

# Cannock Chase Council: Cannock Chase Local Plan Representation Form



Making a representation: We cannot accept anonymous representations. You must provide your contact details but only your name and comments will be published on the website. Your personal data will be held securely and processed in line with our privacy notice [www.cannockchasedc.gov.uk/privacynotices](http://www.cannockchasedc.gov.uk/privacynotices). Once the plan is submitted your comments will be shared with the Planning Inspectorate and an independent inspector will review representations. You have the right to withdraw your representation and your data will be destroyed. Data will only be held until adoption of the Cannock Chase Local Plan.

## Part B: Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**. We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

### Part B: Representation

|                        |  |
|------------------------|--|
| Name and Organisation: | Bloor Homes Ltd (c/o Define Planning and Design Ltd) |
|------------------------|--|

**Q1. To which document does this representation relate?** (Please tick one box)

- Cannock Chase Local Plan 2018-2040
- Sustainability Appraisal of the Cannock Chase Local Plan 2018-2040
- Habitats Regulations Assessment of the Cannock Chase Local Plan 2018-2040

**Q2. To which part of the document does this representation relate?**

|                 |  |         |       |       |  |                  |  |
|-----------------|--|---------|-------|-------|--|------------------|--|
| Para-<br>graph: |  | Policy: | SO3.1 | Site: |  | Policies<br>Map: |  |
|-----------------|--|---------|-------|-------|--|------------------|--|

**Q3. Do you consider the Cannock Chase Local Plan is:**

- A. Legally compliant                      Yes:                       No:
- B. Sound    Yes:                       No:
- C. Compliant with the Duty to Co-operate                      Yes:                       No:
- (Please tick as appropriate).*

|                |                  |  |
|----------------|------------------|--|
| For office use | Part B reference |  |
|----------------|------------------|--|

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**Q4. Please give details of why you consider the Cannock Chase Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Cannock Chase Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

## **POLICY SO3.1: PROVISION FOR NEW HOMES:**

### **EXECUTIVE SUMMARY:**

Bloor Homes Limited (BHL) consider that Cannock Chase District Council's (CCDC) Pre-Submission Local Plan (PSLP) is fundamentally unsound, and suggest that wholesale changes are required ahead of the submission of the emerging Local Plan (eLP) for examination.

BHL's objections are based on the following matters: (i) the proposed housing requirement is unsound as it does not respond to the full housing needs (including an uplift to account for the planned level of economic growth and existing affordability issues) or provide for a suitable contribution towards the unmet housing needs arising within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA); (ii) in any case, the purported supply fails to meet the proposed housing requirement as set out in the PSLP when applied over a reasonable plan period, and would fall woefully short of the more appropriate housing requirement that BHL consider should be utilised, (iii) notwithstanding those points, the proposed spatial strategy also fails to facilitate sufficient residential development in Norton Canes despite its sustainable credentials and the economic growth that is directed to it, and the spatial strategy is therefore unbalanced and does not support a sustainable pattern of growth.

Therefore, the PSLP is fundamentally unsound. To remedy that, CCDC must identify additional allocations to meet the updated housing requirement with an appropriate buffer. That should include the delivery of the proposed safeguarded residential site at Land West of Hednesford Road, Norton Canes (PSLP Ref. S3), as well as the remainder of the site to the south (as shown in the submitted Vision Document), in the coming plan period. The allocation of the site would deliver it to its full and logical extents and maximise the delivery of housing in light of the above concerns.

### **HOUSING REQUIREMENT:**

#### **National Context:**

The current acute national housing supply crisis is recognised by all of the main political parties, as is the importance of the housing industry to the nation's economy. Remedying this has been a critical policy imperative for successive Governments, with the February 2017 White Paper 'Fixing Our Broken Housing Market' presenting startling facts and figures highlighting that on average only 160,000 new homes had been delivered each year in England since the 1970s.

The White Paper highlighted that the years of under supply on a national scale have led to rising average house prices compared to earnings, declining home ownership in the under 35s, and escalating rental costs. That is a particularly pertinent point within Cannock Chase that must be addressed through the eLP, as discussed below.

The Government's White Paper also acknowledged that the under-delivery of housing has had a severe negative impact on the economy in terms of labour mobility, the construction industry, economic spend, and increasing housing benefit costs. Therefore, it is clear that those socio-economic impacts will only worsen within the area if the eLP does not provide a sufficient amount to fully meet the actual housing needs of the area required to support the expected economic growth. That would also entrench existing affordability housing issues and, in that regard, the White Paper

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recognised that a significant uplift in the delivery of homes is needed to address such issues where they arise.

A subsequent statement from the Ministry of Housing Communities and Local Government (October 2018) sought to quantify the level of delivery that should be achieved on a national scale, and confirmed the Government's commitment to delivering 300,000 homes a year by the mid 2020s to address those matters; a level that has not been achieved since 1969. Recent statements by the Secretary of State for Levelling Up, Housing and Communities have reiterated the Government's commitment in this regard, including the press release relating to the publication of the latest version of the NPPF in December 2023.

Therefore, the Government's commitment to housebuilding permeates through the NPPF, which focuses (at paragraph 60) on "significantly boosting" housing delivery to address identified housing needs. The NPPF also now explicitly recognises that an area's actual housing need may exceed the base level local housing need (LHN) that is derived from the standard method (SM). In that context, the NPPF highlights the importance of ensuring that a sufficient amount and variety of land comes forward where it is needed, so that the housing needs of specific groups are addressed and that land is developed without unnecessary delay. It also highlights the importance of delivering a sufficient quantum of housing in rural areas to support their ongoing vitality (paragraphs 78 - 79).

The eLP should, therefore, be advanced in line with the clear importance that the Government attributes to increasing the supply of housing both to respond to the national housing crisis (which is manifesting itself in the District and wider HMA) and to ensure that housing delivery is aligned with the economic projections for the District.

## **Plan Period:**

The NPPF requires local plans to "*look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities*". The PSLP proposes a plan period from 2018 to 2040, which is based on the Council's expectation that the plan will be submitted for examination in Summer 2024, that the examination will take place in Autumn / Winter 2024, and that the eLP will be adopted in Summer 2025. However, those timescales do not fully reflect the complexity of the plan and the likely timescales for the remainder of its preparation, and notably do not allow for any slippage in the plan's examination and adoption.

For example, the suggestion that the plan will be submitted for examination within six months of the end of this consultation is particularly optimistic given that, in BHL's view, CCDC will need to entirely revisit its spatial strategy to address some fundamentally unsound elements of the plan (i.e. the failure to fully meet the housing requirement and provide for a balanced spatial strategy). That may necessitate an additional Regulation 19 consultation period, which clearly would result in a significant delay to the plan's adoption. However, even if CCDC consider that the alterations can be accounted for without a further consultation, it will take in excess of 6 months to process and account for the comments that will be received through this consultation, update the evidence base (which will require updates in relation to the spatial strategy, housing needs, the SA, site assessments, etc.), make the required amendments to the plan to address the matters raised, seek approval of the amended plan through the Council's own committee structure, and then compile and submit the plan and its evidence base to the Secretary of State.

Likewise, the timescales for the plan's examination and adoption (suggested to be just one year in the PSLP) are similarly unrealistic. This is an extremely complex plan that needs to consider cross-boundary matters such as the scale of the unmet housing needs of the GBBCHMA and what an appropriate level of contribution towards those unmet needs would be. That is itself an increasingly

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complicated point in light of the cessation of the Black Country Plan, which is of particular relevance to CCDC given the close geographical and functional relationship with Walsall in particular. Those sessions will, therefore, require the Inspectors to grapple with multi-faceted matters and will likely include a wide range of stakeholders, including other local authorities. It is likely, therefore, that there will be multiple rounds of hearing sessions and that CCDC will need to provide additional evidence to demonstrate the soundness of the plan.

The examination is, therefore, likely to take well in excess of the 1 year that has been suggested, and BHL note that the Solihull Local Plan examination (which has considered many of the same matters) is now approaching two years in length, with no sign that the plan will be adopted imminently. Similarly, North Warwickshire's local plan considered similar matters to this plan and experienced a 3.5 year plan period. Even based on the shorter of those two periods, the plan would not be adopted until 2027 at the earliest; which would mean that the current proposed end date would be insufficient.

Therefore, the proposed end date must be extended to at least 2042 to meet the requirements of NPPF paragraph 22. CCDC should take account of that ahead of the submission of the plan, and must extend the housing requirement (based on a more appropriate annual figure, as below) and identify additional allocations accordingly. That would allow for the required additional Sustainability Appraisal (SA) and Site Selection work to be carried out now, rather than through the plan's examination; which is the particularly difficult position that Solihull and North Warwickshire Borough Councils have experienced in recent years.

The remainder of BHL's comments assume that the plan period will be extended to 2042.

## **Current Proposed Approach:**

The PSLP suggests an overall housing requirement of c. 6,300 dwellings across a plan period of 2018 to 2040. Policy SO3.1 states that this comprises the delivery of 5,808 dwellings in line with the District's SM-derived LHN figure of 264 dwellings per annum (dpa), and a contribution of 500 homes to the unmet needs arising in the GBBCHMA.

The following analysis outlines that this is a fundamentally unsound approach in that it (i) fails to address the full needs of the District when accounting for the scale of growth required to align with the projected level of economic growth and address existing affordability issues and (ii) provides an inadequate unmet need contribution given the District's functional and geographic relationship with the wider GBBCHMA authorities (Walsall in particular) and the scale of the unmet need that will arise in the remainder of the plan period to 2042.

Notwithstanding those concerns, and those that are presented in the following analysis, the purported housing delivery (according to the PSLP's Housing Trajectory) will total 6,380 dwellings. Even if CCDC chooses not to increase its annual housing requirement or unmet needs contribution (despite the clear evidence highlighting the need to do so), applying the current approach across the extended plan period to 2042 would require the delivery of 6,836 dwellings; meaning that the current supply would be insufficient.

Moreover, the Housing Trajectory indicates that annual deliveries are only expected to meet the annual housing requirement in 3 of the remaining years in the plan period. Based on the current proposed supply, CCDC would therefore be unable to establish a five year supply of housing at the plan's adoption, and also could not maintain one throughout the remainder of the plan period.



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There is, therefore, clearly a need to identify additional sites even if CCDC makes no changes to address BHL's comments in relation to the housing requirement. As a minimum, therefore, the safeguarded sites should be allocated for development within this plan period. However, the following identifies why the residual housing target is much more significant than that; meaning that the supply of housing in the plan should be substantially bolstered.

## **Addressing Local Housing Needs:**

National guidance has long made clear that the SM-derived LHN is the starting point in calculating an authority's housing requirement, and the 2023 version of the NPPF now explicitly recognises that there may be circumstances "*which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals*" (NPPF paragraph 60).

The 'Housing and Economic Development Needs Assessment' Planning Practice Guidance (PPG) sets out further guidance in that regard. It states that the circumstances where a higher housing requirement will be appropriate include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of:

- Growth strategies for the area that are likely to be deliverable, for example where there is funding in place to promote and facilitate additional growth;
- Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

However, the evidence base significantly over-simplifies the consideration of those matters; treating them at a surface level and therefore unduly dismissing them as factors that would justify an uplift to the housing requirement. However, BHL strongly believe that there are a number of factors that each justify a significant uplift to the requirement.

## Responding to Market Signals and Past Delivery:

Firstly, the NPPF expects the supply of housing to reflect market signals (NPPF paragraph 60). However, the proposed housing requirement (averaging 286dpa across the plan period) will deliver a significantly lower level of development than has been experienced in recent years.

CCDC's Authorities Monitoring Report (AMR) states that an average of 338 dwellings has been delivered each year between 2006/07 and 2021/22; which is 50dpa higher than the housing requirement (286dpa). Likewise, the Housing Trajectory that is incorporated within the PSLP suggests that 930 dwellings were delivered in 2019/20, 620 dwellings were delivered in 2021/22 and 437 dwellings were delivered in 2022/23; with the only year of lower delivery (which, at 319 dwellings, is still above the proposed annual housing requirement) being 2020/21, where Covid-19 restrictions will have limited deliveries. The average delivery in those four years was, therefore, 576dpa, which is 70% higher than the average deliveries that the proposed housing requirement would facilitate.

The healthy delivery of housing in that period, despite the ongoing housing crisis, two recessions and a global pandemic, is clearly testament to the strength of the local housing market and the demand for housing in the District. As set out below, housing affordability issues have continued to worsen despite housing delivery reaching such rates, which suggests that there is no sign of the delivery having saturated the market. That indicates that there are external factors that are not necessarily captured within the SM calculations which are driving an additional need for housing; as discussed below.

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In that context, it would clearly be entirely inappropriate for the Council to seek to deliver a much lower level of housing in the forthcoming plan period, despite the market evidence to the contrary.

#### Uplift to Align with Economic Growth:

Moreover, economic activity has not been accounted for in the calculation of the housing requirement. Therefore, the PSLP overlooks that the evidence base, when analysed in detail, provides clear justification for a significant increase to the housing requirement on that basis.

A detailed report prepared by Marrons' National Socio-Economics Team has been submitted alongside BHL's representations. It highlights significant inconsistencies between the evidence base that has been published with the PSLP document, previous iterations of reports that have been published by CCDC, and the approach that is ultimately proposed by CCDC in the PSLP in setting the housing requirement.

Notably, the 2020 Economic Development Needs Assessment (EDNA) highlights that there would be a need to deliver at least 351dpa to align with the delivery of 46 hectares of employment land. On that basis, the 2020 EDNA strongly recommended that, if the housing requirement was set below 351dpa (as CCDC is now proposing), the Council should undertake *"more detailed housing modelling to ensure the job projections are aligned closely with their housing requirement."*

As Marrons highlight, this has not taken place. Instead, the PSLP seeks to reduce the delivery of housing (to an average of 286dpa), but substantially increase the delivery of employment land to 69ha; which is clearly a significant uplift above that 46ha figure. The PSLP's approach to economic development reflects the support that officers have given to the "Regeneration" economic growth scenario, that envisages the creation of 5,100 new jobs over the plan period. Marrons note that this is an entirely realistic level of job creation given previous trends (with 7,500 new jobs having been delivered between 2013 and 2023).

It is critical, therefore, that residential growth is aligned with that planned economic growth, and CCDC's failure to undertake further modelling in that regard (contrary to the strong recommendations of the 2020 EDNA) is therefore unsound and, as a result, the proposed housing requirement is inadequate.

Moreover, there are significant negative effects associated with a failure to align residential growth with employment growth, which are not reflected in the SA's testing of the delivery options. Principally, and as highlighted in NPPF paragraph 86c, an inadequate supply of housing is a barrier to economic growth. The failure to deliver sufficient residential development, therefore, is likely to give rise to a position where there is an insufficient working age population to fill the jobs that are created by the new employment position, which could stunt economic activity and / or give rise to unsustainable growth and commuting patterns, with employees being sourced from outside of the District.

As set out in the Marrons Report, the 2024 EDNA highlighted that at least 378 dpa will be required to support the delivery of 58ha of employment land. Therefore, Marrons suggests that the delivery of **in excess of 400dpa** would be needed to align with the provision of 69ha of employment land, as per the PSLP. That should be taken as a minimum starting point.

#### Uplift for Affordability:

Likewise, the evidence base incorrectly states that there is no justification for an uplift to the housing requirement, despite significant evidence to the contrary.

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Notably, the 2024 HNA establishes that there is a significant need for affordable housing (AH), amounting to 290 affordable dwellings per year. That figure is higher both than the SM-based LHN of 264dpa and the proposed annualised housing requirement of 286dpa. It is also a need that is consistently increasing by a significant amount; with the 2024 HNA stating that the like-for-like estimate of need in 2019 would have been 219dpa, and the 2012 SHMA suggesting that the annual AH need was 197dpa at that point.

The persistent under-supply of AH in the District will inevitably have played a significant part in that trend. The submitted report by Marrons suggests that net AH delivery, when losses to the social housing stock are accounted for, totals only 1,075 dwellings in the period between 2006/07 and 2022/23; compared to the need of 3,949 affordable dwellings that was established in the 2012 SHMA. By way of comparison, the report highlights that, if the 2024 HNA's assessment of AH need was applied from the start of the intended plan period, the shortfall would be in the order of 2,800 dwellings; which equates to 75% of the need.

The report by Marrons identifies the impact that the persistent under-supply of AH has had in the District. The housing affordability ratio in the District (which reflects the average cost of a house compared to the average household income) has risen at a significant rate, with the lower quartile figure having increased by 44% in the last decade compared to a 17% increase across the West Midlands as a whole. That indicates that *"affordability is worsening at a more rapid rate in Cannock Chase"*, which specifically includes for *"homes which should be the most affordable."* As above, that is despite the significant housing delivery in recent years.

Constraining delivery to a much lower rate (as is proposed) will only intensify those trends. The PSLP suggests varied AH requirements of between 20% and 35%, dependent on the location of a site and whether it is brownfield or greenfield. Even if the highest requirement of 35% was applied to the total supply in the PSLP (setting aside that commitments may be subject to lower levels of AH provision, that some developments will be too small to trigger AH delivery, and that many of the remaining sites will be subject to a lower AH requirement), just 2,233 affordable dwellings would be delivered. That would equate to just 32% of the total AH need in the plan period to 2042 (6,960 dwellings). Clearly, that is an unacceptable position to be in, and would only continue the trend of an increasing AH need in each plan period.

A failure to deliver sufficient housing (including AH) will only entrench existing affordability issues in the District, which will have significant socio-economic impacts that again have not been fully recognised in the evidence base (notably the SA testing of housing requirement figures). Ignoring the District's full AH needs will drive house prices up further, entrenching affordability issues and leading to a cycle of unaffordability; particularly for more marginalised groups who are less able to access even affordable products. That will also increase associated socio-economic impacts relating to persistent affordability issues; including escalating house prices, declining ownership, increasing housing benefits costs.

As above, the insufficient provision of housing (including AH) is also a limiter to economic growth, labour mobility, and local economic spend; which is particularly significant given that the Council has sought to pursue a high-growth economic model. Again, that will stunt economic growth and / or it will result in unsustainable growth / commuting patterns.

It is clear, therefore, that the proposed housing requirement is also wholly inadequate from an AH delivery perspective and that such an approach will give rise to significant socio-economic and environmental effects. There is, therefore, clear evidence to justify an uplift above the SM-derived

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LHN. The delivery of at least 400dpa to align with economic growth would also increase the delivery of much-needed AH; although it is noted that this would still fall well short of the level of housing delivery required to meet the District's AH needs in full.

## Proposed Uplift to LHN:

On the basis of the above, there is clear evidence that the District's actual housing needs is significantly higher than the SM-based LHN. On the basis of the detailed analysis that has been prepared by Marrons, the absolute minimum local housing need that should be applied to account for economic growth would be 400dpa, although that should be very clearly highlighted as a minimum figure given that maximising housing delivery would also be beneficial in addressing the substantive AH need.

In calculating the housing requirement, that should be applied across the plan period to 2042 (i.e. across 24 years), and then an appropriate contribution towards the unmet needs arising in the GBBCHMA must be applied on top of that.

## **Providing an Appropriate Contribution Towards Unmet Needs:**

The PSLP proposes to make a contribution of just 500 dwellings towards the unmet housing needs of the GBBCHMA authorities. Section 6 of the PSLP suggests that this figure has been proposed despite a *"very difficult context in which to progress Local Plans to adoption"* in light of national policy changes and the cessation / withdrawal of the emerging plans of some GBBCHMA authorities (notably the Black Country Authorities (BCAs) and Lichfield District Council (LDC)). The suggestion appears to be, therefore, that the proposed 500 dwelling 'offer' is sound in the absence of more certainty with regard to the exact scale of the unmet need arising in the wider HMA.

However, that is clearly unfounded. Whilst the Council are correct in highlighting that the emerging local plans being prepared by the BCAs and LDC have now been withdrawn, this does not mean that the scale of the unmet need that was previously declared can be ignored.

Whilst the BCAs are no longer preparing a joint Black Country Plan (BCP), the last iteration of the plan was predicated on each authority's position that they had maximised the potential of sites within their jurisdiction and, where they felt appropriate, had identified Green Belt sites that could be released for development. On that basis, the draft BCP established a shortfall of some 28,000 homes between the combined local housing need between 2020 and 2039, and the purported supply of housing. Whilst it is recognised that CCDC commented to suggest that the exported unmet need figure could have been reduced somewhat through the identification of additional sites, that is clearly a very significant scale of unmet housing needs and, even if additional sites were identified, the additional supply would not be in the order of almost 30,000 homes.

CCDC's eLP can, therefore, be examined with a great degree of certainty that there will be substantial unmet housing needs arising from the BCAs. Furthermore, given that the delivery of identified sites will be delayed whilst each constituent BCA authority prepares its own plan, the unmet housing need figure will increase; particularly when extended to cover the period to 2042.

Likewise, whilst it is recognised that CCDC does not share as strong of a relationship with Birmingham City Council (BCC) as it does with the BCAs, there is still a functional and economic relationship; with the residents of Cannock Chase able to access the city centre and the employment opportunities, services and facilities that it offers via frequent and direct train services. BCC's extant plan established an unmet housing need of 37,900 dwellings between 2011 and 2031. Very few meaningful contributions have been made towards that substantial unmet housing need and, given the change to the SM calculation of BCC's LHN and that BCC is still subject to the same constraints

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to housing delivery, the scale of the unmet need to 2042 (and beyond) will inevitably be significantly higher than the extant plan established. BCC's recent Issues and Options consultation estimated a shortfall in the order of 78,415 homes between 2022 and 2042.

There is, therefore, a great deal of certainty that there will be very significant unmet housing needs from BCC and the BCAs. Some local authorities have previously made contribution 'offers' towards those unmet needs. Taking just the initial estimations, the unmet needs of BCC and the BCAs would total c. 106,000 dwellings. The proposed contribution of 500 dwellings would equate to just 0.5% of that figure.

To demonstrate the inadequacy of that contribution offer, the submitted analysis by Marrons considers what the residual unmet housing need in the GBBCHMA would be if the proposed contributions of CCDC and other HMA authorities were to be applied on a pro-rata basis to 2042. That analysis suggests that, on that basis, the residual unmet housing need would still be in the order of 97,000 dwellings between 2020 and 2042. A step-change is, therefore, required in the contributions of neighbouring authorities.

CCDC's proposed contribution of just 500 dwellings is, therefore, wholly insufficient given the scale of the unmet needs, the District's relationship with the BCAs and BCC, and the role that the urban areas play in supporting Cannock Chase from a socio-economic perspective. Rather, the 500 dwelling figure was clearly arbitrarily chosen at the start of the local plan review process and has been maintained since despite the evidence base suggesting that it could be uplifted without any particular significant effects (as set out below).

Therefore, the proposed contribution of 500 dwellings is not positively prepared, justified, effective or consistent with nationally policy and, therefore, does not meet the tests of soundness (NPPF paragraph 35). In light of the above context, a 2,500 dwelling contribution is the minimum acceptable figure.

## **Setting the Housing Requirement:**

On the basis of the above, it is clear that there is compelling justification for the housing requirement to incorporate significant uplifts to reflect past delivery rates, to align with predicted levels of economic growth, to address the existing affordability issues, and to provide an appropriate contribution towards the unmet needs of the GBBCHMA.

Based on the above analysis, the District's own housing need should be set at a minimum of at least 400 dpa, and a contribution of at least 2,500 dwellings should be made to the unmet housing needs of the GBBCHMA. Therefore, a housing requirement of at least 12,100 dwellings across the plan period between 2018 and 2042 would be appropriate and, subject to further SA and site assessment work to verify that it is an achievable housing requirement, should be expressed as a minimum figure given the clear need to maximise housing delivery.

The Sustainability Appraisal (SA) / Integrated Impact Assessment (IIA) that supports the PSLP does not appear to have re-tested any higher growth scenarios; which again demonstrates that CCDC have not sought to maximise the delivery of housing despite the emphasis in national planning policy on positively responding to the housing crisis. Rather, it replicates the findings of the previous Local Plan Preferred Options (LPPO) SA, which considered the LHN plus an unmet need contribution of 500 dwellings (Option B), 1,500 dwellings (Option C), and 2,500 dwellings (Option D).



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The SA reaches identical conclusions in relation to all SA objectives, besides a potentially (i.e. uncertain) greater negative impact on Previously Developed Land (PDL, SA Objective 3) and a potential (but again, uncertain) negative impact on housing (SA Objective 9) relating to the higher growth scenarios.

However, as set out in BHL's previous representations, this appears both counter-intuitive and an over-simplification of the positive effects that a higher level of growth could bring and, conversely, the significant negative socio-economic and environmental outcomes associated with a failure to provide a sufficient level of growth. Firstly, the potential additional negative effects that have been attributed to a higher level of growth are counter-intuitive. In relation to SA Objective 3, the delivery of more houses does not impact upon the delivery of PDL sites; in that it would not mean that some brownfield / PDL sites could not be delivered, but rather that they would be supplemented with additional greenfield development. Secondly, in relation to SA Objective 9, it is clear that delivering a greater quantum of housing would actually realise additional benefits in relation to housing, insofar as it would meet the actual housing needs, deliver more affordable homes to remedy the existing affordability issues and AH need in that regard, and provide an appropriate contribution towards the persistent unmet housing needs in the HMA that are, in themselves, resulting in significant negative effects on the region. Clearly, therefore, the finding in relation to SA Objective 3 should have remained the same as all other growth options, and there should have been a more favourable outcome for SA Objective 9 as the level of growth being tested increased.

On that basis alone, it is clear from the SA that a significantly increased level of residential growth could be accommodated without significant adverse effects.

In addition, however, there appears to have been an over-simplification in testing all growth scenarios that has overlooked the significant negative effects of failing to fully address the District's housing needs as set out above. As established in the NPPF (paragraph 86c), inadequate housing is a barrier to economic investment and growth; which clearly should be attributed a significant negative effect. Nor does the SA fully reflect the negative environmental effects of the unsustainable patterns of growth that would arise as a result of some residents having to move outside of the District due to a lack of housing supply and increasing housing prices. For those who would continue to work in the District, that would likely increase commuting distances and, therefore, the use of the private vehicle; which has significant environmental implications.

That provides further evidence that a significant uplift to the housing requirement should be included to account for the factors as set out above, and that additional allocation sites should be identified.

## **HOUSING SUPPLY:**

The PSLP does not incorporate a site-by-site housing trajectory as required by NPPF paragraph 75. In the absence of that information, it is not possible to understand whether the Council's assumptions in relation to site deliveries are robust.

However, and as set out above, BHL note that the high-level annual delivery figures included on page 156 do not exceed even the currently proposed housing requirement for the majority of the remaining plan period and, therefore, that a five year supply of housing cannot be established and maintained.

That is, however, before the required uplifts to the housing requirement are made and the plan period is extended. Based on the proposed housing requirement of 12,100 dwellings as set out above, and against the purported supply of c. 6,300 dwellings, there would actually be a shortfall

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of 5,800 dwellings in the plan period. Moreover, the Local Plan Experts Group recommends that a 20% buffer be included above the residual housing requirement (i.e. the housing requirement minus previous completions and existing commitments). In the absence of a breakdown of those figures, that value cannot be calculated, but it would clearly result in a need to identify a yet more significant additional supply.

## **THE SPATIAL STRATEGY:**

BHL have significant concerns as to the proposed spatial strategy, which is fundamentally unbalanced and unsound; regardless of whether the above comments in relation to the scale of growth are accepted by CCDC.

## **Norton Canes:**

Most notably, the PSLP will not facilitate meaningful residential development in Norton Canes in the plan period; only proposing to allocate two smaller sites totalling 66 dwellings. That is despite the sustainable credentials of the settlement, the substantial housing needs in the District and the proposals to deliver significant economic growth within and near to Norton Canes that will itself drive housing needs.

Norton Canes is an entirely sustainable location for growth, offering a wide range of services and facilities, including a nursery, primary and secondary schools, a community library, churches, a pharmacy, and a doctor's surgery. The village centre also has a good retail offer, with a chain convenience store, smaller convenience stores, takeaways, and independent shops. It also benefits from a good offer of sport and recreational facilities, including the playing fields at the rear of the Norton Canes Community Centre, and the recreational opportunities associated with Chasewater Country Park and Cannock Chase. Norton Canes also contains some significant employment areas that will be improved further through the plan period (as below). Norton Canes Industrial Park contains a number of industrial / construction-based businesses, and the Orbital Retail Park, Kingswood Lakeside Employment Park, Longford Industrial Estate and Cedars Business Centre are also in close proximity to the settlement.

Norton Canes is also well served by public transport links, with a number of bus routes running along Hednesford Road and Church Road / Chapel Street. The 60/60A services provide access to Cannock, Burntwood and Lichfield through twice hourly services. The 3/3A service, which stops adjacent to Norton Canes Library, provides access to Cannock and Walsall, via the villages of Brownhills, Pelsall and Rushall. There is, therefore, particularly good connectivity with nearby Cannock and Heath Hayes, both of which have high order services and facilities themselves that would be of benefit to future residents.

Therefore, Norton Canes is an entirely appropriate and sustainable location to accommodate significant residential development to meet the District's full housing needs and the unmet needs arising elsewhere in the HMA. The delivery of just 66 dwellings in the coming plan period falls significantly short of meeting the settlement's potential; particularly in light of the significant housing requirement as set out above. In that regard, the spatial strategy is unbalanced, and the approach to Norton Canes cannot be considered to be justified, effective or testament to positive plan-making (as is required by NPPF paragraph 35).

However, in addition to that and as set out above, the PSLP takes an aspirational approach to economic growth by seeking to facilitate the delivery of some 69ha of employment land. A significant amount of this will be delivered within or surrounding Norton Canes; including an 8.6ha extension to the 'Kingswood Lakeside' to the west of the settlement, a 7.36ha extension to the 'Watling Street

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Business Park' to the immediate south of the settlement, and 0.56ha extension at 'Land off Norton Green Lane'.

NPPF paragraph 109 highlights the need for the planning system to limit the need to travel by supporting sustainable patterns of growth, and it is therefore testament to good plan-making to align residential and economic growth. The delivery of just 66 new dwellings will clearly fail to achieve that and, given that the PSLP clearly recognises that 'Land to the West of Hednesford Road, Norton Canes' is a suitable location for growth by virtue of its identification as a safeguarded site, there is clear justification to release the site now to respond to realise a more balanced spatial strategy. The allocation should incorporate all land being promoted by BHL as set out below.

### **Green Belt Release:**

BHL welcomes CCDC's recognition that the release of land from the designated Green Belt is required to meet the District's housing and economic needs. It is clear in light of those housing needs that there are 'exceptional circumstances' present to justify the release of Green Belt land for development in accordance with NPPF paragraph 146, and the PSLP has sought to maximise delivery through the other mechanisms set out in the NPPF (including through the delivery of brownfield and non-Green Belt land and the implementation of appropriate density requirements).

As CCDC's supply of housing must be significantly increased and in the context that CCDC cannot rely on exporting that through the Duty to Cooperate, there is clear and demonstrable justification to support the removal of additional sites from the Green Belt for residential development in the plan period. As below, the starting point must be the allocation of those sites that have been identified as proposed safeguarded sites in the PSLP and, in the case of 'Land West of Hednesford Road, Norton Canes' (Site Allocation S3) that should be extended to include BHL's full land ownership to ensure a comprehensive development that extends to the full and logical extents of the site and maximise residential deliveries.

### **LAND WEST OF HEDNESFORD ROAD, NORTON CANES (SITE ALLOCATION S3 & SHLAA SITES N24, N33 AND N64):**

BHL control the land to the west of Hednesford Road, Norton Canes as identified in the submitted Vision Document; the northern part of which has been identified as a proposed safeguarded site for residential development (Site Reference S3). The entirety of BHL's land ownership has, however, been subject to a comprehensive site assessment and masterplanning exercise, as reflected in the promotion of the entire area by BHL through the local plan process to date. BHL's submissions in that regard have demonstrated that, whilst the safeguarded site could potentially be developed alone, there is a clear logic to developing the entirety of the land ownership to its full and logical extents in order to maximise housing delivery and realise a comprehensive new development that would round off the built form of Norton Canes.

### **Site Assessment and Suitability:**

In that regard, whilst BHL welcome the recognition that this is a suitable location for growth (hence why it has been identified as a safeguarded site), the reason for the omission of the additional land (SHLAA Site Refs. N24, N33 and N64) has not yet been clearly set out. Indeed, the SHLAA assessment of the omitted parcels is largely similar to the conclusions for N33 (the proposed safeguarded parcel), besides noting the presence of historic landfill and coal mining activity, which have been sensitively dealt with via offsets in the Masterplan that is contained in the Vision Document. Moreover, the SA assessment of the omitted parcels are almost identical to the conclusions for the proposed safeguarded element. Rather, the SA finds that Parcels N24, N33 and N64 would potentially have less significant negative impacts in terms of the historic environment and pollution.

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As such, the residual land under BHL's control performs similarly to the proposed allocation site, and therefore can only be seen as being suitable for residential development.

The site is well-related to the built form, being within 350m of the local centre, and therefore benefits from good access to the existing services, facilities and employment offer in the settlement. Likewise, the bus stops that are located along Hednesford Road and Church Road / Chapel Street provide access to higher order settlements as above. The site also benefits from very good pedestrian connectivity via the adjacent road network and Public Right of Way network. Those links will be enhanced through the provision of a pedestrian / cycle route through the site, which will tie in efficiently with the existing and proposed recreational routes surrounding the site to promote active movement between the site, the local centre, and the proposed recreation area to the north-west.

In addition, technical and environmental site assessments indicate that there are no insurmountable constraints and have also informed the evolving Masterplan as follows:

- The Access Feasibility Report identifies that site access from Hednesford Road is feasible, and consultation has been undertaken with Staffordshire County Council Highways to detail a scheme of improvements to the nearby Five Ways Roundabout to address existing congestion.
- The drainage strategy has evolved to take advantage of the site's natural topography to provide surface water attenuation at the site's south-west corner, and also provides the opportunity for ecological enhancements in that area.
- The gas pipeline that travels north-east to south-west through the site does not constrain development, and will be sensitively incorporated within an open space corridor.
- Development is unlikely to have a significant impact on the wider historic environment as assessed by the 2009 Historic Environment Character Assessment, and the potential for the re-use of the non-designated heritage asset of Norton Lodge Farm (if feasible) and the retention of the historic field boundaries has been incorporated into the proposed scheme;
- The site and its immediate surrounds are not subject to ecological designations, and the site's development will realise the opportunity to contribute to the enhancement of an ecological and recreational east-west corridor / network to the north of the site through the provision of green and blue infrastructure corridors within the site;
- The site is not a valued landscape due to the heavy influence of surrounding detractors (pylons, overhead power lines, infrastructure, industrial buildings). However, the layout will retain attractive features such as the landscape structure / hedgerow patterns.
- The site is well-contained to views within 1km of the site, where the site would be seen in the context of the built development.
- In terms of Green Belt impact, whilst the site will inevitably result in the growth of Norton Canes and some encroachment into the countryside, the nature of the site, its relationship with the existing urban form, the robust landscape structure in the wider area, and notably the defensible Green Belt boundary that will be provided along Long Lane, mean that the degree of harm arising from the release of the land for development would be limited. Rather, the proposed development of the site presents an opportunity for CCDC to meet its development needs in a manner that creates a long-term robust and defensible Green Belt boundary to Norton Canes.

The emerging Masterplan for the comprehensive development of BHL's land will, therefore, realise clear and substantive benefits. Notably, it will deliver a high-quality development of around 420 new homes (including AH) that is well-related to the existing built form, with residents having direct access to, and providing support for, the range of local facilities and services within the settlement. In that regard, CCDC and the Inspector are referred to the submitted Vision Document that sets

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out the design rationale that underpins the emerging Masterplan and provides more detail as to the benefits that it will realise.

## **CONCLUSION:**

The above analysis highlights that the PSLP is fundamentally unsound as currently drafted in that:

- The proposed housing requirement does not respond to the full housing needs (including an uplift to account for the planned level of economic growth and existing affordability issues) or provide for a suitable contribution towards the unmet housing needs arising within the GBBCHMA. The housing requirement should, therefore, be at least 12,100 dwellings, comprising 400dpa to meet CDDC's own housing needs applied over an extended 24 year plan period, with a 2,500 dwelling contribution made towards the GBBCHMA's unmet needs;
- In any case, the purported supply fails to meet the proposed housing requirement as set out in the PSLP when applied over a reasonable plan period, and would fall woefully short of the more appropriate housing requirement of 12,100 dwellings;
- Notwithstanding that, the proposed spatial strategy also fails to facilitate sufficient residential development in Norton Canes despite its sustainable credentials and the economic growth that is directed to it. The spatial strategy is therefore unbalanced and does not support a sustainable pattern of growth.

CCDC should revisit its spatial strategy and site allocations to address that. A key element in addressing those matters should be the allocation of BHL's site at 'Land West of Hednesford Road, Norton Canes' for development in the forthcoming plan period. That should include the additional land that has been promoted by BHL to the south of the proposed safeguarded site. The capacity of the entirety of BHL's land ownership is c. 420 dwellings, and should be reflected in the allocation.

*(Please continue on a separate sheet if necessary)*

## **Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan is fundamentally unsound as currently drafted, and therefore CCDC should revisit the spatial strategy and site allocations accordingly. The following changes should be made, whether that is part of a revised Regulation 19 consultation or ahead of the submission of the plan:

- The housing requirement should be increased to at least 12,100 dwellings; comprising 400dpa to meet CDDC's own housing needs applied over an extended 24 year plan period, with a 2,500 dwelling contribution made towards the GBBCHMA's unmet needs;
- Additional development should be directed to Norton Canes regardless of whether the above is accepted in order to realise a more balanced spatial strategy;
- To account for the above, BHL's site at 'Land West of Hednesford Road, Norton Canes' should be allocated for development in the forthcoming plan period. That should include the additional land that has been promoted by BHL to the south of the proposed safeguarded site. The capacity of BHL's land is c. 420 dwellings, and should be reflected in the site allocation.



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**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

**Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

BHL has fundamental concerns as to the soundness of the emerging local plan, and consider that they can only fully be considered through discussion at the Local Plan hearing sessions.

**Please note:** The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature: [REDACTED]

Date: 18/03/2024



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

The policy as currently drafted includes slight variations to the policy tests set out in the NPPF that could potentially be read as subtle contrasts to national policy and guidance, and / or may be deemed out-of-date if the national policy tests alter in the future. Therefore, it is suggested that this policy is updated to refer to national policy tests and / or National Development Management Policies (once introduced).

### **Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The policy should be updated to refer to the policy tests as set out in the NPPF and / or NDMPs (once they have been introduced).

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

### **Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

### **Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

BHL reserves the right to attend hearing sessions in relation to the housing requirement, housing supply, spatial strategy, and site allocations (including safeguarded sites), but does not consider it necessary to attend sessions in relation to development management policies.

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**Please note:** *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

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## **POLICY SO3.2: HOUSING CHOICE**

It is recognised that the proposed housing mix as contained in Table E has been informed by CCDC's 2023 Housing Needs Assessment. However, in order to ensure that the plan and the delivery of sites are "deliverable in the plan period" and therefore effective as required by NPPF paragraph 35c, the policy should be more flexible in applying those figures. Rather, the policy should require housing mixes "broadly in accordance" with Table E, but should also have regard to evidence of localised housing needs and demand, site and settlement-specific characteristics and viability.

Based on the findings of the Viability Assessment, it is clear that the PSLP seeks to maximise the delivery of affordable and specialist housing (including Category M4(2) and M4(3) compliant housing) within the confines of a viable development. Whilst the evidence base suggests that there is a need for such forms of housing and therefore the approach is justified, there will inevitably be circumstances where meeting all of the plan's requirements will result in a marginal viability position or render developments unviable entirely. Policies SO3.2 and SO3.3 should, therefore, make clear which of the policy requirements is the Council's priority in such circumstances, so that it is clear how proposals should be amended in order to deliver a viable scheme that is acceptable to the Council.

## **Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To ensure that the plan and the delivery of sites are "deliverable in the plan period" and effective as required by NPPF paragraph 35c, the policy should require housing mixes "broadly in accordance" with Table E, but should also have regard to evidence of localised housing needs and demand, site and settlement-specific characteristics and viability.

In circumstances where the plan's policy requirements in relation to affordable housing, housing mix and specialist housing provision would cumulatively render a development unviable, Policies SO3.2 and SO3.3 should make clear which of the requirements is CCDC's priority, so that it is clear how proposals should be amended in order to deliver a viable scheme that is acceptable to the Council.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

## **Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to

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participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

BHL reserves the right to attend hearing sessions in relation to the housing requirement, housing supply, spatial strategy, and site allocations (including safeguarded sites), but does not consider it necessary to attend sessions in relation to development management policies.

**Please note:** *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature: [REDACTED]

Date: 18/03/2024



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## **POLICY SO3.3: DELIVERING HIGH QUALITY HOUSING**

Based on the findings of the Viability Assessment, it is clear that the PSLP seeks to maximise the delivery of affordable and specialist housing (including Category M4(2) and M4(3) compliant housing) within the confines of a viable development. Whilst the evidence base suggests that there is a need for such forms of housing and therefore the approach is justified, there will inevitably be circumstances where meeting all of the plan's requirements will result in a marginal viability position or render developments unviable entirely. Policies SO3.2 and SO3.3 should, therefore, make clear which of the policy requirements is the Council's priority in such circumstances, so that it is clear how proposals should be amended in order to deliver a viable scheme that is acceptable to the Council.

### **Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

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In circumstances where the plan's policy requirements in relation to affordable housing, housing mix and specialist housing provision would cumulatively render a development unviable, Policies SO3.2 and SO3.3 should make clear which of the requirements is CCDC's priority, so that it is clear how proposals should be amended in order to deliver a viable scheme that is acceptable to the Council.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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### **Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

### **Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

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BHL reserves the right to attend hearing sessions in relation to the housing requirement, housing supply, spatial strategy, and site allocations (including safeguarded sites), but does not consider it necessary to attend sessions in relation to development management policies.

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## **POLICY SO5.1: ACCESSIBLE DEVELOPMENT**

The intention of Policy SO5.1 is recognised, as is the importance of facilitating new development that is accessible and promotes sustainable and active travel. However, NPPF paragraph 16d requires planning policies to be “clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” and that is a clear element in ensuring that policies are effective as required by NPPF paragraph 35c.

However, some of the policy requirements do not pass those tests. For example, the requirement for new developments to contribute to “a reduction in the reliance of private cars”, whilst supported, is unclear and not easily enforceable for development management purposes, as it is not stated how the reduction will be measured, and what level of a reduction is considered acceptable. Similarly, the requirement to contribute to the delivery of sustainable and frequent public transport services is unclear, as it is not stipulated what frequency is required as a minimum, nor how close a site must be to those services. The policy should, therefore, be reviewed and minor amendments should be made to ensure that it meets the NPPF’s tests as set out above.

## **Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The policy requirements should be reviewed to ensure that they are “clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” in accordance with NPPF paragraph 16d.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

## **Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)  
 Yes, I wish to participate in hearing session(s)

(Please tick one box)

## **Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

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BHL reserves the right to attend hearing sessions in relation to the housing requirement, housing supply, spatial strategy, and site allocations (including safeguarded sites), but does not consider it necessary to attend sessions in relation to development management policies.

**Please note:** *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

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## **POLICY SO5.3: LOW AND ZERO CARBON TRANSPORT**

BHL supports the scope of Policy SO5.3 and recognises the importance of providing for sustainable transport modes to ensure the sustainable development of the District.

However, some of the requirements within the policy as currently drafted are unclear, and therefore would be difficult to implement during the development management process. For example, it is unclear what is considered to be an appropriate / sufficient contribution towards "reducing the reliance of carbon-intensive modes of transport." Rather, requirements of this kind would need to be 'measurable' to ensure consistency between planning applications and allow for developers to take into account the implication of the requirement on scheme viability. Therefore, Policy SO5.3 should be reviewed to ensure that it is "*clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*", as required by NPPF paragraph 16d.

In addition, more detail is required in relation to the requirement to provide electric vehicle charging points, "*and other infrastructure that may be required for alternative low and zero carbon transport options*" given the viability implications of that provision. That must be set out clearly in the plan itself, given that recent High Court judgements have ascertained that policies which have a cost implication on development proposals cannot be deferred to a Supplementary Planning Document or alike.

### **Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

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The policy requirements should be reviewed to ensure that they are "*clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*" in accordance with NPPF paragraph 16d.

**Please note:** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

### **Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

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**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

BHL reserves the right to attend hearing sessions in relation to the housing requirement, housing supply, spatial strategy, and site allocations (including safeguarded sites), but does not consider it necessary to attend sessions in relation to development management policies.

***Please note:*** The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature: [REDACTED]

Date: 18/03/2024





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## **POLICY SO5.6: SAFEGUARDING PROPOSED RECREATIONAL FOOTPATH AND CYCLE ROUTES:**

BHL supports the intention of Policy SO5.6 and notes that CCDC have identified land to the north of BHL's site at Norton Canes for the delivery of an east-west recreational footpath and cycle route that would link Hednesford Road with Norton Lane, and provide direct access to the proposed safeguarded Country Park.

Whilst the recreational route is not within BHL's land ownership, the development of BHL's site at Land West of Hednesford Road, Norton Canes can play a critical role in supporting the delivery of that proposed recreational footpath and cycle route, and can enhance the wider network that links in with that strategic route. The proposed Masterplan for the site includes a footpath and cycle link through the site that will connect Hednesford Road with Long Lane. That will allow users of the footpath (i.e. existing and new residents) to access Long Lane from Hednesford Road, before travelling north and accessing the proposed route.

Effectively therefore, the site can play a key role in delivering an attractive and safe public footpath / cycle network within the countryside to the north of Norton Canes which will promote recreational uses, active travel and general wellbeing for the wider community of Norton Canes. This would also reduce the pressure places on the District's various ecological designations, which would be a significant benefit associated with the delivery of 'Land West of Hednesford Road, Norton Canes' in the coming plan period.

## **Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

No modifications required to this specific policy.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

## **Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

- No, I do not wish to participate in hearing session(s)  
 Yes, I wish to participate in hearing session(s)

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(Please tick one box)



**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

BHL reserves the right to attend hearing sessions in relation to the housing requirement, housing supply, spatial strategy, and site allocations (including safeguarded sites), but does not consider it necessary to attend sessions in relation to development management policies.

**Please note:** The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature: [REDACTED]

Date: 18/03/2024



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**Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

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This policy should be amended to state that "proposals development within the designated Green Belt will be considered in line with national planning policy."

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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Signature: [REDACTED]

Date: 18/03/2024



**POLICY SO7.7: AMENDMENTS TO THE GREEN BELT**

BHL's response to Policy SO3.1 demonstrates that there is a clear need to release BHL's site to the west of Hednesford Road, Norton Canes from the Green Belt for residential development in this plan period, in order to fully meet the housing requirement for the District (which should be substantially increased) and realise a more balanced, and sound, spatial strategy. The land that should be allocated for residential development should reflect the entirety of BHL's land ownership (i.e. proposed safeguarded site S3, plus SHLAA Sites N24, N33 and N64) in order to reflect the full and logical extents of the site, maximise the delivery of housing in light of the fundamentally unsound elements of the PSLP, and realise a high-quality and comprehensive development in this location. The allocation should also reflect the capacity of the site of c. 420 dwellings.

Policy SO7.7 suggests that, where Green Belt land is released for development, "*appropriate mitigation will be made to compensate for the loss of Green Belt land.*" However, it does not sufficiently detail the level of mitigation that is required, particularly in terms of the "*new or enhanced green infrastructure*" that is referred to. The policy requirement is not clearly written and unambiguous as required by NPPF paragraph 16d, and therefore decision-makers could reach very different views as to what level of Green Belt mitigation is acceptable. Moreover, where an officer / decision-maker considers that a much higher level of mitigation is required than another comparative development, that could have very significant viability implications, particularly if there is an expectation that additional Green and Blue Infrastructure should be delivered at the expense of built development. In the absence of specific guidance in relation to the specific requirements of this policy, that cannot have been accounted for in the PSLP's Viability Assessment.

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The PSLP should release BHL's site to the west of Hednesford Road, Norton Canes from the Green Belt for residential development in this plan period. That allocation should reflect the entirety of BHL's land ownership (i.e. proposed safeguarded site S3, plus SHLAA Sites N24, N33 and N64) in order to reflect the full and logical extents of the site, maximise the delivery of housing in light of the fundamentally unsound elements of the PSLP (as set out in BHL's response to Policy SO3.1), and realise a high-quality and comprehensive development in this location. It should also reflect the capacity of c. 420 dwellings. As part of the allocation of the site, Policy SO7.7 should be amended accordingly.

If CCDC is to continue to pursue the approach of requiring Green Belt mitigation, specific requirements should be set out within the policy that are informed by evidence (to ensure that they are justified) and that have been taken account of in the whole plan Viability Assessment to ensure that they do not render developments unviable alongside the plan's other policy requirements.

***Please note:*** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.



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No, I do not wish to participate in hearing session(s)

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*(Please tick one box)*

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Signature: [REDACTED]

Date: 18/03/2024



**POLICY SO8.2: ACHIEVING NET ZERO CARBON DEVELOPMENT**

Whilst CCDC's ambition to achieve Net Carbon Zero (NCZ) in the long-term is recognised, the Council must ensure that energy efficiency requirements can be realised without undermining viability and the delivery and affordability of housing. Therefore, BHL has significant concerns in relation to the proposed requirements as set out in Policy SO8.2, which go above the national requirements.

That approach is contrary to the Government's clear objective in recent years to adopt standardised energy efficiency and sustainable construction requirements through the adopted Building Regulations and emerging Future Homes Standards (FHS), so that the requirements are clear to developers and can be implemented in a cost-effective and consistent manner. The Government's January 2021 response to the FHS consultation sets out that *"we must ensure that all parts of industry are ready to meet the Future Homes Standard from 2025, which will be challenging to deliver in practice."* Therefore, a more significant requirement to achieve NCZ immediately upon the plan's adoption would be even more challenging.

Given the difficulty of achieving NCZ in practice, a key element of the Government's strategy to improve energy efficiency and achieve more sustainable modes of construction is ensuring that the economies of scale are in place to provide the technology required to support the transition to NCZ at a viable price. The requirements of the Building Regulations (and FHS) at any given time are carefully considered, and subject to national viability assessments that consider what measures can be sought without undermining the viability of developments, and therefore deliverability.

That is the reason why the Government are pursuing incremental improvements on a national scale and, in turn, why the Government's own objective is to reach NCZ by 2050. That is underpinned by a *"delivery pathway"* of meeting interim goals / objectives that recognises the challenges of achieving development with such significant technical standards. By seeking to skip that process, the eLP will undermine the Government's long-term intentions, and also potentially introduce a requirement that is not achievable from a technical perspective, or at the very least is not achievable without passing on significant costs to the end-user. Indeed, a Written Ministerial Statement by the Housing Minister confirms that *"the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations."*

Therefore, the proposed NCZ requirement must be deleted. Instead, CCDC should utilise flexible policy wording that will ensure that the plan continues to seek the most up-to-date requirements throughout the plan period, by requiring developments to *"achieve an energy efficiency in line with the latest standards set by the Government, whether that be Building Regulations or the Future Homes Standard (including any transitional arrangements)."*

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The requirement to achieve NCZ should be removed. Instead, the policy should require developments to "achieve an energy efficiency in line with the latest standards set by the Government, whether that be Building Regulations or the Future Homes Standard (including any transitional arrangements)."

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No, I do not wish to participate in hearing session(s)

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*(Please tick one box)*

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Signature:

[Redacted Signature]

Date:

18/03/2024



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## **POLICY SO8.3: SUSTAINABLE DESIGN**

BHL recognises the Council's intentions regarding sustainable design, but notes that policy requirements should be justified and achievable, without undermining the viability of developments. In that regard, BHL's response to Policy SO8.2 highlights their concerns in relation to the proposed requirement for new developments to achieve NCZ.

In addition to that, it is noted that Policy SO8.3 requires all residential developments to meet or exceed the standards set out by the Home Quality Mark (HQM). However, no justification for that is provided in the supporting text, and it is noted that the Viability Assessment makes no allowance either for the cost of the infrastructure required to meet that, or the cost of monitoring compliance / attaining accreditation. The requirement should, therefore, be removed unless it can be justified and viably achieved.

## **Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

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BHL's proposed modifications in relation to the requirement for new developments to achieve NCZ are set out in their comments in response to Policy SO8.2.

Given that there is no evidence to justify the requirement for all residential developments to meet or exceed the Home Quality Mark, and that the impact of this policy requirement has not been accounted for in the plan's Viability Assessment, the requirement should be removed.

**Please note:** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

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- No, I do not wish to participate in hearing session(s)  
 Yes, I wish to participate in hearing session(s)  
*(Please tick one box)*

## **Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**



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## **POLICY SO8.4: MANAGING FLOOD RISK**

BHL recognise the intention of Policy SO8.4 in the context of the NPPF's imperative to avoid or mitigate against flood risk. That said, the policy should only resist development proposals on sites that are at risk from flooding where it cannot be mitigated. Rather, to resist development on any site that is at risk of any form of flooding (no matter how small the area at risk is) is not consistent with the national policy tests in that regard, and could potentially remove sites that would otherwise be entirely suitable, subject to mitigation and sensitive design.

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To ensure that the policy tests are consistent with national planning policy and guidance, Policy SO8.4 should only resist proposals on sites that are at risk from flooding where it cannot be mitigated.

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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

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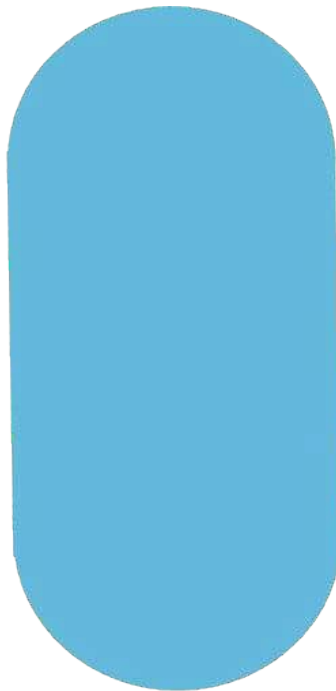
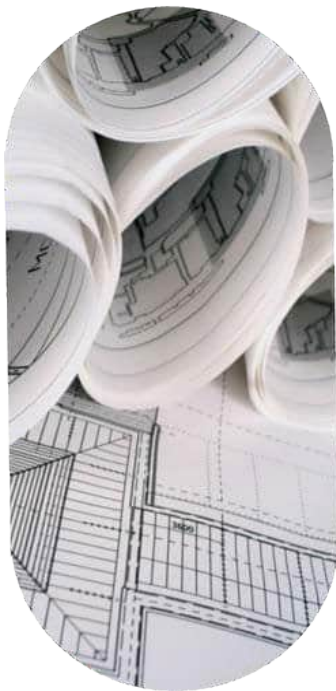
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 Part of Shakespeare Martineau

# CANNOCK CHASE HOUSING NEED ASSESSMENT AND EVIDENCE BASE REVIEW

PREPARED ON BEHALF OF BLOOR HOMES







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## 1. INTRODUCTION AND NATIONAL PLANNING POLICY CONTEXT

- 1.1 This Technical Report has been prepared by Marrons National Socio Economics Team on behalf of Bloor Homes in support of their development interests in the administrative area of Cannock Chase District Council (CCDC), and in response to the public consultation of the Regulation 19 Cannock Chase District Local Plan (Draft Plan, December 2023).
- 1.2 The objective of the report is to determine whether unconstrained housing need in CCDC exceeds the assessment of housing need underpinning the Draft Plan, and the reasons as to why this is the case.
- 1.3 Notwithstanding the revisions to the National Planning Policy Framework (NPPF) published on 19 December 2023, the Draft Plan will be examined under the provisions of the previous NPPF (September 2023). This is confirmed in Annex 1 (Implementation), paragraph 230 of the December 2023 NPPF which states *“The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements.”*
- 1.4 The Planning Practice Guidance (PPG) accompanying the NPPF sets out the methodology by which unconstrained housing need should be calculated and should be considered alongside the policies of the September 2023 NPPF.
- 1.5 The PPG's Housing and Economic Needs Assessment (HENA) section is very clear that the assessment of housing *need* should be unconstrained and undertaken prior to and independently from the consideration of constraints and the determination of a housing requirement. It is therefore important that full housing need is established before constraints are considered and the process of determining a housing *requirement* begins.
- 1.6 In this section we summarise the NPPF and PPG which the Draft Plan will be assessed against, and also provide a summary of changes to NPPF published in the December 2023 revisions for context.

## National Planning Policy Framework (NPPF, September 2023)

1.7 The September 2023 NPPF states the following in respect of establishing overall housing need:

**“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”<sup>1</sup> (Our emphasis)**

1.8 The NPPF is clear that the standard method set out in its supporting PPG provides the minimum number of homes needed. It is also clear that needs which cannot be met in neighbouring areas should also come into consideration when assessing housing need. The NPPF (paragraph 35a) states how Plans will be found sound if they are ‘positively prepared’, i.e., provides *“a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development”* (Our emphasis). This is important in the case of Cannock Chase given its place within the Greater Birmingham and Black Country Housing Market Area (GB&BCHMA) which has a long history of accepted unmet housing need.

1.9 In respect of how economic growth and housing delivery dovetail, the NPPF also states that *“planning policies should seek to address potential barriers to investment, such as inadequate housing.”*<sup>2</sup> The link between housing growth and economic growth is clear in the NPPF and enough housing must be provided to support economic growth aspirations.

1.10 It is important to emphasise how the Draft Plan will be examined against the September 2023 NPPF and the version of paragraph 61 set out above, and not the December 2023 version. This is important because Plans examined against the policies of the December 2023 NPPF will be examined against changes to paragraph 61, one of which states how the standard method is an *“advisory starting-point”* for establishing a housing requirement.

1.11 Notwithstanding this change, Planning Practice Guidance (PPG) remains unchanged as we discuss below. This means that despite the Standard Method becoming ‘advisory’, as the new NPPF states, ‘exceptional circumstances’ will need to be shown in order to justify an alternative approach to assessing housing need.<sup>3</sup>

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<sup>1</sup> Paragraph 61, NPPF, September 2023

<sup>2</sup> Paragraph 82 c), NPPF, September 2023

<sup>3</sup> Paragraph 61, NPPF, December 2023

## Planning Practice Guidance (PPG)

- 1.12 The method by which housing need should be established, and an explanation of the 'Standard Method' (SM) referred to in the NPPF is set out in detail in the HENA section of PPG (section ID2a).
- 1.13 At the outset the PPG states, "*Housing need is an unconstrained assessment of the number of homes needed in an area*", and goes on to state, "*Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.*" <sup>4</sup> (Our emphasis).
- 1.14 The PPG is very clear that the assessment of need should be unconstrained and is an entirely separate exercise from establishing the housing requirement. The process of establishing the requirement should not be undertaken until unconstrained need is established.
- 1.15 The PPG then moves on to explain what the SM provides. It states "*The standard method uses a formula to identify the minimum number of homes expected to be planned for. The standard method...identifies a minimum annual housing need figure. It does not produce a housing requirement figure.*" <sup>5</sup> (Our emphasis).
- 1.16 This section emphasises how the SM provides the minimum housing need figure and highlights again how the SM does not produce a housing requirement figure. A separate part of PPG addresses housing requirement.
- 1.17 The PPG also makes a very clear distinction as to the tests which will be applied if local authorities seek to justify housing need higher or lower than the SM minimum.
- 1.18 In respect of a housing need figure lower than the standard method minimum, the PPG states "*where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.*" <sup>6</sup> (Our emphasis).

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<sup>4</sup> Paragraph ID:2a-001, PPG, 2019

<sup>5</sup> Paragraph ID:2a-001, PPG, 2019

<sup>6</sup> Paragraph ID:2a-015, PPG, 2019

- 1.19 In contrast, in terms of establishing housing need which is above the Standard Method, PPG states “Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.”<sup>7</sup> (Our emphasis).
- 1.20 Having established that the SM represents minimum need, and that actual housing need may be higher, the PPG moves to discuss when it might be appropriate to plan for a higher housing need figure than the SM indicates.
- 1.21 PPG therefore states that “there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”<sup>8</sup> (Our emphasis)
- 1.22 In discussing these circumstances PPG reiterates how the standard method only represents minimum need, stating “The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.”<sup>9</sup> (Our emphasis)
- 1.23 The PPG then moves on to discuss what circumstances might lead to an increase in housing need, but confirms at the outset that the circumstances it refers to are not exhaustive and there may be other reasons as to why overall housing need exceeds the Standard Method’s minimum calculation:

**“Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:**

- **growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g., Housing Deals);**
- **strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or**
- **an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;**

**There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to**

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<sup>7</sup> Paragraph ID:2a-015, PPG, 2019

<sup>8</sup> Paragraph ID:2a-010, PPG, 2019

<sup>9</sup> Paragraph ID:2a-010, PPG, 2019

**make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more homes. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”<sup>10</sup>**

- 1.24 The delivery of much needed affordable housing can also have an impact on the assessment of overall need. In this respect the Planning Practice Guidance (PPG) states *“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”<sup>11</sup>*
- 1.25 The PPG also reiterates that this assessment of need is separate to the process of establishing a housing requirement, stating that the circumstances which may lead to a higher need figure *“will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan)<sup>12</sup>* (Our emphasis).

### Summary

- 1.26 Notwithstanding the publication of a revised NPPF on 19 December 2023, Annex 1 of the revised NPPF confirms that the Draft Plan will be examined under the policies of the September 2023 NPPF.
- 1.27 Therefore, to summarise, both the NPPF and PPG emphasise that the SM determines the minimum number of homes needed for each local authority. Consideration must be given to whether other circumstances warrant an increase to the minimum need, and in this context and to comply with PPG the assessment of need must be unconstrained.
- 1.28 Furthermore the PPG emphasises throughout how the assessment of need must be carried out separately and prior to the determination of a housing requirement (when any constraints to meeting need can be considered).
- 1.29 The PPG also refers to exceptional circumstances being required to justify housing need which is below the Standard Method minimum. This remains the position in the revised December 2023 NPPF if a local authority presents an alternative approach to the Standard Method.
- 1.30 In contrast the PPG states how a range of circumstances may justify the determination of housing need which exceeds the SM minimum, and that an assessment of need which establishes a figure

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<sup>10</sup> Ibid

<sup>11</sup> Paragraph ID2a:024, PPG, 2019

<sup>12</sup> Paragraph ID:2a-010, PPG, 2019

which is higher than the SM minimum will be considered sound if it “*adequately reflects current and future demographic trends and market signals.*”

- 1.31 It is therefore important to consider whether any factors justify an increase in the SM minimum when determining housing need. If local housing need is determined to be lower than the SM minimum, exceptional circumstances must be shown to justify the departure from the SM.
- 1.32 The following section of this report considers whether the Draft Plan evidence base provides the required assessment of unconstrained housing need, and whether more work needs to be done to provide it.



## 2.0 LOCAL PLANNING POLICY

### Introduction

2.1 The previous section of this report outlined the national policy and guidance context for determining unconstrained housing need. This section considers how the draft planning policies for Cannock Chase District Council (CCDC) align with these policies in respect of housing need, and whether the underlying evidence base of the Plan provides an adequate assessment.

### **Cannock Chase District Local Plan Pre-Submission (Regulation 19), December 2023 ('Draft Plan)**

2.2 The Draft Plan for CCDC is intended to plan for the 2018-2040 period, and will replace the current development plan which comprises the Cannock Chase Local Plan - Local Plan (Part 1) 2014.

2.3 The Draft Plan (Policy SO3.1) proposes the delivery of a minimum 5,808 dwellings in Cannock Chase, 2018-2040. This equates to average delivery of 264 dwellings per annum (dpa) and the Draft Plan confirms it is based on the government's standard methodology.<sup>13</sup>

2.4 At this point it should be reiterated that the standard method provides a minimum starting point of housing need.

2.5 In addition to the above delivery for CCDC's housing need, the Draft Plan proposes to deliver 500 dwellings over the Plan period to meet the unmet needs of neighbouring areas in the Greater Birmingham and Black Country Housing Market Area (GB&BCHMA).<sup>14</sup>

2.6 We consider what the unmet need from the GB&BCHMA is in total in the following sections of this report.

2.7 The Draft Plan also states under 'Strategic Objective 4: To Encourage a Vibrant Local Economy and Workforce' that the Plan will *"Provide for new employment uses with up to 69 hectares of land for office, manufacturing and distribution employment development during the period to 2040, with a range of sizes and types of employment to meet business needs"*<sup>15</sup> (our emphasis).

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<sup>13</sup> Page 66, Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023

<sup>14</sup> Page 66, Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023

<sup>15</sup> Page 9, Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023

- 2.8 It is therefore essential that the assessment of housing need determines the number of jobs which will be created by this development, and ensures that the labour force growth is supported by an adequate supply of housing to ensure that unsustainable commuting patterns are not exacerbated.
- 2.9 Affordable housing provision is also a key priority of the Council as set out in the 'Key Issues' of the Draft Plan. This section states *"Future housing needs, particularly affordable housing requirements, have to be met including a contribution to the shortfall across the wider housing market area"* <sup>16</sup> (our emphasis).
- 2.10 Paragraph 6.104 also states *"The latest evidence identifies there is a significant need for affordable rented housing"* <sup>17</sup> (our emphasis). The following paragraph 6.105 adds *"Evidence shows the need for affordable dwellings across the district will not be met in entirety by this plan it is therefore appropriate to require a higher level of provision and to safeguard the provision made by the plan to ensure the amount of dwellings which remain affordable in perpetuity delivers this strategic objective."*
- 2.11 This emphasises the clear need for affordable housing which this report considers in greater detail later in this report.

#### **Cannock Chase Housing Need Assessment (HNA, January 2024)**

- 2.12 The most recent assessment of housing need for Cannock Chase is set out in the 2024 HNA. This concludes that housing need for the District is no greater than the NPPF's standard method minimum, i.e. 264 dwellings per annum (dpa).
- 2.13 However, the same report concludes that *affordable* housing need for CCDC (290 affordable dpa) is higher than the assessment of overall need.
- 2.14 Although this is higher than the conclusion on overall housing need the HNA states *"The analysis estimates an annual need for 290 rented affordable homes, which is notionally 110% of a Local Housing Need of 264 dwellings per annum (as calculated using the Standard Method). However, as noted, caution should be exercised in trying to make a direct link between affordable need and planned delivery, with the key point being that many of those households picked up as having a need will already be living in housing and so providing an affordable option does not lead to an overall net increase in the need for housing (as they would vacate a home to be used by someone else)."* <sup>18</sup>

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<sup>16</sup> Page 23, Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023

<sup>17</sup> Page 23, Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023

<sup>18</sup> Paragraph 4.55, page 99, Cannock Chase District Housing Need Assessment, January 2024

- 2.15 Notwithstanding this statement the Housing and Economic Needs Assessment (HENA) section of the Planning Practice Guidance (PPG) states *“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”*<sup>19</sup>
- 2.16 In the context of the affordable need identified by the HNA, unconstrained overall housing need would be significantly higher than 264 dpa to address the affordable need.
- 2.17 We consider affordable housing need and delivery in Cannock Chase District in more detail later in this report.
- 2.18 The Draft Plan has clear economic growth aspirations as we have highlighted above, with up to 69 hectares of employment land proposed for a range of industries. However the HNA does not discuss the relationship between homes and jobs, and whether the minimum housing need will support the labour force that is likely to result from the development of 69 hectares of employment land. This is crucial in the context of paragraph 86c of the NPPF which states how a lack of housing should not create a barrier to investment, and we discuss this below in the context of the Council’s evidence base.

#### **Cannock Chase Economic Development Needs Assessment (EDNA, 08 January 2024)**

- 2.19 The 2024 Cannock Chase EDNA updates a previous EDNA published in 2020. The 2020 EDNA concluded that Cannock Chase District’s objectively assessed need (OAN) for employment land should comprise a range of between 48 hectares (ha) to 66 ha net between 2018 and 2038 (including flexibility). If losses were taken account of this increased to between 63ha and 81ha.<sup>20</sup>
- 2.20 The 2020 EDNA concluded *“If the housing requirement is at or below the 7,020 net dwelling growth under labour supply Scenario 5 (276 dpa SM + 1,500 dwellings unmet need, i.e. 351 dpa) then this could have repercussions on the employment land target, which may have to be reduced as a consequence to ensure the two are not misaligned. It is strongly recommended that in these circumstances the Council undertake more detailed housing modelling to ensure the job projections are aligned closely with their housing requirement.”*<sup>21</sup> (our emphasis)
- 2.21 This conclusion meant that the 2020 evidence base suggested that at least 351 dwellings per annum would be required to align homes with jobs. However this would only require 46 hectares (net) of employment land (including flexibility) according to the 2020 EDNA.

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<sup>19</sup> Paragraph ID2a:024, PPG, 2019

<sup>20</sup> Paragraph 5.108, page 64, Cannock Chase Economic Development Needs Assessment Covid-19 Update, December 2020

<sup>21</sup> Paragraph 5.109, page 64, Cannock Chase Economic Development Needs Assessment Covid-19 Update, December 2020

- 2.22 In contrast the Regulation 19 Plan states how it plans for “*up to 69 hectares of employment land*”.<sup>22</sup> The 2020 EDNA (Scenario 6) stated that the standard method (276 dpa) plus 2,500 unmet need scenario (401 dpa overall) would only require 52 hectares net (including flexibility).
- 2.23 This evidence indicates that the Regulation 19 Local Plan housing target of only 264 dpa will not be enough to support anywhere close to 69 hectares of employment land proposed by the Plan.
- 2.24 Furthermore the recommendation of the 2020 EDNA for the Council to undertake more detailed housing modelling to ensure the job projections align with the housing requirement do not appear to have been undertaken by the Council, as they are not included in the January 2024 HNA discussed above.
- 2.25 The 2024 EDNA updates the analysis of the 2020 report and determines that the labour force supply scenarios will generate a higher employment land need. This is illustrated in Table 4.19, page 46 of the 2024 report which shows how scenario 4 (Standard Method of 264 dpa plus 500 dwellings for unmet need, or 287 dpa) will only support 46 hectares (net) including flexibility.
- 2.26 The same table shows how scenario 6 (Standard Method of 264 dpa plus 2,500 dwellings unmet need, or 378 dpa) will still only support 58 hectares of employment land (compared with 52 in the 2020 EDNA). This would equate to 378 dpa reflecting Cannock District’s need only and still falls 11 hectares short of the 69 hectares mentioned in the Draft Plan. A contribution to unmet need would have to be added to this figure.
- 2.27 The Council’s ‘Employment Topic Paper’ (December 2023) also confirms that the housing requirement being proposed in the Plan is too low. Under paragraph 5.1 the paper states “*The employment need based solely on the unmet Housing Need Identified in the current Local Plan (Standard Methodology+500 units (Scenario 4 of the EDNA) of 68.19Ha is BELOW the Experian baseline figure of 74.09Ha (Scenario 1 of the EDNA) (Table 4.19 of the EDNA)*” (our emphasis).
- 2.28 The paper goes on to state “*The Experian Baseline growth figure of 74.09Ha is the minimum figure that should be provided for as this is based on the latest economic growth forecasts. There is no justification in the EDNA to plan for a need below this figure” (our emphasis).*
- 2.29 The Council’s own evidence therefore appears to contradict itself, confirming that proposed housing requirement will be too low to align homes with jobs.
- 2.30 As the 2020 HNA stated, the Council needed to undertake housing modelling to determine what the housing need is. There appears to be no evidence of this and based on the 2024 EDNA it appears

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<sup>22</sup> Page 7, Cannock Chase District Local Plan Pre-Submission (Regulation 19) December 2023

that 287 dpa will fail to support the employment land being planned for by the Council, and that more than 378 dpa will be required to support 69 hectares of employment land development over the Plan period.

- 2.31 However the job growth scenarios included in the EDNA also need to be considered. The number of jobs which each scenario is expected to support is set out in order in Table 2.1.

**Table 2.1: Job growth scenarios in Cannock Chase**

| Scenario  | Jobs 2018-2040 |
|---|----------------|
| Dwelling-led (264 dpa)  | 1,598          |
| Dwelling-led (264 dpa + 500 dwellings unmet need) – 287 dpa   | 2,072          |
| Dwelling-led (264 dpa + 1,500 dwellings unmet need) – 332 dpa | 3,020          |
| Experian Baseline (September 2023)                            | 3,000          |
| Dwelling-led (264 dpa + 2,500 dwellings unmet need – 378 dpa) | 3,968          |
| Regeneration – dpa unknown                                    | 5,100          |
| Past trends – dpa unknown                                     | 17,470         |

Source: 2024 EDNA

- 2.32 As Table 2.1 illustrates, the existing approach to a housing requirement in the Draft Plan would support 2,072 jobs 2018-2040. This is based on the standard method calculation of minimum housing need for Cannock Chase, i.e. 264 dpa, and in addition 500 dwellings 2018-2040 for GB&BCHMA's unmet need. This results in the housing requirement of 287 dpa over the Plan period.
- 2.33 However the job growth figures in Table 2.1 are for Cannock Chase District only. They do not relate to the area outside of the District, and the contribution to unmet need from the GB&BCHMA should therefore be *in addition* to however many homes are required to support job growth in Cannock Chase District. The current approach to need in Cannock Chase District (264 dpa) would only support 1,598 jobs as Table 2.1 illustrates.
- 2.34 Furthermore the 2024 EDNA's baseline Experian forecast is for 3,000 jobs for Cannock Chase District, further emphasising that housing need just for Cannock Chase District in isolation (i.e., *excluding* the unmet need contribution) would be approximately 332 dpa. A contribution for the GB&BCHMA's unmet need would have to be in addition to this figure.
- 2.35 However the Regeneration scenario indicates that housing need should be even higher for Cannock District in isolation from the unmet need contribution. The Regeneration scenario is described as follows: *"This was based upon a review of key growth drivers in the region. The 2020 and 2019 EDNAs incorporated discussions with the Council's Economic Development Officers, informed by a review of the target growth sectors set out in the SEPs prepared by the Stoke on Trent and Staffordshire Local*

*Enterprise Partnership [LEP]; the Greater Birmingham and Solihull LEP and the West Midlands Combined Authority [WMCA]. To recap, the 2020 EDNA concluded that there were several core growth sectors that Officers confirmed should be promoted and supported in the years ahead across the various SEP areas.”<sup>23</sup>*

- 2.36 The Regeneration scenario projects nearly 2,000 more jobs than the Experian baseline and as the above excerpt from the 2024 EDNA illustrates, this is a scenario supported by Council officers. It therefore needs to be fully understood how many homes would be required to support growth of 5,100 jobs in Cannock Chase District between 2018 and 2040. This would be known if the EDNA’s recommendation to undertake additional modelling had been followed by the Council.
- 2.37 This should also be considered in the context of past trends job growth in Cannock which has been 7,500 jobs between 2013 and 2023, and a continuation of which would be 17,470 jobs 2018-2040. This illustrates how realistic the higher labour supply scenarios and the Regeneration scenario are.
- 2.38 We therefore concur with the EDNA’s recommendation for the Council to undertake additional demographic modelling to understand how many homes would be needed to support these job growth scenarios.

### **Summary**

- 2.39 This section of our report has outlined how Cannock Chase’s housing need evidence base concludes on unconstrained housing *need* being 6,308 dwellings 2018-2040. However this conflates the need for Cannock District (264 dpa) with a contribution to unmet need from the GB&BCHMA.
- 2.40 However as we have outlined, the Council’s own evidence indicates that unconstrained housing need *exceeds* 264 dpa for Cannock Chase, based on aligning homes with jobs, and contributing to affordable housing need. Furthermore there is limited discussion of unmet housing need from the GB&BCHMA authorities and how this might affect the assessment of unconstrained housing need.
- 2.41 Based on aligning homes with jobs, the 2024 EDNA indicates that at least 378 dpa will be required to support employment land in Cannock Chase District. A contribution to the GB&BCHMA’s would be in addition to this figure.
- 2.42 However the Regeneration scenario (5,100 jobs over the Plan period) is entirely realistic in the context of significantly higher job growth experienced between 2013 and 2023, and is also supported by Council officers. As the 2020 EDNA recommended to the Council, the Council should undertake

<sup>23</sup> Paragraph 4.37, page 30, Cannock Chase Economic Development Needs Assessment : Update Report, 2024

bespoke demographic modelling to confirm how many homes would be needed to support the Regeneration scenario, however it appears they are yet to do so. An unmet need contribution would then need to be added.

2.43 In the following section of this report we consider affordable housing need in more detail.





### 3. AFFORDABLE HOUSING NEED

#### Introduction

- 3.1 Planning Practice Guidance (PPG) states that *“an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”* Local authorities should therefore consider if the minimum housing need calculated using the standard method should be increased to accommodate more affordable housing.
- 3.2 A precedent was set in this regard in the case of the Eastleigh Local Plan. The Inspector’s final report quoted the above section of the PPG and stated *“I have found that the Council has failed to recognise the true scale of need for affordable housing. There is also the consequential failure to consider how that need might be addressed. The Framework requires every effort to be made to meet needs.”*<sup>24</sup>
- 3.3 In this context the Inspector moved on to state, *“there is evidence which strongly suggests that some increase in delivery of market housing is achievable and could deliver a significant proportion of affordable housing. The developers of the major sites allocated in the Plan and included in the five year supply are keen to start delivering and where planning permission has not already been granted they are intending to submit planning applications very shortly. There is also clearly strong interest from other developers for additional housing sites to be allocated in the Plan and some of these appear likely also to be progressed as planning applications soon.”*<sup>25</sup>
- 3.4 In concluding the Inspector stated *“in the light of my conclusion in relation to affordable housing, on demographic projections alone there is some scope to increase the provision of market housing to deliver more affordable housing.”*<sup>26</sup>
- 3.5 This failure to properly consider affordable housing need and an increase in the overall housing need to deliver more affordable need led to the Inspector recommending non-adoption of the Plan.
- 3.6 It is therefore imperative that local authorities consider an increase in the housing requirement in order to deliver a shortfall in affordable homes where one exists.

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<sup>24</sup> Paragraph 56, Eastleigh Borough Local Plan, Inspector’s Report February 2015

<sup>25</sup> Paragraph 54, Eastleigh Borough Local Plan, Inspector’s Report February 2015

<sup>26</sup> Paragraph 54, Eastleigh Borough Local Plan, Inspector’s Report February 2015

## The National Picture

- 3.7 Affordable housing need has become acute across the country as the affordability of housing has worsened over the past two decades. The January 2022 House of Lords report ‘Meeting Housing Demand’ identifies *“there were 1,187,641 households on local authority housing waiting lists in 2021”* and *“as of March 2021, 95,450 families had been placed into temporary accommodation by local authorities.”*<sup>27</sup>
- 3.8 Research for the National Housing Federation and Crisis in 2018 identified a need for 145,000 new affordable homes per year, of which 90,000 for the next 15 years should be for social rent, 30,000 for affordable rent and 25,000 shared ownership homes.<sup>28</sup>
- 3.9 However despite this need the House of Lords report states, *“There has been a steady decline in social rent as a proportion of new supply, from over 75% in 1991/92 to 11% in 2019/20. In 50 local authorities, no homes for social rent were built over the five-year period from 2015/16 to 2019/20”*<sup>29</sup> (our emphasis).
- 3.10 To put this into context, only 63,605 new affordable homes were delivered across England in 2022/23, approximately 27.1% of all net completions (234,397). However this a gross affordable delivery figure and the Government’s statistics show a loss of 27,500 affordable dwellings in 2022/23 to demolitions and sales. Net affordable completions were therefore only 36,105 (i.e., 15.4% of all net completions).
- 3.11 This has led the House of Lords report to conclude on this issue with the following two points:
- There is a serious shortage of social housing, which is reflected in long waiting lists for social homes and a large number of families housed in temporary accommodation. The Government should set out what proportion of funding for the Affordable Homes Programme it believes should be spent on homes for social or affordable rent;
  - Right to buy has left some councils unable to replace their social housing stock. Right to buy must be reformed to help councils replenish their social housing stock: councils should keep more of the receipts from Right to Buy sales, have a longer period to spend the receipts, and there should be tighter restrictions on the conditions under which social homes can be bought.<sup>30</sup>

<sup>27</sup> Paragraph 69, page 36, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

<sup>28</sup> Professor Glen Bramley, Crisis and National Housing Federation Housing supply requirements across Great Britain (November 2018)

<sup>29</sup> Paragraph 65, page 33, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

<sup>30</sup> Paragraphs 76-77, pages 37-38, Meeting housing demand, House of Lords Built Environment Committee,

- 3.12 In addition, academic research by Professor Glen Bramley and commissioned by the National Housing Federation concluded that 150,000 affordable homes were needed every year in England (90,000 social housing, 27,000 shared ownership or equivalent Low Cost Home Ownership, and 33,000 intermediate affordable rent).
- 3.13 The level of net completions is therefore over 110,000 per annum short of Professor Glen Bramley's recommendations in the most recent year, emphasising the acute need for affordable housing across the country.
- 3.14 In this context, in this section of the report we consider the affordable housing position in Cannock Chase.

### **Affordable Housing Need in Cannock Chase**

- 3.15 At the outset, Marrons Planning do not advocate that affordable need necessarily be met in full, given the judgment of Mr Justice Dove in the Kings Lynn case (High Court Judgment)<sup>31</sup>, which concluded that neither the NPPF nor the PPG suggest affordable housing need must be met in full.
- 3.16 However as we have stated in the introduction to this section the need should be considered in the context of PPG which states "*An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes*"<sup>32</sup> (our emphasis).
- 3.17 Affordable housing provision is also a key priority of the Council as set out in the 'Key Issues' of the Regulation 19 Draft Plan. This section states "*Future housing needs, particularly affordable housing requirements, have to be met including a contribution to the shortfall across the wider housing market area*" (our emphasis).
- 3.18 In this context the January 2024 Housing Need Assessment (HNA) prepared by JG Consulting determines there to be an affordable need of 290 dwellings per annum (households unable to buy or rent).
- 3.19 This is higher than the housing requirement proposed in the Regulation 19 Plan.
- 3.20 The HNA also concludes that a 'like-for-like' estimate of need from the previous 2019 HNA would have shown a need for 219 affordable dpa.

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10 January 2022

<sup>31</sup> Paragraphs 34-37, pages 10-11, High Court Judgment, Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government, ELM Park Holdings Ltd, 09 July 2015

<sup>32</sup> Paragraph: 024 Reference ID: 2a-024-20190220

3.21 Policy CP7 – ‘Housing Choice’ of the adopted Local Plan (Part 1) states that the net affordable housing need established by the 2012 Southern Staffordshire Districts Housing Need Study and Strategic Housing Market Assessment (SHMA) Update was 197 affordable dpa, 2006-2028.

3.22 This indicates a significant need for affordable housing dating back to 2006.

### **Affordable Housing Delivery in Cannock Chase**

3.23 The most recent Annual Monitoring Report (AMR) for Cannock Chase is the 2021/22 AMR which reports delivery of 272 affordable dwellings, commenting this is above the year’s target of 231 affordable dwellings.<sup>33</sup> However there doesn’t appear to be a record of previous year’s completions on the Cannock Chase web site.

3.24 We have therefore consulted the Government’s live tables on affordable housing supply, and Table 1008c shows the following affordable completions in Cannock Chase since 2011/12.

**Table 3.1: Affordable housing completions in Cannock Chase since 2006**

| Year | 06 | 07 | 08 | 09  | 10  | 11 | 12  | 13 | 14  | 15 | 16  | 17  | 18  | 19  | 20 | 21  | 22  |
|------|----|----|----|-----|-----|----|-----|----|-----|----|-----|-----|-----|-----|----|-----|-----|
| DPA  | 46 | 92 | 72 | 149 | 165 | 37 | 169 | 47 | 126 | 24 | 116 | 238 | 125 | 108 | 71 | 291 | 152 |

Source: Table 1008c, gov.uk

3.25 Table 3.1 shows there to have been 2,028 affordable completions in the District since 2011/12. This equates to an average of 119 affordable dwellings per annum, significantly lower than the 197 dpa endorsed by the Adopted Plan, and the 290 dpa determined by the HNA.

3.26 However this does not include any affordable housing dwellings lost to schemes such as ‘Right to Buy’, or demolitions.

3.27 To determine whether net affordable delivery is lower than the gross figures set out in Table 3.1, we have consulted the Department for Levelling Up, Housing and Communities (DLUHC) live tables on social housing sales, and specifically the ‘social housing sales open data’. This data is set out in Table 3.2 below.

<sup>33</sup> Page 4, Cannock Chase District Council - Authority Monitoring Report 2021/22

**Table 3.2: DLUHC figures on the disposal of social housing stock in Cannock Chase**

| Row Labels         | Demolition | LCHO Sales | Other Sales | Other sales to sitting tenants | Right to Buy | Sales to sitting tenants | Grand Total |
|--------------------|------------|------------|-------------|--------------------------------|--------------|--------------------------|-------------|
| 2006-07            | 79         |            | 0           | 0                              | 79           |                          | 158         |
| 2007-08            | 49         |            | 10          | 0                              | 44           |                          | 103         |
| 2008-09            | 0          |            | 13          | 0                              | 10           |                          | 23          |
| 2009-10            | 0          |            | 20          | 0                              | 8            |                          | 28          |
| 2010-11            | 0          |            | 3           | 1                              | 11           |                          | 15          |
| 2011-12            | 0          | 5          | 7           | 0                              | 11           | 0                        | 23          |
| 2012-13            | 0          | 2          | 5           | 0                              | 18           |                          | 25          |
| 2013-14            | 0          | 5          | 2           | 0                              | 27           | 0                        | 34          |
| 2014-15            | 167        | 3          | 1           | 0                              | 31           | 5                        | 207         |
| 2015-16            | 0          | 10         | 2           | 0                              | 43           | 1                        | 56          |
| 2016-17            | 0          | 3          | 0           | 0                              | 35           | 3                        | 41          |
| 2017-18            | 0          | 6          | 2           | 0                              | 28           | 2                        | 38          |
| 2018-19            | 0          | 8          | 1           | 0                              | 27           | 1                        | 37          |
| 2019-20            | 0          | 10         | 0           | 0                              | 32           | 5                        | 47          |
| 2020-21            | 0          | 8          | 0           | 0                              | 29           | 1                        | 38          |
| 2021-22            | 0          | 6          | 4           | 0                              | 32           |                          | 42          |
| 2022-23            | 0          | 6          | 0           | 0                              | 30           | 2                        | 38          |
| <b>Grand Total</b> | <b>295</b> | <b>72</b>  | <b>70</b>   | <b>1</b>                       | <b>495</b>   | <b>20</b>                | <b>953</b>  |

Source: DLUHC live tables

3.28 Table 3.2 shows that there have been 953 losses to affordable housing stock since 2006/07, the starting year of the Adopted Local Plan.

3.29 This means that net affordable housing delivery has only been 1,075 dwellings (2,028 gross completions minus 953 losses) in the first 17 years of the Adopted Plan period, i.e., 2006/07 to 2022/23 compared to a need for 3,349 affordable dwellings over the same period (based on the 2012 SHMA's assessment of need, i.e., 197 dwellings per annum).

3.30 This level of net affordable delivery is 68% lower than the affordable housing target included in the Adopted Local Plan, albeit this should also be considered in the context of the higher need determined in the most recent 2024 HNA (290 affordable dwellings per annum).

3.31 If we were to include the 2024 HNA's assessment of need from the start of the intended Plan period (2018), the need would have been 3,814 and the shortfall would be 2,861 affordable dwellings, i.e. 75% of need.

### Net affordable housing delivery as a proportion of overall delivery

3.32 It is useful to understand how much of all housing provision has been affordable over the existing Plan period. Table 3.3 therefore measures overall net housing completions against net affordable completions. We have obtained this data from Government live tables due to limited data being available on the Council's web site.

**Table 3.3: Net affordable completions as a % of overall completions**

| Year           | 06   | 07  | 08  | 09  | 10  | 11 | 12  | 13  | 14  | 15  | 16  | 17  | 18  | 19  | 20  | 21  | 22  |
|----------------|------|-----|-----|-----|-----|----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| Affordable dpa | -112 | -11 | 49  | 121 | 150 | 14 | 144 | 13  | -81 | -32 | 75  | 200 | 88  | 61  | 33  | 249 | 114 |
| Overall dpa    | 607  | 297 | 296 | 228 | 317 | 24 | 149 | 243 | 238 | -23 | 355 | 608 | 217 | 913 | 302 | 620 | 437 |

Source: Table 1008c, gov.uk

3.33 As Table 3.3 illustrates there have been 1,075 net affordable completions and 5,825 completions of all tenures over the past 17 years. This means that affordable delivery has been 18.4% of all completions.

### Overall Housing Need and Affordable Housing

3.34 The analysis set out above should be considered in the context of the housing targets put forward in the Draft Plan.

3.35 As the analysis has shown, net affordable completions have been 18.4% of all completions since the start of the Adopted Local Plan period (2006/07).

3.36 If delivery were to continue at this rate, overall housing need would increase significantly from what is proposed in the Draft Plan to deliver the 2024 HNA's conclusion on net affordable need for Cannock Chase (290 affordable dwellings per annum).

**Table 3.4: Overall housing need required in Cannock Chase to meet affordable housing need of 290 dwellings per annum**

| Net Affordable Delivery as a % of overall completions | Overall Housing Need to meet Affordable in full (per annum) |
|---|---|
| 18.4%   | 1,576   |

3.37 As Table 3.4 illustrates, overall housing need in Cannock Chase would need to increase significantly from the Draft Plan housing requirement (287 dpa) or the standard method calculation (264 dpa) to deliver affordable need in full if past rates of delivery continue.

3.38 This analysis shows that unconstrained housing need in Cannock Chase exceeds the standard method minimum based on delivering affordable need in full.

3.39 In the context of Planning Practice Guidance which states how "*An increase in the total*

*housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes”<sup>34</sup> it is considered that Cannock Chase should consider whether the housing requirement can be increased beyond the standard method minimum to deliver more affordable housing.*

- 3.40 The Council’s own evidence acknowledges the significant need for affordable housing and states its intention to maximise delivery. Unconstrained housing need shows how addressing the affordable housing need issues in the Cannock Chase require an increase to overall housing need.

### **Numbers of households on waiting lists**

- 3.41 The number of households on local authority waiting lists can also provide context for affordable need in an area, and we present the data for Cannock Chase in Table 3.5.

**Table 3.5: Cannock Chase housing waiting list**

| 2014  | 2015  | 2016  | 2017 | 2018 | 2019 | 2020 | 2021 | 2022  | 2023  |
|-------|-------|-------|------|------|------|------|------|-------|-------|
| 1,296 | 1,256 | 1,078 | 573  | 886  | 800  | 816  | 964  | 1,096 | 1,315 |

Source: DLUHC, Live Table 600

- 3.42 As Table 3.5 illustrates, the number of households on the Council’s housing register is 1,315 households as of 2023. This represents the highest level since 2014 and highlights the acute affordable housing need in the District.
- 3.43 It is important to emphasise that these figures are households and not persons. Some of these households may be large families in need of an affordable home. The number of people affected is therefore significantly higher than the household figure.

### **Homelessness**

- 3.44 In respect of homelessness, Table 3.6 sets out the data collected by DLUHC for the last five financial years.

<sup>34</sup> Paragraph: 024 Reference ID: 2a-024-20190220



**Table 3.6: Homelessness in Cannock Chase, 2019/19 to 2021/22**

| Year    | Number of households assessed | Total households owed a duty | Threatened with homelessness - Prevention duty owed | Homeless - Relief duty owed |
|---------|-------------------------------|------------------------------|---|-----------------------------|
| 2022/23 | 224                           | 223                          | 178   | 45                          |
| 2021/22 | 216                           | 211                          | 160   | 51                          |
| 2020/21 | 180                           | 178                          | 95  | 83                          |
| 2019/20 | 259                           | 258                          | 86  | 172                         |
| 2018/19 | 182                           | 182                          | 101   | 81                          |

Source: DLUHC

3.45 Table 3.6 shows how the number of households assessed for homelessness in 2022/23 is the highest since 2019/20. This increase reflects the affordable housing need issues emphasised in this section.

### Affordable Housing Summary

3.46 In summary, the key points to note from our analysis are as follows:

- The Draft Plan states how there is a particular need for affordable housing in Cannock Chase District;
- The evidence base for the Regulation 19 Draft Plan shows need of 290 affordable dpa; prior to this the adopted Local Plan showed need of 197 affordable dpa from 2006;
- There has been net delivery (after demolitions and sales of stock) of 1,075 affordable dwellings between 2006/07 and 2022/23 (63 per annum);
- Net affordable completions account for 18.4% of all completions since 2006;
- Continuing delivery of affordable housing at 18.4%% would require overall housing need of 1,576 dpa to deliver affordable need of 290 affordable dpa in full;
- Net affordable housing delivery has only been 25% of need since 2006;
- The Council's housing waiting list in 2023 is the highest it has been in over a decade;
- The number of households assessed for homelessness in 2022/23 is the highest it has been since 2019/20.

3.47 This section has highlighted the significant need for affordable housing in Cannock Chase to address the lack of affordable housing delivery over the period since 2006.

3.48 As we have set out at the beginning of this section we do not advocate that the housing *requirement* be increased to unrealistic levels to meet affordable housing need in full.

3.49 However the evidence in this section suggests that unconstrained housing need (as

required to be assessed by PPG) significantly exceeds the Standard Method's minimum housing need (264 dpa).

- 3.50 The *requirement* should be increased as much as possible to meet the affordable need, in the context of the PPG which states "*An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes*" <sup>35</sup> (our emphasis).
- 3.51 As we have summarised, the Eastleigh Local Plan Inspector recommended an increase in the overall housing need figure based on the same PPG in order to deliver the significant need for affordable housing there.

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<sup>35</sup> Paragraph: 024 Reference ID: 2a-024-20190220



## 4. AFFORDABILITY ANALYSIS

- 4.1 As the January 2022 House of Lords report 'Meeting Housing Demand' states "*Affordability has worsened dramatically over the past 20 years: in England the ratio of median house prices to median earnings has almost doubled while in London it has more than doubled*"<sup>36</sup> (our emphasis).
- 4.2 In 1997, the median full-time worker in England could expect to pay about 3.5 times their annual earnings to buy a home; this had more than doubled by 2020 to 7.7. Homes in the private rented sector have become increasingly unaffordable. In 1980, the average working-age family renting privately spent 12% of its income on housing; in 2020 it spent almost three times this proportion (32%).<sup>37</sup>
- 4.3 This trend has resulted in worsening living conditions and increases in overcrowding and the number of concealed households (where two or more households are living together) across the country.
- 4.4 Various actions are required to improve affordability, not least boosting supply across the country. The House of Lords report includes a statement from the UK Collaborative Centre for Housing Evidence which said "*It is certainly the case that large, sustained increases in housing supply are necessary if the objective is to improve affordability ... But, even then, it is most unlikely that increases in supply alone could bring house price to earnings ratios even close to a value of 4.0.*"<sup>38</sup>
- 4.5 Furthermore, the National Planning Policy Framework's (NPPF) standard method for calculating minimum housing need is set in the context of Government's ambition to build 300,000 homes per annum by the mid-2020s. However, the House of Lords report includes evidence from Professor Glen Bramley. Professor Bramley's analysis concludes that 340,000 homes per annum would be required to address "*future household projections, backlog of housing need and scale of homelessness.*"<sup>39</sup> This indicates a significant increase in need from that determined nationally under the standard method.
- 4.6 Below we consider the affordability position in Cannock Chase.

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<sup>36</sup> Paragraph 1, page 11, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

<sup>37</sup> Paragraph 52, page 29, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

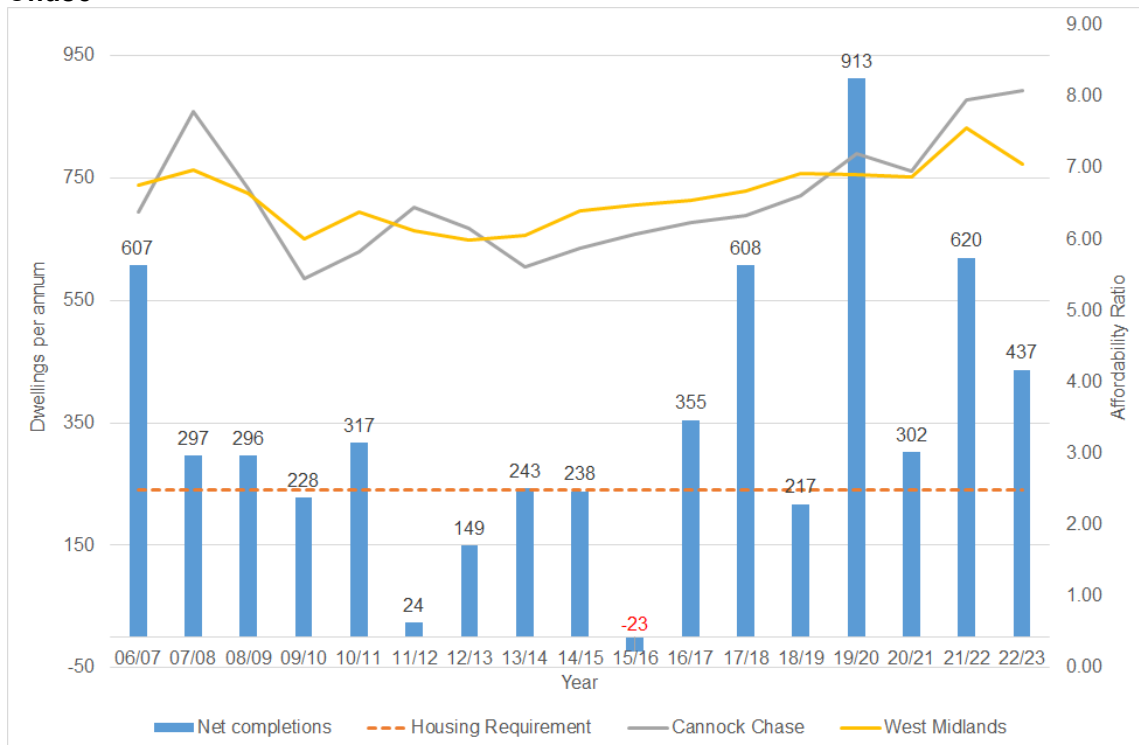
<sup>38</sup> Paragraph 31, page 20, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

<sup>39</sup> Paragraph 30, page 19, Meeting housing demand, House of Lords Built Environment Committee, 10 January 2022

### Lower Quartile Affordability Ratio

- 4.7 The lower quartile ratio is defined as follows; “the lower quartile housing affordability ratio (workplace-based) is calculated by dividing house prices by gross annual earnings, based on the lower quartile of both house prices and earnings.”
- 4.8 Figure 4.1 (below) shows how the lower quartile affordability ratio changed between 2006/07 and 2022/23, set against overall net housing completions and the ratio for the West Midlands region.

**Figure 4.1: Lower quartile affordability ratio and housing completions in Cannock Chase**



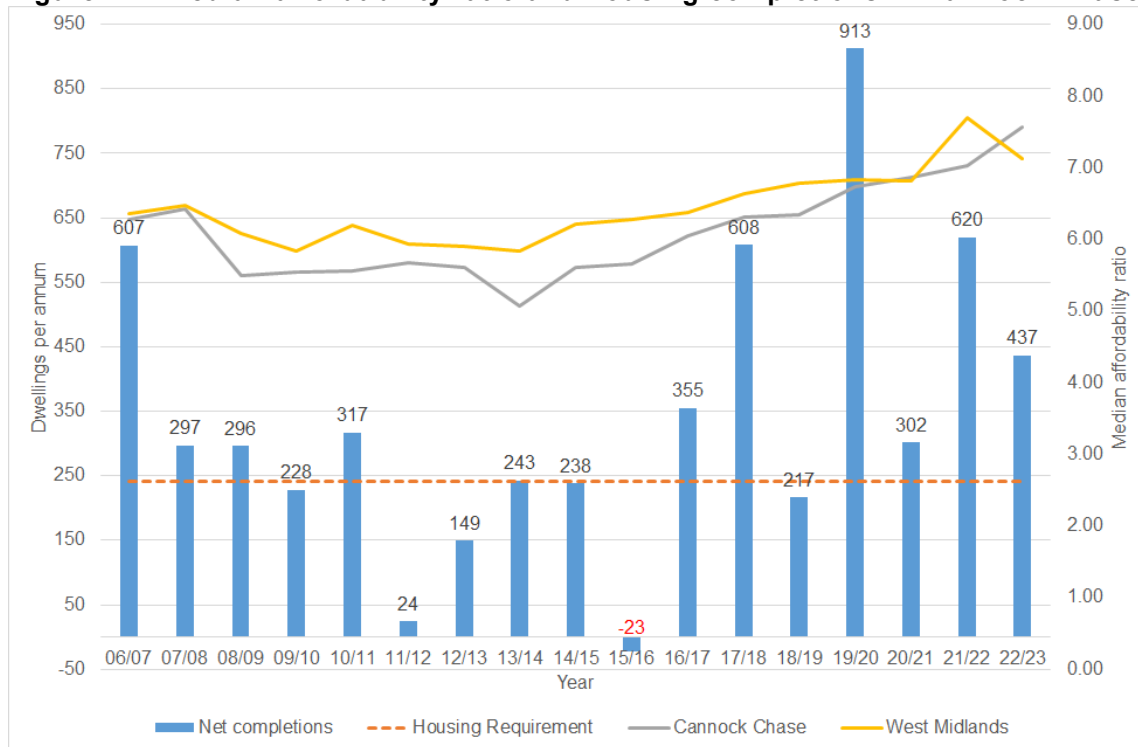
Sources: gov.uk

- 4.9 Figure 4.1 shows how the ratio for Cannock Chase reached a high of 7.79 prior to the economic recession of 2008/09 when it fell to 5.45 in 2009/10. Despite some fluctuation between 2009/10 and 2013/14, the ratio has gradually increased year on year from 5.62 in 2013/14 to 8.08 in the most recent year (2022/23).
- 4.10 This represents an increase of 44% in the lower quartile ratio over the last decade in Cannock Chase compared with only 17% increase across the West Midlands.
- 4.11 It should be noted how the lower quartile ratio increased over the past decade despite some years in which net housing completions were over double the housing requirement (in 2017/18, 2019/20, and 2021/22. This suggests that this high delivery could not address worsening affordability trends in the District.

## Median Affordability Ratio

4.12 The median affordability ratio is used to calculate the 2023 NPPF's minimum 'standard method' housing need. Median housing affordability ratio refers to the ratio of median price paid for residential property to the median workplace-based gross annual earnings for full-time workers. The change in the ratio against net completions is shown for Cannock Chase in Figure 4.2, compared with the ratio for West Midlands.

**Figure 4.2: Median affordability ratio and housing completions in Cannock Chase**



Sources: gov.uk

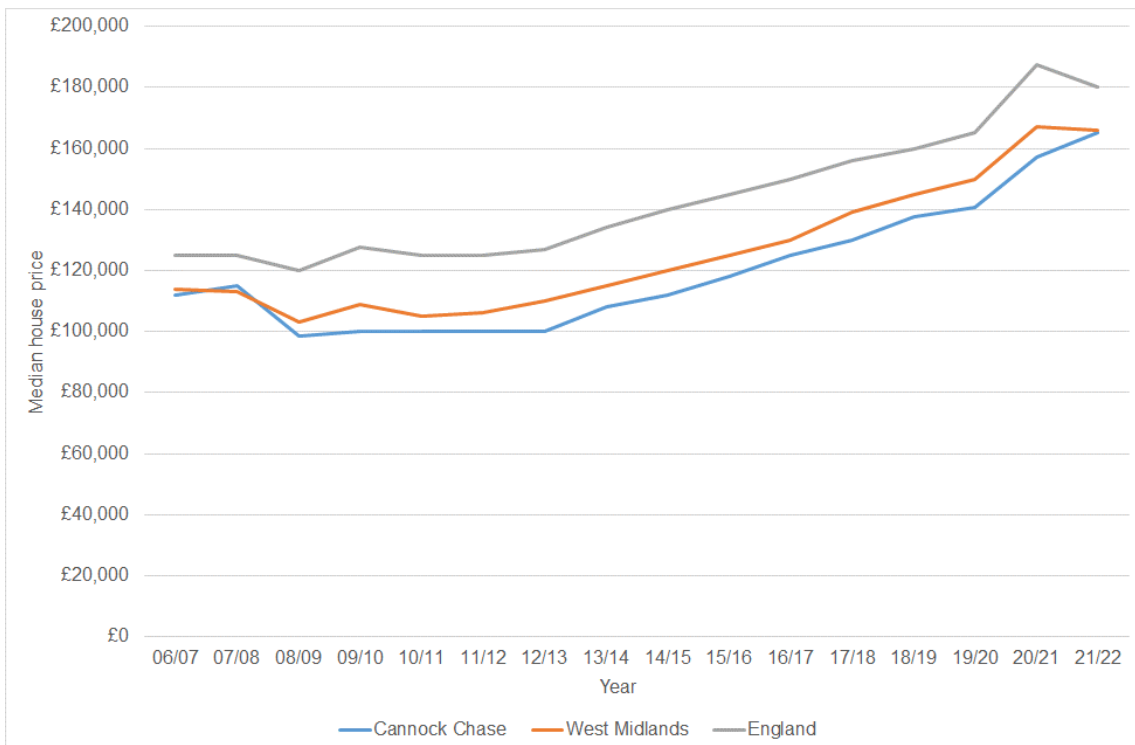
4.13 Figure 4.2 shows a similar pattern to Figure 4.1, although both Cannock Chase and the West Midlands lowest ratios were in 2013/14 following the end of the recession. However since that year the median ratio for Cannock has risen by 49%, from 5.07 to 7.56. In contrast the West Midlands average has seen less than half that increase, at 22%.

4.14 Only following delivery of 913 new dwellings in 2019/20 did affordability improve in Cannock, indicating how housing need is significantly higher than the 264 dpa concluded on by the Council.

## House Prices in Cannock Chase

4.15 The increase in house prices across the country over the recent past has been significant. We have compared this with the figures for the West Midlands and England (see Figure 4.3).

**Figure 4.3: Lower Quartile House Price Change 2006/07-2021/22**

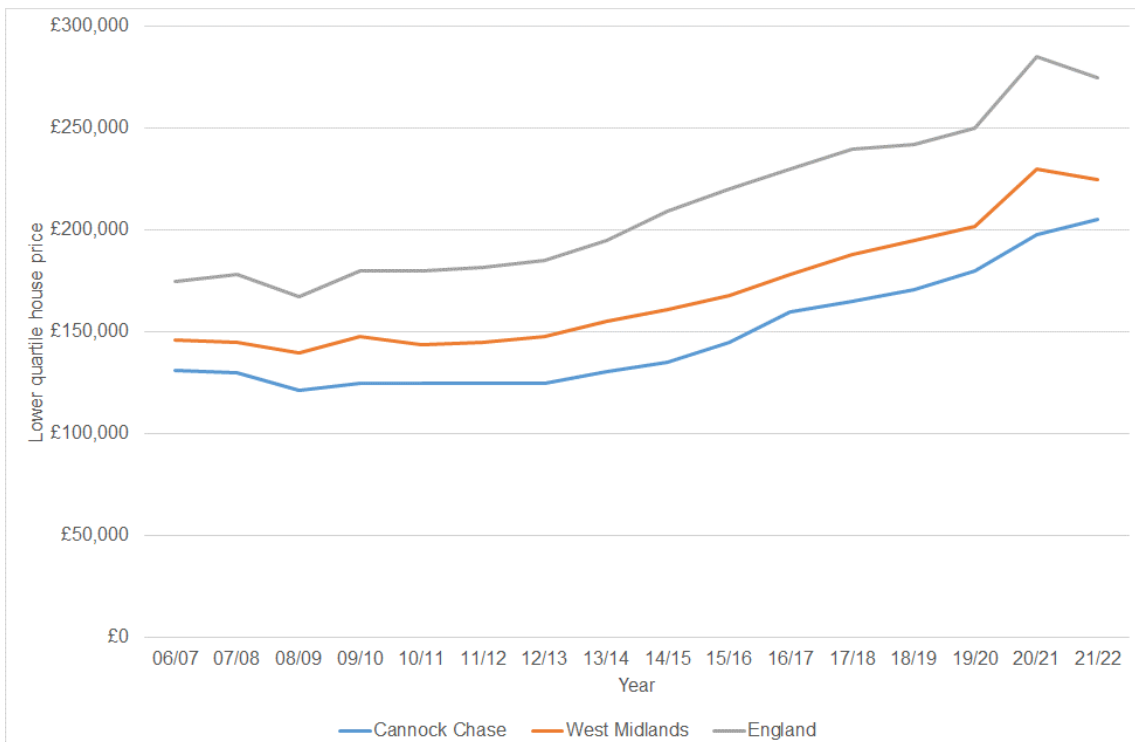


Source: Information on the ratio of house price to workplace-based earnings (lower quartile and median), ONS, 2023

4.16 Figure 4.3 shows how Cannock Chase's lower quartile house price is lower than both the West Midlands and England averages.

4.17 However the *increase* since the end of the recession (2013/14) has been 53% in Cannock Chase compared with only 44% across the West Midlands and 34% across England. This indicates that affordability is worsening at a more rapid rate in Cannock Chase in those homes which should be the most affordable.

4.18 Figure 4.4 provides the same comparison for the median house price change.

**Figure 4.4: Median House Price Change 2006/07-2021/22**

Source: Information on the ratio of house price to workplace-based earnings (lower quartile and median), ONS, 2023

- 4.19 This analysis shows how Cannock Chase's median house price is also lower than both the West Midlands and England averages.
- 4.20 However as with the lower quartile house price the increase since the end of the recession (2013/14) has been 57% in Cannock Chase compared with only 45% across the West Midlands and 41% across England. This again indicates that affordability is worsening at a more rapid rate in Cannock Chase.

### Summary

- 4.21 In summary this analysis shows how Cannock Chase has acute affordability issues which past levels of housing delivery have failed to address. The lower quartile and median affordability ratios have rapidly increased since the end of the recession in circa 2013, at a greater rate than regional and national averages. This trend has continued despite housebuilding of over 600 dwellings in some years. The only time the affordability ratios have fallen followed delivery of over 900 dwellings.
- 4.22 This indicates that past housing requirements have been inadequate in addressing worsening affordability, and housing need is significantly higher than the Regulation 19 Draft Plan's evidence base determines.





## 5. UNMET HOUSING NEED IN THE GREATER BIRMINGHAM AND BLACK COUNTRY HOUSING MARKET AREA

- 5.1 Unmet housing need from the Greater Birmingham and Black Country Housing Market Area (GB&BCHMA) and how it may be delivered has been an ongoing issue for several years now, and it remains pertinent now.
- 5.2 It has long been established that Birmingham City Council (BCC) and the Black Country authorities have been unable to meet their housing needs due to restrictive amounts of land in their mainly urban boundaries, and that surrounding local authorities would need to collaborate to deliver these unmet needs.
- 5.3 Cannock Chase District (CCD) is part of the GB&BCHMA and acknowledges its role in delivering some of the unmet need. The Regulation 19 Local Plan therefore commits to delivering 500 dwellings of the HMA's unmet need.
- 5.4 However how much of the unmet need should CCD be providing for? In this section we consider what the unmet need for the HMA currently is, and whether this indicates that CCD should be planning to deliver more than the 500 dwellings indicated in the Regulation 19 Draft Plan.

### **The extent of unmet housing need in the GB&BCHMA**

- 5.5 When the BCC Local Plan was adopted in 2017, it stated that its unmet housing need equated to 37,900 homes between 2011 and 2031. In late 2022 BCC formally commenced the review of its plan and estimated a shortfall of 78,415 homes (2022-2042) in its Issues and Options document based on the Standard Method calculation of minimum housing need.
- 5.6 Furthermore, although progress on a joint Local Plan for the Black Country local authorities has now ceased, a Regulation 18 Draft Black Country Plan (2021) estimated a shortfall of 28,239 homes (2018-2039) based on the Standard Method's minimum housing need.
- 5.7 This indicates an unmet need of 106,654 dwellings in the HMA before contributions of other local authorities are taken account of. This means that CCD's contribution is only 0.5% of the unmet need.
- 5.8 The most recent '*Greater Birmingham and Black Country Housing Market Area (GB&BCHMA) Position Statement Addendum, April 2023*' stated that contributions from

HMA authorities amount to 18,181 dwellings in total. This leaves a significant shortfall of nearly 90,000 dwellings in unmet need up to circa 2040 in the HMA which the HMA local authorities should be helping to deliver.

5.9 In the context of the above, Marrons have undertaken their own analysis of unmet need for the 2020-2031 and 2031-2042 periods, as set out in Tables 5.1 and 5.2 below.

5.10 Our approach is based on a pro-rata calculation of the provision which the GB&BCHMA authorities plan to provide for the unmet need identified by Birmingham City Council and the Black Country authorities, over the respective local authorities Plan periods.

5.11 For example Cannock Chase intend to provide 500 dwellings towards the unmet need. Their proposed Plan period is 22 years, so  $500/22=22.7$  dwellings per annum. The Plan starts in 2018, and 2018-2031 is 13 years, so  $22.7 \times 13=295$  dwellings towards the unmet need up to 2031.

**Table 5.1: Unmet need in the Greater Birmingham and Black Country Housing Market Area to 2031**

| GB&BCHMA Local authorities | Plan period | Standard Method Need per annum | Local Plan Housing Requirement/ Capacity per annum | Total unmet housing need over Plan period | Pro rata unmet need to 2031 | Pro rata delivery of unmet need to 2031 | Remaining unmet Need to 2031 |  |
|----------------------------|-------------|--------------------------------|--|---|-----------------------------|---|------------------------------|--|
| Birmingham                 | 2020-2042   | 7,070                          | 3,221  | 84,678                                    | 42,339                      | -                                       |                              |  |
| Bromsgrove                 | 2023-2040   | 398                            | 398  | -   | -                           | -                                       |                              |  |
| Cannock                    | 2018-2040   | 252                            | 287  | -   | -                           | 295                                     |                              |  |
| Lichfield                  | 2018-2040   | 310                            | 319  | -   | -                           | 1,575                                   |                              |  |
| Redditch                   | 2011-2030   | 149                            | 337  | -   | -                           | -                                       |                              |  |
| Solihull                   | 2020-2036   | 797                            | 938  | -   | -                           | 1,447                                   |                              |  |
| Tamworth                   | 2022-2043   | 122                            | 141  | -   | -                           | -                                       |                              |  |
| North Warwickshire         | 2014-2033   | 165                            | 436  | -   | -                           | 4,009                                   |                              |  |
| Stratford-on-Avon          | 2011-2031   | 555                            | 730  | -   | -                           | 3,250                                   |                              |  |
| Dudley                     | 2023-2041   | 652                            | 604  | 1,078                                     | 479                         | -                                       |                              |  |
| Sandwell                   | 2022-2041   | 1,566                          | 588  | 18,606                                    | 8,373                       | -                                       |                              |  |
| Walsall                    | n/a         | 907                            | 907  | -   | -                           | -                                       |                              |  |
| Wolverhampton              | 2022-2042   | 1,083                          | 486  | 11,988                                    | 5,395                       | -                                       |                              |  |
| South Staffs               | 2022-2039   | 227                            | 535  | -   | -                           | 2,118                                   |                              |  |
| <b>OTHER AUTHORITIES</b>   |             |                                |  |   |                             |   |                              |  |
| Shropshire                 | 2018-2036   | n/a                            | n/a  | n/a                                       | -                           | 1,083                                   |                              |  |
| <b>TOTAL</b>               |             | <b>14,253</b>                  | <b>9,020</b>                                       | <b>116,350</b>                            | <b>56,585</b>               | <b>13,777</b>                           | <b>42,808</b>                |  |

N.B. South Staffordshire Council and Lichfield Borough Council's contributions are under review through their respective emerging Local Plans. In the event that these authorities remove their contributions the remaining unmet need would increase to 46,501 dwellings to 2031.

5.12 Table 5.1 illustrates how there would be a remaining unmet need of 42,808 dwellings in the GB&BCHMA up to 2031 if the local authorities planning to deliver some of the GB&BCHMA's unmet need do so on a pro rata basis.

5.13 Table 5.2 takes the same approach as Table 5.1 but looks further forward from 2031 to 2042, this being the final year of the emerging Birmingham Local Plan.

**Table 5.2: Unmet need in the Greater Birmingham and Black Country Housing Market Area 2031-2042**

| GB&BCHMA Local authorities | Plan period | Standard Method Need per annum | Local Plan Housing Requirement/ Capacity per annum | Total unmet housing need over Plan period | Pro rata unmet need to 2031 | Pro rata delivery of unmet need to 2031 | Remaining unmet Need 2031-2042 |
|----------------------------|-------------|--------------------------------|--|---|-----------------------------|---|--------------------------------|
| Birmingham                 | 2020-2042   | 7,070                          | 3,221  | 84,678                                    | 41,789                      | -                                       |                                |
| Bromsgrove                 | 2023-2040   | 398                            | 398  | -   | -                           | -                                       |                                |
| Cannock                    | 2018-2040   | 252                            | 287  | -   | -                           | 207                                     |                                |
| Lichfield                  | 2018-2040   | 310                            | 319  | -   | -                           | 1,385                                   |                                |
| Redditch                   | 2011-2030   | 149                            | 337  | -   | -                           | -                                       |                                |
| Solihull                   | 2020-2036   | 797                            | 938  | -   | -                           | 658                                     |                                |
| Tamworth                   | 2022-2043   | 122                            | 141  | -   | -                           | -                                       |                                |
| North Warwickshire         | 2014-2033   | 165                            | 436  | -   | -                           | 464                                     |                                |
| Stratford-on-Avon          | 2011-2031   | 555                            | 730  | -   | -                           | -                                       |                                |
| Dudley                     | 2023-2041   | 652                            | 604  | 1,078                                     | 599                         | -                                       |                                |
| Sandwell                   | 2022-2041   | 1,566                          | 588  | 18,606                                    | 10,233                      | -                                       |                                |
| Walsall                    | n/a         | 907                            | 907  | -   | -                           | -                                       |                                |
| Wolverhampton              | 2022-2042   | 1,083                          | 486  | 11,988                                    | 6,593                       | -                                       |                                |
| South Staffs               | 2022-2039   | 227                            | 535  | -   | -                           | 1,882                                   |                                |
| <b>OTHER AUTHORITIES</b>   |             |                                |  |   |                             |   |                                |
| Shropshire                 | 2018-2036   | n/a                            | n/a  | n/a                                       | -                           | 417                                     |                                |
| <b>TOTAL</b>               |             | <b>14,253</b>                  | <b>9,020</b>                                       | <b>116,350</b>                            | <b>59,215</b>               | <b>5,013</b>                            | <b>54,201</b>                  |

N.B. South Staffordshire Council and Lichfield Borough Council's contributions are under review through their respective emerging Local Plans. In the event that these authorities remove their contributions the remaining unmet need would increase to 57,469 dwellings to 2042.

5.14 Our calculations in Table 5.2 indicate that at present, there would be an unmet need of 54,201 dwellings, 2031-2042.

5.15 This means that between 2020 and 2042 we have calculated there to be outstanding unmet need of 97,000 dwellings in the GB&BCHMA after the provision in emerging and existing Local Plans are taken account of.

5.16 As a constituent member of the GB&BCHMA it is questionable as to whether the 500 dwellings to meet unmet need proposed by Cannock Chase District is adequate in the context of outstanding unmet need being close to 100,000 homes over the next 20 years.

5.17 In this context the March 2019 Sustainability Appraisal prepared for the Issues and Options stage of the Draft Plan considered four options for growth which planned for up to 2,500 dwellings to meet unmet need from the GB&BCHMA. The analysis set out in

this section indicates that this higher level of provision for unmet needs is justified.

- 5.18 As we have set out in previous sections of this report, the provision of an additional 2,500 dwellings would also move closer to supporting the labour supply generated by the Draft Plan's proposed employment land.

### **Summary**

- 5.19 In summary, Cannock Chase District Council has a responsibility to assist in addressing significant unmet housing need from the GB&BCHMA alongside the other local authorities of the HMA and this should come into the consideration of unconstrained housing need in line with PPG.
- 5.20 It is questionable whether a contribution of 500 dwellings to the significant unmet need we have identified is satisfactory. As we have summarised, we consider the outstanding unmet need beyond the provision of existing/emerging Local Plans is approximately 97,000 homes over 22 years although this will increase further if South Staffordshire and Lichfield Councils remove their contribution through their emerging Plans.
- 5.21 A higher contribution from Cannock Chase of 1,500 or 2,500 additional dwellings aligns more closely with their planned employment land.

## 6. SUMMARY AND CONCLUSIONS

- 6.1 This report has considered what unconstrained housing need for Cannock Chase is, in the context of the Regulation 19 Cannock Chase Local Plan (the Draft Plan) and its evidence base.
- 6.2 The evidence base underpinning the Draft Plan concluded that unconstrained housing need in the District is that which results from the National Planning Policy Framework's (NPPF, 2023) minimum starting point estimate of housing need, as calculated using the standard method.
- 6.3 It should be noted how the Draft Plan will be examined under the policies of the September 2023 NPPF due to the Regulation 19 version of the Plan being submitted prior to the 19 March 2024.
- 6.4 The Housing and Economic Needs Assessment (HENA) section of Planning Practice Guidance (PPG) clearly states that 'unconstrained' housing need should be determined before constraints are considered and a housing requirement is arrived at.
- 6.5 The housing need evidence base for the Draft Plan is set out in the January 2024 Housing Need Assessment (HNA) which concludes that overall housing need aligns with the NPPF's standard method (264 dwellings per annum – dpa).
- 6.6 However, the HNA calculates affordable housing need to be 290 dpa, higher than the level of overall housing need. This conclusion highlights an acute need for affordable housing in Cannock Chase District.
- 6.7 Furthermore the HNA fails to assess the number of homes required to align with planned economic growth, despite the 2020 Economic Development Needs Assessment (EDNA) stating "*It is strongly recommended that the Council undertake more detailed housing modelling to ensure the job projections are aligned closely with their housing requirement*"<sup>40</sup> (our emphasis) which has not been published as part of the evidence base.
- 6.8 Instead the 2024 EDNA indicates that at least 378 dpa will be required to support employment land. However the EDNA indicates this will only support the delivery of 58 hectares of employment land, whereas the Draft Plan plans for up to 69 hectares.
- 6.9 It is therefore considered that housing need to align with 69 hectares of employment

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<sup>40</sup> Paragraph 5.109, page 64, Cannock Chase Economic Development Needs Assessment Covid-19 Update, December 2020

land would be highly likely to exceed 400 dpa.

- 6.10 Furthermore the Regeneration job growth scenario (5,100 jobs 2018-2040) is significantly higher than the job growth identified by the 2024 EDNA to support 3,698 jobs and is supported by Council officers. The demographic modelling recommended by the EDNA is needed to understand the housing implications of this level of job growth which is considered highly realistic in the context of past trend job growth (7,500 jobs 2013-2023).
- 6.11 A contribution to unmet housing need from the GB&BCHMA would need to be added to the need for Cannock Chase District.
- 6.12 Cannock Chase District have also been able to deliver over 900 homes in a single year very recently (2019) and Planning Practice Guidance (PPG) is clear that a reason for unconstrained housing need exceeding the standard method can be where previous levels of delivery in an area are significantly greater than the outcome from the standard method.
- 6.13 Cannock Chase have been able to deliver more than 400 dpa in five years of the existing Plan period (i.e. 2006) and it is therefore considered that at least 400 dpa is a realistic number to deliver.
- 6.14 The delivery of affordable housing in the District has been particularly poor, with the level of affordable need only being achieved in full in one of the first 17 years of the existing Plan period and net delivery over that time only being 25% of need.
- 6.15 There have been four separate years since 2006 when Cannock has experienced a net *decline* in affordable housing delivery, once losses to the stock through demolitions and sales have been taken account.
- 6.16 The rate of net affordable housing delivery as a % of overall delivery has been 18.4%. Continuing delivery of affordable housing at 18.4% would require overall housing need of 1,576 dpa to deliver affordable need of 290 affordable dpa in full. This highlights how delivery has failed to keep up with need.
- 6.17 This has manifest itself in the highest number of households on the Council's housing register over the last decade in the most recent year, and the second highest number of households applying for homelessness relief duties.
- 6.18 The Inspector in the Eastleigh Local Plan identified a significant shortfall in the delivery of affordable housing and recommended an increase in the housing requirement to

deliver affordable need, in line with PPG.

- 6.19 Furthermore the affordability of housing has deteriorated at a greater rate than the West Midlands and national averages since 2013/14 when the country came out of the last recession. There has been an increase of 44% in the lower quartile ratio over the last decade in Cannock Chase compared with only 17% increase across the West Midlands, and a 49% increase in the median ratio compared with 22%.
- 6.20 House prices have increased by 53% in Cannock Chase compared with only 44% across the West Midlands and 34% across England.
- 6.21 Unmet housing need from the Greater Birmingham and Black Country Housing Market Area (GB&BCHMA) is also a consideration and as we have shown, we consider there to be outstanding unmet need of 97,000 dwellings in the HMA up to 2042. This is after all existing contributions to unmet need in HMA authorities are taken account of. This will increase further if South Staffordshire and Lichfield Councils remove their contribution through their emerging Plans.
- 6.22 In this context and in the context of the Council's sustainability appraisal considering contributions of 1,500 and 2,500 dwellings towards the unmet need, the planned provision of only 500 dwellings in the Draft Plan is considered to be inadequate.

### **Summary**

- 6.23 In the context of our analysis, and ensuring the alignment of homes with jobs, addressing affordable housing need, seeking to arrest declining affordability, and contributing to the GB&BCHMA's unmet housing need, we consider unconstrained housing need in Cannock Chase is significantly higher than the 278 dpa currently proposed.
- 6.24 The evidence available to us indicates that need for Cannock Chase alone is at least 378 dpa to align homes with jobs and additional demographic modelling could show a higher figure based on the Regeneration scenario supported by Council officers.
- 6.25 A contribution to the unmet need from the GB&BCHMA would be in addition to this need for Cannock Chase District.
- 6.26 In the context of Cannock Chase delivering 913 dwellings in a single year as recently as 2019, and 620 dwellings in 2021, delivery of at least 378 dpa is considered very realistic and a contribution to the GB&BCHMA's unmet housing need will mean that need exceeds 400 dpa.



# Land to the West of Hednesford Road

Norton Canes

VISION DOCUMENT

March 2024

**BLOOR HOMES**<sup>®</sup>

**Define.**

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Prepared on behalf of



by



# Introduction

## PURPOSE

This Vision Document in relation to Bloor Homes Limited's (BHL) site at Land West of Hednesford Road, Norton Canes ("the site") has been prepared to accompany representations by BHL in response to Cannock Chase District Council's (CCDC) Regulation 19 Draft Local Plan (DLP) consultation.

The DLP identifies part of the site as a proposed safeguarded site for residential development outside of the plan period. BHL's representations highlight, however, that the DLP is not sound as currently drafted in that it does not fully address the District's housing needs, fails to provide a sufficient contribution towards the unmet needs that are arising within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), and that it fails to provide a balanced spatial strategy that maximises the potential of Norton Canes despite its sustainable credentials.

In that regard, this Vision Document demonstrates the suitability of BHL's site at Land West of Hednesford Road, Norton Canes for residential development, as well as its capacity to accommodate c. 420 dwellings. It is clear, in light of BHL's significant concerns in relation to the soundness of the DLP, that CCDC must revisit the DLP's spatial strategy and allocation of residential sites, and should identify the entirety of BHL's land ownership for residential development within the forthcoming plan period.

## THE SITE

The site lies on the north-western edge of Norton Canes, one of the main villages within the District. It is approximately 20.67 hectares in size and is comprised of a network of regular shaped agricultural fields of varied sizes that are defined by low hedgerows. The site also contains the farm buildings and associated outbuildings of Norton Lodge Farm.

The site is bound by Hednesford Road at the northern part of its eastern boundary, with established residential areas to the east and south. Its western boundary is marked by a robust belt of vegetation that runs along the Long Lane Public Right of Way (PROW). Hedgerows also define the site's northern boundary. Open fields lie beyond the site's boundaries to the north and west.

## THE OPPORTUNITY

The emerging Masterplan proposals as presented in this document are underpinned by detailed assessments of the site and a carefully considered masterplanning exercise.

Therefore, the Masterplan highlights how the development of the site would deliver an attractive and sustainable development that respects and directly responds to the site's features and setting as a natural extension to the existing settlement form of Norton Canes. The comprehensive development of the site would, therefore, create a rounded urban form that benefits from a defensible boundary to the Green Belt as defined by the Long Lane PROW.

It is, therefore, suggested that the site is removed from the Green Belt and allocated for residential development in the emerging Cannock Chase Local Plan so that its delivery can make a significant contribution to meeting the identified housing needs in the District and the wider GBBCHMA.

Bloor Homes would very much welcome the opportunity to discuss their site, its potential allocation for development and the emerging development proposals with the Council.

## REPORT STRUCTURE

The Vision Document is structured as follows:

- **Section 2:** A Sustainable Location for Development – considers the site's relationship with the sustainable settlement and the services and facilities therein;
- **Section 3:** Understanding the Site – highlights the relative lack of constraints to the site's development;
- **Section 4:** Landscape & Visual Amenity – Examines the landscape character context and explains why the site's development would have a relatively limited impact on landscape character and visual amenity;
- **Section 5:** Green Belt Assessment – Sets out why the site makes a limited contribution to the purposes of the District's Green Belt;
- **Section 6:** Site Synthesis – Draws the preceding analysis together to inform the development scheme proposals;
- **Sections 7 & 8:** Development Concept and Masterplan – Presents a vision for the site; demonstrating its deliverability and highlighting the role it can play in meeting the District's identified housing needs; and
- **Section 9:** Conclusions.



# A Sustainable Location

## NORTON CANES

The site is located at the north-western edge of Norton Canes, a main urban area within Cannock Chase District.

The village contains a range of local services and community facilities, including a nursery, primary and secondary schools, a community library, churches, a pharmacy, and a doctor's surgery. Indeed, Jerome Primary School is located approximately 300 metres south of the site, and is directly accessible via Long Lane PROW. Meanwhile, Norton Canes High School is located a 10 minute walk east of the site. A small pharmacy is located within the nearby local centre, whilst Norton Canes Medical Centre is located at Brownhills Road within a 10 – 15 minute walk.

The village's local centre also has a good retail offer, with a chain convenience store, smaller convenience stores, takeaways, and independent shops all located within close proximity (approx 350m) to the site. Indeed, a bakery / café, a restaurant and a cluster of fast food / takeaway services are located along Brownhills Road within a 5 minute walk of the site, whilst the nearest public house is located at Walsall Road, 600 metres south of the site.

The site and surrounding area also benefit from a good offer of sport and recreational facilities. Indeed, numerous open spaces are located in proximity of the site, including the playing fields at the rear of the Norton Canes Community Centre; located a 10 minute walk from the site. In the wider area, the site is located close to Chasewater Country Park and Cannock Chase AONB.

Norton Canes also contains some significant employment areas. The expansive Norton Canes Industrial Park, which contains a number of industrial and construction-based businesses, is located approximately 600m south of the site. The excellent connectivity afforded by the A5 / M6 Toll also provides access to the Orbital Retail Park, Kingswood Lakeside Employment Park, the Longford Industrial Estate and Cedars Business Centre.

## PUBLIC TRANSPORT

The settlement is also well served by public transport links, with a number of bus routes running along Hednesford Road adjacent to the site and along Church Road / Chapel Street. Indeed, the 60/60A services that travel along Hednesford Road provide access to Cannock, Burntwood and Lichfield through twice hourly services. The 3/3A service, which stops adjacent to Norton Canes Library provides access to Cannock and Walsall, via the villages of Brownhills, Pelsall and Rushall.

There is, therefore, particularly good connectivity with nearby Cannock and Heath Hayes, both of which have high order services and facilities themselves that would be of benefit to future residents.

Therefore, Norton Canes is an entirely appropriate and sustainable location to accommodate further residential development and growth to meet the needs of the District and the unmet need arising elsewhere in the HMA.





**LEGEND**





















-  Site boundary
-  Chasewater County Park
-  Urban form
-  Industrial / employment
-  Local green space
-  Woodland / vegetation
-  Primary road
-  Chasewater railway line
-  Public right of way
-  Proposed recreational footpath / cycle Route
-  Bus stop
-  Convenience store
-  Post office
-  Church
-  Community centre
-  Primary school / Nursery
-  Secondary school
-  Leisure facility
-  Local centre
-  Heath Hayes roundabout



Figure 1 - Access & Facilities



# Understanding the Site

## HERITAGE

There are no statutory or non-statutory heritage assets within or in close proximity to the site. Whilst the Grade II\* listed Church of St. James is located approximately 800m to the south-west of the site, the site has a very limited visual and functional relationship with it.

The Historic Environment Character Assessment (HECA-2009) prepared on behalf of CCDC sets out a description of the historic environment across the District and assesses the potential implications of medium-large scale development in certain areas.

A small part of the site at its northernmost extent is located within CHECZ13 and the rest of the northern part of the site is located within CHECZ14, both of which extend north from Norton Canes to Cannock. The southern part of the site is located within CHECZ16, which extends west to Churchbridge.

The northern part of the site within CHECZ13 forms part of an "18th/19th century field system", the part within CHECZ14 forms part of a "piecemeal enclosure" field system and the southern part within CHECZ16 forms part of an area of "post 1880s reorganised fields".

There are few known (non-designated) heritage assets in any of those areas and none within the site or its immediate surrounds, albeit that (as anywhere else) unknown archaeological remains may still be present.

The HECA concludes that despite being relatively large and as yet undeveloped areas (certainly compared to the others assessed), CHECZ13 and 16 are still only of "moderate" and CHECZ14 of "low/moderate" historic value.

It continues to state, therefore, that medium to large scale development is unlikely to have a significant impact on the historic environment within CHECZ 14 and may have a moderate impact on the historic environment within CHECZ13 and 16. However, in relation to the site itself, given the distance from the identified assets, the impact would be somewhat less than that.

There are, therefore, no known cultural heritage constraints to the site's development. Assessment of the archaeological potential of the site will be required in due course, but otherwise in accordance with the HECA's recommendations the development proposals should consider and address the historic landscape character of the area and incorporate "design strategies for retaining or reflecting the local distinctiveness of the zone."

## ECOLOGY

The site and its surrounds are not subject to any nature conservation designations. Indeed, the Cannock Chase District Nature Recovery Network Mapping (2020) prepared by the Staffordshire Wildlife Trust shows the site to be of "Low" distinctiveness and, therefore, of only site level importance.

Detailed assessments will be undertaken in due course to determine whether any significant habitats and protected species are present in the area and what mitigation would be required as part of the development proposals.

However, the site's development provides an opportunity to enhance the area's biodiversity by strengthening the retained Green Infrastructure network (notably the site's robust hedgerow framework), and providing additional native tree, shrub and grassland planting, as well as wet/dry SUDS features providing structural diversity, connectivity, foraging and nesting habitats.

### Cannock Chase Special Area of Conservation

The site is also located close the Cannock Chase Special Area of Conservation (SAC). The Cannock Chase SAC Partnership recently commissioned the "Cannock Chase SAC Strategic Area of Management & Monitoring Measures- Detailed Implementation Plan: Site User, Infrastructure, Education and Engagement" (CCSAC DIP- 2020). The CCSAC DIP recognises that the growing population and housing delivery in the area will likely increase visitor pressure in Cannock Chase, but that this activity realises a range of socio-economic benefits. It therefore sets out a range of enhancement and management measures that will provide for and improve future recreational use across the AONB without compromising the nature

conservation, archaeological, geological and historic interest of the area.

## MOVEMENT AND HIGHWAYS

### Site Access

An Access Feasibility Report (AFR) has been prepared by WYG to identify the opportunities to provide suitable site access.

The AFR suggests that a four arm compact roundabout junction on Hednesford Road, linking with Woodfield Drive, could be provided at the existing field access into the site. Given that Hednesford Road is a bus route it should be designed to accommodate bus movements.

A second access point could then be provided further south between Hill Street and Laurence Grove, which would require the bus stop located opposite Hill Street to be relocated further north.

In order to encourage active travel to nearby services and facilities, the AFR also recommends seeking to provide pedestrian / cycle links to connect with the Long Lane PROW that runs along the western boundary and to Chasewater Way to the east of the site.

### Highway Network

The AFR highlights that improvements to the nearby Five Ways Island, located 1km to the north of the site (see Access and Facilities Figure), will be required in order to address existing levels of congestion and poor air quality.

It is understood that Staffordshire County Council (SCC), as the Highways Authority, have already submitted an 'in principle' scheme to the Department for Transport for Local Pinch Point funding that will seek to improve existing conditions at the junction and facilitate further development in the area. WYG have also considered potential improvement scheme options and the intention is to discuss those with both SCC and CCDC in order to identify a preferred way forward.



## DRAINAGE

The site is not located within the floodplain and a drainage strategy including SUDS features will be incorporated within the scheme to provide surface water attenuation and ensure that the development does not increase the risk of flooding elsewhere. Due to the site's topography, which falls from approximately 165m AOD at its north-eastern extent to approximately 147m AOD at its south-western extent, it is expected that the SUDS features will be located within the southern part of the site.

## SERVICES

A gas pipeline is located within the site. It enters at the south-west corner, running north-east to the south-eastern boundary before turning north and running through the centre of the site. An 6.1m easement (either side) is in place to allow free access for its maintenance, and has been taken into account in the emerging Masterplan.



Figure 2 - The Site



# Landscape & Visual

## LANDSCAPE CHARACTER

The site is located within the “Coalfield Farmlands” Landscape Character Type (LCT), as defined by the Cannock Chase Landscape Character Assessment Review (LCAR) from November 2016. The LCT is described as “a varied settled / industrial landscape of former mining villages, pockets of ancient settled farmland and areas of disturbed ground. The remaining farmland, used mainly for stock rearing, comprises small to medium sized hedged fields defined by irregular, mixed species hedgerows. This is often surrounded by urban settlement and/or land disturbed by extensive coal mining and clay winning.” Within the District, the LCT mainly lies on either side of the A5 between Great Wyrley, Norton Canes, and the Walsall urban edge (see [Figure 3](#)).

Key characteristics of the LCT (that are of relevance to the site) include:

- Undulating landform north of the A5 rising up to Heath Hayes and Hednesford;
- Pockets of ancient settled farmland with thick mixed species hedgerows;
- Scattered hedgerow oaks and patches of secondary woodland;
- Former mineral sites restored for stock rearing and/or amenity uses; and
- Mining settlements with brick built terrace houses.

Overall, the LCAR considers the LCT to have a Moderate ‘strength of character’, which is mainly derived from the cultural dimension of the landscape and remnant patches of semi-natural habitat. The condition is considered to be Good, as despite being an industrial/farming landscape in decline it still retains a strong rural character, with many patches of semi-natural habitats that are worthy of conserving and restoring. It also notes that where opencast coal mining and arable intensification have occurred “the scale of the landscape has enlarged, creating a more open, less enclosed character, often with wide views to the surrounding urban edges”.



Within the larger LCT the area is split up into smaller localised Land Description Units (LDUs). The site is located within LDU ‘CF23’ (see [Figure 3](#)). It is described as:

“A heavily modified Coalfield Farmlands landscape, almost surrounded by urban development in the zone between Great Wyrley, Heath Hayes and Norton Canes. Much of this area has been worked over by opencast coal mining and although it has since been restored to farmland, little survives of the original historic landscape apart from a few relics in the north east corner of the area. The functional integrity of this zone is therefore weak”.

The northern part of the site contains some of this relic historic landscape – indicated by the mature trees and hedgerows that define the field boundaries within this area.

The overall vision for the LCT is to “Conserve and Enhance” and specific to LDU CF23 by “encouraging the creation and management of characteristic features”. This includes the development of healthy vegetation along roadsides and the potential expansion and management of historic lanes and trackways as recreational routes.

It concludes that LDU CF23 has:

“A moderate inherent sensitivity relating to the historic time depth of the cultural pattern. Where the historic pattern has been removed/damaged due to opencasting, then the sensitivity is lower. Visual sensitivity is also low to moderate reflecting the prominence of tree cover and gently rolling/undulating nature of the topography.”

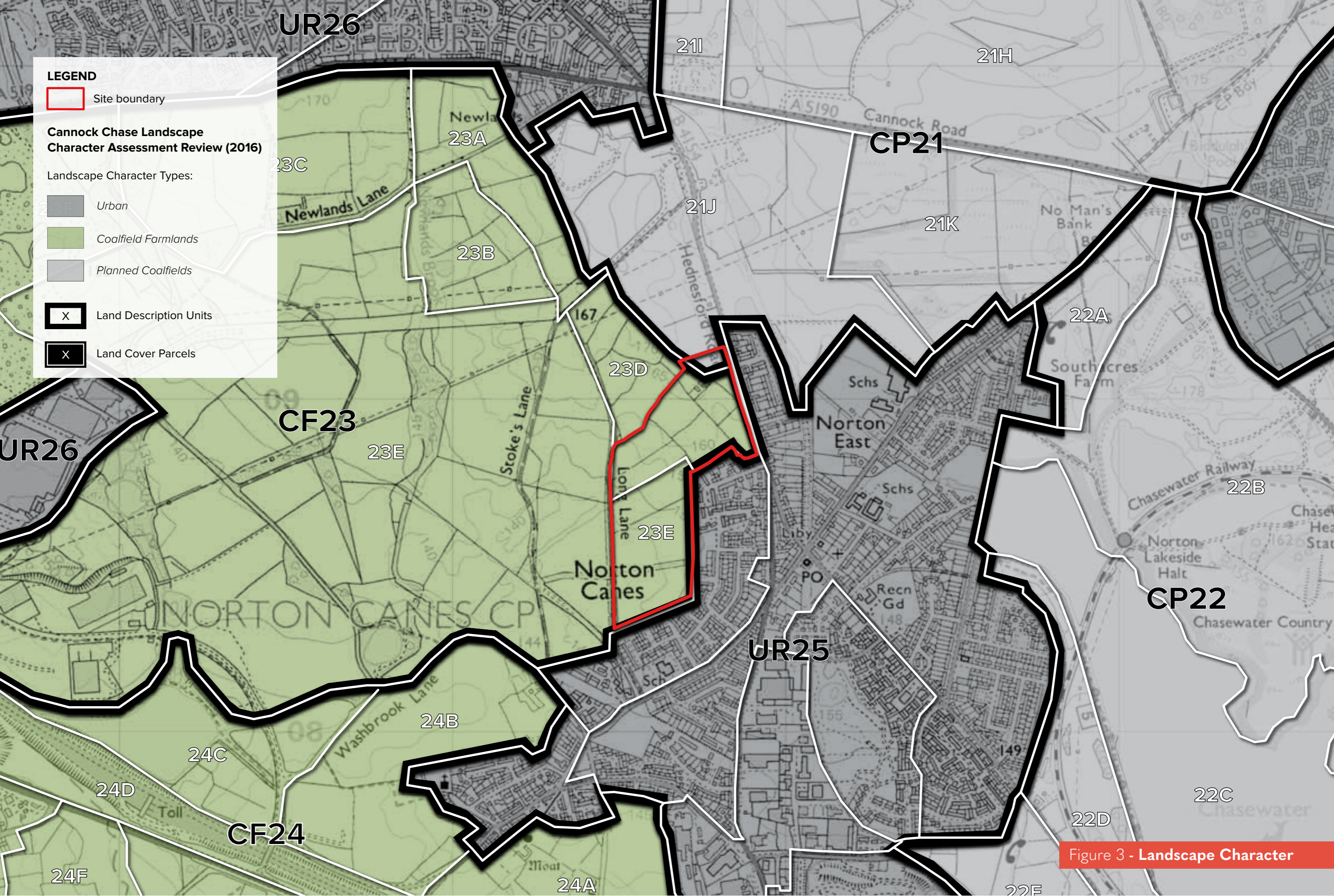


The site contains some historic field boundaries and vegetation in the northern parts of the site but displays lower visual sensitivity due to the combination of existing tree cover and underlying landform. Conversely, the area to the south lacks the sense of strong landscape enclosure and is more open.

As part of the assessment process the LCAR further subdivided the LDU into a series of Land Cover Parcels (LCPs) which are also indicated on [Figure 3](#). The northern part of the site is included within 23d, a discrete area on the edge of the LDU that also includes an area of intact historic farmland extending north towards Stoke’s Lane. The southern field is included within the much larger LCP 23e, which extends west towards Cannock and covers a tract of landscape north of the M6 Toll. The LCAR considers the overall condition of 23d to be Good, due to its intact landscape with mature trees and mixed species hedgerows, while the overall condition of 23e is considered to be Poor, mainly because of the impact on the landscape of the previous large scale opencast mining and the proximity of nearby urban areas and major infrastructure.

This is consistent with the character displayed on site. As part of the mitigation strategy for the site, the historic pattern of hedgerows will be retained where possible and integrated into the proposed layout. Additional trees and planting will also be used to strengthen the landscape structure in the southern parts of the site.





**LEGEND**

- Site boundary

**Cannock Chase Landscape Character Assessment Review (2016)**

Landscape Character Types:

- Urban
- Coalfield Farmlands
- Planned Coalfields

- Land Description Units
- Land Cover Parcels

Figure 3 - Landscape Character



## LANDSCAPE VALUE

While the site is not covered by any specific designations that imply a higher landscape value, the relative value of the site within its wider context has been considered using guidance contained within the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) published in 2013, specifically the range of factors set out in Box 5.1 that can help in the identification of valued landscapes. These are set out below.

### 1. LANDSCAPE QUALITY (CONDITION)

The LCAR considers the condition of the northern section of the site (as part of LCP 23d) to be “Good” and the southern field (as part of LCP 23e) to be “Poor”. This is apparent on the site, where the northern areas are characterised by a generally intact historic field pattern comprising of pasture enclosed by hedgerows. Many of these hedgerows include mature trees and form robust landscape features – particularly to the north and west of Norton Terrace. The southern field is generally open and is mainly used for horse grazing subdivided by post and wire fencing with an area of juvenile woodland in the western corner.

### 2. SCENIC QUALITY

The majority of the site is well screened from the surrounding area by the adjacent settlement edge and by robust hedgerows and mature trees within and around the edges of the site. Where parts of the site are more exposed, such as the higher ground in the southern field and the triangle of land along the western edge of Hednesford Road, more open views are available. However, their scenic quality is often impaired by visible detractors within the landscape, including the surrounding settlement edge, large commercial buildings, pylons and overhead wires. Overall the scenic quality of the site is considered to be limited.

### 3. RARITY

The fields within the northern sections of the site form part of a small tract of historic farmland that extends northwards from the edge of Norton Canes towards Heath Hayes. While not inherently rare in terms of the broader landscape characteristics – pasture land enclosed by mature hedgerows– these remnant pockets of farmland assume greater value within an area where the landscape has otherwise been impacted by extensive open-cast mining and subsequent restoration. This is reflected in the LCAR description of CF23 (see section on Landscape Character).

### 4. REPRESENTATIVENESS

The northern sections of the site are representative of the pockets of remnant historic farmland that are described within the LCAR descriptions of the LCT and LDU.

### 5. CONSERVATION INTERESTS

The site is not covered by any specific conservation designations (see Figure 4) and there are no known features of wildlife, earth science or archaeological or historical and cultural interest within the site that would add to the value of the landscape (subject to further survey). The northern fields and associated tree and hedgerow boundaries are identified as characteristic features of value within the LCAR descriptions of the LCT and LDU and the LCAR vision for the LCT is to conserve and enhance.

### 6. RECREATION VALUE

There are no public rights of way within the site, although Long Lane runs along the western edge of the site within a heavily vegetated corridor. The site constitutes farmland with some horse grazing and does not have any current recreational value.

### 7. PERCEPTUAL ASPECTS

The site is not considered to be wild nor tranquil. Although some areas of the site are more discrete and enclosed the site is closely related to the existing settlement edge and is located within an area of former opencast mining.

### 8. ASSOCIATIONS

The main cultural associations with the surrounding landscape are related to the former coal mining industry. However, there are no known associations specific to the site, in terms of particular people or events in history or in any recorded reference to it in literature, that contribute to perceptions of natural beauty in the area.

### SUMMARY

Overall, the site is not considered to be a valued landscape, although the field patterns and tree/hedgerow boundaries in the northern part of the site are considered to have elevated value within the local context because of their relative quality (condition) and because they are representative of the small areas of ancient farmland that have survived within an area that has otherwise undergone significant disturbance from the operation and subsequent restoration of open cast mining. These features would be retained where possible and incorporated within the proposed layout. Elsewhere, the site is heavily influenced by the surrounding urban context and notable detractors (including pylons, overhead power lines, infrastructure and industrial buildings).





**LEGEND**

- Site boundary
- Public Right of Way
- Localised ridgeline
- Significant tree belt alongside Long Lane
- Well vegetated boundaries following historic field pattern
- Contours
- Pylons & overhead power-lines
- Key drainage corridor
- Site of Biological Interest
- SSSI
- Green Space Network

Figure 4 - Landscape Analysis



## VISUAL AMENITY

To understand the potential visibility of the site, a Zone of Theoretical Visibility (ZTV) has been prepared (see [Figure 5](#)). This is a digital ground model that places light sources on the site to represent the mass of proposed building development. Within the ZTV, the lighter areas indicate the locations from where there may be a potential view of development on the site and the darker areas represent the areas where there would not.

It indicates that potential views of the site are most likely to be from the gently rising ground around Great Wyrley to the south west and from undulating higher ground to the west and north east. There are unlikely to be any views from the urban edges of Cannock and Heath Hayes to the north and north west or from Chasetown to the east.

However, the ZTV only takes into account the screening provided by the area's topography and does not take into account any screening provided by surrounding vegetation or buildings. Further refinement using a combination of desk and field study showed that views of the site are generally restricted to an area within a one kilometre radius, with some occasional distant views where breaks in the surrounding topography and land uses allow. This is mainly due to the screening provided by surrounding vegetation and the adjacent settlement edge. Views of the site from within Norton Canes are effectively restricted to the adjacent properties and settlement edge due to the falling topography and robust boundary vegetation within and around the edges of the site.

The main publicly accessible views of the site were identified as:

- Views from public rights of way within a kilometre of the site to the north and west (Stoke's Lane and Long Lane);
- Views from Hednesford Road to the north and on the eastern edge of the site;
- Views from estate roads and footpaths within the adjacent housing area to the east;
- A view from the public bridleway off Newlands Lane to the west of the site; and
- A long distance view from Jacob's Hall Lane on the edge of Great Wyrley – which also forms part of a strategic recreational route.

Representative views from these locations are set out and described on the following pages.

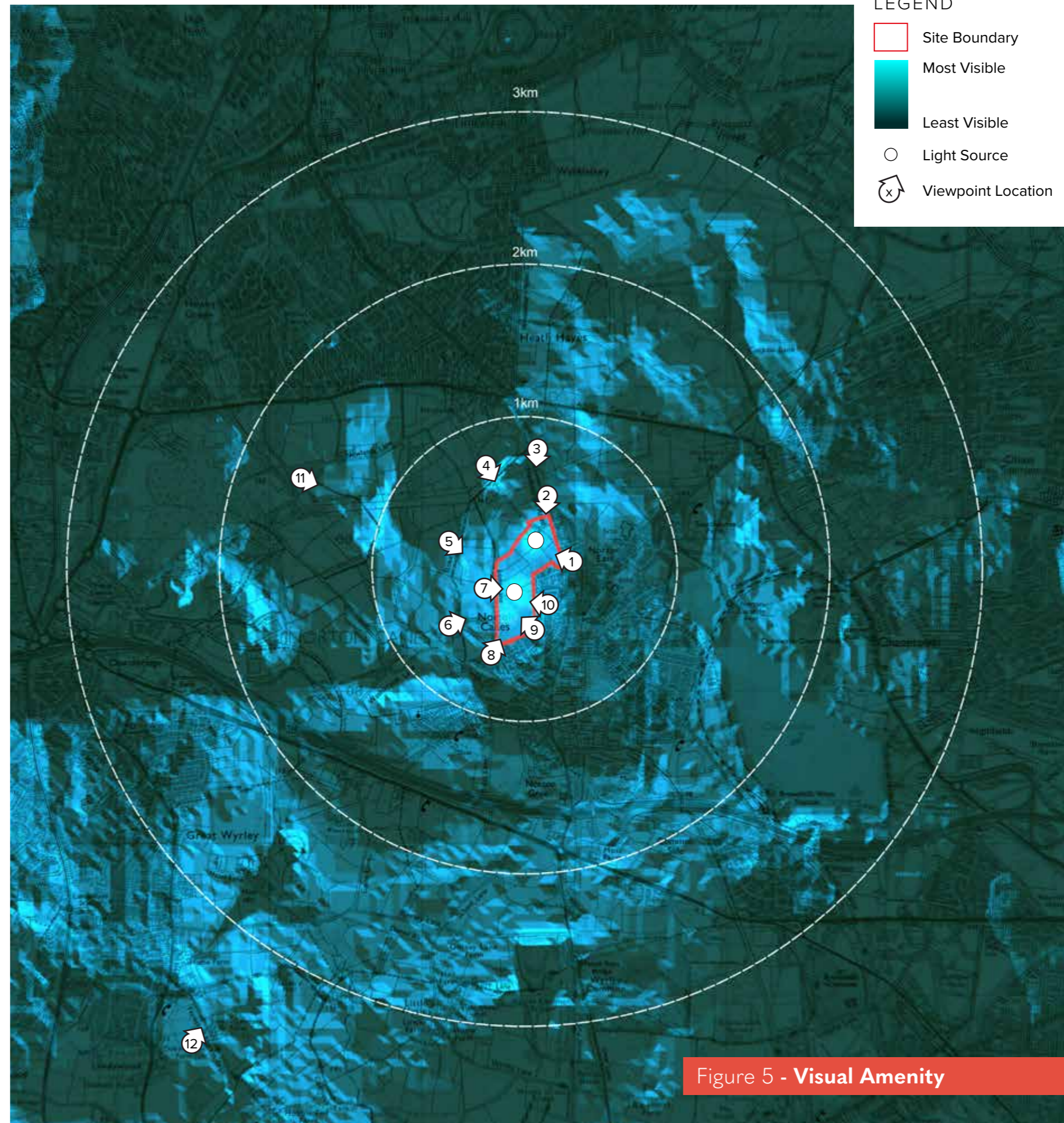


Figure 5 - Visual Amenity





**VIEWPOINT 1 - View from Hednesford Road, adjacent to site's eastern boundary:** From this location, there are views into the north-eastern part of the site over the trimmed hedge boundary along the western edge of Hednesford Road. The open fields allow the view to extend northwards across the site to the rising ground around Norton Lodge Farm. However, these views are seen in the context of existing ribbon development along Hednesford Road, and the presence of pylons and overhead power lines to the north further detracts from the visual experience. The remainder of the site is screened from view by surrounding vegetation and the existing housing off Norton Terrace. Any development on the site would therefore be seen within the context of the existing settlement edge.



**VIEWPOINT 2 -View from Hednesford Road, approaching the settlement from the north:** Views into the site from this location are influenced by the underlying localised topography, as the undulating road corridor and the managed roadside hedgerow allow occasional - and often transient - views across towards the site. Nearby signage and outlying dwellings denote the arrival into Norton Canes from the north. Although north eastern parts of the site can be seen alongside the road corridor - including some prominent hedgerow trees - the majority of the site is screened from view by rising landform, surrounding vegetation and the existing settlement edge. Any development on the site would be seen in the context of the existing settlement edge and the extents already established by the ribbon development along Hednesford Road. The presence of overhead power-lines and pylons are further detractors within the view.



**VIEWPOINT 3 -View from Hednesford Road, on the eastern edge of the settlement:** From this location, only the north eastern parts of the site are visible as the rising land around Norton Lodge Farm and surrounding hedgerow boundaries screen the majority of the site from view. Some of the prominent hedgerow trees within the site can be seen above the roadside vegetation, as can the cluster of farm buildings, although the housing area to the south of the site is generally screened by trees. There is a strong sense of arriving into the settlement at this location, as a tree belt gives way to ribbon development along the eastern edge of Hednesford Road. Development on the site would be seen in the context of this existing housing and would not extend the settlement edge any further north along Hednesford Road.





**VIEWPOINT 4 - View from Public Right of Way (Norton Canes CP 33 / Stoke's Lane), north of site:** From this location only a small triangular area in the north eastern corner of the site is visible, sitting between Hednesford Road and Norton Lodge Farm either side of the existing farm access. The existing ribbon development along Hednesford Road is a visible backdrop to this area of the site, although the wider settlement is screened from view by an adjacent tree belt. The majority of the buildings within the farm complex and the wider site to the south west are effectively screened from view by the layers of hedgerow vegetation that define the intervening field boundaries as the land starts to slope away. Two sets of pylons and overhead power-lines are significant detractors in the foreground to the view. Any development on the site is likely to be a minor component within the view and would be seen in the context of the existing visible housing edge along Hednesford Road.



**VIEWPOINT 5 - View from Public Right of Way (Norton Canes CP 33 / Stoke's Lane) north-west of site:** From this location, the majority of views into the site are filtered by the robust tree planting that flanks Long Lane along its western edge. Existing housing development along Chasewater Way can be seen on the skyline above this vegetation, including a small open area in the south easternmost corner of the site. Although the larger fields surrounding the viewpoint allow for a greater depth of view, wider views are generally well contained by the surrounding landform and vegetation and much of the wider settlement is screened from view. While there is a sense of being within the countryside, the existing settlement edge is visible to the south east and the pylons and overhead power-lines are detractors in the view to the north. Development on the site would be seen in the context of the existing settlement edge and would sit in front of, and below, the housing already visible within the view. It should be set back from the western edge of the site to take into account the filtered views across Long Lane.



**VIEWPOINT 6 -Views from Public Right of Way (Norton Canes CP 33) west of site:** Moving further south along Stoke's Lane, and closer to the existing settlement edge, a gap in the boundary vegetation allows an opportunist view across the adjacent fields towards the site. While the majority of the site continues to be screened from view by the robust tree belts flanking Long Lane, there are filtered views of the rising ground in the southern part of the site. However, the existing housing along the edge of Chasewater Way can also be seen on the skyline beyond. The large open fields adjacent to the viewpoint allow for a greater depth of view - particularly to the north (where pylons and overhead power-lines are noticeable), but wider views are generally well contained by the surrounding landform and vegetation and much of the wider settlement is screened from view. Development on the site is likely to extend the perceived settlement edge further north. However, it would largely be contained by surrounding tree cover and would be seen in the context of the existing built up area - sitting alongside, and below, the housing already visible within the view.

**Views 4-6**





**VIEWPOINT 7 - View from Public Right of Way (Norton Canes CP 34 / Long Lane) adjacent to site's west boundary:** Views of the site from the adjacent public right of way are immediate and direct because of the close proximity of the viewer. However, they are also heavily filtered by the trees and vegetation that run along the western boundary of the site. Within the interior of the site, the rising ground and the intervening hedgerows provide a strong sense of enclosure. Existing housing along the edges of Chasewater Way can be glimpsed beyond an area of juvenile woodland at the top of the slope. However, the wider settlement and the ribbon development along Hednesford Road are generally screened from view. Development on the site should be set back from this edge to maintain a degree of separation along the public right of way and should be sensitively positioned to provide informal overlooking without being overbearing.



**VIEWPOINT 8 - View from Public Right of Way (Norton Canes CP 34 / Long Lane) across the field to the immediate south of the site:** At this location a break in the boundary vegetation along Long Lane allows an open view towards the site and the adjacent housing area off Chasewater Way. It is taken from the immediate edge of the settlement next to Kingswood Drive (which has a footpath link to Long Lane via an adjacent open space). The existing housing edge is prominent at the top of the slope to the east. Along the southern boundary of the site, a relatively low hedgerow allows views across to the rising ground and mature hedgerow boundaries in the sites interior to the north, including a glimpse of the farm buildings at Norton Lodge Farm. Pylons and overhead power-lines are also visible on the horizon. Development on the site would be seen in the context of the existing housing edge while the retention of trees and hedgerows within the interior of the site would also help to integrate buildings into the landscape.



**VIEWPOINT 9 - View from Norton Springs cul-de-sac, adjacent to site's south-east corner:** From this location there are slightly elevated views from the edge of the adjacent housing area across the site and the surrounding countryside to the west - where the rising landform and surrounding tree cover gives a wider sense of enclosure. Pylons, overhead power-line and large commercial buildings are detractors within the view and can be seen on the horizon to the north and west. A gap in the southern hedgerow boundary allows views across to the rising ground and mature hedgerow boundaries in the sites interior. The remainder of the site is screened from view by the surrounding housing. Development on the site would be seen in the context of the existing housing edge while the retention of trees and hedgerows within the interior of the site would also help to integrate buildings into the landscape.





**VIEWPOINT 10 - View from open space at Chasewater Way, adjacent to site's eastern boundary:** This view is representative of views from the adjacent housing edge, which has a varied interface with the site along its eastern boundary - with the majority defined by houses and private gardens backing on to the site but with some sections of frontage set back behind private drives and boundary vegetation. From this location, a break in the surrounding housing edge allows open views from the estate road across the southern part of the site, albeit slightly filtered by trees along the boundary. The remainder of the site is screened from view by the surrounding built up area. Within the view, large commercial units, pylons and overhead power-lines on the edge of Cannock can be seen above the surrounding tree cover on rising ground further to the west and are detractors within the view. Development in the southern part of the site would be seen in the context of the existing housing edge and would sit lower in the landscape.



**VIEWPOINT 11 - Views from Public Right of Way (Norton Canes CP 35), west of the site:** From this location the open, slightly elevated position provides a panoramic view to the east. The edge of Norton Canes can be seen amongst the wooded backdrop, including the existing housing off Chasewater Way - although it is a relatively minor component within a view that is otherwise dominated by the overhead power-lines and pylons that march across the landscape. It is also heavily influenced by the large commercial units that sit beyond a tree belt to the south. Development on the site would be seen within the extents and context of the settlement edge that is already visible within the view.



**VIEWPOINT 12 - View from Jacob's Hall Lane, south west of site:** This view is representative of distant views from the gently rising ground to the south around Great Wyrley (beyond 3 kilometres) and is taken from a strategic recreational route (albeit it from a field access that forms a gap in the otherwise robust roadside vegetation). Norton Canes is just about discernible on the distant horizon - its position highlighted by the chimney stack to the south of the settlement- and forms a very minor component within the wider panoramic view. Although the surrounding landform and vegetation cover give a strong sense of wider enclosure (including effective screening of the M6 Toll Road from this location) the industrial and urban context is apparent - including filtered views of the large commercial units on the edge of Cannock and the visible pylons, overhead power-lines and settlement edge further to the north. Development on the site is unlikely to be discernible from this location.

## Views 10-12





The north eastern parts of the site are open to views from Hednesford Road but are seen in the context of existing housing development



The existing housing edge is prominent in views from the south and west - occupying the higher ground above the site

## SUMMARY

The ZTV (based on the underlying topography) indicated that there may be extensive views to the south and from selected locations on higher ground to the north and west. However, further field and desk study showed that the screening provided by the surrounding settlement edge and vegetation effectively restricted views of the site to within a kilometre. In considering a number of selected viewpoints from the surrounding area the following observations were made:

In terms of visual amenity, the underlying landform and existing hedgerow enclosure within the site effectively split the site into two distinct areas – the higher land to the north east and the southern field and rising land to the west:

- The higher land on the north eastern corner (around Norton Lodge Farm) is visible in views from the Hednesford Road corridor and sections of Stoke's Lane to the north but the remainder of the site is generally screened from view by the rising landform and field boundary vegetation;
- The southern field is more visible in views from the Stoke's Lane public right of way to the west but is seen against a backdrop of the existing housing edge. The remainder of the site is screened by trees flanking Long Lane (although there are some filtered views through the vegetation into the western fringes of the site);
- Further south, the underlying landform and low hedgerow on the sites southern boundary opens up views into the rising ground and field compartments within the interior of the site. However, these views are seen from either within – or on the immediate edge of – the existing settlement and are heavily influenced by the housing surrounding the site;
- Views from Long Lane would be direct and immediate but would be heavily filtered by vegetation along the western boundary;
- Views from within the adjacent housing would be a mix of public and private views depending on whether surrounding properties front or back on to the site (with private gardens). However, views would generally be limited to properties on the immediate edge of the site as elsewhere the combination of underlying landform, robust interior and boundary vegetation and built enclosure provides an effective screen; and
- There are few distant views of the site. Where these exist they are seen within the context of the existing settlement edge and surrounding urbanising detractors – including large commercial units and overhead power-lines.
- The existing vegetation within, and surrounding, the site should be retained where possible, to maintain the level of screening within the site and help to successfully integrate the proposed development into its surroundings.



# Green Belt Assessment

## CONTEXT

Approximately 32% of the District is currently developed and a further 30% forms part of the Area of Outstanding Natural Beauty (AONB). Whilst there is some overlap, over 60% of the District also forms part of the designated Green Belt. Therefore, given the scale of future development required to address the identified development needs in the District and wider HMA, and ensure that those needs are met in accordance with a sustainable spatial strategy, it is essential that land adjacent to the District's main settlements is released from the Green Belt and allocated for development.

As one of the main urban areas in the District, Norton Canes must play a key role in this respect. Critically, the land in its surrounds are not subject to the AONB designation. There are, however, still significant constraints that limit the opportunities to realise substantive developments that are well related to the existing urban form (and the services and facilities within). Notably they include the A5 and M6 toll road corridor to the south and the SSSI/SBI ecological designations to the east. There is, therefore, inevitably a focus on the land to the north and west of the settlement that includes this site.

## PREVIOUS GREEN BELT ASSESSMENT

The Cannock Chase Green Belt Study (CCGBS- 2016) prepared on behalf of CCDC assessed the performance of land within the Cannock Chase Green Belt against the 5 stated purposes of Green Belts as set out in NPPF.

In the CCGBS, the site and adjacent land to the north and west constitutes assessment parcel NC3. The CCGBS concludes that the area plays a very limited role in terms of Purpose 1, which relates to checking the unrestricted sprawl of large built-up areas, and no role at all in terms of Purpose 4, which relates to preserving the setting and special character of historic towns. It does conclude, however that the area plays a significant role in terms of Purpose 2, which relates to preventing neighbouring towns merging into one another, and Purpose 3, which relates to safeguarding the countryside from encroachment. All areas are considered to play a significant role in terms of assisting urban regeneration.

Overall NC3 is considered to be a mid performing parcel. Nonetheless it plays less of a role in relation to the Green Belt purposes than the majority of Parcels around Norton Canes,

and less than the parcels to the north (NC1 & C16) and south west (NC4&5). Indeed, only one other Parcel (NC7) plays less of a role, but that is remote from the settlement centre.

Moreover, it is apparent that the site's location, aspect and the clear defensible boundary that is provided by Long Lane means that it performs less of a role than Parcel NC3 taken as a whole. It clearly does not occupy a particularly sensitive part of the Green Belt, and its removal for development would not undermine the function and purpose of the residual Green Belt.

## URBAN SPRAWL

The site is already bordered to its east and south by the well established urban form of Norton Canes. The location and nature of the site would, therefore, allow it to be developed in a compact form that relates well to the existing built form, consolidating the overall pattern of development on this edge of the urban area. It would also provide a sympathetic and well defined edge to the countryside to the north and west, sitting unobtrusively within its setting by virtue of the screening provided by the site's existing vegetation, and the site's location at a lower lying area than the existing built form.

## COALESCENCE

The development of the site would have a minimal impact in terms of the coalescence of settlements. The site's development would not extend the urban form of Norton Canes further north than the existing residential dwellings that are adjacent to Hednesford Road or west beyond Church Road.

Indeed, the existing gap between Norton Canes and Heath Hayes to the north is 700m, whilst the gap between the northern edge of the development and Heath Hayes to the north would be 700m. To the site's west, the existing gap between the western edge of Norton Canes and the eastern extent of Churchbridge is 950m. The gap between the western edge of the development and Churchbridge would be 1.4km. Notably, that is more than the 1km criteria in the CCGBS, and therefore the site would score lower than Parcel NC3 in this respect.

Moreover, the visual containment provided by the robust landscape framework in the surrounding area would maintain the strong sense of separation between the settlements and ensure that there is no perception of coalescence between them.

## COUNTRYSIDE ENCROACHMENT

Whilst the site's development would ultimately represent encroachment into the countryside (in so far as the development of any greenfield site would), the surrounding urban form (on two of the site's sides), and the established landscape structure at its boundaries, would very much negate the perception of encroachment, particularly when viewing the site from the existing urban areas. Indeed, as described in the preceding section, the visibility of the development would largely be limited to the site's immediate environs, and would be seen in the context of the existing settlement.

Moreover, the robustly vegetated Long Lane would provide a new defensible boundary for the Green Belt that would contain the development and limit further encroachment on the countryside.

## HISTORIC TOWNS

The parcel does not sit within or adjacent to a Conservation Area within a historic town and does not have direct views in to a historic town's historic core. Therefore, the parcel is not considered to contribute to the setting and special character of a historic town.

## URBAN REGENERATION

The site performs the same role in relation to this matter as any other greenfield site within the designated Green Belt in the District.

## SUMMARY

The development of the site will inevitably result in the growth of Norton Canes and some encroachment on the surrounding countryside. However, the nature of the site, its relationship with the existing urban form, the robust landscape structure in the wider area, and notably, the defensible Green Belt boundary provided by Long Lane at its western extent, mean that it plays a very limited role in relation to the NPPF's stated Green Belt purposes and, therefore, that the degree of harm arising from its development would be limited in this respect.



**LEGEND**

- Site boundary
- District boundary
- Green belt
- Countryside
- Urban form
- Woodland / vegetation
- Site of Special Scientific Interest (SSSI)
- Site of Biological Interest (SBI)
- Primary road
- Motorway
- Public right of way

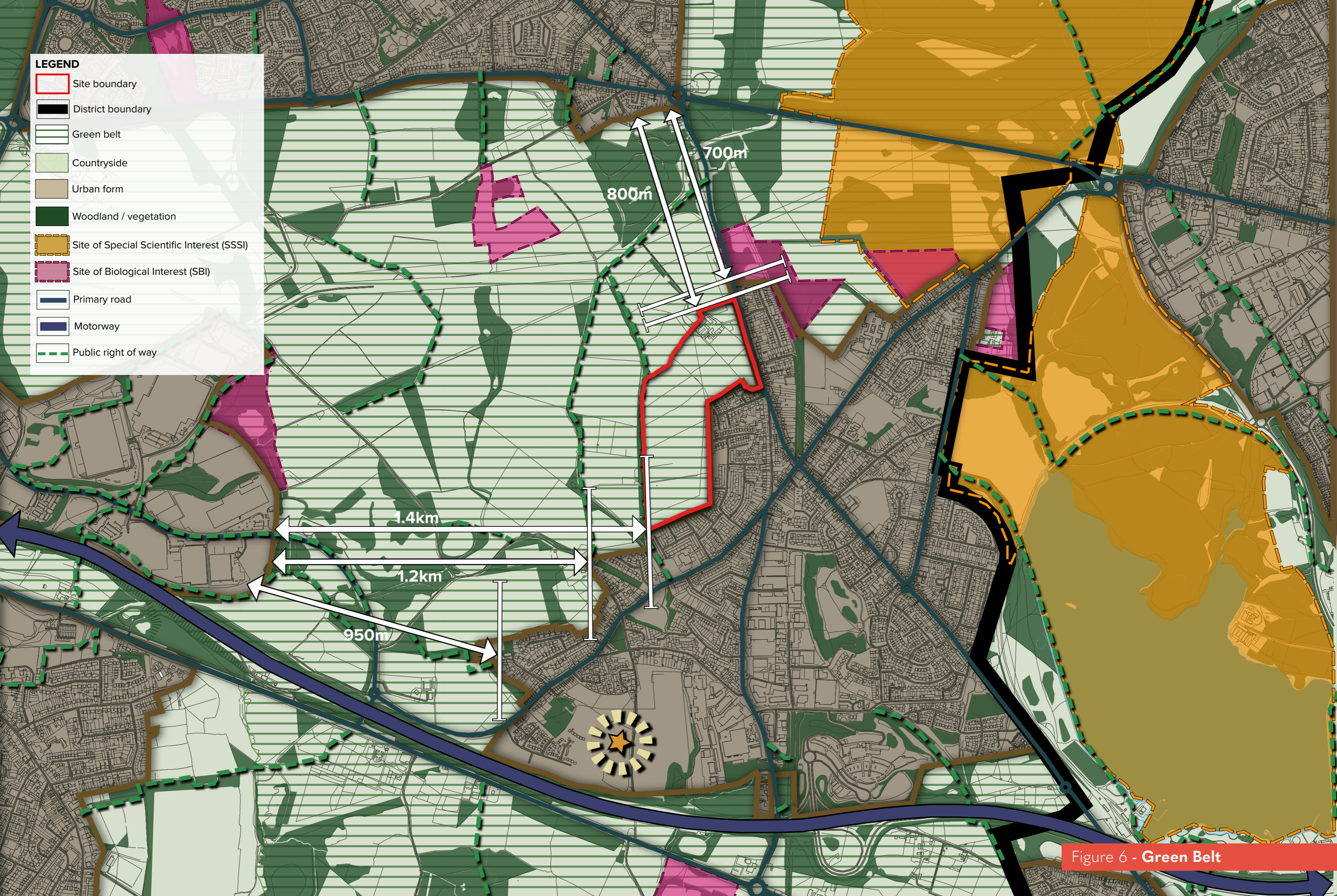


Figure 6 - Green Belt



# Site Synthesis

From our understanding of the site, the following key matters have been identified. These are set out on [Figure 7](#) and described below.

- 1 The majority of the site is subdivided by established hedgerows with mature trees. A number of these field boundaries reflect the historic field pattern. Sensitive design to minimise the loss of these hedgerows will be required.
- 2 A high pressure gas pipeline crosses the site with an associated easement of 6.1m either side in which building development is restricted. Road crossings should also be kept to minimum (and would be subject to further consultation).
- 3 Long Lane is a public right of way running along the western edge of the site. It links Stoke's Lane to the north with the edge of Norton Canes to the south, including a nearby primary school and recreation ground. Pedestrian links between the development and the public right of way should be incorporated within the proposals.

- 4 Potential pedestrian links between the site and the adjacent housing areas should also be investigated, including possible connections to Chasewater Way. As well as helping to properly integrate the new development with the surrounding community, this will allow access through to an existing pedestrian link between Gainsbrook Crescent and Hednesford Road near the local centre.
- 5 There are limited views of the site from the surrounding area. Where these exist they are largely filtered by established and maturing tree belts along the northern and western boundaries and by a localised ridge running through the site's north-eastern area. These may be reinforced by additional planting around the edges of the site to help soften potential views of the new development.
- 6 The highest point on the site is near its north eastern corner, around the existing farm complex. It is the most visually prominent part of the site, located alongside the Hednesford Road on a key gateway into Norton Canes from the north. Sensitive siting of uses will be required to soften the impact of the development in this location.

- 7 The lowest point on the site is towards its south-western corner, and may be the most suitable location to incorporate SuDS and drainage attenuation features. The size and nature of these features would be subject to more detailed investigation.
- 8 Views into the site are also available from the adjacent residential areas to the south and east. Appropriate positioning of development and buffer landscaping may be required to respond to surrounding property boundaries – particularly where private rear gardens back on to the site.
- 9 The site benefits from a frontage with Hednesford Road along its eastern site boundary. Two points of access will be required from Hednesford Road – a primary access to the north, close to the existing farm access, and a second access to the south, closer to the south eastern edge of the site. The position and form of these access points will be subject to detailed investigation.





**LEGEND**

- Site boundary
- Public Right of Way
- Localised ridgeline
- Filtered views into the site from local public right of ways
- Significant tree belt alongside Long Lane
- Neighbouring settlement edge
- Well vegetated boundaries following historic field pattern
- Potential access point off Hednesford Road
- Indicative gas pipeline & easement
- Potential pedestrian links to adjacent housing area
- Existing pumping station location
- Higher ground
- Lower ground - potential area for SuDS/attenuation
- Existing farm buildings - potential for conversion (subject to further investigation)



Figure 7 - Site Analysis



# Development Concept

Based on an understanding of the key site issues set out in the site synthesis, a concept for the development of the site has been formulated. This is set out on the facing page and its key features are described below.

One of the key drivers of the development concept is the retention of as much of the historic field pattern and boundary vegetation as possible – to provide a structure for the proposed development. While internal roads will have to cut across some of these features to provide access, they will be kept to a minimum. The retained hedgerows and trees will form the basis for a network of linking green corridors through the site, with an appropriate landscape buffer provided between the existing vegetation and the surrounding proposed development edges. In some locations this will also incorporate footpath and cycle routes.

The high pressure gas pipeline and associated easement also needs to be integrated into the layout, placing restrictions on where development can be located. The easement will be incorporated into a central open space corridor that runs north-south through the site, linking the hedgerow corridors and providing a direct pedestrian 'spine' within the development that connects a number of linked green spaces. These spaces will benefit from the established landscape setting and may incorporate a range of community uses – including picnic and meeting areas, children's play or communal gardens/orchards.

Pedestrian and cycle connections to the surrounding area will also be important – to ensure that the proposed development is well integrated with the adjacent housing edge and to promote sustainable movement routes between the development and facilities within the settlement over car travel. Long Lane provides a direct, car-free linkage between the site and the primary school and recreation ground off Chapel Lane to the south and to public rights of way along Stoke's Lane to the north. Potential links to the adjacent housing area will also be explored (subject to any third party ownership) to help bring together the proposed and existing communities, promote the sharing of facilities within the site (such as the footpath links and network of open spaces) and allow alternative pedestrian access through to the local centre.

The primary access to the site will be provided via a new roundabout, positioned where the existing farm access is taken off Hednesford Road, opposite the junction to Woodfield Drive. As well as consolidating the existing access arrangements this feature will help to slow traffic on the approach into Norton Canes from the north. Proposed development close to the main access will have an important visual function as it will be in a prominent position on the main gateway into the village from the north. New buffer planting along the northern edge of the site will help to soften and frame views of the new gateway development from this approach.

Due to the scale of the proposed development, a second access is also proposed further south along Hednesford Road in the form of a T-junction. This access would be a short walk from the local centre via Brownhills Road. An area of open space and pedestrian links will be provided within the triangular area on the eastern edge of the development within easy reach of the surrounding community. This will create an attractive setting and focal community space along Hednesford Road, while maintaining the distinctive trees along its western boundary.

The existing farm complex will not be retained although a built vernacular landmark off the primary entrance could be provided in its place. The farm courtyard could also be reflected in the position of an enclosed square at the site entrance – providing a distinctive arrival space and identity for the new development.

Drainage is an issue that will need to be looked at in more detail as the masterplan develops, but the concept works with the underlying topography by locating the main attenuation areas in the lowest part of the site – in the south west corner. There may also be an opportunity to include a localised swale corridor in the north eastern section of the site, responding to the undulating landform in this area.



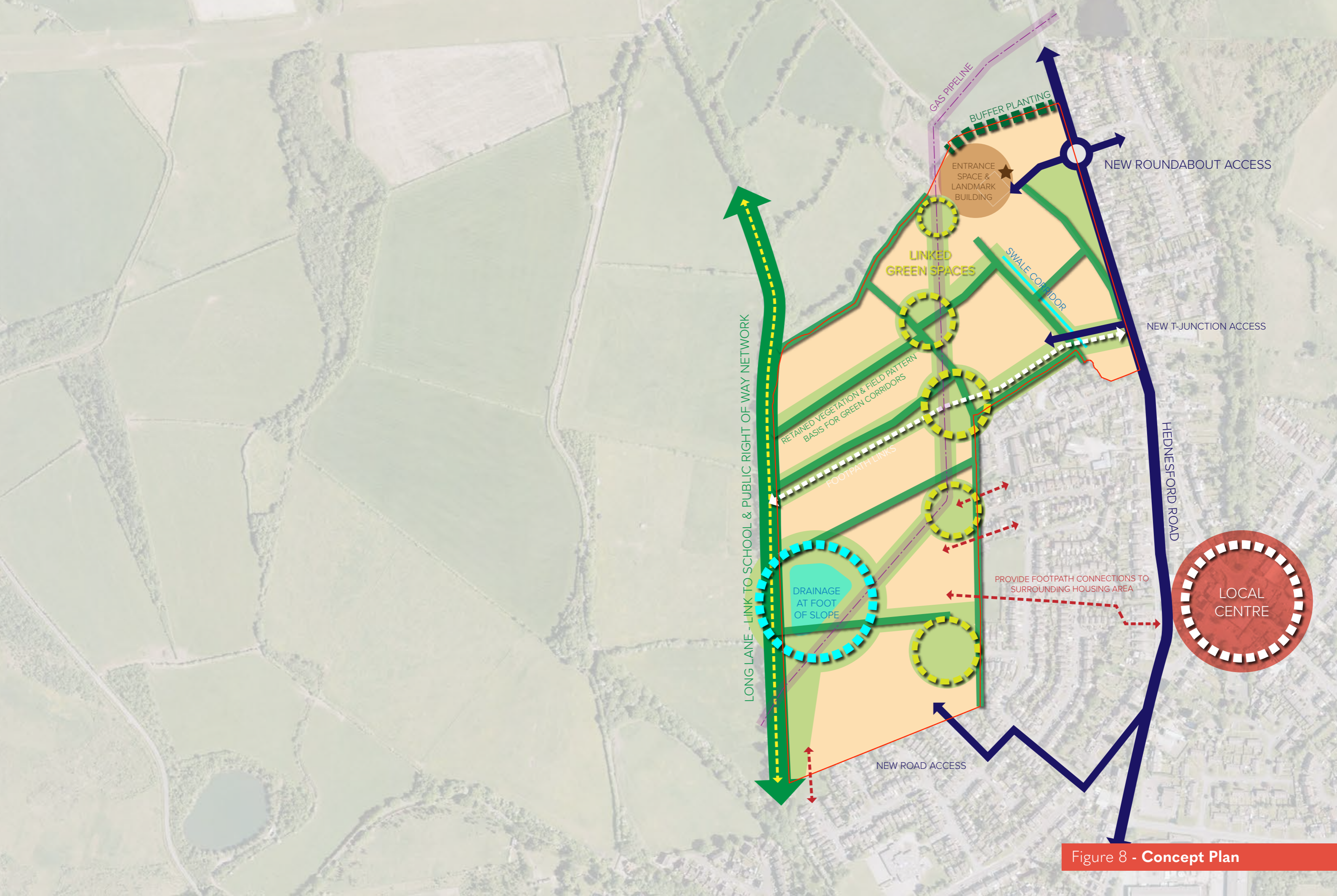


Figure 8 - Concept Plan



# Masterplan















The emerging Masterplan proposals reflect the key features set out in the development concept and have been prepared with a clear knowledge and understanding of the specific characteristics of the site, respecting the local context within which the development would sit and seeking to maximise the use of existing features. The core aim is to create an attractive and sustainable environment that responds to the site's setting, retaining natural key features, and taking advantage of the existing landscape framework to create a high quality distinctive development with a sense of place that is well integrated into its surroundings.

The Masterplan shows how around 350 new homes could be provided on the site. The underlying principles are set on the plan and are described below:

- 1 Existing farm entrance replaced by new access roundabout on Hednesford Road to serve proposed development and maintain access to Woodfield Drive. It will also help to slow traffic moving along Hednesford Road.
- 2 Public open space provides landscaped setting alongside Hednesford Road on the edge of the settlement.
- 3 Opportunity for landmark building(s) at the entrance into the new development and on the main gateway into the settlement from the north.
- 4 Entrance square reflecting former farm courtyard.
- 5 Second T-junction access off Hednesford Road, positioned relative to the existing road junctions along its eastern edge.
- 6 Focal open space and drainage corridor incorporating SuDS features which respond to the localised underlying topography.
- 7 Network of central open spaces forming an easily accessible green infrastructure spine running north-south through the development. It incorporates areas of retained vegetation, footpath/cycle links and the gas pipeline and easement and provides opportunities for habitat diversity or community use – such as children's play and outdoor meeting or picnic areas.
- 8 Trees and hedgerow boundaries will be retained within the layout where possible. As well as providing attractive landscape features within the development, they will form the basis of green movement corridors within the layout and will structure areas of proposed housing.
- 9 A perimeter space will be located along the back of existing backland development off Norton Terrace to help retain the robust tree belt along this edge.
- 10 The proposed housing development will be arranged as a series of perimeter blocks with buildings fronting out onto the surrounding streets and open spaces and private gardens enclosed within the block.
- 11 A primary road link will help to distribute vehicles around the layout and will connect the two proposed access points on Hednesford Road. There will be no direct vehicular connections with the adjacent housing area but may provide a future access to the field to the south.
- 12 New pedestrian links will provide connections to the adjacent public right of way corridor that will be enhanced to enable alternative, vehicle-free routes to Chapel Street and the nearby primary school as well as access to the wider footpath network. This may require improvements to the existing footpath route, which at the time of assessment was heavily waterlogged.
- 13 Where space allows, adjoining private gardens should be enclosed within perimeter blocks.
- 14 Pedestrian links between the proposed development and the adjacent housing area will help to promote movement between the existing and new communities. It will also allow new residents to access the existing pedestrian link between Gainsbrook Crescent and Hednesford Road, providing a direct route to bus stops on the B4514 and facilities in the local centre further to the east.
- 15 Sustainable drainage (SuDS) including attenuation features will be accommodated in the lowest parts of the site to take advantage of natural drainage patterns. This will be designed to positively manage run-off on the site and where possible contribute to biodiversity through the creation of wetland habitat.



LEGEND

-  Site Boundary (20.67 Ha)
-  Residential Area (11.24 Ha)\*
-  Entrance Square
-  Potential Conversion
-  Primary Road
-  Indicative Footpath/Cycle Link
-  Public Open Space
-  Community Space/Play Area
-  Existing Vegetation
-  Indicative Tree Planting
-  Indicative Drainage Attenuation
-  Proposed Ditch Diversion
-  Proposed Cut Off Ditch
-  Pumping Station

\*c. 420 units at 37.5 dph

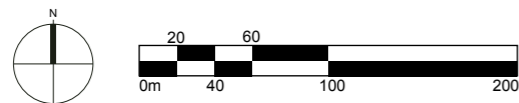


Figure 9 - The Masterplan



# Benefits & Conclusion

## BENEFITS

The development of the site (as outlined in the preceding sections) would ensure the creation of a balanced and healthy community within a high-quality built environment, providing an attractive place to live with a strong sense of place. It would result in a number of significant benefits to Norton Canes, the District and the wider Housing Market Area in respect of the economic, social and environmental dimensions of sustainable development, as set out below;

- The delivery of approximately 420 dwellings at around 37.5 dph to make a substantial contribution to addressing the identified housing need arising in the District and the unmet need arising in the wider HMA, in a location that would contribute to a sustainable pattern of development.
- The provision of a range of house types, sizes and tenures would widen the choice of housing in the area and ensure the creation of a mixed and cohesive community that is representative of the local population.
- The provision of a substantial proportion of affordable housing would allow those on lower incomes or concealed families to remain in or return to the area.

## IMAGES OF BLOORS DEVELOPMENT



- The provision of a substantial area of public open space (approximately 9.43ha) that includes a number of community spaces and play areas providing informal recreation opportunities and an easily accessible place for people to meet, relax and play, aiding the health and well-being of residents and the wider community, encouraging social interaction and creating a sense of identity and ownership within the development.
- The provision of new pedestrian and cycle links through the site would integrate the development with the existing community, encourage active travel, and provide links to community facilities. They will also connect to the existing Public Right of Way network to the west providing enhanced access to the wider countryside.
- Significant structural landscaping within and around the edges of the site would reflect and enhance the local landscape character and integrate the proposed housing into the surrounding landscape.
- The retention of existing landscape features and creation and management of new landscape planting and SUDS features within the site would provide new habitats and enhance the quality of the existing habitats improving the biodiversity in the site.

## CONCLUSION

The site is an entirely appropriate location for sustainable development in terms of its relationship with the settlement. Furthermore, the site assessments and Masterplanning work demonstrates that there are no insurmountable technical or environmental constraints to development on the site that cannot be appropriately mitigated.

In that context, the proposal for the delivery of approximately 420 new homes accords with the provisions of the NPPF and would constitute 'sustainable development'. Indeed, the proposed development as set out in this vision document would result in a number of significant economic, social and environmental benefits.

The development would provide much needed housing, including affordable housing in a sustainable location, where residents will have direct access to, and provide support for, a range of local facilities and services within Norton Canes. They would also benefit from good access via public transport to higher level services and employment opportunities provided in Cannock and the wider area.

A strong and vibrant community would be created within a high-quality built environment providing an attractive place to live with a strong sense of place. The Masterplan clearly demonstrates how the development would relate well to the settlement, respect its relationship with the surrounding countryside and provide positive environmental enhancements. It effectively demonstrates both the capacity for development and critically, its deliverability.

The site is available now, suitable and the proposed development is deliverable. This Vision Document, therefore, clearly demonstrates that the site is a realisable opportunity that will make a significant contribution to meeting the identified market and affordable housing needs within the plan period. The emerging Local Plan should, therefore, allocate the entirety of the site for development in the coming plan period.



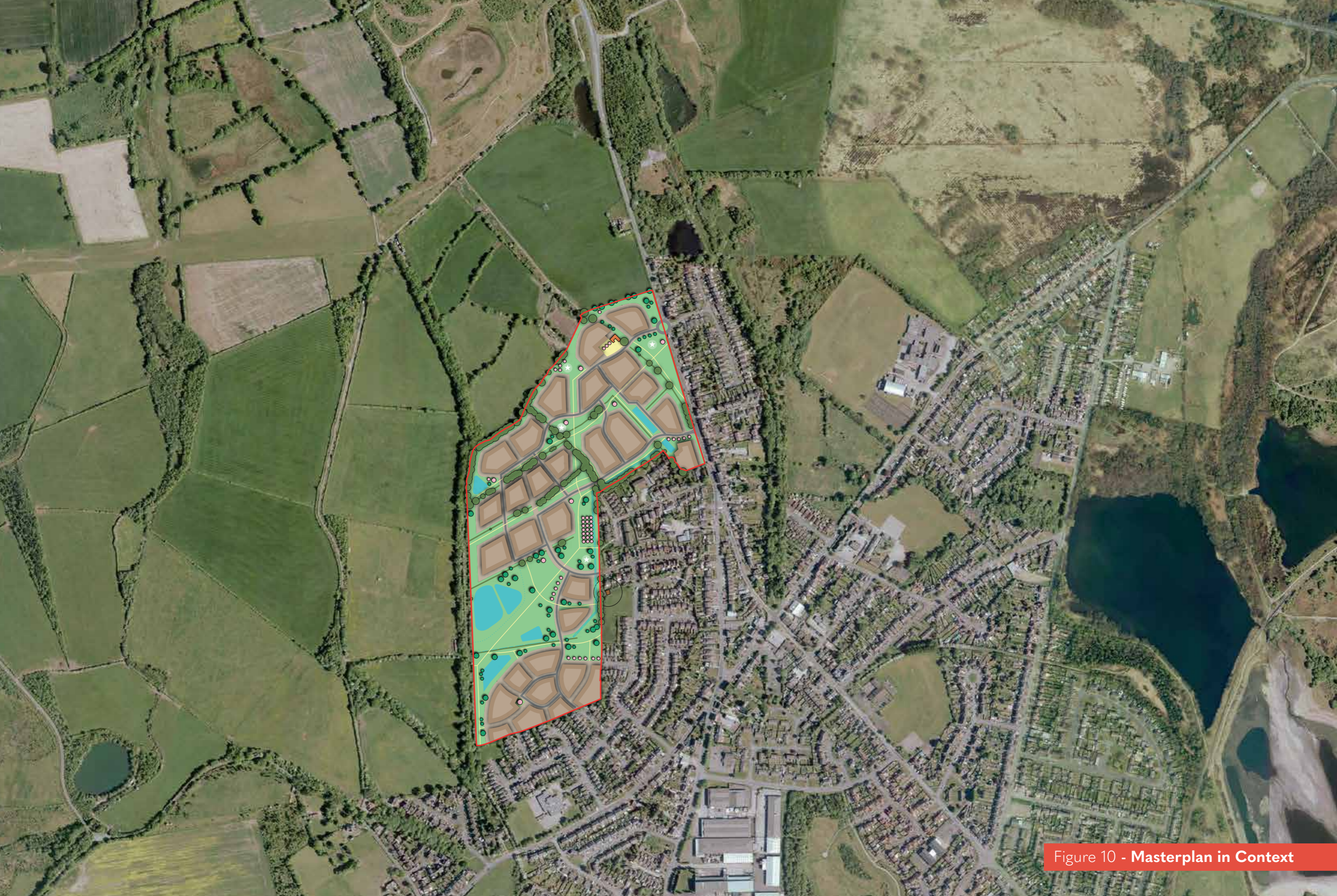


Figure 10 - Masterplan in Context



**BLOOR HOMES**<sup>®</sup>

**Define.**

