

Cannock Chase Council:  
Cannock Chase Local Plan  
Representation Form  
**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:	Sam Cripps, Turley on behalf of Bloor Homes
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM3
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**Q2. Do you consider the Main Modification is:**

A. Legally compliant Yes: ☒ No: ☐

B. Sound Yes: ☐ No: ☒  
(Please tick as appropriate).

**Q3. Please give details of why you consider the Main Modification is or is not legally compliant or sound. Please be as precise as possible.**

Your representation should relate only to the Proposed Main Modifications.

The amendment to the wording of the Policy SS1 to update the housing requirement from 5,808 dwellings to 6,308 dwellings is noted. However, as set out in our response to PMM57, below, it is considered that the Plan as currently drafted cannot demonstrate a Five-Year Housing Land Supply (5yhls) upon adoption.

(Please continue on a separate sheet if necessary)

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**Q4. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of legal compliance or soundness matters you have identified at Q.3 above.** You will need to say why each change will make the 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. If you support the modification, please skip this question.

Therefore, for the Plan to deliver a “minimum of 6,308 dwellings” it is considered that sites identified as “safeguarded to meet future needs” should be included as allocations within this plan along with further Green Belt release.

As highlighted within Bloor’s statements to EXAM38, EXAM38A, EXAM38B, EXAM38C, EXAM38D and EXAM38E (see EXAM38G), there are examples (Uttlesford and South Worcestershire Development Plan) where Inspectors have found that a Plan can be found sound even without a 5yhls upon adoption. This approach would allow for a Plan to be adopted but also acknowledges that additional, non-allocated sites, will need to come forward to ensure that the Local Planning Authority is able to demonstrate a 5yhls. This is a proactive approach, and an approach that could be taken here.

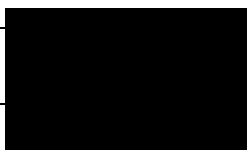
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**Q5. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification. Please comment in the box below.**

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**Part B: Representation**

Name and Organisation:	Sam Cripps, Turley on behalf of Bloor Homes
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM6
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**Q2. Do you consider the Main Modification is:**

A. Legally compliant Yes: ☒ No: ☐

B. Sound Yes: ☐ No: ☒

(Please tick as appropriate).

**Q3. Please give details of why you consider the Main Modification is or is not legally compliant or sound. Please be as precise as possible.**

Your representation should relate only to the Proposed Main Modifications.

PMM6 proposes modified policy wording to replace 'positive' and 'sustainable' development with 'proportionate'. However, development that is 'proportionate' to the existing size, role, and function is considered overly restrictive and does not align with the NPPF's presumption in favour of sustainable development.

Development that is proportionate to the existing scenario implies a presumption in favour of maintaining the status quo. Policy SS4 should align with the NPPF and be sufficiently flexible to allow *sustainable* development that delivers upon strategic objectives – which can necessitate the growth and evolution of the size, role and function – to come forwards.

The supporting text to SS4 proposed by PMM6 (paragraphs 5.20 to 5.22) are not considered necessary for the following reasons:

- **Paragraph 5.20:** The significant growth referred to within paragraph 5.20 has contributed significant funds to Cannock Chase District Council and Staffordshire County Council (through S106 and CIL payments) for improvements to infrastructure, including education, which has yet to be spent on those improvements.

Furthermore, applicants will be required to submit assessments of infrastructure capacity at the planning application stage to ensure that infrastructure can support the proposed development. Additionally, Policies SO2.1 and SO5.4 sufficiently provide for the need to ensure that local infrastructure capacity supports developments proposed to come forward. It is therefore

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considered that this paragraph is placing an unnecessary restriction on future development at Norton Canes.

- **Paragraph 5.21:** It is acknowledged that that the Parish Council are preparing a Neighbourhood Plan but at the current moment in time this has not been drafted or consulted on. Once prepared and adopted, the NDP will form part of the Development Plan and will be consideration in any future planning application. Until this point, it should not be referenced within the Local Plan
- **Paragraph 5.22:** As set out in our response to Paragraph 5.20, any future application will need to consider all infrastructure that is required to make sure the development is sustainable. At present, there is no evidence that a new school is required, it did not form part of the examination of this Plan and therefore should not be included within the Plan. In line with Paragraph 35(b) of the NPPF (2023), local plans must be justified and based on proportionate evidence. As no such evidence has been presented, this addition to the plan is considered unsound.

Bloor submitted a report prepared by EFM in response to EXAM38 which assessed existing school capacity (Document 5 of the response dated August 2025). The report provided evidence that following the expansion of Norton Canes Primary Academy, there is sufficient capacity to accommodate Bloor's proposed residential development at Norton Canes without need to deliver a new primary school.

Further, references to how land can be released from the Green Belt do not align with the NPPF and should be removed as other policies within this Plan are correctly drafted and cover this point.

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

**Q4. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of legal compliance or soundness matters you have identified at Q.3 above.** You will need to say why each change will make the 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. If you support the modification, please skip this question.

PMM6 should not be taken forward.

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

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**Q5. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification. Please comment in the box below.**

<div></div> <div>(Please continue on a separate sheet if necessary)</div>
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**Part B: Representation**

Name and Organisation:	Sam Cripps, Turley on behalf of Bloor Homes
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM26
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**Q2. Do you consider the Main Modification is:**

A. Legally compliant Yes: ☒ No: ☐

B. Sound Yes: ☐ No: ☒  
(Please tick as appropriate).

**Q3. Please give details of why you consider the Main Modification is or is not legally compliant or sound. Please be as precise as possible.**

Your representation should relate only to the Proposed Main Modifications.

PMM26 proposes to align affordable housing percentages in emerging Policy SO3.2 with Table 6.1 of the Viability Study (2024)<sup>1</sup>. As set out in our Affordable Housing Briefing Report (August 2025)<sup>2</sup>, these reductions are not supported and would result in a significant decrease in the number of affordable homes delivered over the plan period.

The Report includes a full trajectory-based assessment of likely affordable housing delivery over the plan period using the Council's Proposed Modifications Housing Trajectory<sup>3</sup>. It demonstrates that even under the submission version of Policy SO3.2, delivery would fall far below identified needs. When the reduced percentages in PMM26 are applied to the same trajectory, projected affordable housing delivery falls further still. As set out in Table 3.3 of the Report, applying the main modifications results in a likely shortfall of 5,771 homes against a need to provide 6,764, i.e., just 15% of needs being met over the plan period.

The scale of this shortfall is fundamental to the soundness of the Local Plan. The evidence demonstrates that the emerging policy framework, even before the proposed reductions, is incapable of delivering affordable housing at a level that remotely aligns with assessed needs. The further reduction in requirements introduced through PMM26 therefore moves the plan in the opposite direction to that required by national policy, which is clear that plans must be positively prepared and supported by a strategy capable of meeting

<sup>1</sup> EC10

<sup>2</sup> EXAM38G; Document 3

<sup>3</sup> EXAM 38B

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needs. Instead of narrowing the gap, PMM26 widens it and results in an outcome where the majority of households in need will have no prospect of securing an affordable home over the plan period.

It is also noted that the proposed modifications do not include a map setting out the boundaries of each zone. As noted in the Report, the zonal structure continues to rely on ward boundaries that were superseded in 2023. Several of the newly defined wards now fall across multiple zones, which makes the policy difficult to interpret and risks inconsistent application in decision making. Without a clear and up to date map the proposed policy wording lacks clarity and fails to meet the tests of effectiveness and certainty required for sound plan making.

Furthermore, the main modifications do not introduce a clear affordable housing target or any effective monitoring framework for Policy SO3.2. The emerging Local Plan contains no quantified expectation of the number of affordable homes it seeks to deliver over the plan period, nor any trajectory or benchmark against which performance can be assessed. As a result, there is no mechanism to identify whether delivery is falling short or to trigger remedial action. This omission is inconsistent with national policy and undermines the effectiveness of the policy, particularly given the substantial and growing shortfall in affordable housing identified in the evidence base.

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

**Q4. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of legal compliance or soundness matters you have identified at Q.3 above.** You will need to say why each change will make the 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. If you support the modification, please skip this question.

For the reasons set out above, and with reference to the submitted Affordable Housing Briefing Report (see EXAM38G), Bloor does not support PMM26. The modification would reduce affordable housing delivery at a time when the evidence confirms that a substantial uplift is required. It is neither justified nor effective, and it fails to provide a sound basis for meeting identified affordable housing needs. The conclusions of Bloor's earlier representations therefore remain unchanged.

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

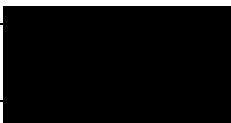
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**Part B: Representation**

Name and Organisation:	Sam Cripps, Turley on behalf of Bloor Homes
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM57
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**Q2. Do you consider the Main Modification is:**

A. Legally compliant Yes: ☒ No: ☐

B. Sound Yes: ☐ No: ☒

*(Please tick as appropriate).*

**Q3. Please give details of why you consider the Main Modification is or is not legally compliant or sound. Please be as precise as possible.**

Your representation should relate only to the Proposed Main Modifications.

PMM57 modifies the wording of Strategic Objective 7 to clarify that the Green Belt will be protected except where strategic release has been identified to meet growth requirements.

Given that the modifications being consulted on fail to ensure the Council can demonstrate a 5YHLS, Green Belt boundaries will need to be reviewed by CCDC immediately upon adoption as discussed in Bloor's Matter 9 Hearing Statement.

As per Paragraph 148(e), the local plan should be able to demonstrate that the Green Belt boundaries will not need to be altered at the end of the plan period. This cannot be the case at present in the current context and is therefore not in line with national planning policy.

It would therefore be appropriate to allocate the whole of land to the west of Hednesford Road, Norton Canes (proposed safeguarded site: S3 and SHLAA site ref: N24, N33 and N64). Failing this, the whole site should be identified as a safeguarded site.

The fact that at present, land to the west of Hednesford Road, Norton Canes (proposed safeguarded site: S3 and SHLAA site ref: N24, N33 and N64), could proceed with a planning application as Grey Belt (based upon the Council's own evidence base at ENV14 and ENV14f) is evidence that the site should be allocated in the plan.

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

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Allocate the whole of land to the west of Hednesford Road, Norton Canes (proposed safeguarded site: S3 and SHLAA site ref: N24, N33 and N64). Failing this, the whole site should be identified as a safeguarded site.

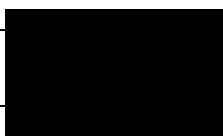
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**Part B: Representation**

Name and Organisation:	Sam Cripps, Turley on behalf of Bloor Homes
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM65
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**Q2. Do you consider the Main Modification is:**

A. Legally compliant Yes: ☒ No: ☐

B. Sound Yes: ☐ No: ☒

*(Please tick as appropriate).*

**Q3. Please give details of why you consider the Main Modification is or is not legally compliant or sound. Please be as precise as possible.**

*Your representation should relate only to the Proposed Main Modifications.*

PMM65 would be more effective if the wording of Policy SO7.6 simply referred back to the NPPF, at present it is silent on national policy which is unusual given this is a Green Belt policy.

It is considered that, to align with the NPPF, the policy text should be amended to state “*proposals for development within the Green Belt will be considered in line with national planning policy.*”

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

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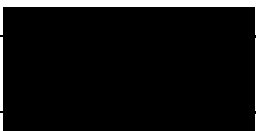
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As above.
(Please continue on a separate sheet if necessary)

**Q5. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification. Please comment in the box below.**

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**Part B: Representation**

Name and Organisation:	Sam Cripps, Turley on behalf of Bloor Homes
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM74
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**Q2. Do you consider the Main Modification is:**

A. Legally compliant Yes: ☒ No: ☐

B. Sound Yes: ☐ No: ☒  
(Please tick as appropriate).

**Q3. Please give details of why you consider the Main Modification is or is not legally compliant or sound. Please be as precise as possible.**

Your representation should relate only to the Proposed Main Modifications.

As set out at the hearing sessions in relation to Policy SO8.3. The requirement that “*all residential development proposals should meet the standards set out by the Home Quality Mark*” is considered unreasonable. The Home Quality Mark was replaced BREEAM UK New Construction Residential in April 2025. BREEAM UK New Construction Residential is a non-mandatory accreditation that requires new homes to go above and beyond current building regulations. It is not clear how such a requirement has been assessed through the Viability Study and how this will impact the delivery of housing within the District.

It is considered that reference to the Homes Quality Mark should be removed and the policy should state “*all residential development proposals should comply with the most current national building regulations*”.

Such an approach will allow flexibility within the policy to meet the most up to date requirements of building regulations without placing unnecessary and unviable burdens on future developments.

(Please continue on a separate sheet if necessary)

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**Q4. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of legal compliance or soundness matters you have identified at Q.3 above.** You will need to say why each change will make the 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. If you support the modification, please skip this question.

It is considered that reference to the Homes Quality Mark should be removed and the policy should state  
*"all residential development proposals should comply with the most current national building regulations"*.

Such an approach will allow flexibility within the policy to meet the most up to date requirements of building regulations without placing unnecessary and unviable burdens on future developments.

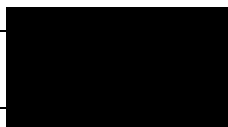
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**Part B: Representation**

Name and Organisation:	Sam Cripps, Turley on behalf of Bloor Homes
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PMM109
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**Q2. Do you consider the Main Modification is:**

A. Legally compliant Yes: ☒ No: ☐

B. Sound Yes: ☐ No: ☒  
(Please tick as appropriate).

**Q3. Please give details of why you consider the Main Modification is or is not legally compliant or sound. Please be as precise as possible.**

Your representation should relate only to the Proposed Main Modifications.

The modification is not sound because the following sites should be removed because they are not “deliverable” or “developable” as set out in the Council’s evidence base for the Local Plan:

- **H38 – Land at Walsall Road, Avon Road, Hunter Road, Hallcourt Lane, Cannock (24 dwellings):** The 2024 SHLAA (EXAM 5 – PDF page 70) states that residential use is not being proactively considered by the landowners at present. It lists the site as being “restricted and excluded” (i.e. Sites that are not considered to be suitable, available or achievable within 15years) and states that the site is not available. The 2024 SHLAA refers to the following potential constraints:

*“Previous developer entered into administration and site now in multiple ownership. Previous schemes currently unviable and residential use is not being proactively considered by new land-owners at present.”*

- **H39 – 26-28 Wolverhampton Road, Cannock (25 dwellings):** The 2024 SHLAA (EXAM 5 – PDF page 70) lists the site as being “restricted and excluded” (i.e. Sites that are not considered to be suitable, available or achievable within 15years) and states that the site is not available.
- **H43 – 243 Hill Street, Hednesford, Cannock (13 dwellings):** The 2024 SHLAA (EXAM 5 – PDF page 74) lists the site as being “restricted and excluded” (i.e. Sites that are not considered to be suitable, available or achievable within 15years) and states that the site is not suitable or available. The 2024 SHLAA refers to the following potential constraints:

*“Part of site in Coal Authority High Risk Area. Abuts Green Space Network.”*

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- **H63 – Former Rumer Hill Industrial Estate, Cannock (99 dwellings):** The 2024 SHLAA (EXAM 5 – PDF page 70) lists the site as being “restricted and excluded” (i.e. Sites that are not considered to be suitable, available or achievable within 15 years) and states that the site is not suitable. The 2024 SHLAA refers to the following potential constraints:

*“Remediation work. Neighbouring industrial uses and proposed rail-freight interchange. Coal Authority High Risk Development Area. TPOs. Landowner intentions.”*

- **H49 – Land at the Mossley, off Armitage Road (40 dwellings):** The 2024 SHLAA (EXAM 5 – PDF page 75) lists the site as being “restricted and excluded” (i.e. Sites that are not considered to be suitable, available or achievable within 15 years) and states that the site is not suitable. The 2024 SHLAA refers to the following potential constraints:

*“Landownership/ highways access. Adjacent to Conservation Area.”*

- **H50 – Nursery Fields, St Michaels Road, Brereton (35 dwellings):** The 2024 SHLAA (EXAM 5 – PDF page 75) lists the site as being “restricted and excluded” (i.e. Sites that are not considered to be suitable, available or achievable within 15 years) and states that the site is not suitable. The 2024 SHLAA refers to the following potential constraints:

*“Green Space Network. Potential alternative use”*

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

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As above.

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**Q5. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification. Please comment in the box below.**

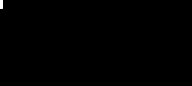
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Name and Organisation:	Sam Cripps, Turley on behalf of Bloor Homes
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PAM133
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**Q2. Do you consider the Main Modification is:**

A. Legally compliant Yes: ☒ No: ☐

B. Sound Yes: ☐ No: ☒  
(Please tick as appropriate).

**Q3. Please give details of why you consider the Main Modification is or is not legally compliant or sound. Please be as precise as possible.**

Your representation should relate only to the Proposed Main Modifications.

PAM133 – Site Allocations Paragraph 6.398 Table B should be amended as follows:

- **H16 – Land west of Pye Green Road, Hednesford Cannock:** the capacity of this site should be amended to 47 dwellings to reflect the reserved matters;

Paragraph 7.5 of the Local Plan is to be amended to state that the housing requirement will be stepped from 2030 when the needs from elsewhere in the HMA are to be met. However, because the proposed housing requirement is significantly below the local housing need of 518 dwellings per annum, the Council will be required to undertake an immediate review to address the short-fall in housing need in accordance with the Framework. Therefore, it is expected that a new plan (that addresses the local housing need in full) will be adopted before 2030. On this basis, no unmet need will be met by this Local Plan before it has been removed and updated.

For this reason, we disagree with the stepped housing requirement, and this paragraph should be removed and the trajectory amended accordingly. The unmet need should be spread across the plan period as originally proposed in the trajectory in the submitted plan.

(Please continue on a separate sheet if necessary)

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**Q4. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of legal compliance or soundness matters you have identified at Q.3 above.** You will need to say why each change will make the 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. If you support the modification, please skip this question.

For the above reasons, we disagree with the stepped housing requirement, and this paragraph should be removed and the trajectory amended accordingly. The unmet need should be spread across the plan period as originally proposed in the trajectory in the submitted plan.

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

**Q5. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification. Please comment in the box below.**

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

**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.

Signature:



Date:

01/12/2025

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Part B Reference

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**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:	Sam Cripps, Turley on behalf of Bloor Homes
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**Q1. To which Main Modification (MM) does this representation relate?**

MM:	PAM134
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**Q2. Do you consider the Main Modification is:**

A. Legally compliant Yes: ☒ No: ☐

B. Sound Yes: ☐ No: ☒  
(Please tick as appropriate).

**Q3. Please give details of why you consider the Main Modification is or is not legally compliant or sound. Please be as precise as possible.**

Your representation should relate only to the Proposed Main Modifications.

In line with the comments we previously made (EXAM 38G) in our response to the proposed trajectory (EXAM 38B) The housing trajectory should be amended as follows:

Site Ref(s)	Site	Capacity	Council 5YHLS	Comments	Change proposed
H16 and C113g	Land west of Pye Green Road, Hednesford Cannock	51	51	The site has outline pp for 51 dwellings, but the RM application pending is for 47. The Council has not provided clear evidence for the inclusion of 4 dwellings in the 5YHLS, and these should be removed.	4 dwellings should be removed
M6 and R143	Rugeley Market Hall and Bus Station, Rugeley	50	25	This site does not have planning permission or an application pending determination. There is no clear evidence of firm progress being made	This site is not deliverable and therefore should not be included in the 5 year

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				<p>towards the submission of an application.</p> <p>The 2024 SHLAA (EXAM 5) lists the site as being “<b>restricted and excluded</b>” and states that it is “<b>not available</b>”.</p>	<p>period from 1<sup>st</sup> April 2025.</p>
H29 and C488	Land at 521 Pye Green Road, Hednesford, Cannock	80	38	<p>This site does not have planning permission or an application pending determination. There is no clear evidence of firm progress being made towards the submission of an application.</p> <p>The 2024 SHLAA (EXAM 5) lists the site as being “achievable within 6-15 years”.</p>	<p>This site is not deliverable and therefore should not be included in the 5 year period from 1<sup>st</sup> April 2025.</p>
M1 and C505	Multi Storey Car Park, Market Hall and Retail Units, Church Street, Cannock	70	60	<p>This site has outline pp for mixed use including extra care / retirement of up to 70 dwellings. A reserved matters application has not been made and there is no clear evidence of firm progress being made towards a RM application.</p> <p>The 2024 SHLAA (EXAM 5) lists the site as being “achievable within 6-15 years”.</p>	<p>This site is not deliverable and therefore should not be included in the 5 year period from 1<sup>st</sup> April 2025.</p>
H35 and C177	Land at Girton Road / Spring Street, Cannock	24	24	<p>The site does not have pp. A full application was made over 3.5 years ago. A resolution to grant was made 2.5 years ago and the S106 has not been agreed and signed since.</p> <p>The 2024 SHLAA (EXAM 5) lists the site as being “achievable within 6-15 years”.</p>	<p>This site is not deliverable and therefore should not be included in the 5 year period from 1<sup>st</sup> April 2025.</p>

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H38 and C86	Land at Walsall Road, Avon Road, Hunter Road, Hallcourt Lane, Cannock	24	24	<p>The site does not have planning permission or a planning application pending determination. There is no clear evidence of firm progress being made towards the submission of an application.</p> <p>The 2024 SHLAA (EXAM 5) lists the site as being “<b>restricted and excluded</b>” and states that it is “<b>not available</b>”.</p>	<p>This site is not deliverable and therefore should not be included in the 5 year period from 1<sup>st</sup> April 2025.</p> <p>It should be removed from the plan period trajectory</p>
H40 and C507	Danilo Road Car Park, Cannock	20	20	<p>The site does not have planning permission or a planning application pending determination. There is no clear evidence of firm progress being made towards the submission of an application.</p> <p>The 2024 SHLAA (EXAM 5) lists the site as being “achievable within 6-15 years”.</p>	<p>This site is not deliverable and therefore should not be included in the 5 year period from 1<sup>st</sup> April 2025.</p>
M2 and C505	Park Road Bus Station, Cannock	15	15	<p>The site does not have planning permission or a planning application pending determination. There is no clear evidence of firm progress being made towards the submission of an application.</p> <p>The 2024 SHLAA (EXAM 5) lists the site as being “achievable within 6-15 years”.</p>	<p>This site is not deliverable and therefore should not be included in the 5 year period from 1<sup>st</sup> April 2025.</p>
H63 and C127	Former Rumer Hill Industrial Estate, Cannock	75	75	<p>The site does not have planning permission or a planning application pending determination. There is no clear evidence of firm progress being made towards the submission of an application.</p>	<p>This site is not deliverable and therefore should not be included in the 5 year period from 1<sup>st</sup> April 2025.</p> <p>It should be removed from</p>

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				The 2024 SHLAA (EXAM 5) lists the site as being <b>“restricted and excluded”</b> . It states that the site is <b>“not suitable”</b> .	the plan period trajectory
H65 and C469	A Dunford and Son, Brindley Heath Road, Cannock	15	15	<p>The site does not have planning permission. A full planning application was made in November 2022 but appears to have stalled.</p> <p>The 2024 SHLAA (EXAM 5) lists the site as being “achievable within 6-15 years”.</p>	This site is not deliverable and therefore should not be included in the 5 year period from 1 <sup>st</sup> April 2025.
H49 and R18	Land at the Mossley, off Armitage Road	40	40	<p>The site does not have planning permission. Whilst an outline planning application was made in June 2023, this has since been withdrawn and there is no clear evidence of firm progress being made towards the submission of a planning application.</p> <p>The 2024 SHLAA (EXAM 5) lists the site as being <b>“restricted and excluded”</b>. It states that the site is <b>“not suitable”</b>.</p>	<p>This site is not deliverable and therefore should not be included in the 5 year period from 1<sup>st</sup> April 2025.</p> <p>It should be removed from the plan period trajectory</p>
H50 and R25	Nursery Fields, St Michaels Road, Brereton	35	35	<p>The site does not have planning permission or a planning application pending determination. There is no clear evidence of firm progress being made towards the submission of an application.</p> <p>The 2024 SHLAA (EXAM 5) lists the site as being <b>“restricted and excluded”</b>. It states that the site is <b>“not suitable”</b>.</p>	<p>This site is not deliverable and therefore should not be included in the 5 year period from 1<sup>st</sup> April 2025.</p> <p>It should be removed from the plan period trajectory</p>

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H52 and R22	Gregory Works, Armitage Road, Brereton	23	23	<p>The site does not have planning permission or a planning application pending determination. There is no clear evidence of firm progress being made towards the submission of an application.</p> <p>The 2024 SHLAA (EXAM 5) lists the site as being “achievable within 6-15 years”.</p>	This site is not deliverable and therefore should not be included in the 5 year period from 1 <sup>st</sup> April 2025.
H53 and R189	Land off Lichfield Street, Rugeley	20	20	<p>The site does not have planning permission. A planning application for 12 dwellings was validated in June 2023, but this is still pending determination over 2 years later. It does not explain why the Council has included 20 dwellings at the site.</p> <p>The 2024 SHLAA (EXAM 5) lists the site as being “achievable within 6-15 years”.</p>	This site is not deliverable and therefore should not be included in the 5 year period from 1 <sup>st</sup> April 2025.
H69 and N67b	272 Hednesford Road, Norton Canes	11	11	<p>The site does not have planning permission. A planning application for 11 dwellings was validated in June 2022. Whilst a resolution to grant was made at committee in March 2024, this was subject to a S106 agreement for contributions towards education and off-site affordable housing. The S106 agreement has not been signed over 16 months later.</p> <p>The 2024 SHLAA (EXAM 5) lists the site as being “achievable within 6-15 years”.</p>	This site is not deliverable and therefore should not be included in the 5 year period from 1 <sup>st</sup> April 2025.



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SM1 and R127	Rugeley Power Station, Rugeley	1,000	400	<p>The site has outline planning permission.</p> <p>Whilst a reserved matters application has been recently made in October 2025, it remains undetermined.</p> <p>There is no written agreement from the developer to confirm the trajectory advanced by the Council, which claims that development will commence in the current year (2025/26). The Council's trajectory is unrealistic.</p> <p>In the absence of clear evidence, the site is not deliverable. However, if the Inspector disagrees and concludes the site is deliverable, the lead-in time should be extended to allow time for reserved matters to be made, determined, pre-commencement conditions to be discharged, infrastructure delivered and a start on site made.</p>	<p>This site is not deliverable and therefore should not be included in the 5 year period from 1<sup>st</sup> April 2025.</p> <p>It should be removed from the plan period trajectory.</p> <p>Alternatively, delivery at this site should be pushed back to provide a realistic lead-in time and build rate.</p> <p>At Drakelow Power Station in South Derbyshire, the first reserved matters application was approved in July 2014, but the first dwellings were not completed until the very end of the 2015/16 monitoring year when 18 dwellings were completed.</p>
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*(Please continue on a separate sheet if necessary)*

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As above.

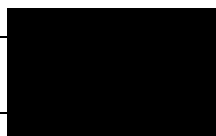
*(Please continue on a separate sheet if necessary)*

**Q5. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification. Please comment in the box below.**

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

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Signature:



Date:

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