

Nick Bubalo, MRTPI.

CDC

Croft Development
Consultancy
UK Ltd.

Planning Department,
South Staffordshire Council,
Council Offices Wolverhampton Road,
Codsall,
Codsall Wood,
WV8 1PX.

28th May, 2024

Dear Sirs,

Re: South Staffordshire Council, Publication Plan, Regulation 19, April 2024

I act for Cannock Land Ltd, the owner of land at Wellington Drive Cannock currently in use as a Car Auction Facility and instructed to make formal representations to the South Staffordshire Council, Publication Plan (Regulation 19), April 2024, in relation to the above site.

The site is accessed off Wellington Drive, in the administrative boundary of Cannock Chase District Council and forms part of a Car Auctions facility. It is undisputable that the land has been in operation for this use for many years and therefore is previously developed land, albeit that much of the site is open hard standing. I have attached the Land Registry Title and Plan for the site. The administrative boundary between South Staffordshire Council and Cannock Chase District Council runs through the site and bisects the building.

As can be seen much of the site sits within Cannock Chase District Council's administrative boundary. In their latest Local Plan Review; Cannock Chase Local Plan 2018-2040 Regulation 19 Document, February 2024, the site has been identified as a strategic residential allocation, Proposal SH3. Attached are the relevant screenshots of the Policy Document and the interactive proposals map. I understand that there have been no representations made against this allocation

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and therefore it is now likely to carry forward through to the adopted local plan. Given my clients interest in the site we are now actively pursuing the preparation of a planning application and my client is also in discussion with a major house builder to deliver its development.

Previous representations have been made to yourselves in relation to this site and the adjacent wider area of land, used for a car boot sale, seeking its allocation for residential purposes and its removal from the green belt. I note that your latest SHELAA identifies the site as an Urban Edge Site, potentially suitable for development (Site 474). This representation relates specifically and solely to that part of the site which is used for Car Auction purposes, See Plan1, that lies adjacent to the strategic housing site in Cannock's emerging local plan and is identified on the attached land registry plan.

In my clients view and mine it makes no sense to retain this sliver of land within the green belt, given that its previously developed land the same rationale should be applied for its removal from the Green Belt as Cannock used. In my opinion its development will not impact on the openness of the character of the area and I would draw your attention to paragraph 147 of the NPPF below:

“147. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channeling 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.”

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In my view the Council should give more weight to the strategic allocation within Cannock's emerging plan and the development of this land in conjunction with the residential allocation will create a far more sustainable pattern of development that relates to the urban area of Cannock, utilizes previously developed land and is well served by public transport together with other community facilities. Therefore I feel there has been a lack of Dialogue with Cannock Chase District Council under the duty to co-operate in preparing South Staffs Plan as set out at Para 3.6 and 3.7. It is neither rational, logical or good planning to leave this small parcel of land in the Green Belt, when in the same ownership and part of the same hereditament.

Representations are also made in respect para 3.10, as this piece of land if allocated would meet a high sustainability threshold. Within a five minute walk there are local shops, doctors surgeries and education facilities. Cannock Town Centre is a 10 minute walk and Cannock Rail station which provides access to the National Rail network is a 15 minute walk. Local bus service also run past the site.

Given the above wish to make representations in relation to Strategic Objective 2. It is accepted that in principle, new housing and associated green belt releases should be in sustainable locations with a particular focus on public transport, but the approach adopted is too inward looking and fails to take account of such locations and centres that sit adjacent to the Borough, in this case Cannock town centre. For the reasons set out above Cannock town centre is a sustainable location and, in many respects, delivers more than the Tier 1 Settlements in South Staffs.

In addition, given there are a number of constraints associated with the site the inclusion of this land contributes to the wider viability of the development. I have also included a provisional layout, to demonstrate how the site could be developed and the potential capacity of the development.

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I would be grateful if you could give due consideration to the above and make what is a minor alteration to the Green Belt Boundary, which in my view is both logical and sensible given status of the majority of the site within Cannock's Local Plan. Representations have been made to Cannock Chase District Council to raise this issue with yourselves.

Sincerely,

N Bubalo.

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