

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:	Ben Cook, Stantec, on behalf of the Church Commissioners of England
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**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-graph:		Policy:	SO3.1	Site:		Policies Map:	
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**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.

Please see accompanying representation.

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

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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.**

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.

Please see accompanying representation.

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

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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:**

we wish to appear at the Local Plan Examination in Public (EiP) on behalf of the Commissioners. This is necessary in order to fully convey the matters raised within this (and previous) representations to the Local Plan.

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

**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: 

Date: 15/03/2024



18 March 2024

Planning Policy  
Cannock Chase Council  
Civic Centre  
Beecroft Road  
Cannock  
WS11 1BG

**SUBMITTED VIA EMAIL ONLY TO:** [planningpolicy@cannockchasedc.gov.uk](mailto:planningpolicy@cannockchasedc.gov.uk)  
Our Ref: 20485/A3/BDC

Dear Sir / Madam

**CANNOCK CHASE LOCAL PLAN - REGULATION 19 PRE-SUBMISSION LOCAL PLAN CONSULTATION  
REPRESENTATION MADE ON BEHALF OF THE CHURCH COMMISSIONERS FOR ENGLAND IN RESPECT OF LAND AT BLEAK HOUSE, CANNOCK**

Thank you for inviting comments on the Cannock Chase Local Plan Preferred Options (the 'draft Plan'). We respond on behalf of our Client, the Church Commissioners for England (hereafter, 'the Commissioners') in respect of their land interest to the east of Wimblebury Road, known as 'Bleak House' for residential development. A Site Boundary Plan is included at **Appendix 1**.

Stantec<sup>1</sup> has previously submitted representations to the Cannock Chase Local Plan process and Strategic Housing Land Availability Assessment (SHLAA) on behalf of the Commissioners, with the most recent representations being to the Local Plan Preferred Options consultation in April 2021. Land at Bleak House was also submitted to the Call for Sites exercise held by the Council in March 2023.

The SHLAA identifies the Commissioners' Site as 'Land to the east of John Street/Wimblebury Road' under SHLAA Reference C264, and sub-divided into smaller land parcels under C264 (a) to (e) reflecting the proposed phasing of the Site. The SHLAA notes that the Site has an estimated overall capacity of 1,069 dwellings (sub-total of the individual parcels).

It is submitted that our Client's site offers a sustainable location for residential development. It is suitable, available and achievable for meeting housing needs within Cannock Chase District. The site should be removed from the Green Belt and identified as a residential allocation.

**REQUEST TO APPEAR AT THE LOCAL PLAN EXAMINATION IN PUBLIC**

For the avoidance of doubt, we wish to appear at the Local Plan Examination in Public (EiP) on behalf of the Commissioners. This is necessary in order to fully convey the matters raised within this (and previous) representations to the Local Plan.

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<sup>1</sup> Formerly Barton Willmore.



## **SUPPORTING INFORMATION**

We have previously submitted the supporting technical work listed below to the Council in support of our representations (most recently to the Preferred Options consultation in April 2021 and Call for Sites exercise in April 2023). This work provides a thorough understanding of the site and has informed the proposed development illustrated in the Concept Masterplan within the Vision Document.

- Vision Document
- Landscape and Visual Appraisal and Green Belt Review (LVAGBR)
- Heritage and Archaeology Appraisal
- Arboricultural Technical Note
- Ecology Technical Note
- Transport Note (Initial Access Appraisal)
- Sustainable Drainage Statement

In the interests of brevity, we do not re-attach these documents to this representation. However, reference will be made to them within this response, as necessary. We will also make reference to them at the Local Plan Examination, should our request to appear be granted.

## **OVERVIEW OF LAND TO THE EAST OF WIMBLEBURY ROAD, 'BLEAK HOUSE'**

Bleak House is located adjacent to the urban edge of Cannock/Hednesford/Heath Hayes, approximately 2km east of Hednesford town centre and approximately 4km east of Cannock town centre. The site is bounded by residential development at the urban areas of Rawnsley and Wimblebury to the north and west respectively. A thicket of trees and Cannock Wood Road comprise the eastern boundary, with hedgerows and a Public Right of Way (PRoW) defining the southern boundary.

The Commissioners also own a large parcel of land further south of Bleak House, which provides a significant spatial gap between the site, the Staffordshire Coalfield Heaths Site of Special Scientific Interest (SSSI) and Burntwood. For the avoidance of doubt, the Commissioners are not promoting the land to the south for development. However, as noted within the submitted Vision Document, whilst release of Bleak House from the Green Belt does not depend upon this there is the potential for the land to the south to be made available as appropriate e.g. to provide environmental improvements.

Bleak House is in a highly sustainable location, with two primary schools located within 0.8km of the site. There are also several employment opportunities, including Anglesey Business Park and Lower Keys Business Park, within 1.2km of Bleak House.

Within approximately 0.6km of the site lie several existing areas of play areas and public open space. In addition to the PRoW along the southern boundary, another PRoW crosses the north western corner of the site. These PRoWs can provide leisure opportunities for pedestrians and sustainable access to surrounding development in the first four phases of development, as outlined in the accompanying Vision Document.

In terms of transport connections, the site benefits from good transport connections with existing bus stops on Cannock Wood Road, John Street and Littleworth Road providing frequent services to Cannock and Lichfield.

Bleak House is approximately 2km in walking distance from Hednesford Railway Station offering services to Birmingham and Walsall. Bleak House is located approximately 1.5km north of the A5190 (Cannock Road) which provides direct access westwards to Cannock, where onward connections can be made to the M6 and M6 Toll, and eastwards to Burntwood and Lichfield.

As seen from the Vision Document, the proposal seeks to deliver residential development alongside a new primary school, a new local centre, shops and community services. This holistic approach supports the necessary infrastructure and facilities required for residential dwellings and in so doing, accords with the NPPF.

Development of Bleak House will also deliver several benefits to the local community through the provision of green spaces an equipped play area, pedestrian and cycle links connecting to neighbouring areas, substantial tree planting and heathland creation, increased recreation and access via new green infrastructure and improved habitat connectivity.

Our development proposals demonstrate how Bleak House will be contained by hedgerows and the existing PRow and track along the southern boundary, which offer permanence and a defensible boundary. It is important to note that future development of Bleak House will retain a significant spatial gap between the existing settlements of Burntwood and Cannock/Hednesford/Heath Hayes.

The Site Plan and Vision Document show that Bleak House is made up of five parcels of land and the Phasing Plan (at Figure 7) shows the four phases, which have the ability to deliver within the early part of the Plan period and be completed before the end of the Plan period. As shown on Figure 5: Concept Plan of the Vision Document, the Commissioners own additional land immediately north of Parcel 1A and west of Parcels 1B and 1C, which can be included as part of any allocation going forward.

## **RESPONSE TO PRE-SUBMISSION LOCAL PLAN POLICIES AND EVIDENCE BASE**

Stantec has previously commented upon the appropriateness of certain documents within the Local Plan evidence base, such as the Green Belt Study Report 2021, as well as certain Policies such as Policy SO7.6 (Protecting Conserving and Enhancing the Green Belt). Again, these comments are not repeated here, but remain relevant to the Commissioners overall case, and reference will be made to them at the Local Plan EiP.

This representation focuses on the Local Plan Policies and evidence base which have changed or been updated since the Preferred Options consultation in 2021.

### **POLICY SO3.1 PROVISION OF NEW HOMES**

*Policy SO3.1 is not considered to be sound as it is not justified or effective*

The Church Commissioners supports the Council's use of the Standard Method as the way of calculating minimum housing need, which results in a need for 264 dwellings per annum. This is based on household growth of 216 per annum and an affordability uplift of 22% and results in the provision of 5,808 dwellings across the 22-year Plan period (2018 - 2040).

The Church Commissioners also support the Council's efforts to make a contribution to meeting the housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), which is currently proposed at 500 dwellings<sup>2</sup>.

However, for the reasons set out below, this level of provision is demonstrated to be not justified or effective and is therefore unsound.

### **Affordable Housing Need (Cannock Chase Local Housing Needs Assessment, January 2024)**

Cannock Chase Local Housing Needs Assessment prepared by jg Consulting (January 2024) suggests there is a need for 290 affordable homes per annum across the District. This figure is significant and is in excess of the 264 dwelling figure resulting from the Standard Method.

The Assessment nonetheless goes on to state that:

*“Despite the level of need, it is not considered that this points to any requirement for the Council to increase the Local Plan housing requirement due to affordable needs. The link between affordable need and overall need (of all tenures) is complex and in trying to make a link it must be remembered that many of those picked up as having an affordable need are already in housing (and therefore do not generate a net additional need for a home). That said, the level of affordable need does suggest the Council should maximise the delivery of such housing at every opportunity.”*

The Church Commissioners categorically refutes this. Whilst it may be the link between affordable need and overall need is complex, the fact remains that the identified affordable housing need is greater than the housing need figure suggested by the Standard Method. Planning Practice Guidance is clear that the Standard Method comprises the minimum starting point for housing and that there will be circumstances where it is appropriate to plan for a higher housing need figure than the standard method. This is clearly one such circumstance.

Local Plan Policy SO3.2 Housing Choice presents a varied level of affordable housing provision within the District, which ranges from 20 - 35% depending on geographical location. Even if the upper percentage figure of 35% is used, the provision of the Standard Method 264 dwellings per year will only result in 92.4 affordable dwellings being provided per year<sup>3</sup>. This provision is less than a third of the identified need<sup>4</sup>.

Whilst affordable housing exception sites may come forward during the Plan period which are in addition to the 5,808 dwellings to be planned for, it is evident that the Plan will woefully under deliver affordable housing against identified need. This would remain the case even if the Council was to revisit other solutions such as increased development densities or increased affordable housing percentage requirements for market-led development.

The only logical resolution to this issue is to allocate additional sites for market housing.

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<sup>2</sup> This figure is presented separately and in addition to the 5,808 dwellings identified as being towards meeting local need.

<sup>3</sup> 264 dwelling x 0.35 = 92.4 dwellings

<sup>4</sup> 92.4 ÷ 290 = 0.32 (rounded)



## **Cannock Chase Economic Development Needs Assessment Update Report, January 2024**

In a similar vein, the Councils Economic Development Needs Assessment ('EDNA') Update Report prepared by Lichfields (January 2024) concludes that the District's employment land range is between 43 ha and 74 hectares (net) for the period 2018 to 2040 (including flexibility)<sup>5</sup>.

However, the Report goes on to state that "*if the housing requirement is at or below the net dwelling growth under labour supply Scenario 4 (Standard Method (264 dpa) + 500 dwellings unmet need), then this could have repercussions on the employment land target. To ensure the two are not misaligned, it is recommended that the Council undertake more detailed housing modelling to ensure the job projections are aligned closely with their housing requirement.*"

As has already been summarised above, the Council is indeed looking to Plan at the level described by Scenario 4 (264 dpa) + 500 dwellings unmet need). As such, in accordance with the recommendation made by the EDNA, this could have repercussions on the employment land target.

To understand this further, the Report recommends that the Council undertake more detailed housing modelling to ensure the job projections are aligned closely with their housing requirement. The Council has not done this. There is, therefore, a demonstrable and evidenced risk that the level of housing proposed by the Council undermines the delivery of the identified employment land need.

Furthermore, the EDNA is clear that the employment land range does not make provision for the full need for strategic B8 logistics in the area, meaning that, in reality, employment provision should be greater than that identified.

This, in turn, will need to be supported by a greater level of housing provision, to ensure that the required workforce exists to support employment need.

As such, the only logical resolution to this issue is, again, to allocate additional sites for market housing.

## **Contribution Towards Greater Birmingham and Black Country Housing Market Area**

As described above, the Council is planning for an additional 500 dwellings to meet the needs of the GBBCHMA (over the period to 2040). The Birmingham City Council shortfall for the period 2011 - 2031 (established as part of the Birmingham Development Plan, 2017) amounts to 37,900 dwellings, in conjunction with the more recent Black Country shortfall of around 29,260 dwellings for 2019-2038 (established via the Black Country Urban Capacity Study, 2019)<sup>6</sup>, amounting to a total shortfall of 67,160 dwellings to 2031/2038.

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<sup>5</sup> The Report goes on to note that "*this range makes no allowance for the replacement of losses. The Council will need to take a decision regarding the extent to which additional provision should be planned for, over and above the net need. The range rises further – to between 65 ha and 94 ha – if losses are replaced at an appropriate rate.*"

<sup>6</sup> Notwithstanding that the Black Country Core Strategy is no longer being progressed, this evidence remains valid in determining the level of unmet need at that time.

We agree that the Plan should be contributing to the unmet needs of the GBBCHMA. However, we consider that the current contribution of 500 dwellings not a sufficient contribution in terms of the scale of unmet needs over the draft Plan period.

The 500 dwelling contribution represents the minimum option proposed in the Issues and Options Local Plan consultation (2019), which was based upon the Greater Birmingham Housing Market Area Strategic Growth Study (2018) which suggested options for accommodating additional development. We consider that the level of contribution should be higher considering the evidence base for the shortfall.

The supporting text to Policy SO3.1 notes that South Staffordshire and Lichfield (neighbouring authorities to Cannock), who share GBBCHMA have previously proposed 4,500 and 2,665 homes respectively towards the unmet need through their emerging Local Plans. This text is misleading and glosses over the fact that, during 2023, South Staffordshire District Council paused work on its emerging Local Plan, whilst Lichfield District Council abandoned its plan entirely. In fact, since the Birmingham Development Plan was adopted in 2017, the only local authority to adopted a local plan with a contribution towards GBBCHMA unmet need is North Warwickshire Borough in 2021 (500 dwellings).

Whilst the GBBCHMA Position Statement Addendum (December 2021) suggests that the shortfall has reduced to 6,302 dwellings, it should be noted that some of the capacity within this statement remains untested via Local Plan examinations and unsecured i.e. within the Position Statement (at Table 3) some of the capacity identified to meet the shortfall (6,665 dwellings) is that which is within 'emerging' in Local Plans, including South Staffordshire and Lichfield Districts, which are both no longer 'emerging'.

There is also a significant proportion of windfall supply identified (12,595 dwellings across the GBBCHMA). It is unclear if this is justified.

Furthermore, the Position Statement only monitors housing requirements and land supply up to 2031. It does not provide an assessment up to 2040 (end of plan period for the Cannock Local Plan). The Birmingham Local Plan Issues and Options consultation document (October 2022) suggests that the shortfall arising from Birmingham alone to 2042 is 78,415 dwellings.

We would note that the Cannock Chase Local Duty to Co-operate Statement of Compliance (December 2023) does not acknowledge this figure, and instead works on the basis of the figure arising from the 2017 BDP. It also does not present any evidence on the extent of agreement with other GBBCHMA authorities on the appropriateness of this level of contribution to unmet needs.

It has therefore not been demonstrated that the Local Plan is compliant with the Duty to Cooperate.

Whilst the principle of a contribution is commendable, it is abundantly clear that the provision of 500 dwellings is simply inadequate in the context of the identified shortfall.

### **Policy SO3.1 is not Justified or Effective**

As a result of the above, it is clear that Policy SO3.1 is therefore not justified, as the Council has not presented any rationale for not exceeding the Standard Method figure in respect of its own need, nor is the 500 dwelling contribution towards the GBBCHMA robustly evidenced. Given the context within which the Council is planning for housing and the findings of its own evidence base. it would be expected that

the Council 'tests' an increased level of delivery, to ascertain whether or not it is deliverable. This has not been done.

Policy SO3.1 is also therefore not effective, as it fails to meet the identified affordable housing needs of the District.

### **Required Amendment to Policy SO3.1**

It follows from the above that the Council should amend Policy SO3.1 by allocating additional sites for residential development. Given the Council has demonstrated that exceptional circumstances exist to justify the release of land from the Green Belt<sup>7</sup>, it should look to the Green Belt to accommodate additional sites. This includes Land at Bleak House, which is located immediately adjacent to Cannock; the main urban area for the District. Land at Bleak House has been demonstrated through our previous representations to be suitable, available and achievable, and therefore deliverable.

It is therefore submitted that Land at Bleak House should be allocated for residential-led development.

### **SUMMARY**

This Representation has demonstrated how Policy SO3.1 is not considered to be sound, as it is not justified or effective.

For the avoidance of doubt, we wish to appear at the Local Plan Examination in Public (EiP) on behalf of the Commissioners. This is necessary in order to fully convey the matters raised within this (and previous) representations to the Local Plan.

We trust this submission is clear and helpful, but should you have any questions in relation to the above and/or attached please do not hesitate to contact me or Sarah Jones. We would be grateful for confirmation that these representations have been received and registered as duly made.

Yours faithfully

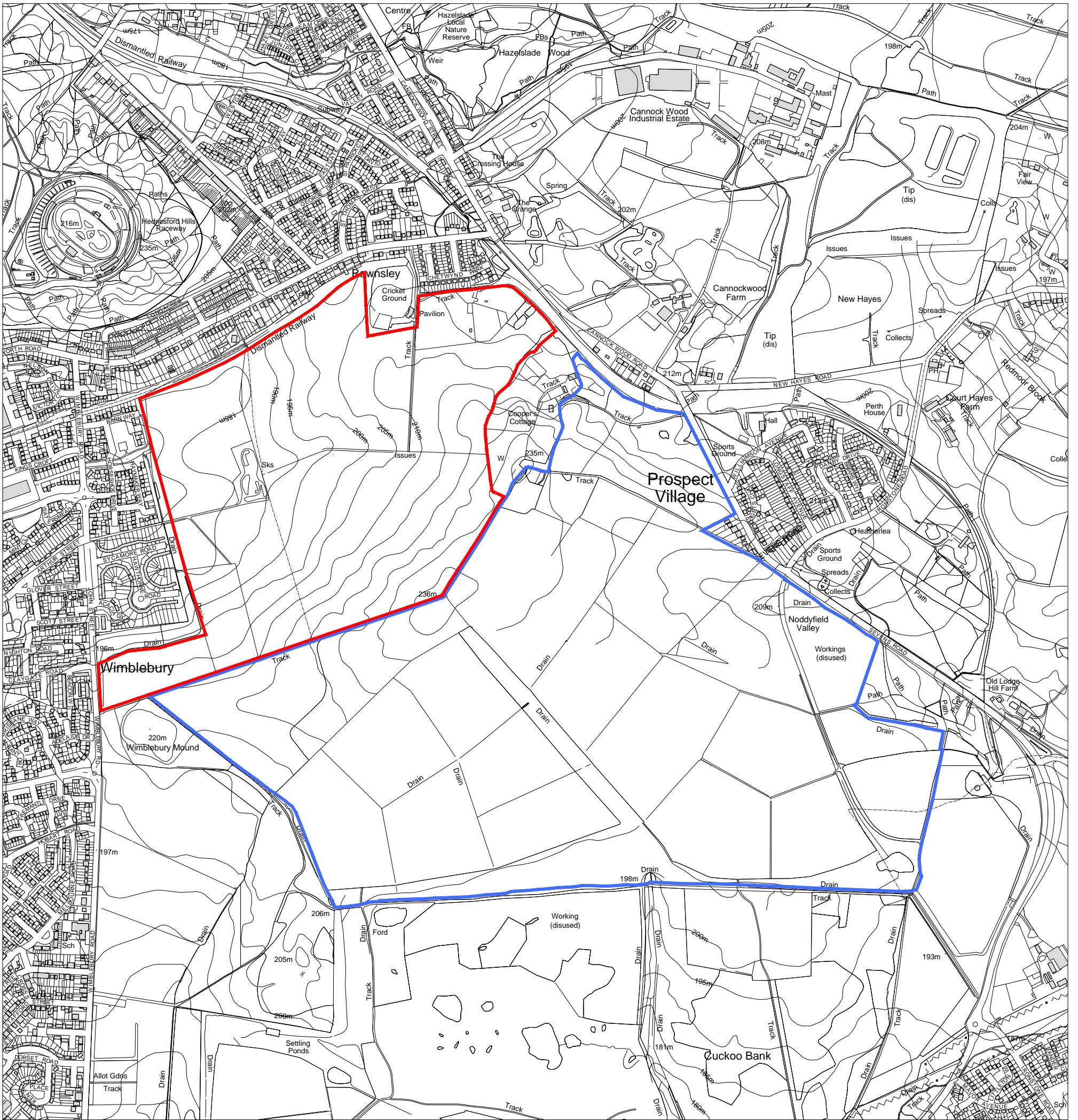


**Ben Cook**  
**Planning Associate**  
on behalf of Stantec UK Ltd

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<sup>7</sup> By virtue of the degree of the housing needs of the District and the wider housing market area; the lack of sufficient urban capacity (including potential for density uplifts) and other suitable non-Green Belt sites; and the inability of neighbouring authorities to assist in meeting the District's housing needs.

## **APPENDIX 1**



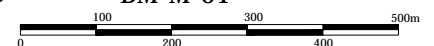
**Legend**

- Site Boundary  
65.50Ha / 161.85Ac
- Land within Commissioners  
Ownership  
141.15Ha / 348.78Ac

Project  
**Bleak House,  
 Land to the East of Cannock**  
 Drawing Title  
**Site Location Plan**



Date	Scale	Drawn by	Check by
08.03.19	1:10,000@A3	M.S.	MXS
Project No	Drawing No	Revision	
20485	BM-M-01	-	



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