1,200 houses at **Coven (site ref: 646a&b)** is within a Tier 3-5 least sustainable rural location and on this basis significant development in any Tier 3-5 least sustainable location could take place and the Settlement Hierarchy become redundant. The hierarchy would serve no purpose. It is **not** within the **NEIGHBOURING CANNOCK TOWN CENTRE** urban catchment area of a Sub-Regional Shopping Centre or Regional McArthur Glenn Outlet. It is **not** within a TOWN CENTRE BUS ZONE, it is remote. It is **not** within proximity of a BUS STATION HUB with bus services to many other destinations. It does **not** have access to a railway station within convenient walking distance (6.6km by car). It relies heavily on the private motorcar. It will **not** deliver sustainable growth, it's Tier 3-5. It will **not** mitigate climate change because it is **not** "well-served by public transport", it's Tier 3-5. It is "poorly served by public transport" (IDP 2021, pg 7) with "existing high car usage" (Sustainability Appraisal, para 6.8.4) which is why the Sustainability Appraisal designates it as a Tier 3-5 "less sustainable area". There will continue to be "existing high car usage" which will exponentially increase if significant development (1,200 houses) is allocated in conflict with the District Council's Tier 3-5 Settlement Hierarchy strategy ref: RURAL SERVICES AND FACILITIES **AUDIT** prepared by this "strategic policymaking authority". It is **not** a TIER 1 settlement where sustainable growth should be directed by a "strategic policymaking authority" to accommodate the 79% of the working population who commute out of the District.

POLICY DS3 applies equally to both Essington and Coven: (neither has a Railway Station)

"an integral part of the Strategy will be to ensure that growth is distributed to the District's most sustainable locations" ... "and have access to key rail corridors into the adjacent towns and cities upon which the district relies for its higher order services and employment"

The Council acknowledges that the District is (with the exception of "the District's most sustainable" TIER 1 locations): "poorly serviced by public transport" (IDP 2021, page 7)

with

"existing high car usage" (Sustainability Appraisal, para 6.8.4)

Tier 3-5 Essington and Coven (**no** Bus Zone & **no** Railway Station) conflicts with NPPF Para 105 it requires a "genuine choice of transport modes" (bus and rail).

● **TIER 1 PROMOTED SITE – ref 116, 131 and adjacent land (satisfies LOCAL PLAN POLICY DS3)**

Site ref 116 is occupied by Campions Wood QUARRY with the Campions woodland within the QUARRY SITE as part of the Forest of Mercia, linking directly to the Forest of Mercia Way accessing Green Belt land. It is considered an area “*potentially suitable*” to accommodate additional housing, but is “*subject to policy constraints - Green Belt*” (SHELAA 2021, Appendix 6, Locality 3). **NPPF Para 142 applies to “policy constraints” the release of Green Belt land.** Site ref 131 and adjacent land are side-by-side site ref 116.

The Promoted Site adjacent to TIER 1 CHESLYN HAY satisfies the three criteria of NPPF Para 142:

- 1.** The Promoted Site is “*well-served by public transport*” both by bus within the CANNOCK TOWN CENTRE BUS ZONE and by train within a KEY RAIL CORRIDOR to the GBHMA West Midlands conurbation. The 2001 STRUCTURE PLAN makes clear the Chase Line is a key commuter rail corridor into the GBHMA West Midlands conurbation, it was upgraded with £110m of public investment increasing capacity. It is within the urban catchment of NEIGHBOURING CANNOCK TOWN CENTRE, a Sub-Regional Shopping Centre and is within the CANNOCK BUS ZONE 5km/10-15minutes from the CANNOCK BUS STATION HUB with bus services radiating out to many other destinations accessing employment opportunities across a range of sectors. see IMAGE 10
- 2.** Development “*can be off-set through compensatory improvements to environmental quality*”
The District Council agrees an “*opportunity*” exists ref: the HOUSING SITE TOPIC SELECTION PAPER.
- 3.** Development does provide “*accessibility of remaining Green Belt land*” see IMAGES 2.0-9.0
Campions woodland is linked to the Forest of Mercia Way, it already provides access to the Green Belt. The Promoted Site is in the most accessible and sustainable location adjacent to one of the District’s key villages TIER 1 CHESLYN HAY with access to a key rail corridor and a wide range of services, facilities and employment opportunities accessible via walking/cycling using existing safe Green Infrastructure (car free) including proximity to ALLOTMENTS, COMMUNITY CENTRE/LIBRARY & LEISURE CENTRE. There are only 3 in the South Staffs District. Development will access 10 educational establishments, 2 NHS GP surgeries, and 3 hospitals.

The Chase Line, a key commuter rail corridor (**Local Plan POLICY DS3**) is accessible from LANDYWOOD STATION, which is within 1.4km walking/cycling distance of the Promoted Site boundary using existing car free Green Infrastructure to mitigate climate change. **ALL OF THE PROMOTED SITE IS WITHIN 2KM OF THE STATION**

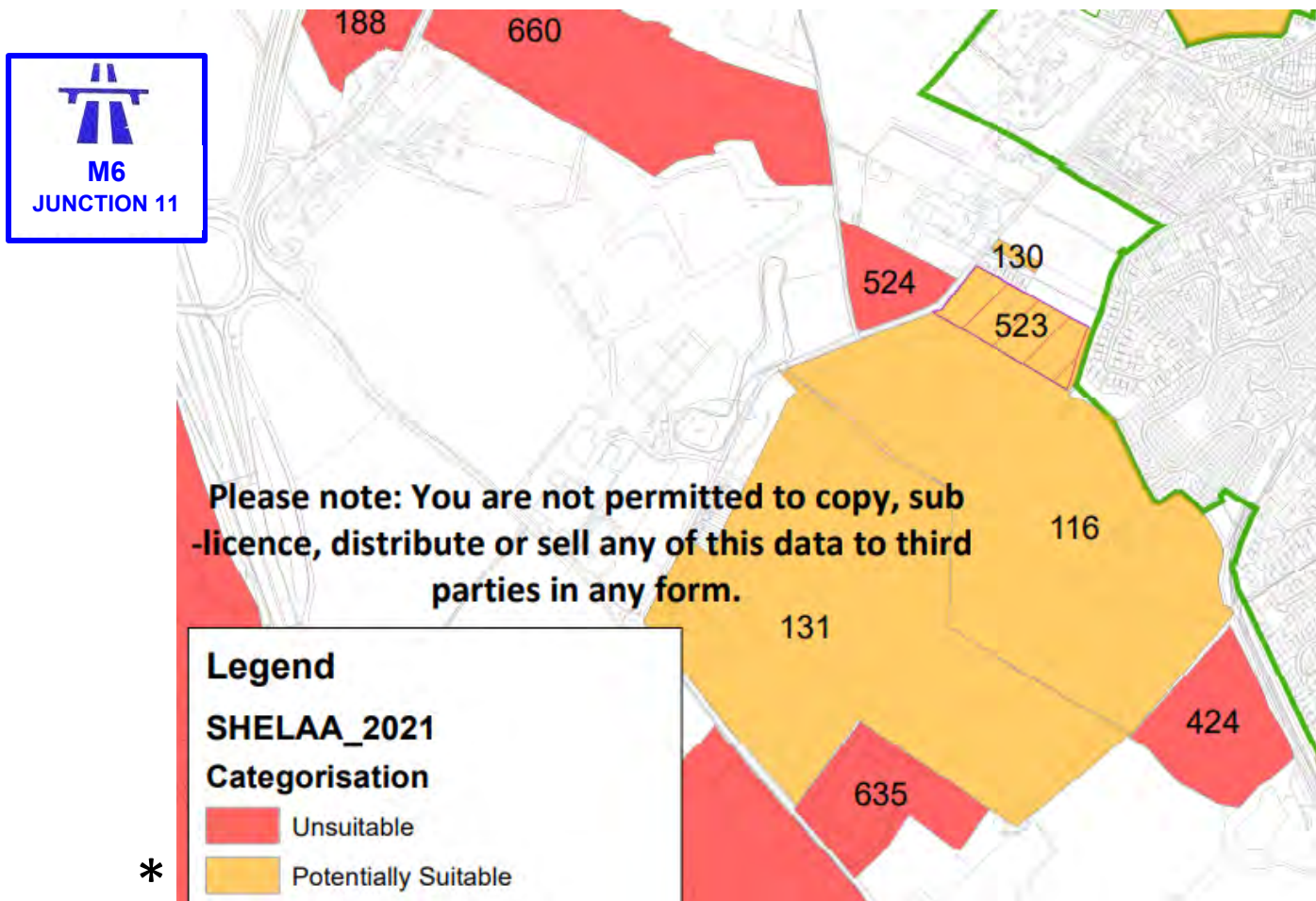
It is a brief 3 minute train journey to CANNOCK STATION which is within 1.6km of the TOWN CENTRE and Regional McArthur Glenn Designer Outlet and within about 2km of CANNOCK RETAIL PARKS. By train from Landywood Station it is a brief 3 minutes to Cannock, 7 minutes to Bloxwich, 13 minutes to Walsall and 34 minutes to Birmingham New Street, Birmingham City Centre interconnecting with other significant public transport infrastructure, including BUS STATION HUB at WALSALL TOWN CENTRE integrated with Railway Station, the Metrolink tram system at Birmingham New Street, HS2, and Birmingham International Airport strategic transport infrastructures limiting the need to travel to within just 15 minutes by train accessing employment opportunities on a large-scale on the doorstep (with the exception of Birmingham New Street which is 34 minutes).

Accessing public transport, both “*bus and rail*” STRUCTURE PLAN para 7.27 “*to the West Midlands conurbation*”, will deliver sustainable growth with significant employment opportunities across a range of employment sectors with 79% of the working population commuting out of the District for their employment up from 50% in 2002.

The Chase Line is a key commuter rail corridor into the GBHMA conurbation **STRUCTURE PLAN Para 7.21. STRUCTURE PLAN Para 8.65 supports major development in/adjacent to Cheslyn Hay which is identified for growth** LANDYWOOD STATION is the only Station on the Chase Line in South Staffs.

Allocation of the Promoted Site in a BUS ZONE close to LANDYWOOD STATION ON THE CHASE LINE satisfies NPPF Paras 105 & 142, release of Green Belt land “*first*” – “*well-served by public transport*” to satisfy housing needs following the upgrade in capacity and electrification of the Chase Railway Line completed 2019. This **STRUCTURE PLAN** transport strategy electrification and upgrade in capacity was supported by all District Councils. This public investment of £110m in the Chase Line, a key rail corridor into the GBHMA West Midlands conurbation accessing services, facilities and employment opportunities across a range of employment sectors will support “*a sustainable pattern of development... align growth and infrastructure... mitigate climate change...*” NPPF Para 11(a) and provide a “*genuine choice of transport modes*” (bus and rail) NPPF Para 105.

TIER 1 PROMOTED SITE - ref 116, 131 and adjacent land (extract from SHELAA, Appendix 7, locality 3)



See APPENDIX 1 for High Court Judgement, it confirmed sustainability of “areas immediately adjoining” Cheslyn Hay/Great Wyrley (ref: 116 and 131) by agreement of all parties to the proceedings:

- Para 3 : “They abut, indeed they appear essentially to be joined on to the edge of Cannock, which itself is a substantial town”.
- Para 8 : “Areas immediately adjoining Great Wyrley/ Cheslyn Hay, and extending towards Essington are seen as meeting many of the basic criteria for achieving long term sustainability”
- Para 17 : “a significant level of development within or immediately adjoining Great Wyrley/Cheslyn Hay would accord with the principles of sustainable development”.

Site ref 116 and 131 (38ha at 35 units per hectare) can accommodate over 1300 houses and in addition 7.8ha of woodland accessing Plum Wood, Champions Wood and in close proximity Strawberry Wood (3.5ha). These interlinked woodlands provide 11.3ha of public open space. IMAGES 2B-2E The 45.8ha (its 38ha + 7.8ha as shown above ref: 116 & 131 and adjoining land) adjacent to TIER 1 CHESLYN HAY are considered areas * “potentially suitable” to accommodate additional housing, but is “subject to policy constraints - Green Belt” (SHELAA 2021, Appendix 6, Locality 3).

NPPF Para 142 applies “policy constraints” to the release of Green Belt land

The following storyboard 14 images (2.0 – 15.0) referable to the Promoted Site 116, 131 and adjacent land sets a benchmark for local and national policy compliance providing evidence (ref High Court Judgement) for the allocation and release of Green Belt land adjacent to Tier 1 settlements for development “*first*” satisfying the three requirements of NPPF Para 142, which are:

1. “well-served by public transport” (bus & rail, NPPF Para 105 requires a “genuine choice of transport modes”) and which
2. “can be off-set through compensatory improvements to the environmental quality” and with
3. “accessibility of remaining Green Belt land”

A HOUSING ALLOCATION CAPABLE OF ACCOMODATING OVER 1000 HOMES WILL DELIVER AN AMENITY / NATURE CONSERVATION AREA OF GREAT VALUE TO THE EXISTING COMMUNITY REFER TO 2018 SHELA A CAMPIONS WOOD PUBLIC OPEN SPACE, IMAGE 4.0 & 1996 LOCAL PLAN POLICY R6 QUARRY RESTORATION PUBLIC OPEN SPACE, IMAGE 5.0. & ACCESSING REMAINING GREEN BELT LAND VIA FOREST OF MERCIA WAY LOCAL NATURE RESERVE & FOR OTHER HIGH QUALITY RECREATIONAL TRAILS DESCRIBED BELOW RIGHT ● IN ADDITION TO THE DISTRICT COUNCIL'S ACKNOWLEDGEMENT IN THE HOUSING SITE TOPIC SELECTION PAPER SEE NOTE CENTRE BOTTOM - * SITE REF 131 SATISFIES NPPF Para 142



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QUARRY

Site ref: 116

NPPF Para 142: NATIONAL PLANNING POLICY REQUIREMENT
The District Council has decided to release Green Belt land in order to accommodate housing numbers - Compliance with Para 142 is necessary

Promoted Site 116, 131 & adjacent land walking / cycling / recreation benefiting physical and mental health Forest of Mercia woodland and high quality Green Belt access

NPPF Para 142: "...Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."

*** Site ref: 131 satisfies NPPF Para 142**
THE COUNCIL ACKNOWLEDGES IN THE HOUSING SITE TOPIC SELECTION PAPER THAT AN OPPORTUNITY AT SITE: 131 EXISTS OWING TO ITS LARGE SCALE TO PROVIDE BIODIVERSITY OFF-SETTING OR GREEN BELT "compensatory improvements", THEREBY SATISFYING NPPF Para 142

SITE REF: 131 WILL PROVIDE HIGH QUALITY GREEN BELT ACCESS FOR RECREATIONAL USE INC. LOCAL NATURE RESERVE AND TO WOLVERHAMPTON ROAD LEISURE CENTRE see IMAGES 7 & 14

APC Parcel Distribution Hub

LOCAL NATURE RESERVE, FOREST OF MERCIA WAY is an Active Travel (walking/cycling) trail linking Woodlands together to create the Forest of Mercia. It lies between Penkrige in the west, Lichfield in the east and spreads north from Wolverhampton and Walsall as far as Cannock Chase; there are links from the Forest of Mercia Way into these surrounding urban areas. The trail is used by individuals and groups of all ages and mobilities to experience, enjoy and educate themselves on the natural environment, benefitting physical and mental health and well-being. **IT LINKS INTO THE PROMOTED SITE** see IMAGE 7



THE ONLY STATION in South Staffs on the Chase Line, A KEY CORRIDOR FOR COMMUTERS
Landywood Railway Station 1.4km to site boundary. All of site within 2km.



ACCESS TO WOODLANDS – Plum wood - Campions wood - Strawberry wood – all linked to the FOREST OF MERCIA WAY LOCAL NATURE RESERVE

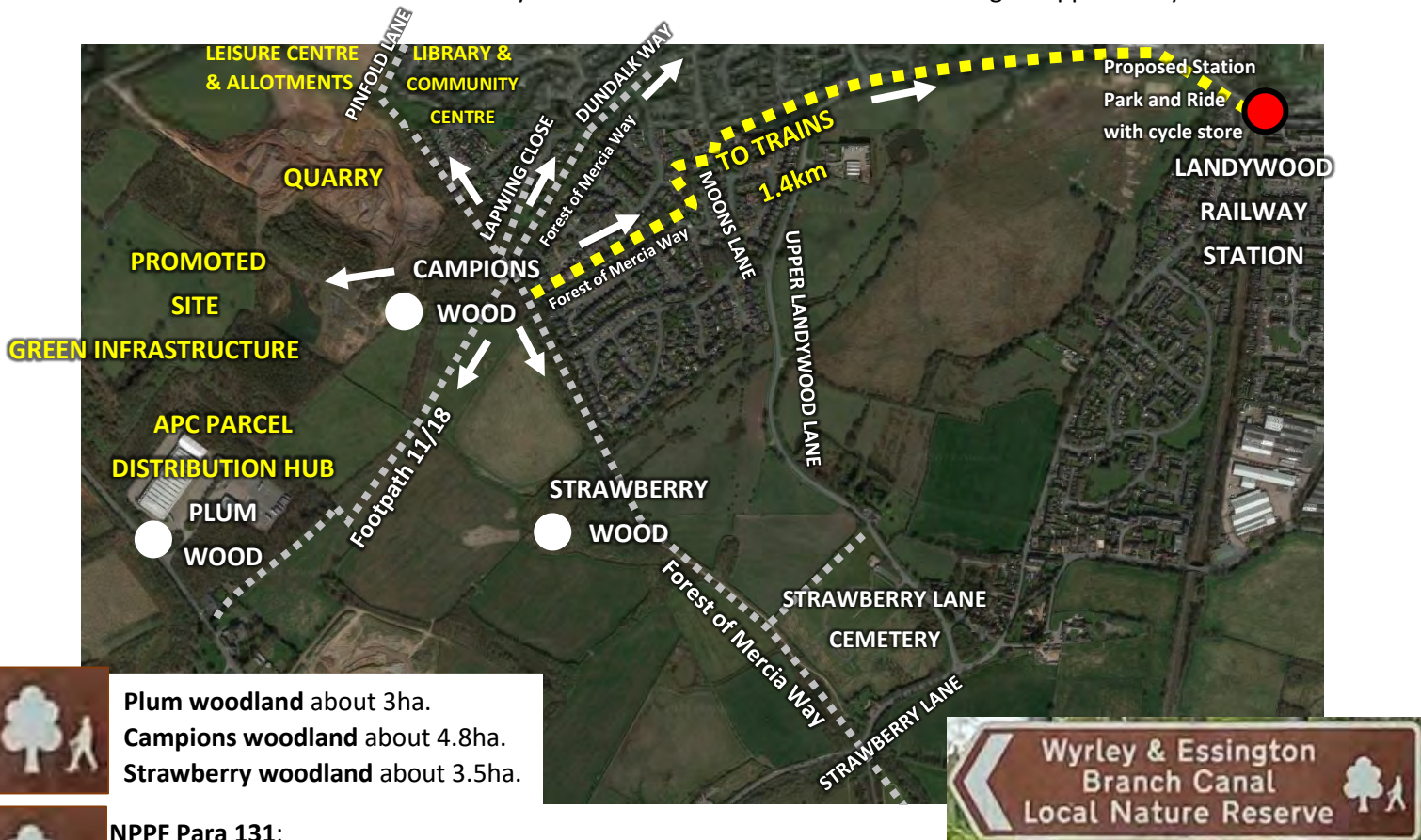
2.0B of 15.0

Three woodlands linked by public rights of way are all accessible either within the Promoted Site (Campions wood) or adjoining the site (Plum wood) or nearby (Strawberry wood) via the Forest of Mercia Way. The Promoted Site layout will provide multiple connections to the Forest of Mercia Way, woodlands, Green Belt and Railway Station. see below

These three woodlands, in combination 11.3ha (Plum – Campions – Strawberry) are as follows:

- Plum woodland – alongside APC Parcel Distribution Hub
- Campions woodland – within Promoted Site, part of Campions Wood Quarry
- Strawberry woodland – rear of Strawberry Lane Cemetery

These three woodlands are connected and publicly accessible via the Forest of Mercia Way and Footpath 11/18. Woodlands can be used by individuals and groups of all ages and mobilities to experience, enjoy and educate themselves on the natural environment, benefitting physical and mental health and well-being, providing recreational activity and appreciation of the natural environment/Local Nature Reserve. Dundalk Way and Lapwing Close are connected via the Forest of Mercia Way which extends into this urban area linking to Upper Landywood Lane.



Plum woodland about 3ha.
 Campions woodland about 4.8ha.
 Strawberry woodland about 3.5ha.

NPPF Para 131:

"Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change".

NPPF Para 142:

"the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land"

Core Strategy Para 11.3:

It is proposed to help people lead healthier lifestyles

"through a combination of protecting, improving, replacing and promoting existing open spaces and sport and recreation facilities and developing new ones.

This approach will encourage and enable local communities and visitors to actively participate in activities which meet their needs and interests, reducing the need to travel and ensuring a range of provision and opportunities are available locally".

NPPF Para 92(c):

"Planning policies should aim to access... green infrastructure, allotments and layouts that encourage walking/cycling"



**EXTRACT FROM FOREST OF MERCIA WAY INFORMATION PANEL
OFF DUNDALK WAY PROMOTING HEALTH AND WELL-BEING**

Source: South Staffordshire District Council

Forest of Mercia Way
Local Nature Reserve
accessing Green Belt Land



This walk is 0.77km. By completing a return walk you will have walked 1.54km and taken 3080 steps.

Healthwatch Walks

Walking is the one of the most effective forms of exercise there is. It is suitable for the majority of people whilst being fun and safe at the same time.

Did you know that walking regularly at a brisk pace has the following benefits for the individual?

- Burns as many calories as jogging the same distance
- It can halve the risk of a Heart Attack or Stroke
- It can lower blood pressure
- Lower your cholesterol
- Help in weight management
- Help prevent Diabetes
- Helps to manage stress and improve self-esteem

Recommendations are that you should aim to take at least 10,000 steps everyday. This doesn't have to be in one go, break it down into small chunks, maybe 10 minutes 3 times a day.

Core Strategy 11.20:

“Green Space Networks connecting residential areas with recreational sites (including allotments and Leisure Centres)...can help promote healthier lifestyles and greater recreational activity”.



Allotments these are within 300m.

Community Centre & Library (IMAGE 15) are within 600m.

Leisure Centre (IMAGE 7 & 14) is within 900m



IMAGE 15

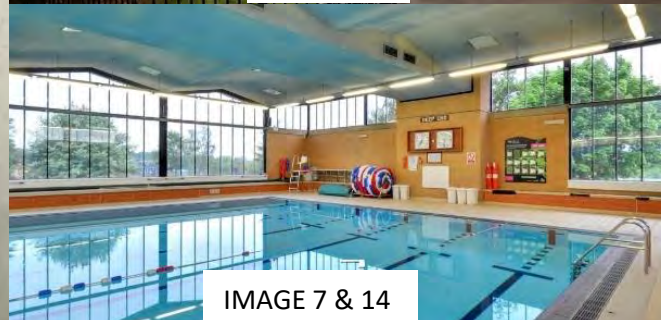


IMAGE 7 & 14

The above image notes the recommendation for people to walk at least 10,000 steps everyday, based on the distances stated above, this equates to approximate 4.98km.

LANDYWOOD STATION



For comparison, LANDYWOOD RAILWAY STATION from the site boundary is 1.4km, by completing a daily return walk/journey using the Chase Railway Line for employment/commuting, shopping, leisure you will have walked 2.8km and taken approximately 5,400 steps.

Being able to walk (including unaccompanied children [no adult] below driving age and for those who choose not to drive to a Railway Station) promotes healthier lifestyles.

The Local Nature Reserve follows the Forest of Mercia Way and from the Promoted Site to Strawberry Lane (IMAGE 2B, 1.2km). The Forest of Mercia Way (green infrastructure) continues to the well-used Wyrley and Essington Canal (blue infrastructure – canoes and pleasure craft), a total distance of 7km connecting to many other recreational trails, including to Chasewater Country Park (360ha) and the National Cycle Network.



FOREST OF MERCIA WAY/LOCAL NATURE RESERVE LINKS WITH DUNDALK WAY AND LAPWING CLOSE HOUSING ESTATES



The Forest of Mercia Way/Local Nature Reserve provides green links to the Green Belt and will connect into the Promoted Site as it does to Dundalk Way and Lapwing Close within the housing estates using existing links see below

The Forest of Mercia Way connects to the Mary Rose Pub & Restaurant (Moons Lane) and using this green infrastructure (car free) connects to Upper Landywood Lane with walking/cycling access to Landywood Railway Station over a short distance of 1.4km from the Railway Station to the Promoted Site boundary.



The Forest of Mercia Way and Footpath 11/18 connect to three woodlands, see IMAGE 2B

NPPF Para 131:

“Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change”.



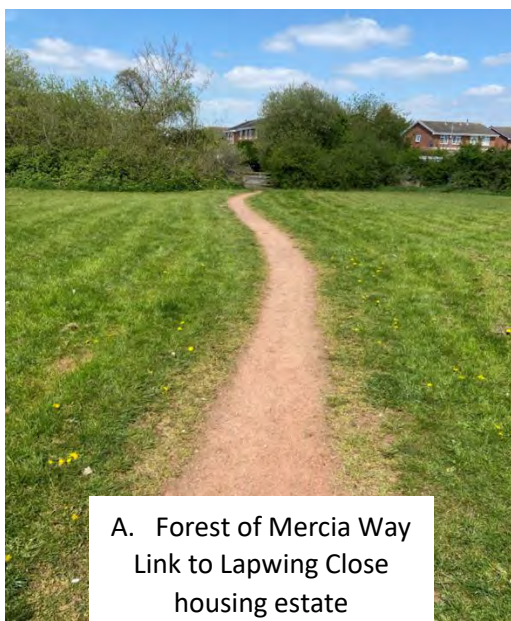
Forest of Mercia Way
Link to Dundalk Way



Forest of Mercia Way
Information Panel – Dundalk Way

The surrounding IMAGES show well-maintained and frequently-used pedestrian/cycling linkages from the Forest of Mercia Way and Local Nature Reserve into the existing housing estates at Dundalk Way and Lapwing Close.

Our client seeks to extend this well-used green infrastructure into the Promoted Site through Champions woodland: *“restoration proposals for the site (within quarry), will create an amenity/nature conservation area of great value to the community”*: ref 1996 Local Plan, Policy R6 see IMAGES 2A & 2B



A. Forest of Mercia Way
Link to Lapwing Close
housing estate



B. Lapwing Close
(opposite view)
Forest of Mercia Way
Linking woodlands together

FOREST OF MERCIA WAY: UPPER LANDYWOOD LANE/STRAWBERRY LANE TO THE PROMOTED SITE



The layout of Strawberry Lane Cemetery incorporates pathways/road infrastructure providing a pedestrian/cycling link from the Forest of Mercia Way to Upper Landywood Lane

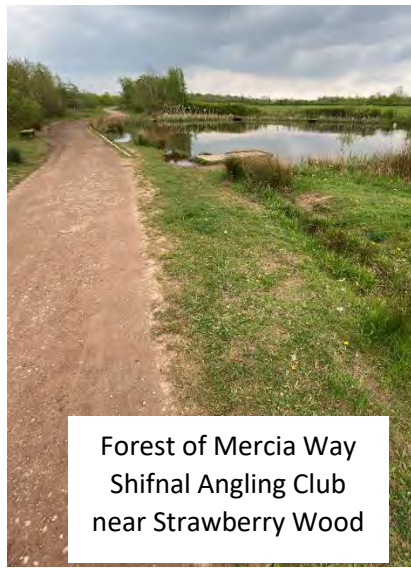


The surrounding images show linkages from the Forest of Mercia Way and Local Nature Reserve into the existing Strawberry Lane Cemetery and surrounding housing estates at Dundalk Way and Lapwing Close. These linkages will connect into the Promoted Site.

The Promoted Site will access the Forest of Mercia Way/Local Nature Reserve and Footpath 11/18 accessing Plum woodland, Campions woodland and Strawberry woodland (11.3ha) which will “make an important contribution to the character and quality of urban environments” NPPF Para 131.



Strawberry Lane connecting to Local Nature Reserve accessing 3 woodlands (11.3ha) linking to the Promoted Site (1.2km)



Forest of Mercia Way Shifnal Angling Club near Strawberry Wood



Core Strategy Para 11.3:
activities which meet their needs and interests reducing the need to travel are available locally

THIS ADDRESSES CLIMATE CHANGE HEALTH AND WELL-BEING



Strawberry woodland recreational route (walking, jogging, fishing, off-road cycling), providing appreciation of the natural environment, benefitting physical and mental health and well-being



NPPF Para 11(a):

“all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change...”

NPPF Para 92(c):

“Planning policies should aim to achieve healthy, inclusive and safe places which... enable and support healthy lifestyles... for example through the provision of safe and accessible green infrastructure... allotments and layouts that encourage walking and cycling”.

Green Infrastructure with TIER 1 access
Planning policies should aim to encourage walking/cycling/recreation for healthier lifestyles benefitting physical and mental health

Planning policies should aim to encourage walking/cycling/recreation for healthier lifestyles benefitting physical and mental health



The Council acknowledges that the district is with the exception of TIER 1 locations:

“poorly served by public transport” (IDP 2021, image 7) with “existing high car usage” (Sustainability Appraisal, para 6.8.4)

- Active Quarry Working Area to be restored
- ROMP Area including protected Campions Wood and restored Open Cast coal mine
- KEY RAIL CORRIDOR Landywood Station 1.4km to site boundary, car-free Green Infrastructure for walking/ cycling for getting to work.

EMPLOYMENT. 79% of the working population commute out of the district for EMPLOYMENT (Para 3.12 of the Sustainability Appraisal and Figure 4.3 of the South Staffordshire Economic Development Needs Assessment).

GREEN INFRASTRUCTURE NPPF Para 92(c) “through the provision of safe and accessible green infrastructure... allotments and layouts that encourage walking and cycling”. **THIS IS ACHIEVED.**

Core Strategy 11.20, “Green Space Networks connecting residential areas with recreational sites... can help promote healthier lifestyles”. THIS IS ACHIEVED.



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Access to a transport infrastructure of 3 interconnected motorways from J11

M6 - M6 TOLL - M54 STRATEGIC ROAD NETWORK

To M6 J11 (600m)

M6 TOLL is linked to M6 J11

The M54 LINK ROAD is linked to M6 J11

NPPF Para 98:

“Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.”

R6 “an attractive amenity / nature conservation area” which will become accessible to existing TIER 1 residents



EMPLOYMENT. 79% of the working population commute out of the district for EMPLOYMENT

THIS IS UP FROM 50% IN 2002. APPENDIX 1 – Para 12

Active Quarry Working Area to be restored

ROMP Area including protected Campions Wood and restored Open Cast coal mine

KEY RAIL CORRIDOR Landywood Station 1.4km to site boundary, car-free Green Infrastructure for walking/ cycling for getting to work.

SEE IMAGE 9



Achieving: 1996 POLICY R6, 2018 SHELAA, NPPF Para 92(c), NPPF Para 98, Core Strategy 11.20

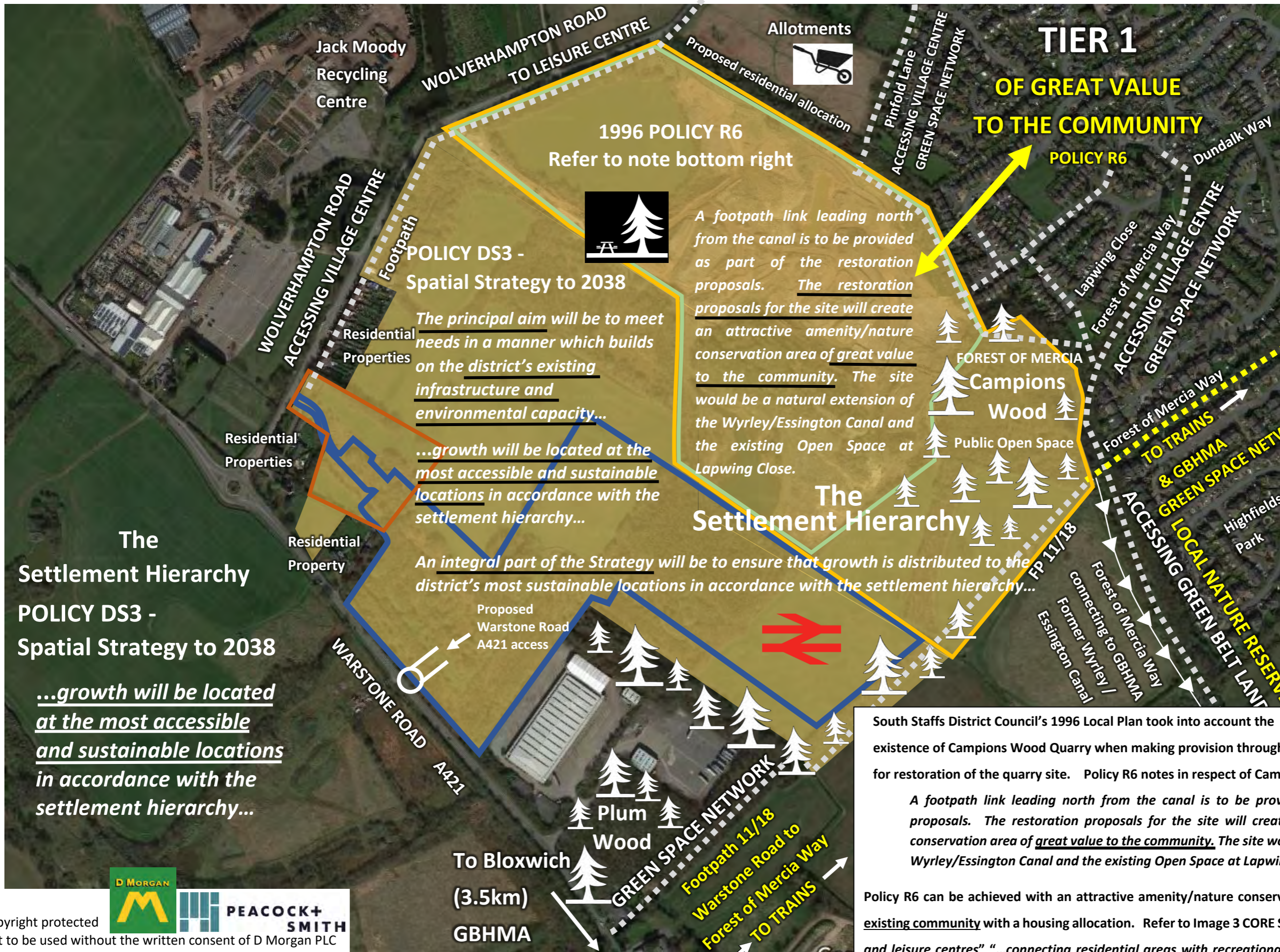
ALL SEEK TO ACHIEVE: “An attractive amenity/ nature conservation area of great value to the (existing) community”... “land for recreational use”... “encourage walking/cycling” “access to a network of high-quality open spaces” “Green Space Networks connecting residential areas with recreational sites (including allotments and Leisure Centres)”

ALL ARE ACHIEVED






1996 LOCAL PLAN POLICY R6. OVER 1000 HOMES SITE REF 116 & 131 WILL CREATE AN ATTRACTIVE AMENITY/NATURE CONSERVATION AREA OF GREAT VALUE TO THE COMMUNITY.

5.0 of 15.0 HOLLY BUSH GARDEN CENTRE & HOUSES FRONTING WOLVERHAMPTON ROAD ACCESSING ALLOTMENTS, LEISURE CENTRE, SWIMMING POOL, ACADEMY, PRIMARY SCHOOL AND CAMPIONS WOOD LINK TO FOREST OF MERCIA WAY GREEN INFRASTRUCTURE AND TO LANDYWOOD RAILWAY STATION  ACCESSIBLE BY WALKING/CYCLING 1.4KM FROM SITE BOUNDARY



EMPLOYMENT. 79% of the working population commute out of the district for EMPLOYMENT

THIS IS UP FROM 50% IN 2002.
APPENDIX 1 – Para 12

-  Active Quarry Working Area to be restored
-  ROMP Area including protected Campions Wood and restored Open Cast coal mine
-  KEY RAIL CORRIDOR Landywood Station 1.4km to site boundary, car-free Green Infrastructure for walking/ cycling for getting to work.

The only Station in South Staffs on the Chase Line, a key corridor for commuters getting to work

CAMPIONS WOOD QUARRY & 1996 POLICY R6 QUARRY RESTORATION SCHEME OF GREAT VALUE TO THE COMMUNITY LINKING TO LOCAL NATURE RESERVE

South Staffs District Council's 1996 Local Plan took into account the existence of Campions Wood Quarry when making provision through the requirement of Policy R6 for restoration of the quarry site. Policy R6 notes in respect of Campions Wood Quarry that:

A footpath link leading north from the canal is to be provided as part of the restoration proposals. The restoration proposals for the site will create an attractive amenity/nature conservation area of great value to the community. The site would be a natural extension of the Wyrley/Essington Canal and the existing Open Space at Lapwing Close.

Policy R6 can be achieved with an attractive amenity/nature conservation area of great value to the existing community with a housing allocation. Refer to Image 3 CORE STRATEGY Para 11.20 "allotments and leisure centres" "...connecting residential areas with recreational sites" 1996 Policy R6 and 2018 SHELAA & NPPF Para 98 "...high quality open spaces"... "for the health and well-being of communities..."

EMPLOYMENT. PROXIMITY TO LANDYWOOD RAILWAY STATION  TRAINS TO GBHMA IMAGE 9 PROXIMITY TO BUS STATION HUB & BUS ZONE TO GBHMA IMAGE 10

CHESLYN HAY TIER 1 ACCESS TO EMPLOYMENT. LEISURE CENTRE, ACADEMY, PRIMARY SCHOOL, JACK MOODY RECYCLING CENTRE, HOLLY BUSH GARDEN CENTRE, APC PARCEL DISTRIBUTION HUB, LANDYWOOD RAILWAY STATION TRAINS INTO CANNOCK TOWN CENTRE, BLOXWICH, WALSALL TOWN CENTRE AND THE GBHMA, METROLINK, HS2, BIRMINGHAM AIRPORT, ALSO VIA 3 MOTORWAYS, M6 JUNCTION 11, M6 TOLL & GBHMA, M54 & i54 STRATEGIC EMPLOYMENT SITE, AND A421 (WARSTONE ROAD) TO BLOXWICH & GBHMA IN BUS ZONE




To M6 J11 (600m)

WITHIN CANNOCK TOWN CENTRE BUS ZONE
(10-15 minutes, 5km to BUS STATION HUB, see image 10)

EMPLOYMENT OPPORTUNITIES

EMPLOYMENT.
79% of the working population commute out of the district for EMPLOYMENT.

 Active Quarry Working Area to be restored

KEY RAIL CORRIDOR
Landywood Station 1.4km to site boundary, car-free Green Infrastructure for walking/ cycling for getting to work.

SEE BUS ZONE IMAGE 10
URBAN BUS INFRASTRUCTURE
Access to BUS STATION HUB & BUS ZONE with valid tickets to Bloxwich and Walsall into the GBHMA for employment, leisure, shopping and other urban services and facilities within the BUS ZONE

MAXIMISING USE OF PUBLIC TRANSPORT INFRASTRUCTURE.
THIS INCLUDES WALKING/CYCLING AS THE MOST SUSTAINABLE SOLUTION USING GREEN SPACE INFRASTRUCTURE
THIS IS ACHIEVED.



TRANSPORT INFRASTRUCTURE
3 MOTORWAYS VIA M6 J11
TRAIN STATION & BUS STATION HUB (SEE IMAGES 9 & 10)

KEY RAIL CORRIDOR & BUS ZONE

Para 2.3, RURAL SERVICES AND FACILITIES AUDIT

"...it is clear that the NPPF 2021 emphasises the importance of the following matters:

- Maximising the opportunities to use existing and proposed transport infrastructure;

Para 3.17, RURAL SERVICES AND FACILITIES AUDIT

"...the availability of public transport access to employment is particularly important in South Staffordshire which has relatively few employment opportunities..." "as such, a settlement's relative level of employment access via public transport is given great weight in the final settlement hierarchy"

APC Parcel Distribution Hub

accessing M6 – M6 TOLL – M54 LINK ROAD & A421

To Bloxwich (3.5km) & GBHMA EMPLOYMENT OPPORTUNITIES
GREEN SPACE NETWORK
Footpath 11/18
Warstone Road to Forest of Mercia Way
TO TRAINS

EMPLOYMENT OPPORTUNITIES

VIA 3 MOTORWAYS

M6 TOLL to the GBHMA accessing employment opportunities is linked to M6 J11
The M54 LINK ROAD accessing employment opportunities, including i54 Strategic Employment Site 5km from the Promoted Site is linked to M6 J11

3 Motorways, **BUS STATION HUB, RAILWAY STATION** joining Metrolink (tram), HS2 and B'ham Int'l Airport all on the doorstep of TIER 1 location joining Green Space Network for walking/ cycling and getting to work offering a genuine choice of transport modes, bus/rail

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PROXIMITY. GREEN INFRASTRUCTURE TO RAILWAY STATION **BETWEEN POINTS X AND C 1.4KM**
PROXIMITY. GREEN INFRASTRUCTURE ACCESS TO TIER 1 VILLAGE CENTRE & FOREST OF MERCIA WAY

WITHIN CANNOCK TOWN CENTRE BUS ZONE

Leisure Centre (10-15 minutes, 5km to BUS STATION HUB, see image 10)
Swimming Pool

WELL-SERVED BY BUSES AND TRAINS

NPPF PARA 105 REQUIRES A "GENUINE CHOICE OF TRANSPORT MODES"

& Outdoor Pitches for sport, recreation & well-being

TIER 1
Cheslyn Hay
Village Centre

Community Centre & Library
& 10 Educational Establishments

- Public Highway - Walking/cycling route from Point X off Forest of Mercia Way to Landywood Railway Station (Point C) 1.4km Chase Line to GBHMA
- Walking/cycling public highway route from Point 1 to Point 2 Village Centre 550m
- Other walking/cycling routes and Public Rights of Way including Forest of Mercia Way connecting to GBHMA
- A** Public Highway - Green Infrastructure Mary Rose Pub & Restaurant from point X to point A is 475m from point A via B to Village Centre is 575m from point A to point C is 975m
- B** Green Infrastructure 'crossroads' to Stepping Stones Park
- C** Landywood Railway Station on Chase Line into GBHMA
- X** Entrance to Promoted Site from Landywood Railway Station

Active Travel (walking/cycling) is the most sustainable mode of transport. A walking/cycling route exists from the Promoted Site (X) heading north-east as a route to the Mary Rose public house and restaurant (A) continuing to Landywood Railway Station (C), also heading north and south from the boundary of the Promoted Site (X) connecting to the Forest of Mercia Way Local Nature Reserve into GBHMA. Footpath 11/18 crosses the Promoted Site leading to Warstone Road (A462).



Promoted site walking/cycling infrastructure to Village Centre, Library & Community Centre and two NHS GP Surgeries and Academy, Primary School, Swimming Pool & Leisure Centre

TIER 1 IS THE MOST SUSTAINABLE LOCATION FOR EMPLOYMENT, SERVICES & FACILITIES

The Council acknowledges that the district is (with the exception of TIER 1 locations):

"poorly serviced by public transport" (IDP 2021, page 7) with *"existing high car usage"* (Sustainability Appraisal, para 6.8.4)



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FOREST OF MERCIA
Campions Wood
Public Open Space



3 minutes to Cannock Town Centre & BUS STATION
Landywood Lane
Proposed Station Park and Ride with cycle store
CHASE LINE TO GBHMA
13 minutes to Walsall Town Centre & BUS STATION

TO TRAINS WELL-SERVED BY PUBLIC TRANSPORT FROM POINT X TO C = 1.4km

TO TRAINS & VILLAGE CENTRE

LOCAL NATURE RESERVE
ACCESSING GREEN BELT LAND



WITHIN CANNOCK TOWN CENTRE BUS ZONE

Cheslyn Hay Academy (10-15 minutes, 5km to BUS STATION HUB, see image 10) & Primary School

WELL-SERVED BY BUSES AND TRAINS

NPPF PARA 105 REQUIRES A "GENUINE CHOICE OF TRANSPORT MODES"



TO A RANGE OF 10 LOCAL EDUCATION ESTABLISHMENTS

- Walking/cycling or local bus service to the following limiting the need to travel:
- Cheslyn Hay Academy
 - Cheslyn Hay Primary School
 - The Village Pre-School
 - Little Explorers Preschool
 - Great Wyrley Academy
 - Glenthorne Community Primary School
 - Saint Thomas More Catholic Primary School
 - Landywood Playgroup
 - Moat Hall Primary School
 - Landywood Primary School



TO MEDICAL FACILITIES / HOSPITALS

There are no hospitals in South Staffordshire. Refer to our December 2021 submission, Appendix 6 – the Council's plan evidences that this TIER 1 location has the shortest journey times to hospitals. Landywood Railway Station is just 1.4km from the Promoted Site. It takes 3 minutes to reach Cannock Railway Station from Landywood; Cannock Chase Hospital is 1.1km from Cannock train Station. Manor Hospital at Walsall is 1km from Walsall train Station and can be accessed via Landywood in just 13 minutes. Also using the Chase Line to Birmingham New Street a journey which takes 34 minutes, is Birmingham Children's Hospital the UK's leading specialist paediatric centre 1km from the train Station. TIER 1 Cheslyn Hay has 2 NHS GP Surgeries for local treatment.



Promoted site walking/cycling infrastructure to Village Centre, Library & Community Centre and two NHS GP Surgeries and Academy, Primary School, Swimming Pool & Leisure Centre

Settlement Hierarchy POLICY DS3 - Spatial Strategy to 2038

...growth will be located at the most accessible and sustainable locations in accordance with the settlement hierarchy... TIER 1 OF THE SETTLEMENT HIERARCHY IS THE MOST ACCESSIBLE & SUSTAINABLE



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OF GREAT VALUE TO THE COMMUNITY

POLICY R6



FOREST OF MERCIA Champions Wood Public Open Space

ACCESSING VILLAGE CENTRE GREEN SPACE NETWORK & VILLAGE CENTRE GREEN SPACE NETWORK

LOCAL NATURE RESERVE ACCESSING GREEN BELT LAND

NOTE. Stepping Stones Park will be supplemented with an "amenity / nature conservation area of great value to the community"

QUARRY RESTORATION site refs: 116 & 131. 1996 POLICY R6.



TIER 1 NHS Cheslyn Hay GP Surgery WS6 7AB

NHS GP Surgery WS6 7AE

3 minutes to Cannock Town Centre & BUS STATION
Landywood Lane
Proposed Station Park and Ride with cycle store
CHASE LINE
TO GBHMA
13 minutes to Walsall Town Centre & BUS STATION








TO TRAINS WELL-SERVED BY PUBLIC TRANSPORT FROM POINT X TO C = 1.4km



FROM POINT X TO C = 1.4KM

OVER 1000 HOMES WILL BE WELL-SERVED BY PUBLIC TRANSPORT, BUS & TRAINS  **COMPLIANT WITH NPPF Paras 105 & 142.** FOR BUS STATION HUB & BUS ZONE TO GBHMA SEE IMAGE 10
READ WITH IMAGES 2.0, 3.0, 4.0 & 5.0. GREEN INFRASTRUCTURE ADDRESSING CLIMATE CHANGE, SAFE, WELL-LIT FOOTWAY/CYCLING CONNECTIONS WILL BE IMPROVED OR PROVIDED.
STEPPING STONES PARK (images 7.0 & 8.0) TO BE SUPPLEMENTED WITH "amenity / nature conservation area of great value to the (existing) community"...
"for recreational use..." (SEE WHITE AREAS ON IMAGE BELOW) IT WILL LINK TO THE WYRLEY BRANCH CANAL LOCAL NATURE RESERVE



- CHASE LINE, A KEY RAIL CORRIDOR WITH MANY URBAN INFRASTRUCTURE CONNECTIONS**
-  Rugeley Trent Valley 18 minutes connecting to West Coast Mainline, Crewe (Manchester/ Manchester Airport / London Euston) & Rugeley Town Centre 14 minutes
 -  Hednesford Town Centre 7 minutes
 -  Cannock Town Centre 3 minutes
 - KEY RAIL CORRIDOR**
 Landywood Station 1.4km to site boundary, car-free Green Infrastructure for walking/ cycling for getting to work.
EMPLOYMENT 79% of the working population commute out of the district for EMPLOYMENT.
 -  Bloxwich Town Centre 7 minutes
 -  Walsall Town Centre 13 minutes
 -  Birmingham City Centre 34 minutes
- And connection to Metrolink,
 And connection to HS2
 And connection to Birmingham International Airport infrastructures
- The Promoted Site is well-served by public transport compliant with NPPF Para 142 within the CANNOCK TOWN CENTRE BUS ZONE – see image 10 and accessing railway Stations and the Chase Railway Line, a key rail corridor into the GBHMA used for commuting, employment, leisure, shopping and other urban services and facilities.

NPPF Para 142:

Paragraph 142 concerning release of Green Belt land is prescriptive and makes it clear to the District Council: "plans should give first consideration to land which has been previously-developed and/or is well-served by public transport".

The Council acknowledges in the HOUSING SITE TOPIC SELECTION PAPER that an opportunity at Site 131 exists to accommodate over 1,000 homes owing to its large scale to provide biodiversity off-setting or Green Belt "compensatory improvements", also accessing remaining Green Belt, thereby satisfying NPPF Para 142.

● **NPPF Para 105 requires a “genuine choice of transport modes” (bus and rail) Landywood Station on the Chase Railway Line, a key commuter public transport corridor accessing a choice of employment opportunities across a wide range of employment sectors across District boundaries all within 15 minutes see below**



2001 STRUCTURE PLAN £110m public transport investment in electrification upgrade of the Chase Line completed 2019



the only Station in South Staffs in this key rail corridor into the West Midlands conurbation for commuters

STRUCTURE PLAN Para 7.21: “...the existence of commuting is accepted and particular regard has been paid when considering development options, to the existence of (or of the potential for) regular public transport, especially rail links, to enable access to the West Midlands Conurbation and other main employment centres” see below

- **EMPLOYMENT.** 79% of the working population commute out of the district for **EMPLOYMENT** Para 3.12 of the Sustainability Appraisal and Figure 4.3 South Staffordshire Economic Development Needs Assessment THIS IS UP FROM 50% IN 2002. APPENDIX 1 – Para 12.

Employment opportunities across a wide range of sectors within 15 minutes

RUGELEY is within 14 minutes of Landywood Station, it is a local service centre for the north of the Cannock District and, whilst not as large as Cannock Town Centre, its role and function in the north is similarly important as Cannock’s in the south. The Market Square, where there is a regular market, is a focal point of the Town.

HEDNESFORD is within 7 minutes of Landywood Station. The original town centre in Market Street is supported and retains a viable range of smaller shops and services. Regeneration projects have improved the range of local shopping, financial and professional services and leisure uses available.

CANNOCK is within a brief 3 minute train journey of Landywood Station, it is a Sub-Regional Shopping Centre with a Regional McArthur Glenn Designer Outlet. A Sub-Regional Shopping Centre is defined as being a “*principle retail offer with a large town centre with strong anchor store/s typically used for weekly shopping trips*”. The full range of shopping, leisure and employment opportunities and with many other services and facilities including **BUS STATION** in Cannock Town Centre are described in the Storyboard – Masterplanning – plans and planning policies IMAGES 11.0-12.0.

LANDYWOOD STATION



STRUCTURE PLAN Para 7.27: The Structure Plan sees Great Wyrley/ Cheslyn Hay as:

*“a location with existing employment, retail, recreation and entertainment facilities, **both locally and in neighbouring Cannock** combined with good transport links (bus and rail) to the West Midlands Conurbation”.*

NPPF PARA 105 requires a “genuine choice of transport modes” (bus and rail)

BLOXWICH is within 7 minutes of Landywood Station, forming a key role as a District Centre. It not only has a strong local catchment, but also a wider catchment area, including adjoining parts of southern Staffordshire. The market is an important asset to the centre which attracts increased footfall on market days.

WALSALL is within 13 minutes of Landywood Station; its Railway Station is integrated with the **BUS STATION**. Walsall is a Sub-Regional Shopping Centre, it being the Walsall District’s premier shopping centre, and a significant focus of commercial, public service, leisure and community activity.

The 2017 Hansen Scores are out of date. They misinform the emerging Local Plan, prejudicing site selection. They take no account of completion in 2019 of the upgrade and electrification with increased capacity of the Chase Line, a key commuter corridor accessing employment across a wide range of employment sectors with large-scale job opportunities within a brief 15 minute train journey from **LANDYWOOD STATION**

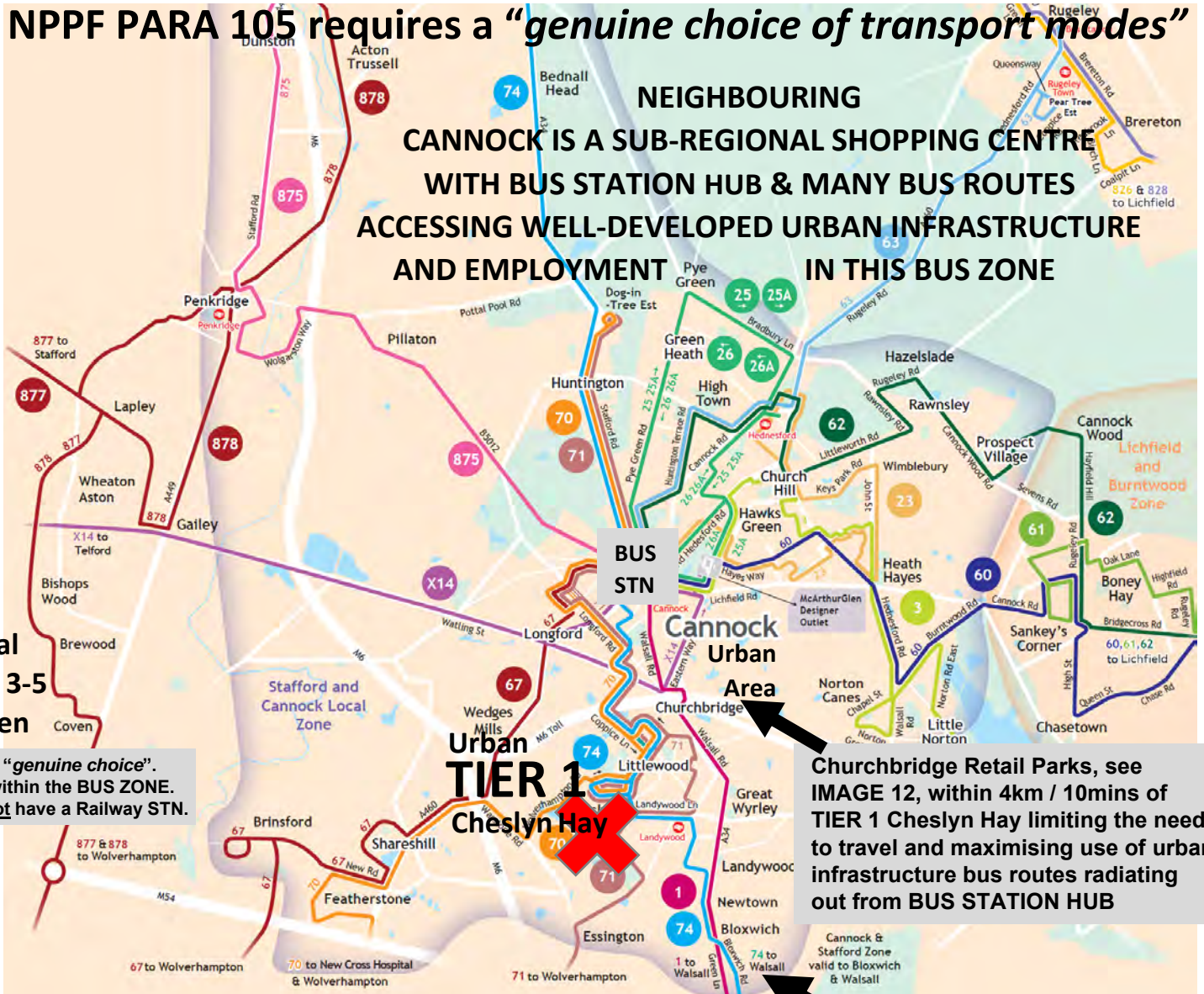
BUS ZONE - NPPF Para 142 – TIER 1 LAND WELL-SERVED BY PUBLIC TRANSPORT

CANNOCK TOWN CENTRE urban bus network from **BUS STATION HUB** to Cheslyn Hay TIER 1 and promoted sites (refs 116 + 131) within the urban Catchment Area for employment, leisure, shopping and many other urban services and facilities, well-served within the urban **BUS ZONE** with frequent, regular, affordable services including valid network tickets to the urban areas of Cannock, Cheslyn Hay, Bloxwich and Walsall for getting to work in Cannock and into the GBHMA

10.0 of 15.0

● **NPPF PARA 105 requires a “genuine choice of transport modes”**

**NEIGHBOURING
CANNOCK IS A SUB-REGIONAL SHOPPING CENTRE
WITH BUS STATION HUB & MANY BUS ROUTES
ACCESSING WELL-DEVELOPED URBAN INFRASTRUCTURE
AND EMPLOYMENT
IN THIS BUS ZONE**



● It is not a “genuine choice”.
It is not within the **BUS ZONE**.
It does not have a Railway STN.

Churchbridge Retail Parks, see IMAGE 12, within 4km / 10mins of TIER 1 Cheslyn Hay limiting the need to travel and maximising use of urban infrastructure bus routes radiating out from **BUS STATION HUB**

**Cheslyn Hay TIER 1 is well-served by public transport (bus and rail)
79% of the working population commute out of the South Staffs District**

URBAN BUS ZONE extends into GBHMA

Getting to Work - Urban Employment Opportunities

Key The promoted sites (ref: 116 and 131) are within 10-15 minutes of Cannock **BUS STATION HUB** (5km), and Cannock’s urban employment opportunities, industrial estates and major local employers, business parks and leisure facilities and **RETAIL PARKS**, including the recently opened McArthur Glen Retail Outlet, **TOWN CENTRE** and urban uses / employment, cinemas, restaurants, food supermarkets / convenience stores see IMAGE 11



Rural Coven (Tier 3-5 site ref 646 a&b) is shown to the west on the above image – this stark difference is seen with **no** **BUS ZONE** and **no** **RAILWAY STATION** in contrast to urban Cheslyn Hay TIER 1 (site refs: 116 and 131) which is well-served with a “**genuine choice of transport modes**” NPPF Para 105, both **BUS ZONE** and by Landywood **RAILWAY STATION** on the Chase Line, a key commuter corridor for getting to work into Cannock and the GBHMA.

Development of sites 116 and 131 for over 1000 homes will increase the viability and sustainability of existing public transport services.

From Cheslyn Hay TIER 1, urban employment opportunities are available on the doorstep with frequent public transport and short journeys using the Chase Line into Cannock (3 minutes) and, Walsall (13 minutes) and using the **BUS ZONE** shown above including Cannock, Bloxwich, Walsall into the GBHMA.

There is excellent bus and rail connectivity, with low-emission public transport and short affordable journeys for all age groups and mobilities and those who do not wish to drive a car to access urban employment, leisure, shopping, and many other urban services and facilities well-served by public transport.

Para 3.12 of the Sustainability Appraisal states that ‘key employment areas’ are defined as locations which would provide a range of employment opportunities from a variety of EMPLOYMENT SECTORS, INCLUDING RETAIL PARKS see IMAGE 12, industrial estates & major local employers. CANNOCK IS ONE EXAMPLE OF SUCH A LOCATION
Cheslyn Hay is in the urban catchment area within 5km of the **BUS STATION HUB**, a journey of 10-15 minutes.

11.0 of 15.0 **NEIGHBOURING CANNOCK TOWN CENTRE WITH NUMEROUS SUPERMARKETS & MANY CONVENIENCE STORES WITHIN 5KM/10-15 MINUTES OF PROMOTED SITE AS WELL AS NUMEROUS OTHER SERVICES AND FACILITIES IN ADJACENT TIER 1 CHESLYN HAY**

CANNOCK is a Sub-Regional Shopping Centre, defined as having a “principal retail offer in a large town centre, with strong anchor store/s, typically used for weekly shopping trips”. It is a short walk to the Regional McArthur Glenn Designer Outlet in close proximity to Cannock Railway Station within 1.6km.



Asda, Lichfield Street, WS11 8UF



Aldi, Walsall Road, WS11 0HP



Tesco, Hayes Way, WS12 3YY



Asda, Avon Road, WS11 1LH



Sainsburys, Voyager Drive, WS11 8XP



Morrisons, Mill Street, WS11 0DR



M&S Foodhall, Voyager Drive, WS11 8XP



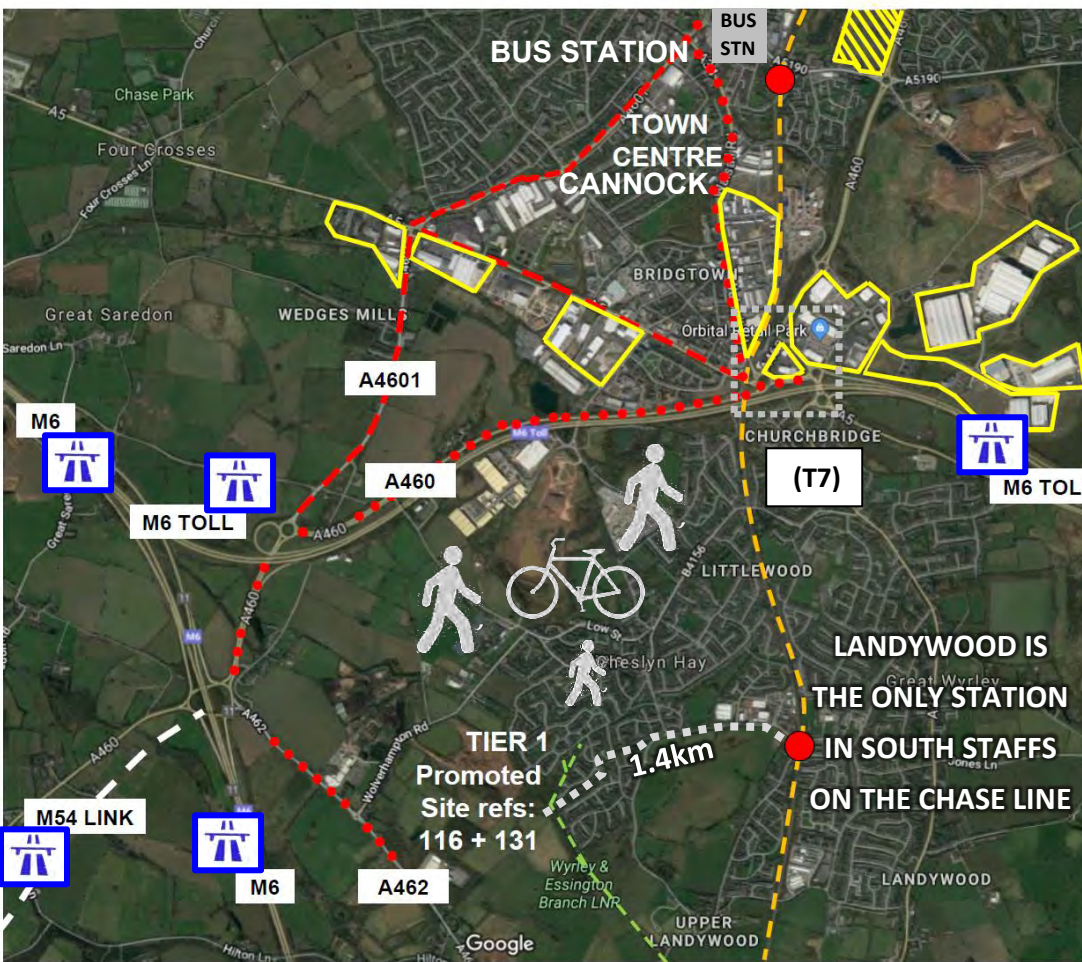
Iceland Food Warehouse, Linkway Retail Park, WS11 1TD

The Promoted Site 116, 131 and adjacent land is adjacent to the key TIER 1 village of Cheslyn Hay and is in the NEIGHBOURING CANNOCK TOWN CENTRE urban catchment area and BUS ZONE providing connections to shopping, leisure and employment.

The BUS STATION HUB, supermarkets and convenience stores are within 5km (10-15 minutes) from the Promoted Site with many onward bus connections to other destinations within BUS ZONE for RETAIL PARKS see IMAGE 12

It is 3 minutes from Landywood Railway Station to Cannock Station. **CANNOCK** is a Sub-Regional Shopping Centre. CANNOCK TOWN CENTRE services and facilities are accessible on foot from Cannock Railway Station (within 1.6km). Landywood Railway Station is accessible on foot from the Promoted Site using car free Green Infrastructure (1.4km).

12.0A of 15.0 RETAIL PARKS ARE NUMEROUS WITHIN 4KM / 10 MINUTES OF PROMOTED SITE FOR EMPLOYMENT



Key

- BUS STN**
CANNOCK TO TIER 1 Cheslyn Hay (10-15 minutes, 5km)
- McARTHUR GLEN DESIGNER OUTLET**
- RAILWAY STATIONS**
Cannock to Landywood (3 minutes)
- KEY RAIL CORRIDOR**
Chase Railway line electrified 2019
- Location of numerous RETAIL PARKS**
- CHURCH BRIDGE Triangle (T7) Interchange & Retail Parks**

For a short distance, access to CANNOCK TOWN CENTRE along the A4601 is approximately 5.4km (3.3 miles)

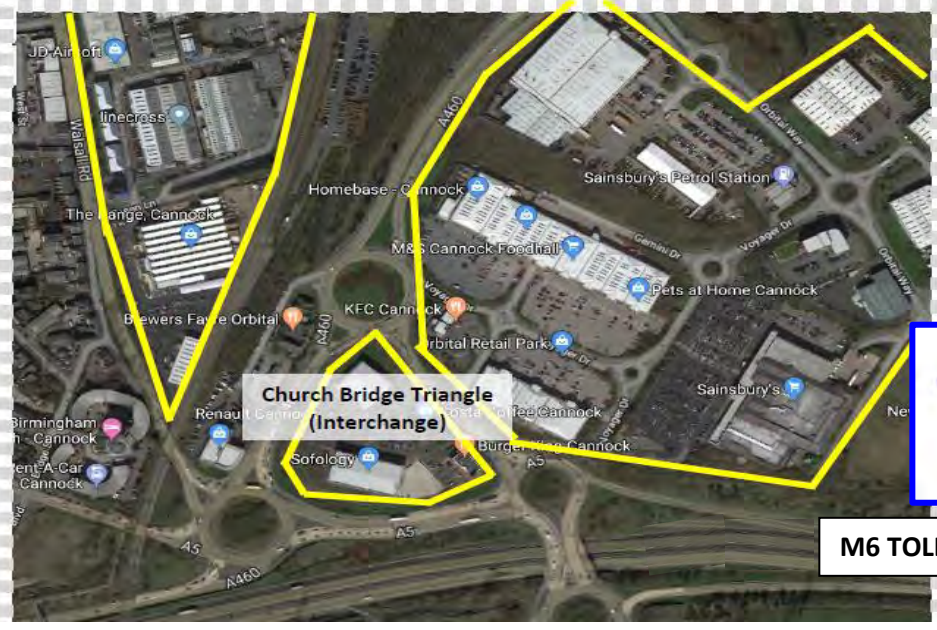
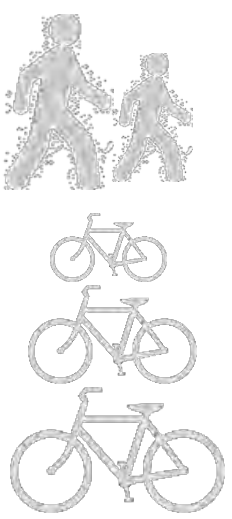
FOREST OF MERCIA WAY and proposed footpath link through Campions Woodland Open Space recreational area as Community Greenspace linking to Pinfold Lane Community Centre and Library

M6, M6 TOLL, M54 LINK ROAD Strategic Infrastructure Road Network

Walking/cycling is an option to nearby Retail Parks + public transport addressing Climate Change. For employment and shopping.

NUMEROUS RETAIL PARKS ARE AVAILABLE IN CANNOCK. All are within 4km / 10 minutes of TIER 1 Cheslyn Hay and Promoted Site limiting the need to travel and maximising use of public transport or walking/cycling. IMAGE 12B:

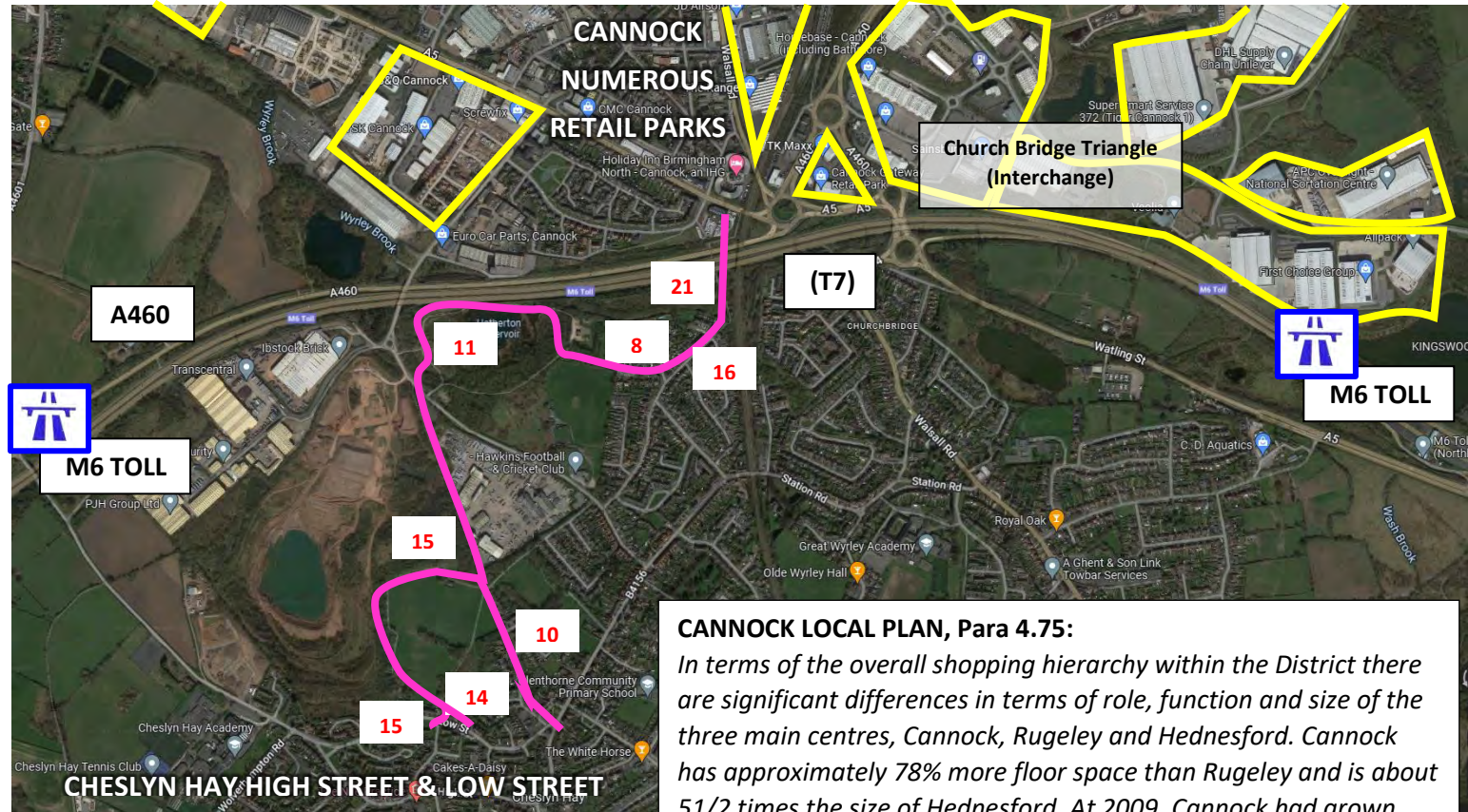
- Wyrley Brook Retail Park
- Orbital Retail Park
- Cannock Gateway Retail Park
- Virage Park
- McArthur Glenn Retail Outlet
- Linkway Industrial Estate



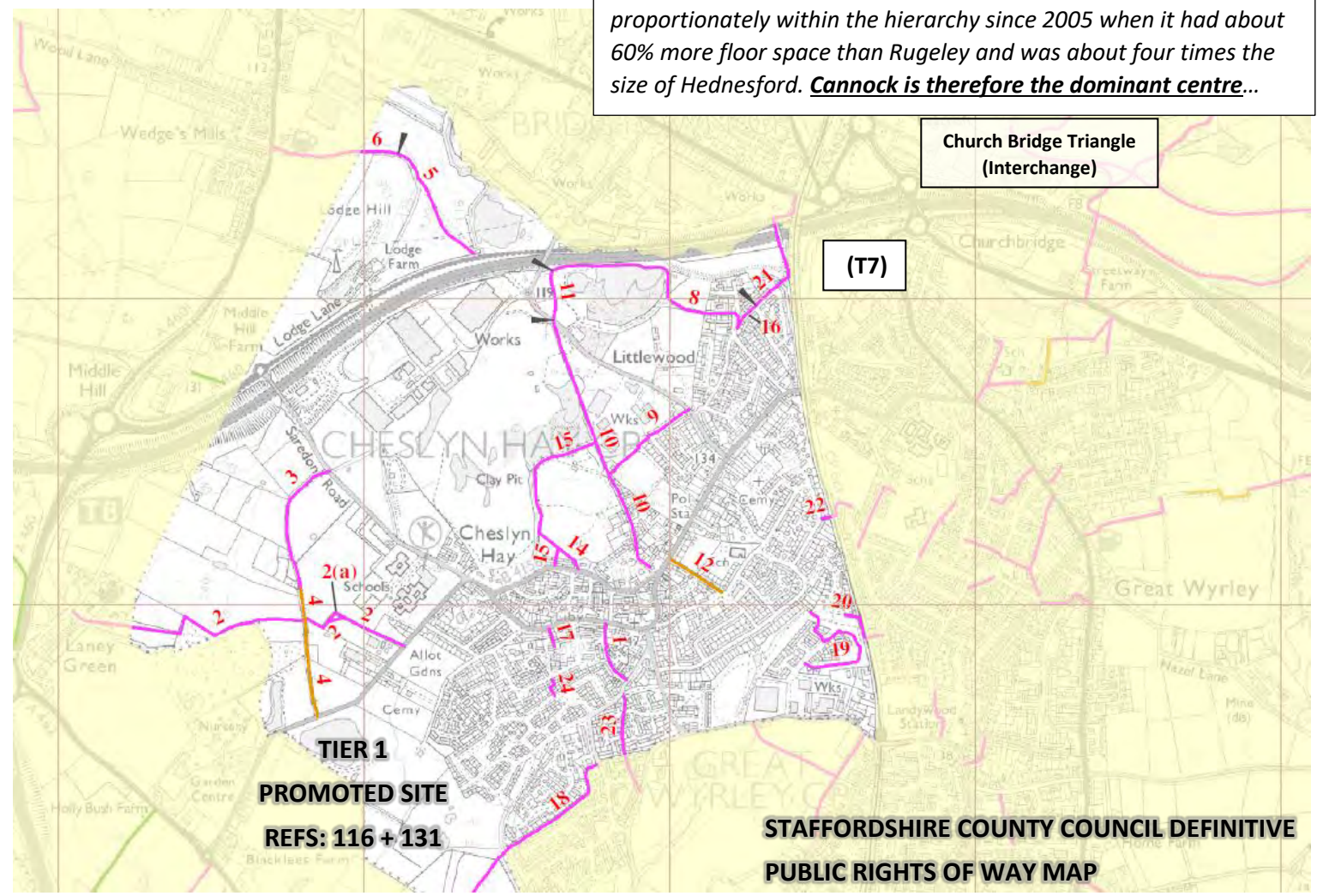
M6 TOLL (T7)

Extract from top image showing detail of Church Bridge Triangle, M6 TOLL (T7) with numerous surrounding Retail Parks It's a brief 3 minutes for all age groups and mobilities, and those who do not drive, by train from LANDYWOOD STATION to CANNOCK STATION for the **CANNOCK Sub-Regional Shopping Centre & BUS STATION & Regional McArthur Glenn Designer Outlet**, for shopping, leisure & other urban TOWN CENTRE services, facilities & employment opportunities.

12.0B of 15.0 **EXISTING PEDESTRIAN/CYCLING LINKS ABOUT 2KM FROM CHESLYN HAY TO CANNOCK**



CANNOCK LOCAL PLAN, Para 4.75:
*In terms of the overall shopping hierarchy within the District there are significant differences in terms of role, function and size of the three main centres, Cannock, Rugeley and Hednesford. Cannock has approximately 78% more floor space than Rugeley and is about 51/2 times the size of Hednesford. At 2009, Cannock had grown proportionately within the hierarchy since 2005 when it had about 60% more floor space than Rugeley and was about four times the size of Hednesford. **Cannock is therefore the dominant centre...***



Being able to walk (including unaccompanied children [no adult] below driving age and for those who choose not to drive) promotes healthier lifestyles.
 Cycling is also an option to the Retail Parks and Leisure facilities using safe green infrastructure. see IMAGES 13, 14 & 15.

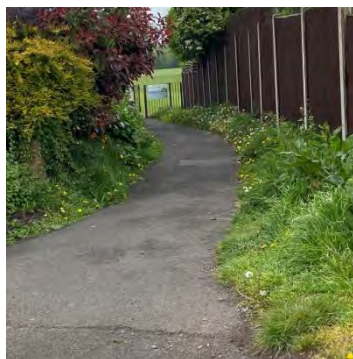
RECREATION - PEDESTRIAN/CYCLING LINKS ABOUT 2KM FROM CHESLYN HAY LOW STREET TO CANNOCK'S NUMEROUS RETAIL PARKS see IMAGES 12A & 12B

The one way system in Cheslyn Hay follows **High Street and Low Street**, and encompasses the residential areas off Queen Street. At the junction of Queen Street from the Colliers Arms pub, it is signposted to the LIBRARY/COMMUNITY CENTRE with communal activities on the doorstep in Pinfold Lane which provides pedestrian/cycling access to the nearby Promoted Site (550m).



From **Low Street**, it is possible to access Footpaths 14 and 15, which head north to access CHEZO ADVENTURE PARK, CHESLYN HAY/ROSEMARY LANE PLAYING FIELDS and Cheslyn Hay Scout Hut, a significant public open space covering 11 hectares accommodating community activities, sports clubs, using a communal pavilion.

There are many sport and recreation clubs for all genders and ages around this part of Cheslyn Hay including: Cheslyn Hay Scout and Cub Group, Cannock Social FC, Cheslyn Hay Athletic FC, Hawkins Sports Juniors FC, The Colliers Arms FC, Walsall Ladies FC, Cheslyn Hay Table Tennis Club, Cheslyn Hay Boys Brigade and G-Dance Academy. CHESLYN HAY LEISURE CENTRE (swimming pool, Tennis Club and gym space) provides activities for all ages. IMAGE 14 There are also multiple FAITH GROUPS at Upper Landywood Methodist Church, Salem Church and St Mark's Church.



Access to CHEZO ADVENTURE PARK, PLAYING FIELDS from Low Street. Via Pinfold Lane it is 850m to the Promoted Site.



Core Strategy Para 11.3:

It is proposed to help people lead healthier lifestyles

“through a combination of protecting, improving, replacing and promoting existing open spaces and sport and recreation facilities and developing new ones.

*This approach will encourage and enable local communities and visitors to actively participate in **activities which meet their needs and interests**, **reducing the need to travel and ensuring a range of provision and opportunities are available locally**”.*

Scout Hut from Low Street.



From the Scout Hut there are onward pedestrian/cycle connections accessing CANNOCK RETAIL PARKS, a short distance of 1.3km via Footpaths 10, 11, 8, 16 and 21, IMAGE 12B

13.0 of 15.0 **NUMEROUS LEISURE FACILITIES WITHIN 3KM / 5-10 MINUTES OF PROMOTED SITE**

Limiting the need to travel for employment and leisure. Walking/cycling is an option to access numerous nearby leisure facilities within 5-10 minutes of Promoted Site or using public transport addressing Climate Change



for all age groups

Planet Ice
CANNOCK, WS11 0XE

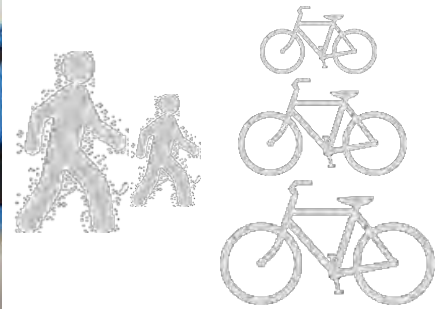


Refer to High Court Judgement, APPENDIX 1, para 3: Cheslyn Hay and Great Wyrley *“abut, indeed they appear essentially to be joined on to the edge of Cannock, which itself is a substantial town”*.

Structure Plan para 7.27: The Structure Plan sees Great Wyrley/ Cheslyn Hay as: *“a location with existing employment, retail, recreation and entertainment facilities, both locally and in neighbouring Cannock...”*.



including for young families



Boing Zone Trampoline Park,
CANNOCK, WS11 0XE

accessible by cycling



Midlands Indoor Golf,
CANNOCK, WS6 6BD



and for those who are less mobile



for family leisure & pleasure

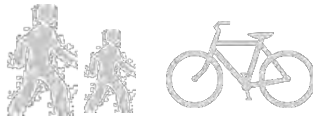
14.0 of 15.0 **NUMEROUS LEISURE FACILITIES WITHIN 300 SECONDS OF PROMOTED SITE**

For health and well-being, walking/cycling is an option addressing Climate Change

TIER 1 Cheslyn Hay LEISURE CENTRE is accessible **within 300 seconds** of Promoted Site (ref: 116, 131 and adjacent land). **It is one of only three in the South Staffordshire District** with TIER 1 Codsall & Penkridge:

THE LEISURE CENTRE offers a range of facilities for all age groups and mobilities including:

- Gym
- Exercise Classes
- Swimming Pool
- All-weather pitches and Sports Hall, for:
 - Netball
 - Cricket
 - Badminton
 - Football
- After-school and holiday sports camps.



For families **within 300 seconds** of Promoted Site.

Core Strategy 11.20:

*“Green Space Networks **connecting residential areas** with recreational sites (including **allotments and Leisure Centres**) ...can help promote healthier lifestyles and greater recreational activity”.* There are only 3 Leisure Centres in South Staffs.



activities which meet their needs and interests reducing the need to travel are available locally

THIS ADDRESSES CLIMATE CHANGE HEALTH AND WELLNESS



Core Strategy Para 11.3:

It is proposed to help people lead healthier lifestyles *“through a combination of protecting, improving, replacing and promoting existing open spaces and sport and recreation facilities and developing new ones. This approach will encourage and enable local communities and visitors to actively participate in activities which meet their needs and interests, reducing the need to travel and ensuring a range of provision and opportunities are available locally”.*



NPPF Para 92(c):

“Planning policies should aim to access... green infrastructure, allotments and layouts that encourage walking/cycling”

FOR INDICATIVE GREEN INFRASTRUCTURE LAYOUTS (WALKING/CYCLING) SEE IMAGES 2.0 – 12.0 INCLUDING ACCESS TO LANDYWOOD RAILWAY STATION



IT IS 1.4KM



BEING ABLE TO WALK (INCLUDING UNACCOMPANIED CHILDREN [NO ADULT] BELOW DRIVING AGE AND FOR THOSE WHO CHOOSE NOT TO DRIVE TO A RAILWAY STATION) PROMOTES HEALTHIER LIFESTYLES

15.0 of 15.0 **NUMEROUS LEISURE FACILITIES WITHIN 200 SECONDS OF PROMOTED SITE**

For health and well-being, walking/cycling is an option addressing Climate Change
 “...reducing the need to travel and ensuring a range of provision and opportunities are available locally”.



For location see image 6.0,  within 600m of M6 J11

HOLLY BUSH GARDEN CENTRE provides for all age groups and mobilities accessible within 200 seconds of Promoted Site (ref: 116, 131 and adjacent land). It houses a Garden Centre, Restaurant & Café, Miniature Railway, Aquatic Shop, Pet Shop and independent retail traders, including:

- Bygone Days
- Chadwick’s Coffee
- Club Sports Kits Direct
- Hollybush Farm Shop
- Guru Hearing
- Pavers Shoes
- RD Block Paving
- Snoopys Dog Grooming
- Kedi Care
- Potsy Pansy
- Elizabeth Spanton Jewellery



It is one of the largest independent Garden Centres in the West Midlands and UK, highly accessible from 3 interconnected motorways: M6 – M6 TOLL, M54 LINK ROAD.



Also within 200 seconds are the **ALLOTMENTS**



Within 200 seconds lies the Mary Rose pub and restaurant, a popular community asset below left and also within 200 seconds is Cheslyn Hay **COMMUNITY CENTRE AND LIBRARY** below right



For location see point A on IMAGE 7



Community Venue/Function Rooms for parties, weddings, exhibitions, exercises and children’s play groups



Housing allocation capable of accommodating over 1000 homes will increase the viability of all these leisure and community facilities on the doorstep assisting in maintaining a good level of service provision for the existing community and will provide “Green Space Networks connecting residential areas” Core Strategy 11.20, “that promote walking/cycling” for a “healthy lifestyle” NPPF Para 92(c) including “an attractive amenity / nature conservation area of great value to the community” 1996 POLICY R6 CAMPIONS WOOD QUARRY RESTORATION FOR THE COMMUNITY linking to Local Nature Reserve, Forest of Mercia Way.



APPENDIX 3:
High Court Judgement
South Staffordshire Council v Stoke-On-Trent City Council
5th February 2002

South Staffordshire Council v Stoke-On-Trent City Council



No Substantial Judicial Treatment

Court

Queen's Bench Division (Administrative Court)

Judgment Date

5 February 2002

No: CO/2328/01

High Court of Justice Queen's Bench Division The Administrative Court

Neutral Citation Number: [2002] EWHC 209 Admin, 2002 WL 237076

Before: Mr Justice Collins

Tuesday 5th February, 2002

Representation

Mr John Hobson QC and Mr Paul Greatorex (instructed by Sharpe Pritchard) appeared on behalf of the Claimant.

Mr Jeremy Cahill (instructed by Staffordshire County Council, Legal Services and Stoke-on-Trent Legal Services) appeared on behalf of the Defendant.

JUDGMENT

1.. This is an application under [section 287 of the Town and Country Planning Act 1990](#) by South Staffordshire Council against the Staffordshire County Council. It relates to a small but important part of one policy in the Structure Plan which has been produced by the defendant Council. What is attacked is the inclusion of a particular village, called Essington, in a policy dealing with the allocation of areas for extra housing to be built in the County.

2.. [Section 287](#) enables a challenge to be brought on two grounds: first, if there is a question about the validity of the relevant plan or any part of it; secondly if, Structure Plan where reasons are required, the reasons given to explain any particular course of action are inadequate or non-existent. So far as the reasons challenge is concerned, that can only succeed if the relevant applicant can show that he has been substantially prejudiced by the failure to give the necessary reasons. The challenge here is largely based upon an alleged inadequacy in the giving of reasons but, in addition, the claimant alleges that a material consideration has not been taken into account and, finally, that the decision of the defendant Council in relation to the inclusion of the village of Essington was irrational.

3.. Before dealing with the principles that are applicable in respect of reasons, it would be convenient to set out the geographical position to explain the issues which arise. The area with which we are concerned lies in the south of the county of Staffordshire. The specific part of South Staffordshire in question is that which borders the West Midlands Conurbation at Willenhall, Bloxwich and Hednesfield. Essington is a village of some 2,000 inhabitants, which lies just Structure Plan beyond the edge of the conurbation. There is a small area of countryside separating it from the conurbation edge. Approximately 3km to the northeast of Essington there are two villages called Cheslyn Hay and Great Wyrley, which have a population totalling something in the order of 18,000. Those two villages lie on the line of the railway between Walsall and Cannock. They abut, indeed they appear essentially to be joined on to the edge of Cannock, which itself is a substantial town. The countryside between Essington, Cheslyn Hay and Great Wyrley is all Green Belt. This area of South Staffordshire is almost entirely Green Belt, as is the large proportion of the whole of the district which is covered by South Staffordshire. That, I hope, adequately sets the scene.

4.. The principles to be applied in relation to reasons are not in dispute. I have been referred to the leading authorities on the subject, encapsulated in two cases: *Save Britain's Heritage v No. 1 Poultry Ltd* [1991] 1 WLR 153, a decision of the House of Lords, and the decision of the Court of Appeal in *Oxford Diocesan Board of Finance v West Oxfordshire District* [1998] P.L.C.R. 370. Reasons, so far as the test that is relevant for these proceedings is concerned, must disclose to an interested party

why the decision in question has been taken. That means that they must grapple with any major points that have been raised before the decision-maker. If it is alleged that reasons are inadequate, it is necessary to consider the question of prejudice. In *Save Britain's Heritage* at page 167, Lord Bridge said:

“The single indivisible question, in my opinion, which the court must ask itself whenever a planning decision is challenged on the ground of a failure to give reasons is whether the interests of the applicant have been substantially prejudiced by the deficiency of the reasons given.”

5.. He then goes on to disclaim an intention to put a gloss on the statutory provisions, he having earlier indicated that that was something which he did not think it appropriate to do and that all that one could say, in general terms, was that the degree of particularity required would depend entirely on the nature of the issues falling for decision in any particular case.

6.. It seems to me that for the purposes of this case prejudice can be said to arise if the individual in question is unaware of the true basis upon which the decision was made, so that any objections which he wishes to make will not be properly focused. That is essentially the case made by Mr Hobson, on behalf of the claimant. Having set the geographical scene and the correct approach so far as reasons are concerned, let me now set out the brief history. I do that for obvious reasons, because it explains why this issue has arisen but, more importantly, reasons cannot be considered in a vacuum. It is always necessary to see what information was given to the interested party, because the context in which the explanation or reasons are given is of vital importance.

7.. There are two defendants here, the Stoke-on-Trent City Council and the Staffordshire County Council, because this is a joint Structure Plan which covers the whole of Staffordshire. In October 1997 the consultation draft Structure Plan was published and the draft policy in issue, H1, stated that provision would be made for 51,800 dwellings between 1996 and 2011; 5,800 of which would be allocated to South Staffordshire. At this early stage no reference was made to the village of Essington. All that was Structure Plan baldly said was that there should be 5,800 dwellings in South Staffordshire. A year later, following consultations, the deposit draft was published and policy H1, so far as material, now stated, in relation to South Staffordshire, as follows:

“5,100 dwellings —

to include an allocation of a maximum of 1,000 dwellings at Great Wyrley/Cheslyn Hay/Essington where the release of Green Belt will be required, while elsewhere, other more limited Green Belt releases may be necessary.”

8.. The explanatory memorandum which accompanied the draft in paragraph 7.26, under the heading “Great Wyrley/Cheslyn Hay/Essington”, stated:

“Areas immediately adjoining Great Wyrley/ Cheslyn Hay, and extending towards Essington are seen as meeting many of the basic criteria for achieving long term sustainability. The presence of existing employment, retail, recreation and entertainment facilities both locally and in neighbouring Cannock, combined with public transport links (bus and rail) to the West Midlands Conurbation, suggest that the protection of Green Belt should be overridden in this general area in the interests of providing required housing in an accessible location. The implementation of a bypass for Great Wyrley is also considered to be necessary if a successful expansion of the urban area is to be achieved with traffic congestion and air pollution contained.”

9.. On the face of it, what was there being proposed was a development immediately around Great Wyrley and Cheslyn Hay but extending in a southwesterly direction towards the village of Essington, and that appeared to be why it was considered appropriate to include Essington in the policy. I should have added that Essington itself, albeit surrounded by Green Belt, contained a relatively small area (enough apparently for some 250, perhaps 300, houses) which was safeguarded, that is to say, it was land which was in the Local Plan and had been there since 1996, which would otherwise have been Green Belt but which it had been decided was appropriate for possible development (in this case for housing) should it be necessary to provide that sort of development in the future. It was essentially identified as a piece of land which might be required to serve development needs in the longer term. That safeguarding stemmed from PPG2, which was issued in 1995 relating to Green Belts. As is well known, there is a presumption against the permitting of any development in Green Belt land. So it was that in certain circumstances it was considered appropriate that land which would otherwise almost certainly have been designated within the Green Belt should be identified as a possible candidate for development. I emphasise the word “possible” because the fact that land is safeguarded does not mean automatically that it will be considered appropriate for development; circumstances may change, other pressures may arise, and it may be decided in due course that safeguarded land ought to be designated Green Belt rather than remain safeguarded land.

10.. However, there is an area of safeguarded land which immediately adjoins Essington. In fact, it is a small area which is to the northeast of Essington and between the village and the junction of the M6 and M54 motorways. The one thing that is apparent from the draft and, in particular, the explanatory memorandum, is that that particular area of land at Essington does not seem to have been intended to be covered by the description in policy H1. The first sentence of 7.26 would appear to make that entirely clear.

11.. The claimant objected to that policy and, following the statutory provisions, an inquiry by an independent panel was held. That inquiry took place in October 1999. The County Council submitted a statement to that panel in which they stated:

“Great Wyrley/Cheslyn Hay/ Essington has been selected as a focus for major development as it is considered that this area offers the best prospect of accommodating growth in a sustainable manner.”

12.. Thus the focus seemed to be upon the area stretching from Cheslyn Hay and Great Wyrley towards Essington. That was expanded in this way, in the more detailed explanation given by the defendant, in paragraph 1.4:

“It is considered that the choice of Great Wyrley/Cheslyn Hay/Essington as a focus for major development offers the best prospect within South Staffordshire District of meeting the requirements for development in a sustainable manner. The settlement of Cheslyn Hay/Great structure plan Wyrley has a combined population of over 18,000 and is located at upon a major public transport corridor. A railway connection within the settlement provides a service to the West Midlands Conurbation, an area in which approximately 50% of the employed residents of Great Wyrley/Cheslyn Hay work. The area also has the benefit of frequent bus services to Cannock, Hednesford, Walsall and Birmingham.”

13.. It will be apparent from that that the intention behind the policy in question appears to be focused on Great Wyrley and Cheslyn Hay, because it is where there was already a substantial population, and it is located upon the major transport corridor and so has the advantages.

14.. The word “sustainable” is an important one because one of the considerations behind the placing of a housing development is whether that development has appropriate facilities (i.e. transport, access to emergency services and so on). As is accepted by Mr Cahill, it would not make sense to position a substantial development in the middle of the country, particularly in a Green Belt area. It Structure Plan would only on the whole make sense if there was some ready access to the facilities that are necessary. That is why this particular provision was looking to Cheslyn Hay and Great Wyrley.

15.. In the course of the hearing, evidence was given by a representative on behalf of the defendant Council. The evidence before me indicates that what that witness said was:

“... that it probably meant [that is to say, the wording of the part of H1 in question] the area towards Essington rather than the village itself, so that in other words it would be the area nearby that could be taken into the evaluation but not detracting too much from the sustainability credentials of being close to the railway and close to the facilities at Cannock.”

16.. That simply confirms what had been written by the Council in connection with this particular policy.

17.. In December 1999 the Panel Report was published. Its conclusions in relation to Essington were as follows:

“4.2.129 espite a high level of public opposition, we conclude that a significant level of development within or immediately adjoining Great Wyrley/Cheslyn Hay would accord with the principles of sustainable development. This is on the basis that the housing provision figures for South Staffordshire remain as in the draft Structure Plan and that the District Council undertakes a view of non-Green Belt options before seeking to justify Green Belt releases.”

18.. It then goes on to consider a question of electrification and the improvement of the Walsall/Cannock railway line and suggests that that should be a precondition for any significant development of Great Wyrley/Cheslyn Hay. That was not accepted in due course by the County Council, and there is no issue before me about that rejection. 4.2.131 continues:

“We consider that the locational guidance should be restricted to mentioning Great Wyrley/Cheslyn Hay. We do not feel it is appropriate to mention Essington in the title, since Essington is a separate village about 3km away. In making this recommendation we are not implying whether the safeguarded land in Essington should or should not be developed for housing — this is a matter for the local plan and review.”

19.. The point there being made is that when South Staffordshire comes to consider where it will place the 5,100 houses the Structure Plan requires them to provide, it will have, in accordance with the present guidance contained in PPG 3, to discover and to allocate for housing any appropriate already developed land (sometimes referred to as “brownfield sites”). It will then have to consider greenfield sites, obviously taking account of all relevant considerations, including particularly sustainability. On the face of things, a site which is safeguarded rather than one which is already within the Green Belt should be a more obvious candidate for development. That is, of course, not inevitable: everything will depend upon the circumstances when the District Council consider the appropriate allocations and when they come to draw up the Local Plan which will have, in accordance with the legislation, generally to conform to the provisions in the Structure Plan. But that means, since there is so

much Green Belt in South Staffordshire, that the area of land safeguarded in Essington may well have to be considered as a possible site for housing development. But the point being made by the panel is that Essington itself is separate from Cheslyn Hay and Great Wyrley, and since the whole of the County Council's approach was apparently based upon taking the view that Essington should be named, because the development at Cheslyn Hay and Great Wyrley would extend in that direction, it was not in fact appropriate that Essington should specifically be named. The one thing that is clear in all this is that at that stage the safeguarded land at Essington was not considered as being within H1 as being part of the land which should be available for the maximum of 1,000 houses to which specific reference was being made.

20.. The local County Councillor for the area covered by Essington (and possibly Cheslyn Hay and Great Wyrley as well) was a Councillor Boyle. He gave evidence to the inquiry. The burden of his evidence was that Cheslyn Hay and Great Wyrley had for too long borne the brunt of development in this particular part of South Staffordshire and it was now time for other parishes in the area to share the burden of over-spill housing, if it could not be stopped altogether. He explained that Essington should be included because it and two other nearby parishes, Little Saredon and Great Saredon, could take pressure off Cheslyn Hay and Great Wyrley. It is said that he mentioned in passing the presence of the safeguarded land at Essington.

21.. Councillor Boyle pursued his case when the matter came back to the Council. I should interject here to explain how the duty to give reasons exists in connection with this procedure. Regulation 15 of the Town and Country Planning (Development Plan)(England) Regulations 1999 is material. It provides:

“(1) Where a local planning authority cause an examination in public to be held ... the authority shall, after considering the report of the person holding the examination in public, prepare a statement of:

- (a) the decisions they have reached in the light of the report and any recommendations contained in the report; and
- (b) the reasons for those decisions.”

22.. So what the defendant had to do first was to consider the report and then to publish its proposals following the report, and give reasons why it had either agreed with or decided not to agree with any of the recommendations. If it decides that it is not going to accept any of the recommendations of the panel, and it decides that it is not necessary or desirable to cause a further examination in public to be held, then regulation 16 will apply, and that provides:

“(1) Where objections have been made to proposals in accordance with these Regulations and not withdrawn and the local planning authority do not cause an examination in public to be held, the authority shall prepare a statement of their decisions as respects all the objections and their reasons for each decision.”

23.. There are thus two possible stages at which reasons have to be given. First, when the relevant authority publishes its reaction to its decision following the panel's recommendations. If it agrees with all the recommendations, no further objections will be considered. If, however, it decides not to accept any recommendation then it must allow further objections to be made, and it must then deal with those further objections and give reasons for the decision made in relation to those objectives.

24.. The evidence before me shows that on 3rd July 2000 there was a meeting to consider the Panel's decision, and the Council officer's reaction in the form of a report is before me. Suffice it to say that, in relation to the relevant recommendations, the officer does not comment specifically on the deletion of Essington but does deal with the question of the upgrading of the

railway. More importantly, the response to the suggestion made by Councillor Boyle pursuing what he had indicated to the inquiry, following the panel's recommendation in 4.2.131, which I have already read, was:

“4.3 It should be noted that the land already safeguarded at Essington (i.e. unallocated land taken out of the Green Belt in the adopted South Staffordshire Local Plan) could accommodate some 250/300 dwellings.

4.4 The inclusion of Essington in the Structure Plan as a named location with potential for more development is not seen as appropriate due to a combination of factors:

- (i) the lack of a railway station,
- (ii) Essington's location away from a Staffordshire settlement but close to the conurbation in a sensitive Green Belt area, and
- (iii) a potential reduction in resources available (as a result of dispersal of proposals) to provide infrastructure and community services to serve major development.

These factors, taken together, suggest that the Panel's view is difficult to rebut.”

25.. I interpolate there that I asked for interpretation of (iii). Its meaning is not immediately obvious, and I am pleased to say that it was not immediately obvious to Mr Cahill when he was asked to give that explanation. What I think it means, and what it appears to be directed at, is the suggestion that if the development at Essington is to be part of the development, and the houses are effectively to be spread over an area, then the provision of essential services would become the more difficult and, in addition, the infrastructure was not available. Going back to the report:

“4.5 The proposal also appears to run contrary to the provisions of the recently published PPG3 in that its re-introduction would require evidence of all other possible development options having been systematically subjected to a ‘sequential test’ in terms of their sustainability credentials and impact on the Green Belt.

4.6 As there were objections made to the policy reference to Essington, as well as the strong view of GOWM [that is the government office of the West Midlands] that Green Belt incursions should be in sustainable locations and identified as precisely as possible, this is likely to lead to objections and quite probably Government intervention.”

26.. The point about the sequential test would seem perhaps to be more relevant to the bringing in of the safeguarded land. The point I think that is being made there is that that would pre-empt the need for the sequential approach, because it would take out of that approach a piece of land that really ought to be in it and ought to be considered as part of the exercise that the Council are having to undergo, rather than for no apparently good reason putting it into the Structure Plan. It is normally something which would not be appropriate for a Structure Plan as opposed to a Local Plan, unless there were special circumstances; such special circumstances do not seem to exist in relation to Essington. One asks oneself the question, going back to what Councillor Boyle had said: why, in the circumstances, reference had not been made to Saredon? Apparently, that was considered as an appropriate venue for some possible development to take the pressure off Cheslyn Hay and Great Wyrley. But that has never been suggested. Indeed, one could take it further and wonder whether any particular area by a village in South Staffordshire should not be identified if Essington was to be identified.

27.. There was then some consideration of various alternative possibilities of wording, but eventually it was decided by the committee that Councillor Boyle's suggestion should carry the day, and that the paragraph in question should be amended to read as follows:

“— to include a maximum allocation of 1000 dwellings between Great Wyrley/Cheslyn Hay/Essington and/or further possible developments around the new railway station at Brinsford including land at the former Featherstone Ordnance Depot, subject to a commitment to the provision of this station having first been secured. These schemes will require the release of Green Belt land.”

28.. That eventually was the decision of the Committee. The matter was taken to the full Council. There is a report from the relevant member. All that says is that he does not agree with the exclusion of Essington. It gives no reasons. It simply baldly states that was the agreement.

29.. The reasons for the new provisions were as follows.

“— not accept the deletion of the reference to Essington and not accept the deletion of the limit to the scale of development at Great Wyrley/Cheslyn Hay/Essington.”

30.. There is incidentally no complaint about the reintroduction of the limit of the maximum of 1000. They go on:

“The promoting authorities consider that the retention of Essington as an option, to be considered in the Local Plan along with the other potential locations mentioned in Policy H1 (as proposed for modification), is in broad conformity with the sequential approach being promoted in the most recent version of PPG 3. Furthermore, in terms of sustainability and access, while separate from the larger built-up area of Great Wyrley/Cheslyn Hay, Essington is close to the rail stations at Landywood Lane and Bloxwich. It also remains the promoting authorities' view that, in recognition of local infrastructure constraints and community concerns, the overall scale of new development in this area, including Essington, should be set at a maximum 1,000 dwellings. Given the level of existing housing commitments and the potential for development elsewhere, including the other locations in Green Belt identified in Policy H1 (as proposed for modification), it is considered that the limit of 1,000 dwellings in this general strategic location would not, in any way, undermine or constrain the overall strategy for south-western Staffordshire being put forward in the Plan.”

31.. It is interesting to note that the reasons both in relation to the stated conformity with PPG 3 and in terms of sustainability and access are totally contrary to the officer's views. That, of course, does not mean that they are necessarily to be regarded as improper or inadequate, because it is the Council's decision that is the one that matters, and a Council is always entitled, if it decides that it is appropriate to do so, not to agree with or to follow an officer's recommendation. However, it does seem to me that it is difficult to follow how the inclusion of Essington can be said to be in broad conformity with the sequential approach.

32.. Be that as it may, the claimant decided to object to the proposed modifications. Those objections were considered and were rejected. On 10th May of last year notice of adoption of the proposals for the plan was given. The objections were summarised in the document put out by the defendants:

“Essington

The Council [that is to say South Staffordshire District Council] objects to the inclusion of Essington as a named strategic location and the rejection of the Panel's recommendation not to delete Essington from Policy H1, Table 2 and paragraph 7.26 of the explanatory memorandum.

The Council consider that the inclusion is not appropriate for the following reasons:

- (a) there is no station to serve the village,
- (b) Essington is separate from Great Wyrley/Cheslyn Hay, and lies in a sensitive area of the Green Belt,
- (c) development could potentially reduce the resources available as a result of the dispersal of proposals to provide infrastructure and community services to serve major development in the area.

The Council consider reference to Essington is contrary to the Panel's recommendation and the revised PPG 3. The reintroduction of Essington would require evidence of all possible development locations having been systematically subjected to the sequential test in terms of their sustainability credentials and impact on the Green Belt.”

33.. The requested change was the deletion of Essington.

34.. The response and the reasons for rejecting the objections were as follows:

“The inclusion of Great Wyrley, Cheslyn Hay and Essington in the area of search within the catchment of the stations on the Walsall — Cannock railway does not predetermine the allocation of development to any or each of the settlements, it is for the District Council to undertake a robust urban capacity study and follow the sequential approach as set out in PPG 3 when identifying specific housing provision through the review of the local plan. No change.”

35.. The point is made that those reasons do not really meet the objections which have been raised, in particular the separation of Essington from Great Wyrley and Cheslyn Hay by some 3km, and its distance as a result from the railway line and the good communications which exist at Cheslyn Hay and Great Wyrley. The policy as modified I have already read. The relevant part of it, I repeat, states:

“— to include a maximum allocation of 1,000 between Great Wyrley/Cheslyn Hay/ Essington.”

36.. When this case was opened, Mr Hobson believed (and I certainly also believed from the history which I have recited and from the language) that what the County Council were meaning to cover by those words was that one should look at the whole of the land between Cheslyn Hay and Great Wyrley and Essington. This, of course, was consistent with the way it had been initially put at the inquiry. Certainly, Mr Cahill did not dissent. However, over the short adjournment, Mr Cahill saw the light, as

it were, because he then submitted that actually what was meant by the language used was that the allocation of 1,000 should be shared between Great Wyrley, Cheslyn Hay and Essington, so that it was not focusing on the land in between those settlements but was intended to identify each of them as potential sites. That is, of course, a possible construction of the words used but, in the light of the history, it was not the obvious meaning of the expression. It certainly was a sea change from that which had been the County Council's approach up to and including the hearing before the Panel.

37.. So it is that it is now said that the existence of the safeguarded land is one of the most important reasons for including Essington. It is intended to identify that land and the suitability, therefore, of some development of housing in Essington which should then become part of the maximum of 1,000 in this broad area, if by "area" one simply means an isolated village some 3km from two other settlements, divided by Green Belt.

38.. In those circumstances, the reasons did not convey to the South Staffordshire Council what really was in the County Council's mind. More importantly, it has meant that the District Council has not focused upon this new way of putting it. It is not persuaded at the moment that the safeguarded land in Essington will necessarily be considered as an appropriate site for housing development. That will depend upon the consideration, which the District Council will have to give, to where the extra housing that the Structure Plan requires will be placed. It will have to undertake that exercise in conformity with PPG 3, looking at the brownfield and then the greenfield and the Green Belt.

39.. One can see that to include this particular site, divorced, as it is, from Cheslyn Hay and Great Wyrley, would arguably not be consistent with the PPG 3 required approach. Structure Plan it would take out for no good reason one possible area of land which otherwise would be considered in the exercise which I have described.

40.. Valiant attempts have been made in the evidence produced on behalf of the defendant to Structure Plan suggest that Essington is close enough to the railway station to qualify in its own right as a sustainable location. As the crow flies it may be that it is about 2km or so from the nearest railway station but, unfortunately, it is not possible to take a route that the crow might take, and if one needs to go on land, whether on foot or bicycle or by car, it is, I gather, a minimum of about 4km, possibly something more. Of course it is possible to walk 4km but studies suggest (and this is contained in PPG 13) that people on the whole will not walk for more than about 2km but will choose a car for journeys in excess of that. The suggestion is made that one might bicycle. So one might, but there are not that many people who still make use of the bicycle, and there are many of course for whom it would not be easy to bicycle. The attempts to suggest that Essington really can be regarded in the same way as Cheslyn Hay and Great Wyrley, so far as sustainability is concerned, are not altogether impressive.

41.. It seems to me, in those circumstances, that these reasons were far from adequate and that prejudice to the necessary degree has been shown because the claimant has not been able to focus its objections in the way that it would have done had it appreciated that what really was being said was that Essington itself was being regarded as a suitable location, rather than that the development should be towards Essington.

42.. It is true, as Mr Cahill submits, that if one reads carefully, and perhaps if one ignores the case that was being put by the defendant at the inquiry, one can spell out that Essington was being identified as a possible site. That may be so, but that does not rescue these reasons when one looks at them in the context as opposed to in a vacuum.

43.. Structure Plan in my view, it follows that Essington ought not to be included in either the policy or the memoranda that go with it. That being so, I shall now ask counsel to address me on any appropriate relief.

MR HOBSON: I am much obliged, my Lord. My Lord, we have discussed this amongst ourselves, as you invited us to do and what we have agreed as appropriate is the very limited deletion simply from H1 of the word "Essington" where it appears subsequently in the explanatory memorandum. My Lord, your Lordship's power is indeed limited only to deleting part of the plan. We do not want to delete any more because that would involve going back through the earlier stages, and both parties are anxious to avoid that. If the word "Essington" is deleted.

MR JUSTICE COLLINS: "Between" is all right, is it not?

MR HOBSON: "Between" is all right. I am told by my learned friend he can live with that. What they propose to do will be to leave the text, just crossing Essington out, and to include in the plan as it is distributed a little asterix explaining how that has come to pass.

MR JUSTICE COLLINS: That is fine. I think that is sensible. I did have a somewhat frivolous thought that if you deleted the letters “B W E E N” you could then pretend that the “E T” was a typing error for “18”, but I think that is unnecessary elaborate; as I said, somewhat frivolous. Your solution is obviously the sensible one.

MR HOBSON: I am obliged, my Lord. I would invite your Lordship to order accordingly.

MR JUSTICE COLLINS: Yes. Mr Cahill?

MR CAHILL: Yes, I can confirm that discussion and we will deal with it in the way that my learned friend has mentioned.

MR JUSTICE COLLINS: In that case, so be it.

MR HOBSON: I am obliged, my Lord. I also invite your Lordship to make an order for payment of the claimant's costs by the defendant. There are two defendants, so I assume it will be the County Council who will pick up the bill.

MR JUSTICE COLLINS: That is a matter between them.

MR HOBSON: My Lord, a schedule has been prepared and copies have been handed to my learned friend, and is now being handed up to your Lordship.

MR JUSTICE COLLINS: Mr Cahill, have you seen this?

MR CAHILL: Yes, I have, my Lord.

MR JUSTICE COLLINS: You have had the opportunity with your clients to consider it?

MR CAHILL: Yes, we have, thank you, my Lord.

MR HOBSON: My Lord, can I substitute — there are handwritten amendments on mine which your Lordship will see, it will be easier if I give you my copy while I explain it. Your Lordship will see that that does not show an addition in respect of today's attendance and we have added a sum at the end in respect of today's attendance.

MR JUSTICE COLLINS: It is always fascinating for a judge to see these and be jealous.

MR HOBSON: Modesty increases as well. Well, not being jealous in this particular case, but did your Lordship have a chance to read the note of the argument in Ouseley J's case where certain other counsel's rather more generous fees were mentioned? I will say no more about that.

MR JUSTICE COLLINS: Mr Cahill, one would hope, normally, that where councils are fighting Structure Plan councils there is a degree of similarity and reasonableness. Have you any comments on this?

MR CAHILL: No, my Lord, in terms of quantum there is no dispute as to the quantum.

MR JUSTICE COLLINS: What about leading counsel? Are you raising any issue about leading counsel?

MR CAHILL: No, I am not instructed to raise that, my Lord.

MR JUSTICE COLLINS: It is just that I suppose on this summary assessment I have to put myself, do I not, to some extent in the position of a taxing master?

MR CAHILL: Yes.

MR JUSTICE COLLINS: And I know whether leading counsel is justified is always something which is raised. You do not need to worry about that.

MR HOBSON: That is a relief. I am not redundant yet.

MR CAHILL: My Lord, I am instructed to raise the principle of costs, not the quantum but the principle of costs. There are two authorities representing charges opposed. Your Lordship's judgment is obviously against me in terms of the adequacy of the reasons. Your Lordship's judgment has touched on the principle of some development at Essington being appropriate to be considered within the local planning context, and I appreciate of course that I have lost the case, and my learned friend has had to come here to secure that which he has.

My Lord, I would submit this is something of a score draw rather than 1–0. Bearing in mind that these are both —

MR JUSTICE COLLINS: 3–2, I should think.

MR CAHILL: Even if that is the case, my Lord, I would ask whether your Lordship might think it is appropriate in this case to consider, given the identity of the two parties, that each sides bears their own costs?

MR JUSTICE COLLINS: I had considered that, Mr Cahill, and the matter seemed to me when we started to be one which ought not to be here. But I was persuaded by Mr Hobson, as you gather, that that preliminary view was not a correct one and, particularly, I am bound to say when I appreciated that the meaning of “between” was not as I had believed it to be. You could so easily have made it clear what you actually intended. You did not. The District Council has a hard enough task because of the extent of its Green Belt to find appropriate venues for housing. It has to go through the sequential exercise in due course and it is, I can see, important for it that no individual area is unnecessarily taken out of that. I use the word “unnecessarily” advisedly because there may be a good reason, and there has to be a good reason, for taking it out. There clearly is a good reason in relation to Cheslyn Hay and Great Wyrley, and everyone has recognised that. So that it did matter to them that, as I am now persuaded, as my judgment makes clear, that Essington should be taken out.

In those circumstances, as it seems to me, it is appropriate that costs should follow the event as would be the normal order.

MR CAHILL: As your Lordship pleases.

MR HOBSON: I am obliged, my Lord. I would invite your Lordship to order that costs be in the sum of the schedule.

MR JUSTICE COLLINS: Yes, that is in the of sum £16,220.

MR HOBSON: I am grateful, my Lord.

MR JUSTICE COLLINS: Thank you.

MR JUSTICE COLLINS: I should add that I have not specifically dealt with the additional claims under failure to have regard to relevant considerations and perversity, because it really it is not necessary to do so. But I should have said perhaps that I would not have been persuaded of perversity in any event.

Crown copyright

APPENDIX 4:

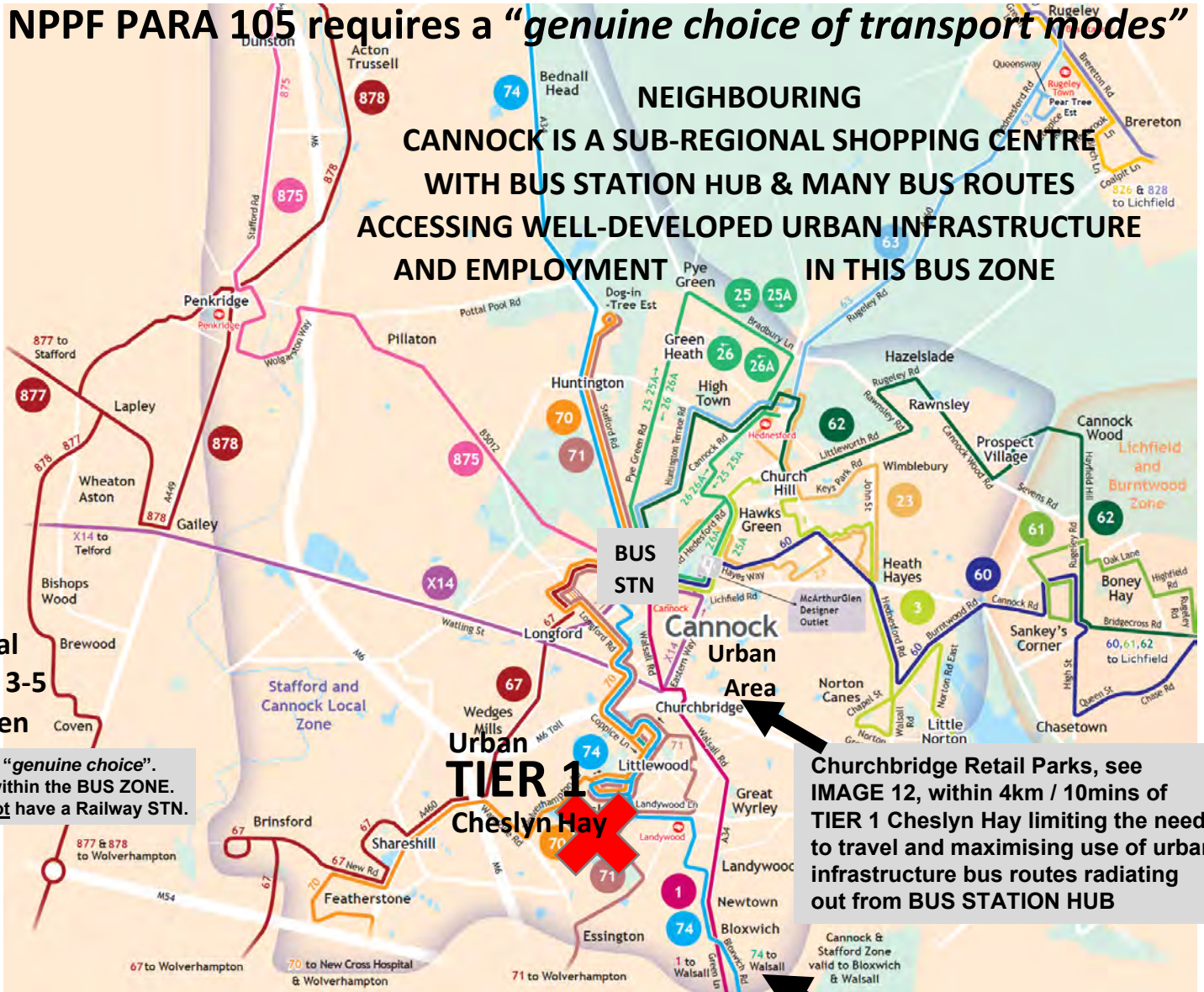
**Bus network accessible from site refs 116 and 131
within Cannock Town Centre Catchment Area and Travel Zone
also accessing Cannock Bus Station within 10-15 minutes
for onward connections**

BUS ZONE - NPPF Para 142 – TIER 1 LAND WELL-SERVED BY PUBLIC TRANSPORT

CANNOCK TOWN CENTRE urban bus network from BUS STATION HUB to Cheslyn Hay TIER 1 and promoted sites (refs 116 + 131) within the urban Catchment Area for employment, leisure, shopping and many other urban services and facilities, well-served within the urban BUS ZONE with frequent, regular, affordable services including valid network tickets to the urban areas of Cannock, Cheslyn Hay, Bloxwich and Walsall for getting to work in Cannock and into the GBHMA

NPPF PARA 105 requires a “genuine choice of transport modes”

**NEIGHBOURING
CANNOCK IS A SUB-REGIONAL SHOPPING CENTRE
WITH BUS STATION HUB & MANY BUS ROUTES
ACCESSING WELL-DEVELOPED URBAN INFRASTRUCTURE
AND EMPLOYMENT
IN THIS BUS ZONE**



Rural Tier 3-5 Coven
It is not a “genuine choice”.
It is not within the BUS ZONE.
It does not have a Railway STN.

Churchbridge Retail Parks, see IMAGE 12, within 4km / 10mins of TIER 1 Cheslyn Hay limiting the need to travel and maximising use of urban infrastructure bus routes radiating out from BUS STATION HUB

**Cheslyn Hay TIER 1 is well-served by public transport (bus and rail)
79% of the working population commute out of the South Staffs District**

**URBAN BUS ZONE extends into GBHMA
Getting to Work - Urban Employment Opportunities**

Key The promoted sites (ref: 116 and 131) are within 10-15 minutes of Cannock BUS STATION HUB (5km), and Cannock’s urban employment opportunities, industrial estates and major local employers, business parks and leisure facilities and RETAIL PARKS, including the recently opened McArthur Glen Retail Outlet, TOWN CENTRE and urban uses / employment, cinemas, restaurants, food supermarkets / convenience stores see IMAGE 11

Development of sites 116 and 131 for over 1000 homes will increase the viability and sustainability of existing public transport services.

There is excellent bus and rail connectivity, with low-emission public transport and short affordable journeys for all age groups and mobilities and those who do not wish to drive a car to access urban employment, leisure, shopping, and many other urban services and facilities well-served by public transport.

Rural Coven (Tier 3-5 site ref 646 a&b) is shown to the west on the above image – this stark difference is seen with no BUS ZONE and no RAILWAY STATION in contrast to urban Cheslyn Hay TIER 1 (site refs: 116 and 131) which is well-served with a “genuine choice of transport modes” NPPF Para 105, both BUS ZONE and by Landywood RAILWAY STATION on the Chase Line, a key commuter corridor for getting to work into Cannock and the GBHMA.

From Cheslyn Hay TIER 1, urban employment opportunities are available on the doorstep with frequent public transport and short journeys using the Chase Line into Cannock (3 minutes) and, Walsall (13 minutes) and using the BUS ZONE shown above including Cannock, Bloxwich, Walsall into the GBHMA.

Para 3.12 of the Sustainability Appraisal states that ‘key employment areas’ are defined as locations which would provide a range of employment opportunities from a variety of EMPLOYMENT SECTORS, INCLUDING RETAIL PARKS see IMAGE 12, industrial estates & major local employers. CANNOCK IS ONE EXAMPLE OF SUCH A LOCATION
Cheslyn Hay is in the urban catchment area within 5km of the BUS STATION HUB, a journey of 10-15 minutes.

APPENDIX 5:

**Rail services available from
Landywood Station into the GBHMA
and Cannock Town Centre and beyond
with national rail network connections
to three international airports and HS2**

Journey times to stations:

Rugeley (14 minutes)

Hednesford (7 minutes)

Cannock (3 minutes)

Bloxwich (7 minutes)

Walsall (13 minutes)

NATIONAL RAIL NETWORK CONNECTIONS TO 3 INTERNATIONAL AIRPORTS AND HS2

From Landywood Station on the Chase Line



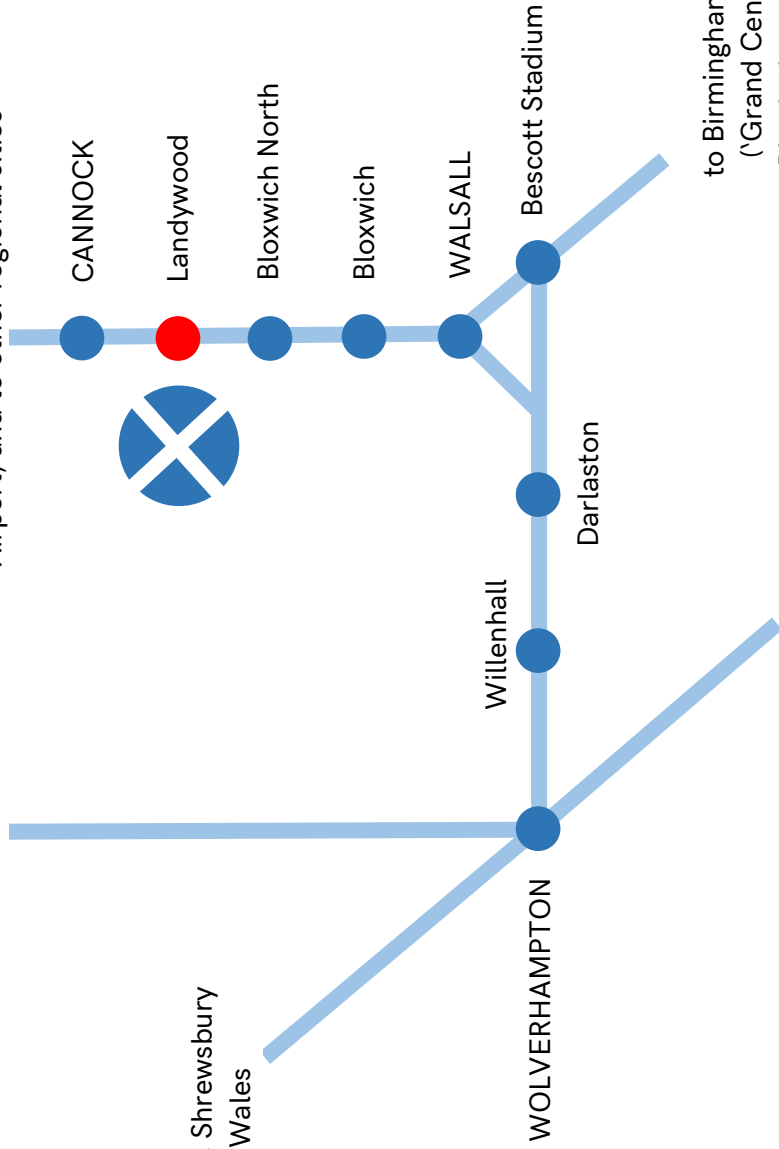
Key:

Proposed housing site

to Rugeley Trent Valley, Crewe (and HS2 connection), Liverpool, Liverpool John Lennon Airport, Manchester, Manchester Airport, and to other regional cities

to Stafford, Stoke-on-Trent, Manchester and the North

to Telford, Shrewsbury and Wales



to Birmingham New Street ('Grand Central'), NEC, Birmingham Airport, and HS2 connection

Hourly service from Walsall to London Euston

to Coventry via Birmingham New Street ('Grand Central')

● **NPPF Para 105 requires a “genuine choice of transport modes” (bus and rail) Landywood Station on the Chase Railway Line, a key commuter public transport corridor accessing a choice of employment opportunities across a wide range of employment sectors across District boundaries all within 15 minutes see below**



2001 STRUCTURE PLAN £110m public transport investment in electrification upgrade of the Chase Line completed 2019



the only Station in South Staffs in this key rail corridor into the West Midlands conurbation for commuters

STRUCTURE PLAN Para 7.21: “...the existence of commuting is accepted and particular regard has been paid when considering development options, to the existence of (or of the potential for) regular public transport, especially rail links, to enable access to the West Midlands Conurbation and other main employment centres” see below

- **EMPLOYMENT.** 79% of the working population commute out of the district for **EMPLOYMENT** Para 3.12 of the Sustainability Appraisal and Figure 4.3 South Staffordshire Economic Development Needs Assessment THIS IS UP FROM 50% IN 2002. APPENDIX 1 – Para 12.

Employment opportunities across a wide range of sectors within 15 minutes

RUGELEY is within 14 minutes of Landywood Station, it is a local service centre for the north of the Cannock District and, whilst not as large as Cannock Town Centre, its role and function in the north is similarly important as Cannock’s in the south. The Market Square, where there is a regular market, is a focal point of the Town.

HEDNESFORD is within 7 minutes of Landywood Station. The original town centre in Market Street is supported and retains a viable range of smaller shops and services. Regeneration projects have improved the range of local shopping, financial and professional services and leisure uses available.

CANNOCK is within a brief 3 minute train journey of Landywood Station, it is a Sub-Regional Shopping Centre with a Regional McArthur Glenn Designer Outlet. A Sub-Regional Shopping Centre is defined as being a “*principle retail offer with a large town centre with strong anchor store/s typically used for weekly shopping trips*”. The full range of shopping, leisure and employment opportunities and with many other services and facilities including **BUS STATION** in Cannock Town Centre are described in the Storyboard – Masterplanning – plans and planning policies IMAGES 11.0-12.0.

LANDYWOOD STATION



STRUCTURE PLAN Para 7.27: The Structure Plan sees Great Wyrley/ Cheslyn Hay as:

*“a location with existing employment, retail, recreation and entertainment facilities, **both locally and in neighbouring Cannock** combined with good transport links (bus and rail) to the West Midlands Conurbation”.*

NPPF PARA 105 requires a “genuine choice of transport modes” (bus and rail)

BLOXWICH is within 7 minutes of Landywood Station, forming a key role as a District Centre. It not only has a strong local catchment, but also a wider catchment area, including adjoining parts of southern Staffordshire. The market is an important asset to the centre which attracts increased footfall on market days.

WALSALL is within 13 minutes of Landywood Station; its Railway Station is integrated with the **BUS STATION**. Walsall is a Sub-Regional Shopping Centre, it being the Walsall District’s premier shopping centre, and a significant focus of commercial, public service, leisure and community activity.

The 2017 Hansen Scores are out of date. They misinform the emerging Local Plan, prejudicing site selection. They take no account of completion in 2019 of the upgrade and electrification with increased capacity of the Chase Line, a key commuter corridor accessing employment across a wide range of employment sectors with large-scale job opportunities within a brief 15 minute train journey from LANDYWOOD STATION

APPENDIX 6:

**Extract from FOI Response from South Staffordshire Council
(26 January 2022) relating to updating of Hansen Scores
from the 2017 baseline position that is out of date**

From: External Email for Planning Services Feedback <PlanningServicesFeedback@sstaffs.gov.uk>
Sent: 26 January 2022 10:20
To: Sarah Lowe <sarah.lowe@peacockandsmith.co.uk>
Cc: External Email for Legal and Governance <LegalGovernance@sstaffs.gov.uk>
Subject: FOI 25/2022 Information Provided and Not Held

Dear Sarah

FOI 25/2022 – Planning Policy (Local Plan)

Thank you for your Freedom of Information request regarding the Local Plan process and your client's site. I understand you have made representations as part of the recent Preferred Options consultation which cover your concerns raised below, and as you are aware these will be read and taken into account by the Strategic Planning Team as it moves forward toward Publication Plan stage. The Council received over 2500 submissions to the consultation and these will be read and analysed and ultimately published online once all representations have been moderated and redacted.

There has been full public consultation at various stages of the process. The Council has adhered to the planning regulations, and this means all persons and organisations have the same opportunity to appraise the proposals, make comments on them at the appropriate time, and these will be reviewed on a consistent basis.

The FOI Act only applies to information that the Council had in its possession as at the date of your request – 18 January 2022. The information also must be recorded on paper or electronically.

...

In response to your request at 3:

- 3.1 – Will the Council be updating the 2017 Hansen Scores to include the Tier 1 Cheslyn Hay settlement located within the Walsall, Cannock and Stafford Travel Zone with bus tickets valid to Bloxwich and Walsall, within the GBHMA? (Appendix 7)
- 3.2 – Will the Council be updating the 2017 Hansen Scores based on up-to-date rail and bus timetables, travel times and frequencies (including 3.1 above), maximising use of the existing transport infrastructure, including Landywood Station on the Chase Line, a key rail corridor into the GBHMA with additional connectivity to two Bus Stations in Cannock and Walsall and to HS2, Birmingham International Airport, and the Metrolink tram system for onward journeys?
- 3.3 - If YES, will the updated Hansen Scores for rail and bus public transport services feed into a revised Sustainability Assessment?
- 3.4 - If YES, when will the evidence be published?
- 3.5 - If NO, please explain the reasons referable to each question.

The Council does not hold this information. This is because this is a request about the Council's intentions rather than for currently held recorded information and a decision about updating evidence will be made in due course.

The information supplied to you continues to be protected by copyright. You are free to use it for your own purposes, including for private study and non-commercial research, and for any other purpose authorised by an exception in current copyright law. Documents (except photographs) can be also used in the UK without requiring permission for the purposes of news reporting. Any other reuse, for example commercial publication, would require the permission of the copyright holder.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original

letter and should be addressed to: The Data Protection & Freedom of Information Officer, South Staffordshire District Council, Council Offices, Codsall, WV8 1PX.

Please remember to quote the reference number above in any future communications.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Your sincerely

Karen Richards

Business Transformation and Planning Officer
Strategic Planning
South Staffordshire Council

Tel: 01902696000

www.sstaffs.gov.uk