

Cannock Chase Council Local Plan  
Review (2018-2040)

Meeting Housing Needs Topic Paper  
November 2024

# Contents

<b>1. Introduction</b>	3
National Planning Policy and Guidance Context	3
<b>2. Development of housing policies in the Local Plan</b>	6
Issues and Scope	6
Issues and Options	6
Preferred Options	10
Pre-Submission Regulation 19	12
<b>3. Housing Requirement</b>	14
Local Housing Needs Figure	14
Housing Needs Assessment (HNA, 2024)	14
Regional Housing Need	14
<b>4. Housing Supply</b>	16
Strategic Housing Land Availability Assessment (SHLAA)	16
Employment Land Availability Assessment (ELAA)	16
Brownfield Land Register	17
Development Capacity Study	17
Small Sites	18
Windfall	19
Local Housing Requirement	19
Housing Trajectory	20
Five Year Housing Land Supply	20
<b>5. Housing need by mix, type and tenure</b>	22
Local Housing Needs Assessment (LHNA) (2019)	22
Housing Needs Assessment (HNA) (2024)	23
Local Plan Viability Report (2022)	24
Provision for New Homes Policy SO3.1	24
Housing Choice Policy SO3.2	25
Affordable Rented Housing	26
Shared Ownership and other Intermediate Housing	27
First Homes	28
Build to Rent	28
Rural Exceptions	29
Exception Sites	29
Market Housing	29
Self and Custom Housebuilding	30
Delivering High Quality Housing Policy SO3.3	30

Housing for Older and Disabled People.....	30
Adult Social Care .....	34
General Needs, Accessible and Adaptable Dwellings and housing with support .....	34
Specialist Housing and Care Homes .....	35
<b>6. Other Groups</b> .....	<b>37</b>
Students.....	37
Service Families .....	37
Gypsies, Travellers and Travelling Showpeople .....	37
<b>7. Summary</b> .....	<b>38</b>
<b>Appendix A: Local Plan Housing Trajectory</b> .....	<b>40</b>

## 1. Introduction

- 1.1. This topic paper considers the relevant national guidance and local evidence that impact on the emerging plan in consideration of meeting the District's housing needs, and provides a summary of the evidence base, where applicable, and how it has been considered during the preparation of the Local Plan.
- 1.2. The Local Plan takes a positive and effective approach to meeting the District's housing needs and the differing needs of the local community. This Topic Paper draws together the evidence used to develop policies in the Local Plan related to meeting housing need. This topic paper covers Local Plan policies SO3.1, SO3.2, SO3.3, in particular:
  - Housing Requirement
  - Housing Supply
  - Affordable and market housing need
  - Rural Exceptions
  - Self and Custom Build Housing
  - The needs of different groups in the community
- 1.3. The first section sets out how policies have been developed through the stages of the Local Plan process, considering the Sustainability Appraisal commission for the Local Plan as well as the consultations undertaken at each stage and how these have influenced the plan-making process.
- 1.4. The report considers in detail how the housing requirement was derived as well as the sources of land supply. The detailed calculations of each source of sites which count towards the housing target are presented as well as the trajectory for site delivery over the plan period
- 1.5. The Housing Mix section sets out the approach taken to providing dwellings suited to young families, older and disabled people and housing suitable for households with specific needs, it considers the evidence provided in the Housing Needs Assessments and Viability Report and sets out how the final draft policies reflect this.
- 1.6. The main factors which influenced the final draft policies related to housing are summarised at the end of this report.

### **National Planning Policy and Guidance Context**

- 1.7. The National Planning Policy Framework considered within this topic paper is the revised September 2023 version in line with the assessment of the Draft Submission Plan under this Framework.
- 1.8. This section summarises the key pieces of national policy and legislation that relates to planning policy and housing.

### **National Planning Policy Framework (September 2023)**

- 1.9. Paragraph 60 of the National Planning Policy Framework (NPPF) states that to support the government's objective of significantly boosting the supply of homes, it is important that

a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. Furthermore, the NPPF makes it clear that 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.

- 1.10. Within this context, the NPPF, at paragraph 62, states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including those who require affordable housing, families with children, older people, students, people with disabilities, service families and people wishing to commission or build their own homes).
- 1.11. The NPPF at paragraph 63, states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified; and the agreed approach contributes to the objective of creating mixed and balanced communities. Footnote 29 of the NPPF identifies that the type of affordable housing required should be considered through the application of the definition in Annex 2 of the Framework.
- 1.12. Paragraphs 64 and 65 of the NPPF, set out the circumstances in which the provision of affordable housing should be sought from residential developments and that where major development involving the provision of housing is proposed, planning policies and decision should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups, exemptions to this 10% requirement are also set out within paragraph 65.
- 1.13. The NPPF, at paragraph 68, states that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability suitability and like economic viability. Planning policies should identify a supply of:
  - a) specific, deliverable sites for years one to five of the plan period; and
  - b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
- 1.14. Paragraph 69 of the NPPF, identifies that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. From this, local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through

the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.

- 1.15. The NPPF, at paragraph 74, states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider where it is appropriate to set out the anticipated rate of development for specific sites.
- 1.16. Footnote 49 of the NPPF notes that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.

### **National Planning Practice Guidance**

- 1.17. The National Planning Practice Guidance (PPG) on housing for older and disabled people identifies that the need to provide housing for older people and people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives. The NPPF Annex 2 (Glossary) provides definitions of older people and people with disabilities for planning purposes, which recognise the diverse range of needs that exist. The health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support. For plan-making purposes strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people. (Paragraph:003 Reference ID: 63-003-20190626).
- 1.18. Within this context, the PPG states that plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period (Paragraph: 006 Reference ID: 63-006-20190626).
- 1.19. The PPG states that where an identified need exists, plans are expected to make use of the optional technical housing standards to help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:

M4(1) Category 1: Visitable dwellings (@the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement)

M4(2) Category 2: Accessible and adaptable dwellings

M4(3) Category 3: Wheelchair user dwellings

Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site-specific factors (Paragraph 009: Reference ID: 63-009-20190626).

## 2. Development of housing policies in the Local Plan

### Background

- 2.1. The current Local Plan was adopted in 2014. The plan sought to balance projected demographic housing need with constraints, such as the Green Belt and National Landscape, and formed part of a Southern Staffordshire strategy to deliver 19,800 houses in Tamworth Borough, Lichfield District and Cannock Chase District between 2006 and 2028. The current Local Plan adopted the figure of 5,300 new homes to be delivered over the period 2006-2028. The intention was to produce a site allocations (Part 2) following adoption of the existing Local Plan.
- 2.2. Work ceased on the Local Plan (Part 2) in February 2018 following Council resolution to enable a full review of the Local Plan to proceed that would incorporate both Part 1 and Part 2 in a new Local Plan.

### Issues and Scope

- 2.3. The first stage of the Local Plan Review (LPR) consultation took place from 2<sup>nd</sup> July to 28<sup>th</sup> August 2018; the consultation document is available [here](#). The document outlined what issues the Council need to consider, including the need to meet the District housing need and the recognition that a contribution to the wider Greater Birmingham HMA shortfall may need to be considered.
- 2.4. Views were invited on the scope of the review, the issues that ought to be taken into account and the broad options for growth that ought to be considered.

### Issues and Options

- 2.5. The second stage of the LPR consultation took place from 13<sup>th</sup> May to 8<sup>th</sup> July 2019; the consultation document is available [here](#). The document set out an update on the key issues and looked at what options there are for addressing them e.g. how much housing or employment land should be provided in the District and where that should be located in the District. This is still an early stage in the process where the more strategic issues are looked at and all the options available have to be considered; no decisions on individual sites suggested for development were made at this stage.

#### Issues and Options Overall Housing Growth Policy Options:

- **Option A:** Local Housing Need alone with no unmet need. Based upon current standard methodology the Districts' local housing growth for the plan period of 2018 - 2036 would be 5,112 net dwellings (284 dwellings per annum)
  - **Option B:** Local Housing Need figure plus unmet need of an additional 500 dwellings giving a total housing growth figure of 5,612 net dwellings for the District (2018 - 2036) or 312 net dwellings per annum.
  - **Option C:** Local Housing Need figure plus unmet need of an additional 1,500 dwellings giving a total housing growth figure of 6,612 net dwellings for the District (2018 - 2036) of 367 net dwellings per annum
  - **Option D:** Local Housing Need figure plus unmet need of an additional 2,500 dwellings giving a total housing growth figure of 7,612 net dwellings for the District (2018-2036) or 423 net dwellings per annum.
- 2.6. Representations to the Issues and Options consultation showed that the majority of respondents considered the higher levels of growth options C and D should be chosen,

this reflects the larger number of responses from site promoters. The majority of individual responses preferred the options supporting the lower levels of growth. Representations were received from neighbouring authorities who considered that the Option A was unlikely to assist in meeting the cross-boundary needs that were known at the time.

#### **Issue and Options Strategy for Meeting Overall Housing Growth Policy Options:**

- **Option A:** Urban Areas - use sites already identified for housing within the urban areas and explore opportunities for further housing on urban sites
- **Option B: Rugeley Power Station**
  - **Option B1:** Urban Areas and housing-led redevelopment of former Rugeley Power Station
  - **Option B2:** Urban Areas and employment-led/mixed use redevelopment of former Rugeley Power Station
- **Option C: Green Belt Urban Extensions**
  - **Option C1:** In combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extensions at Rugeley/Brereton urban edges
  - **Option C2:** In combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extensions at Cannock/Hednesford/Heath Hayes and Norton Canes urban edges
  - **Option C3:** In combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extensions distributed across the District

2.7. Representations to the Issues and Options consultation supported the use of the urban areas and the redevelopment of Rugeley Power Station. Land promoters expressed support for options which would include sites they were promoting including Green Belt Urban Extensions. Individuals largely expressed support for just Options A and B. There was concern expressed regarding the increase in traffic levels and education needs arising from new development, the impact upon the Green Belt and need to protect the National Landscape and Special Area of Conservation (SAC).

#### **Issues and Options Affordable Housing Percentage Requirements Policy Options:**

- **Option A:** Amend strategic policy to reflect updated overall affordable housing needs (based on Housing Needs Assessment) including updated District-wide affordable housing percentage requirement. Require affordable housing provision from schemes of 10 dwellings or more (percentage subject to overall Local Plan viability assessment) with presumption this to be on site, unless circumstances justify off site financial contributions. Continue to allow off-site financial contribution in lieu of on-site provision in exceptional circumstances. Continue to require review of viability on large sites over 2 year period. Subject to Local Plan viability assessment results, consider the need for a continuation of current policy approach i.e. sites of 10-14 dwellings make off-site financial contributions.
- **Option B:** In combination with Option A, implement specific affordable housing requirements for large site allocations.

2.8. Representations to the Issues and Options consultation suggested that the percentage contribution required from each site should be a number not a range and should be based



on the viability of the site, as well as support for an uplifted housing target figure as the best way to support the delivery of affordable housing and the inclusion of off-site contributions in exceptional circumstances. A registered provider of affordable homes asked for consideration of a policy which seeks to provide affordable housing on lower threshold sites of 5 dwellings or more for seeking delivery on-site where achievable and viable.

#### **Issues and Options Housing Mix Policy Options:**

- **Option A:** Continue with current policy approach of encouraging appropriate mix of housing sizes, types and tenures for different groups in the community on a District wide basis, informed by the Housing Needs Assessment.
- **Option B:** Require specific percentages for mix of housing sizes, types and tenures for different groups in the community on individual sites, informed by the Housing Needs Assessment.
- **Option C:** In combination with Option A, require specific percentages for mix of housing sizes, types and tenures for different groups in the community on large site allocations only.
- **Option D:** In combination with other Options, allocate specific sites for different housing needs e.g. 100% affordable housing sites, sites for care homes, self build sites.

2.9. Representations to the Issues and Options Consultation in the main favoured the option to retain the flexible approach to defining housing mix for each site, which referred to the Housing Needs Assessment but was not overly prescriptive to it.

#### **Sustainability Appraisal Report of the Cannock Chase Local Plan: Issues and Options (2019)<sup>1</sup>**

2.10. An interim Sustainability Appraisal (SA) report was published in March 2019 on the 'Issues and Options' stage of the Local Plan Review. The SA summarised the findings for the reasonable alternative policy options that were being considered for the Local Plan and were proposed during the Issues and Options consultation.

#### **Overall Housing Growth Policy Options**

2.11. The SA identified that delivering a significantly higher level of growth over the plan period through Option C (total housing growth of 6,612 net dwellings including 1,500 dwellings to meet the unmet housing need of the HMA) and Option D (total housing growth of 7,612 net dwellings including 2,500 dwellings to meet the unmet housing need of the HMA) was likely to result in a higher amount of greenfield land take being required over the plan period. As such significant negative effects were recorded for Options C and D in relation to SA objective 3: previously developed land.

2.12. It was identified that whilst the level of housing set out to be delivered through Options A and B would be comparatively lower it was still expected that considerable greenfield land take would result and therefore a minor negative effect was recorded for SA objective 3 for these two options.

2.13. When considering SA objective 9: housing, each option would result in the delivery of housing to meet the requirements in the District and as such a positive significant effect was expected in relation to this objective. The SA also notes that in relation to Option A

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<sup>1</sup> [Integrated Impact Assessment: Cannock Chase \(Local Plan Part 2\) \(cannockchasedc.gov.uk\)](https://www.cannockchasedc.gov.uk)

this is combined with a minor negative effect given that this approach would not help to address the wider need of the Greater Birmingham HMA. The significant positive effect expected for Options C and D in relation to SA9 are identified to likely be combined with an uncertain minor negative effect, as these options would support a particularly high uplift above recent average deliver in the District and as such would help to address the unmet need of the Greater Birmingham HMA, but that the high levels of uplift required in the District may be difficult to achieve meaning the contribution to unmet need in the HMA may be overly onerous to meet in full.

### **Strategy for Meeting Overall Housing Growth Policy Options**

2.14. The SA identified that the options considered in relation to the strategy for meeting overall housing growth in the District were expected to have a range of sustainability effects. In general, those options which placed new homes in areas which are in close proximity to existing centres were likely to have more positive effects considering that existing services and facilities would be easier to access and that these areas are already highly developed with increased potential for development of brownfield sites.

2.15. With regards to SA Objective 9: housing the SA identified the following:

- Option A would provide for land to support the lowest amount of housing and therefore is likely to have only a minor positive effect in relation to this objective.
- Option B2 would allow for some additional housing growth at the Rugeley Power Station but this portion of growth would also accommodate mixed use or employment led development meaning the level of residential development at this location would be reduced; a minor positive effect would be expected in relation to this objective.
- Option B1 and C1 could potentially provide more land to meet this housing need and therefore a significant positive effect was identified, most likely to be combined with a minor negative effect for both options.
- Option B1 is considered not likely to meet the unmet need and that the urban edges of Rugeley and Brereton have few site options for development and present limited capacity for housing development.
- Option C2 and C3 would present the best opportunity for providing a larger number of new dwellings over the plan period. As such these approaches would be most suitable in terms of meeting local housing requirements in full and would allow for growth at a higher number of locations.
- Option C2 would allow for the highest proportion of growth as Green Belt urban extensions around Cannock, Hednesford and Norton Canes which corresponds with Proportionate Dispersal Location PD3 set out in the Greater Birmingham HMA Strategic Growth Study as an option to accommodate the unmet needs of Birmingham.
- Option C3 would allow for development at these locations but would direct a proportion of growth to Green Belt locations by Rugeley and therefore may be less suitable in terms of addressing the housing needs of the wider conurbation.

### **Affordable Housing Policy Options**

2.16. The SA identified that both groups of policy options would help deliver different types of new homes which would help to address specific requirements in the District, and that it was likely that both options would have a positive effect in relation to SA9: housing. It

furthered this, by considering that the positive effect expected for both policy options in relation to affordable housing percentage requirements were likely to be significant, and that both options considered would reflect the updated overall affordable housing needs of the District and would be best placed to meet the up-to-date local requirements for this type of housing.

- 2.17. It was identified that the significant positive effect expected for Option B were likely to be combined with an uncertain minor negative given that setting a specific affordable housing requirement at some larger sites was expected to result in a less flexible policy approach which may adversely affect the viability of some potential housing schemes.

### **Housing Mix Policy Options**

- 2.18. All four housing mix options considered were expected to contribute to an appropriate mix of housing in the District which would help to meet local requirements. The SA's findings showed that significant positive effects were expected for Options A, B and C given that they would supply a mix of housing informed by the findings of the Housing Needs Assessment. Options A and C would place an emphasis on encouraging an appropriate mix of housing sizes, types and tenures, with Option C also requiring specific percentages of mixes of housing on larger sites.
- 2.19. It was identified that Option B would set a requirement for a mix of housing at sites of all sizes, considering that viability issues are more likely to emerge at smaller housing sites, the significant positive effect expected in relation to Option B was uncertain; extending the requirement to meet a specific mix of housing at individual sites, to include smaller sites may impact the viability of certain schemes.
- 2.20. The SA identified that Option D would allocate specific sites for different housing needs, this approach was expected to result in some schemes being potentially unviable considering the specific requirements and potential reduced profitability of affordable housing and care home proposals etc. However, it was identified that it could provide options for organisations whose remit is to provide low cost housing such as housing associations and care home providers, and flexibility to allow for self and custom build homes, which is encouraged through the NPPF at paragraph 62.

### **Preferred Options**

- 2.21. The Preferred Options consultation of the LPR took place between 19<sup>th</sup> March to 30<sup>th</sup> April 2021; the consultation document is available [here](#). The document sets out the responses that were received in relation to the options that were presented in the Issues and Options Consultation (as outlined above).
- 2.22. The Preferred Options Local Plan identified within the spatial strategy that the development needs arising from the District could be accommodated within the Cannock Chase authority boundary in addition to providing a contribution towards the HMA shortfall. To meet these needs the Spatial Strategy of the Local Plan proposed that (amongst others):
- Housing and employment requirements will be met where possible within urban areas or in accessible and sustainable expansions to the urban areas;
  - The reuse of previously developed sites will be optimised, and natural assets will be protected, for example by low and zero carbon energy and heat production; and

- Green Belt release in order to provide sufficient land to meet Cannock Chase District’s housing need with an element of flexibility.
- 2.23. The Preferred Policy Direction for Policy SO3.1 outlined within the Preferred Options Local Plan identified the application of Option B as outlined in the Issues and Options for Housing Provision to meet the objectively assessed local housing need in line with the standardised methodology and for a further housing provision of 500 dwellings to be made towards the HMA shortfall.
- 2.24. The preferred policy direction also identified the continued delivery of housing within the District’s urban area, with the policies in the rest of the development plan focussing development on the re-use of brownfield land, the delivery of the redevelopment of the former Rugeley Power Station, and identified new locations adjacent to existing settlements to accommodate the balance of dwellings which cannot be built on sites within the existing urban areas, and form strategic allocations requiring Green Belt release (most closely aligned with Option C2).
- 2.25. The Local Housing Need was established as 276 dwellings per annum or 5,516 over the 20-year Plan period. The Council identified a commitment to a contribution of 500-dwellings to the wider HMA shortfall. The overall housing requirement for the period 2018-2038 was identified as 6,016 dwellings.
- 2.26. The feedback and next steps following the Preferred Options consultation were presented at a meeting of Cabinet in December 2021<sup>2</sup>. In addition to identifying the main issues raised by the representations, it was identified that further evidence would be completed to support the preparation of the next stage of the Local Plan and that discussions would continue with the Council’s Duty to Cooperate partners to meet legal obligations. Further to this, it was identified that a viability assessment would be prepared to ensure the balance between the policy requirements in the Local Plan will be effective, justified, positively prepared and enable the delivery of sustainable development. A full summary of representations was presented at the August 2022<sup>3</sup> meeting of Cabinet.

### **Sustainability Appraisal: Cannock Chase Local Plan Preferred Options (2021)<sup>4</sup>**

#### **Policy SO3.1**

- 2.27. Policy SO3.1 performed well or neutrally against most of the 17 sustainability objectives, with a likely significant positive outcome for housing as the proposed number of dwellings would provide a boost to the local economy, in terms of jobs created during the construction phase and increased spending in the area following construction. This also lead to a minor positive effect being expected in relation to SA15: economy.
- 2.28. Several uncertain/significant negative outcomes were identified with potential impacts on the environment, landscape and townscape, and impacts on the historic environment. These were identified as uncertain as appropriate mitigation may avoid adverse effects.

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<sup>2</sup> [04-Local Plan Preferred Options Consultation Feedback and Next Steps Report Cabinet 161221 \(cannockchasedc.gov.uk\)](#)

<sup>3</sup> [06-local\\_plan\\_2018\\_to\\_2039\\_reg\\_19\\_consultation\\_rpt\\_cabinet\\_250822.pdf \(cannockchasedc.gov.uk\)](#)

<sup>4</sup> [Integrated Impact Assessment: Cannock Chase Local Plan Preferred Options \(cannockchasedc.gov.uk\)](#)

### **Policies SO3.2 and SO3.3**

- 2.29. Policies SO3.2 and SO3.3 performed well or neutrally against all of the 17 sustainability objectives, as their focus is constrained to type of housing and quality of housing. A significant positive effect was expected for both policies in relation to SA9: housing. For Policy SO3.2 this is due to a requirement in the policy that, on the basis of local evidence, a suitable mix of housing sizes, types and tenures should be delivered to ensure all housing needs are met within the District.
- 2.30. In the case of Policy SO3.3, quality standards are set out in terms of space for living and requirements for households with occupants that have health problems or disabilities; this is likely to ensure that the future housing stock in the District is of a high quality for a range of people.

### **Consultation Representations to the Preferred Options Local Plan (2021)**

- 2.31. The Summary of Representations to the Preferred Options Plan were reported to Cabinet on 16<sup>th</sup> December 2021. In total 99 representations were received, which when broken down into the corresponding questions posed within the Preferred Options document provided 518 individual responses plus eight responses to the Sustainability Appraisal and a further four responses relating to the other evidence published at the time.
- 2.32. Comments on Policy SO3.1 'Provision for New Homes' gave general support for the contribution to the unmet need in neighbouring authorities and support for further contributions of an additional 2,000 dwellings. In turn, some respondents considered the quantum of development to be excessive and there was opposition to additional land being provided to meet the needs from the Greater Birmingham and Black Country HMA.
- 2.33. Comments regarding Policies SO3.2 and SO3.3 centred on the impact on viability due to enhanced building standards and housing mix. Respondents raised a desire for greater flexibility on the housing mix and that there should be a greater emphasis on single living, including greater provision for older people and more affordable homes. It was also considered that a lack of larger four and five bedroom homes does not recognise the demand for larger family homes and could increase the proportion of the community who are elderly as they require smaller housing.

### **Pre-Submission Regulation 19**

- 2.34. A Pre-Submission Regulation 19 Local Plan Consultation was held between 5<sup>th</sup> February to 18<sup>th</sup> March 2024, this consulted on a revised version of the 2022 Regulation 19 version of the Plan taken to Cabinet<sup>5</sup> updating the housing figures in line with the 2023 SHLAA and introducing the proposed site allocation policies; including those for the Strategic Residential Green Belt release sites and those identified within Table C of the new Policy SA1.
- 2.35. The consultation document used the standard methodology to assess local housing need, as introduced by the revised NPPF in July 2018. The base year of the Local Plan review remained as 2018 and extended further to 2040 to account for the delay in undertaking the initial consultation of the 2022 Regulation 19. The Local Housing Needs figure was established as 264 dwellings per-annum or 5,808 over the 22-year Plan period in line with

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<sup>5</sup> [06-local\\_plan\\_2018\\_to\\_2039\\_reg\\_19\\_consultation\\_rpt\\_cabinet\\_250822.pdf\(cannockchasedc.gov.uk\)](#)

the standard methodology. The Council continued to commit to a contribution of 500 dwellings to the wider HMA shortfall. The overall housing requirement for the period 2018-2040 therefore stood at 6,308 dwellings.

- 2.36. The final spatial strategy most closely aligned with housing option C2: in combination with the options for the Urban Areas and former Rugeley Power consider Green Belt urban extensions at Cannock/Hednesford/Heath Hayes and Norton Canes urban edges, though for housing it slightly differs from the options presented in the initial stages of the review, in that some additional allocations have been made in Rugeley and land in Norton Canes for housing has been safeguarded as opposed to allocated for the plan period. Norton Canes has had a higher proportion of dwellings delivered to date, early in the plan period than Rugeley and other villages and there is less infrastructure in place to accommodate additional growth. Further to this, Rugeley Town Centre is a more sustainable location for development than Norton Canes village in terms of services and facilities. The Council continues to support Norton Canes Parish Council with their Neighbourhood Plan.
- 2.37. In the Regulation 19 Local Plan, additional housing allocations were made in Rugeley and the decision was made to safeguard sites in Norton Canes which ensures the proportion of development fit with the overall Spatial Strategy.

### **Sustainability Appraisal of the Cannock Chase Local Plan: Pre-Submission (2024)<sup>6</sup>**

#### **Policy SO3.1**

- 2.38. The SA identifies that the level of housing delivery will provide a boost to the local economy, in terms of jobs created during the construction phase and increased spending in the area following construction. As such, a significant positive effect is expected for the policy in relation to SA objective 9: housing and a minor positive effect is expected in relation to SA objective 15: economy.

#### **Policies SO3.2 and SO3.3**

- 2.39. The SA identifies negligible effects in relation to the majority of the SA objectives for both policies as their focus is constrained to type of housing and quality of housing. A significant positive effect is expected for both policies in relation to SA objective 9: housing. In the case of Policy SO3.2, this is due to the policies requirement that, on the basis of local evidence, a suitable mix of housing sizes, types and tenures should be delivered to ensure the housing needs of a wide range of resident types are met within Cannock Chase District. The delivery of the level of affordable housing at larger sites as required by the policy has been demonstrated to be viable through the work supporting the preparation of the plan. However, supporting evidence indicates that the need for affordable dwellings across the District will not be met in entirety by the Plan and therefore the significant positive effect expected is uncertain. With regards to Policy SO3.3 quality standards within the policy set out in terms of space for living and requirements for households with occupants that have health problems or disabilities.
- 2.40. These aspects of the policies will also be beneficial to the health and wellbeing of current and future residents in the District by providing high quality housing and sites to live on for all people, including through the requirement for housing developments to incorporate sufficient external amenity space or private gardens.

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<sup>6</sup> [Local Plan Reg 19 Integrated Impact Assessment inc SA & HIA 02.24\\_0.pdf \(cannockchasedc.gov.uk\)](#)

### 3. Housing Requirement

#### Introduction

- 3.1. The Regulation 19. Pre-Submission Cannock Chase Local Plan, hereon referred to as the Draft Submission Plan (DSP) covers the Plan period of 2018-2040, with expected adoption in 2025.
- 3.2. Paragraph 61 of the NPPF states:

‘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 effects 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.’
- 3.3. The Council originally commissioned a Housing Need Assessment to support the Preferred Options stage which was published in 2019 This was comprehensively updated in 2024 to inform policy in the final Reg 19 Local Plan.

#### Local Housing Needs Figure

- 3.4. The DSP follows guidance on the standard methodology in the NPPF and Planning Practice Guidance in establishing the Local Housing Needs (LHN) figure as a starting point for the District’s housing requirement.
- 3.5. The LHN for the plan period 2018-2040 is 264 dwellings per annum, or 5,808 overall. Further detail on the housing needs figure calculations is provided in the SHLAA (2023) under Annex 1. Cannock Chase District Local Housing Needs Calculation<sup>7</sup> and in Section 3 of the Housing Needs Assessment.

#### Housing Needs Assessment (HNA, 2024)

- 3.6. National Planning Practice Guidance is clear that the LHN provides a minimum starting point in determining the number of homes needed in an area and it explains when it might be appropriate to plan for a higher housing need figure than the standard methodology indicates. This has been addressed in the HNA through the analysis of population projections in consideration of the revised population estimates for England and Wales: mid-2012 to mid-2016 release by the Office for National Statistics (ONS) on the 22<sup>nd</sup> March 2018; seeing how significant these changes were for Cannock Chase and if updated information point to the 2014-based projections as being substantially wrong.
- 3.7. The HNA concludes that a target derived from the Standard Method is a reasonable number to use in estimating housing need for the District.

#### Regional Housing Need

- 3.8. Early in the development of the plan, CCDC worked with local authorities in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) to understand the position in relation to housing need and supply. Members of the GBBCHMA commissioned

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<sup>7</sup> [Cannock Chase SHLAA 2023\\_0.pdf \(cannockchasedc.gov.uk\)](#)

GL Hearn/Wood to provide an update on the overall housing needs across the housing market area and the shortfall in supply arising. It was published in February 2018 and provided an analysis of the potential options for addressing the shortfall. This study considered all evidence of housing need and supply as of 31<sup>st</sup> March 2017 and identified a cumulative shortfall of around 60,900 dwellings across the HMA up to 2036. The study indicated that this shortfall largely arose from Birmingham and the Black Country authorities.

- 3.9. The Green Belt Topic Paper (Update 2023<sup>8</sup>) provides further details in terms of the options for addressing the housing supply shortfall both on land outside the Green Belt and with Green Belt release as set out within the Strategic Growth Study<sup>9</sup>. The Study recommendations implied that CCDC should consider accommodating a minimum of 500 dwellings to contribute to the GBBCHMA shortfall.

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<sup>8</sup> [Green Belt Topic Paper 2023 \(Updated\).pdf \(cannockchasedc.gov.uk\)](#)

<sup>9</sup> [Greater Birmingham HMA Strategic Growth Study Part 1 \(February 2018\)](#)



## 4. Housing Supply

### Site Assessment

- 4.1. This section summarises the main sources of site assessment. The Councils Development Capacity Study considers all sources of the supply of land for housing within the District in greater detail. This should be read in conjunction with this Topic Paper.
- 4.2. The Local Plan, and this topic paper, adopts the definition of a dwelling consistent with that used by the Office for National Statistics (ONS) in the Census, which is a self-contained unit of accommodation where all of the rooms (including kitchen, bathroom and toilet) in a households' accommodation are behind a single door that only the household can use.
- 4.3. The Council assess whether a development provides the characteristics of a self-contained unit of accommodation when assessing sites in the Strategic Housing Land Availability Assessment (SHLAA). Care developments providing homes with these characteristics will be regarded as dwellings in accordance with the ONS definition.
- 4.4. Care bedspaces will be counted towards overall housing supply. This has been applied in line with NPPG Guidance<sup>10</sup> that authorities should base calculations on the average number of adults living in households; the SHLAA 2023 identifies a local ratio of average number of adults living in households from published census data (2011) as 1.86 (i.e. 18 beds in a communal establishment equates to 10 dwellings).

### Strategic Housing Land Availability Assessment (SHLAA)

- 4.5. The SHLAA is undertaken on an annual monitoring period between 1<sup>st</sup> April to 31<sup>st</sup> March and has been continued to be updated throughout the plan-making process informing the housing land supply figures with regards to identifying sites for consideration and the calculation of the Local Housing Need and Five-Year Supply. The latest version of the SHLAA covers the period between 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023 and was the last version to inform the Draft Submission Plan.
- 4.6. The Council's Call for Sites process is open all year-round enabling landowners and/or developers to submit information on sites they wish to be considered for housing and/or employment or provide updated details on existing sites. Any sites submitted up to 31<sup>st</sup> March 2023 and that formed part of the SHLAA were considered as part of the wider site selection process.

### Employment Land Availability Assessment (ELAA)

- 4.7. The ELAA is undertaken on an annual monitoring period between 1<sup>st</sup> April to 31<sup>st</sup> March and has been continued to be updated throughout the plan-making process informing the employment land supply figures with regards to identifying sites for consideration. Alongside this, where appropriate, and in cases where indicated by the landowner/developer a number of employment sites have also been assessed for housing sites and/or mixed use development sites. The latest version of the ELAA covers the period between 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023 and was the last version to inform the Draft Submission Plan.

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<sup>10</sup> [Housing for older and disabled people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/714244/Housing_for_older_and_disabled_people.pdf)

## **Brownfield Land Register**

- 4.8. In 2017 Brownfield Land Register (BLR) regulations were introduced which require each LPA to publish a BLR identifying previously development land which is suitable, available and achievable for residential development.
- 4.9. Give then that Council needs to demonstrate 'exceptional circumstances' if land is to be released from the Green Belt, it is necessary to identify all possible land supply that may be available through this source.
- 4.10. The Council's Brownfield Register is updated and published annually, and draws from the sites identified through the Council's Call for Sites Process and SHLAA on sites of five or more dwellings.

## **Development Capacity Study**

- 4.11. As part of the Council's evidence base the Development Capacity Study<sup>11</sup> (DCS) sets out evidence regarding the housing requirement and the supply of land for housing within the District over the plan period from 2018 to 2040.
- 4.12. The Development Capacity Study is a high-level assessment used to collate all potential sources of housing supply and all potential site options. The study does not seek to establish whether sites in the Green Belt are suitable for removal from the Green Belt; only whether they offer a sustainable location for residential development and are free from absolute constraints<sup>12</sup>. The study identifies sites with planning permission and further sites with potential including sites within the SHLAA and ELAA Restricted and Excluded sections, Neighbourhood Plans and Housing Estates and Redevelopment amongst others.
- 4.13. All sites identified with potential by this study were subsequently assessed using the Site Selection Methodology to consider the contribution that they could make to meeting housing needs over the plan period. The Study provides a high level, theoretical overview of potential capacity in the District but does not provide an accurate figure for the housing supply.

## **Site Selection Methodology**

- 4.14. The Site Selection Methodology<sup>13</sup> sets out the process through which the Council has selected the sites that will contribute to meeting the identified needs for development. The methodology for site selection has been developed through the Plan process with consideration beginning at the Issues and Scoping stage (July 2018) where questions were posed for consideration on how the methodology should be developed.
- 4.15. After an initial sift to determine whether sites were eligible for more detailed assessment, the remaining sites were assessed against a range of criteria using specific categories to provide an overview of the sustainability of a site as well as its deliverability and ability to support and align with the Spatial Strategy using a RAG Criteria. The results of the detailed assessment are site proformas shown in Appendix C of the Site Selection Methodology.

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<sup>11</sup> [Development Capacity Study 09.23.pdf](#)

<sup>12</sup> Absolute Constraints to development are: Ancient Woodland; Scheduled Monuments; Special Areas of Conservation (SAC); Sites of Special Scientific Interest (SSSI); Local Nature Reserves (LNR); Sites of Biological Importance (SBI); Regionally Important Geological Sites (RIGS); Flood Zone 3; Local Green Spaces and where development would involve the total loss of a designated heritage asset

<sup>13</sup> [Site Selection Methodology \(cannockchasedc.gov.uk\)](#)

Not all sites were required to have a proforma as some sites had already been subject to detailed assessment in other strategies or have been identified using the Development Capacity Study; this information is available for each site in Appendix B of the Methodology.

- 4.16. An evaluation stage was undertaken through a series of meetings of the Local Plan Member and Officer Working Group to evaluate the site proforma's and classify them into three categories. The detailed site assessments and the results of the evaluation stage provides information as to the reasons for sites either identified for allocation in the Local Plan or rejected at this stage. The Evaluation Stage was repeated following the Preferred Options consultation and amendments were made to both the Spatial Strategy and sites selected for allocation for the Pre-Submission version of the Local Plan.
- 4.17. Detailed Housing Supply The section shows the more specific calculations of sources of sites which make up the final housing supply in the Draft Local Plan. All deliverable sources of housing supply have been used to inform the final calculation in the Local Plan.
- 4.18. The monitoring of new dwellings is reported on an annual basis to Government, and the year runs from 1<sup>st</sup> April to 31<sup>st</sup> March.
- 4.19. A summary of the Housing Supply for the Draft Submission Local Plan is provided below.

Source	Capacity
1 Completions 2018-2023	2,540
2 Sites with Planning Permission (Under Construction) <sup>14</sup>	365
3 Sites with Planning Permission <sup>15</sup>	1,265
4 Sites identified through Site Selection Process <sup>16</sup>	821
5 Green Belt Release Strategic Sites <sup>17</sup>	1,290
6 Small Site Contribution <sup>18</sup>	163
7 Windfall Allowance <sup>19</sup>	324
<b>Total Capacity</b>	<b>6,768</b>

**Table 4.1: Draft Submission Plan Housing Supply**

### Small Sites

- 4.20. The NPPF (para 69) includes a requirement that 10% of a Local Plan's housing requirement is accommodated on sites no larger than 1ha. This requirement is aimed at promoting the development of a good mix of sites, recognising that small and medium size sites build out more quickly.
- 4.21. Of the known supply (Rows 2-5 above), 606 dwellings are on sites no larger than 1ha. This figure meets the 10% accommodation for small sites on the District's Local Housing Need of 5,808 dwellings.

<sup>14</sup> Full Dwellings and communal combined

<sup>15</sup> As Above. Includes Strategic Site at Rugeley Power Station (SM1)

<sup>16</sup> Identified in Table C of Policy SA1

<sup>17</sup> Identified through the Site Selection Process and within Policy SO3.1 and SA1

<sup>18</sup> Existing Small Sites as identified in the SHLAA 2023 0-5-year (Deliverable) Section with an 18% Non-Implementation deduction applied in line with the 2023 SHLAA

<sup>19</sup> Allowance of 27dpa applied from year 4 of the 5-year supply from adoption (2028/29)

- 4.22. A further 25 dwellings would be required to meet the 10% small sites requirement on the Local Housing Need including a 500-dwelling contribution to the HMA shortfall. It is reasonable to consider that the additional small site contribution shown in Row 6 above contributes the additional 25 dwellings, and that further small sites will come forward on windfall sites.

## **Windfall**

- 4.23. Windfall sites have made a significant contribution in Cannock Chase towards housing supply, in part due to the lack of an adopted up to date plan containing site allocations (as the 2014 Core Strategy was not principally a site allocation plan and was originally meant to be Part 1 of 2 documents which would have included site allocations). Due to the limited number of allocated sites within the adopted Local Plan (2014) by default, most development that has occurred in the District will be marked as windfall as it has not been allocated through a Local Development Document.
- 4.24. The reliability of windfall sites can be tested through the history of windfall sites coming forward. There is compelling evidence that windfall sites consistently become available in Cannock Chase. A detailed assessment of windfall provision is provided within the 2023 SHLAA, where the historic windfall rates between 2014 - 2023 have been assessed and isolated to those sites which will not be reflected elsewhere in future supply (i.e. 1-4 dwellings).
- 4.25. Having regard to all relevant factors set out in paragraph 71 of the NPPF, it is considered appropriate to apply the calculation demonstrated in the 2023 SHLAA and to apply a windfall allowance of 27dpa in future housing land supply estimates. The windfall allowance will not be applied in years 1-3 of the five year supply upon adoption of the DSP and will be applied from year 4 onwards, equating to 27dwellings applied across 12 years of the plan period.

## **Local Housing Requirement**

- 4.26. The NPPF outlines that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in strategic policies, or against their local housing need where the strategic policies are more than five years old (Para 74).
- 4.27. The Local Housing Requirement figure outlined in Policy SO3.1: Provision for New Homes is 264dpa.
- 4.28. As part of the Local Plan Review Cannock Chase Council are also providing a contribution of 500 dwellings to the Housing Market Area across the Plan period. To ensure that an adequate supply of housing will be available through the Plan period and in consideration that some of the larger strategic sites will not make a significant contribution to completions until the mid-delivery phase, the housing requirement is stepped with an additional 50dpa being applied from year 6 of the Local Plan period providing an uplift to 314dpa from this point.

## Housing Trajectory

- 4.29. Housing delivery in Cannock Chase over recent years has been significantly above the level of Local Housing Need, which has resulted in an oversupply in the early part of the plan period (2018-2023). However, a number of the larger sites that have counted towards the supply are coming to full completion, if not already completed. The largest sources of housing supply in the new Local Plan are strategic sites which will not deliver immediately due to the lead in time for planning applications and infrastructure delivery. This includes the Former Rugeley Power Station site as well as site proposed for Green Belt release in Heath Hayes.
- 4.30. With this in mind, and to ensure that the Council meets its own need and that completed sites are not counted towards the identified HMA contribution of 500 dwellings, the Council has opted to take an approach which staggers the housing requirement over the plan period with a lower target for the first five years from adoption (2025-2030). Housing delivery in the first five years from adoption will align with Policy SO3.1 and the annualised housing figure of 264 dwellings. At year six of the Plan period (2030-2031) the annualised housing figure is anticipated to increase by 50dpa to 314 dwellings to account for the contribution to the HMA through the remainder of the Plan period.
- 4.31. The Council considers that a stepped approach to the housing requirement is appropriate in Cannock Chase, to ensure that an adequate supply of housing will be available through the Plan period and in consideration of some of the larger strategic sites not making a significant contribution to completions until the mid-delivery phase. The Council consider that the approach is a realistic reflection on future delivery rather than an obstruction to sites coming forward.

## Five Year Housing Land Supply

- 4.32. The five year housing land supply for the Local Plan reflects the period from the point of adoption of the plan (years 2025-2030) A schedule of the sites included within the 2025 - 2030 five-year supply is provided within the Local Plan Housing Trajectory in Appendix A.
- 4.33. The five-year supply reflects sources of sites in accordance with the most recent SHLAA (2023) methodology which includes a calculation for windfall as outlined above. As such, a total of 54 dwellings have been incorporated as windfall contribution to the 5year supply.
- 4.34. It is also considered appropriate to apply the SHLAA (2023) non-implementation rate to the calculation to account for uncertainty in the case that some sites are not delivered as anticipated. It has been identified in previous years that a non-implementation rate of 18% is considered a fair reflection of the local market circumstances and the trend which is likely to be emerging in the future. In line with the non-implementation rate application to the 0-5year period within the SHLAA (2023) methodology, the non-implementation rate has been solely applied to those minor sites identified within the 5year supply period within the Local Plan Trajectory (2025-2030). This identifies a total of 103 dwellings to apply the 18% discount to, equalling 19 dwellings to discount from the deliverable supply.
- 4.35. Paragraph 74 of the NPPF also identifies that the supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:
- a. 5% to ensure choice and competition in the market for land; or

- b. 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations on the market during that year; or
  - c. 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply
- 4.36. The Council has previously provided a 5% buffer to its housing land supply as there is no under delivery of housing. The 2023 SHLAA identifies that there continues to be no record of under delivery in the District and as such it is considered appropriate to add a 5% buffer to the five-year housing supply period upon adoption of the Plan.
- 4.37. The table below identifies the source of the sites within the Local Plan review to contribute to the Five Year Housing Land Supply and that the Council has identified 4.8 years supply of deliverable housing sites.

Source	Capacity
1. Sites with planning permission (Table A - Under Construction)	91
2. Sites with planning permission, are already allocated or have a resolution to grant planning permission (Table B - excluding Rugeley Power Station)	146
3. Proposed Allocations (Table C - Additional sites from Development Capacity Study)	462
4. Strategic Housing Allocations (including Rugeley Power Station)	725
5. Small Site Contribution (under construction)	29
6. Small Site Contribution (with full or outline planning permission including an 18% non-implementation rate)	74
7. Windfall Housing Land Supply (2028-2030)	54
Total Estimated Capacity	1,581
Annual Housing Target	264
Five year supply requirement (264dpa x 5)	1,320
Add 5% buffer	66
Final Five Year Supply Requirement	1,386 (330dpa)
Balance	+195 net dwellings
Years Supply (1,631//330)	4.8 (rounded)

Table 4.2: Five Year Housing Land Supply

- 4.38. The Council will continue to publish an annual five year housing land supply statement as part of the required update to the SHLAA, and this will be available on the Council's website.

## 5. Housing need by mix, type and tenure

### Introduction

- 5.1. The Council recognises the importance of creating sustainable, inclusive, and mixed communities and seeks to deliver a wide choice of high-quality homes to widen opportunities for home ownership and to meet needs for social and rented housing. Cannock Chase has a significant need for affordable rented housing and the Council is committed to restoring the balance in the housing market by providing more dwellings suited to young families, older and disabled people, and housing suitable for households with specific needs.
- 5.2. The Council's approach is in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

### Local Housing Needs Assessment (LHNA) (2019)

- 5.3. The Local Housing Needs Assessment 2019<sup>20</sup> was commissioned to support the preparation of the Local Plan for the District covering the Plan period of 2018-2036 and was used to form the initial policies within the DSP. The Local Housing Need was calculated in line with the PPG for Housing Need Assessment and the LHNA established a minimum local housing need figure of 284 dwellings per year.
- 5.4. As part of the analysis the LHNA established the unmet need for affordable housing at the time of writing utilising a base date of 2018. The analysis concluded that 964 households were living in unsuitable housing in Cannock Chase and unable to afford their own houses, and that of these households 599 occupied affordable housing that did not meet the households' needs at the time, mainly due to the number of bedrooms. As such, it was identified that there was a net need for 365 households who needed affordable housing and did not occupy affordable housing in the District at the time.
- 5.5. It was identified that it was also necessary to consider those households who will arise in the future and also those who can afford market rents, but who aspire to home ownership. The LHNA assessed the unmet need for affordable housing in 2018 and the associated impact in market housing, together with the future need for market and affordable housing arising over the plan period 2018 - 2036. This identified in summary, a need for:
  - Rented Affordable Housing: 1,550 dwellings (3015) - almost entirely for households who need housing benefit support to cover social rents;
  - Affordable Home Ownership: 1,145 dwellings (22%) - including 434 dwellings (85) for households unable to afford and 711 (14%) for renters that aspire to home ownership;
  - Market Housing: 2,159 (42%); and
  - Allowance for C2 Provision: equivalent to 256 dwellings (5%) - which represents 461 bedspaces.
- 5.6. The LHNA identified that it is important for the Local Authority to plan for the needs of all households unable to afford to rent or own market housing, this represents a need for

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<sup>20</sup> [Cannock Chase Local Housing Needs Assessment \(cannockchasedc.gov.uk\)](https://cannockchasedc.gov.uk)

1,984 dwellings, a net annual need of 110 dwellings per annum. This informed the Preferred Options Policy SO3.2: Housing Choice split between social and intermediate housing of 80:20.

- 5.7. Britain's population is ageing, and people can expect to live longer healthier lives than previous generations. The LHNA identified the potential requirement for new specialist housing based on the growth of 6,050 persons aged 75+ in Cannock Chase. Over the Plan period (2018-2036) the studies analysis identified an increase in need of around 1,519 additional homes; yielding a total need of a around 3,100 dwellings to be provided over the Plan period (including sheltered homes and extra care homes). However, it is important that the delivery of specific schemes for specialist older person housing are considered in partnership with other agencies, in particular those responsible for older person support needs.
- 5.8. The Government made a change to building regulations relating to adaptations and wheelchair accessible homes that were published in the Building Regulations 2010 Approved Document Part M: Access to and use of buildings (2015 edition incorporating 2016 amendments - for use in England)<sup>21</sup> covering three standards:
- M4(1) Category 1: Visitable Dwellings - Mandatory, broadly about accessibility to ALL properties
  - M4(2) Category 2: Accessible and adaptable dwellings - Optional, similar to Lifetime Homes
  - M4(3) Category 3: Wheelchair user dwellings - Optional, equivalent to wheelchair accessible standard
- 5.9. Footnote 49 of the NPPF notes that where an identified need exists, plans are expected to make use of the [optional technical standards](#) to help bring forward an adequate supply of accessible housing. In doing so, planning policies for housing can set out the proportion on new housing that will be delivered to the three building Regulation Standards.
- 5.10. The evidence supported the need for a target of 13% of all housing to meet M4(3) Category 3 requirements and also supported the need for a target of 47% of all housing to meet M4(2). This informed the Preferred Options Policy SO3.3: Delivering High Quality Homes requirement for developments to provide a minimum of 60% of their total number of units as suitable for households with health problems or disabilities.

### **Housing Needs Assessment (HNA) (2024)**

- 5.11. Given the length of time between the Preferred Options and Regulation 19 documents, the Council undertook updates to a number of documents in the Local Plan evidence base, inclusive of the Housing Needs Assessment. The 2024 HNA presented revised recommendations based on the most up to date data, as well as considering the implications of changes to policies at the national level. This resulted in some amendments to the housing policies in the plan, significantly in relation to Policy SO3.2 Housing Choice (particularly housing mix) and Policy SO3.3 Delivering High Quality Housing (particularly the level of housing which is more accessible and adaptable). The HNA 2024 has informed the Regulation 19 version of the Local Plan.

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<sup>21</sup> [Access to and use of buildings: Approved Document M - GOV.UK \(www.gov.uk\)](#)



- 5.12. The HNA 2024 findings identify that when looking at needs from households unable to buy OR rent, the analysis suggests a need for 290 affordable homes per annum across the District, but that despite the level of need, the HNA does not consider that there is any requirement for the Council to increase the Local Plan housing requirement due to affordable needs. It is noted that 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). When compared with the 2019 HNA, this study points to a stronger need for housing from households unable to rent in the market (rather than those able to rent but not buy)
- 5.13. The HNAs analysis of the future mix of housing required takes account of demographic change, including potential changes to the number of family households and the ageing population. In all sectors the analysis points to a particular need for 2bedroom accommodation, with varying proportions of 1bedroom and 3+bedroom homes.

### **Local Plan Viability Report (2022)**

- 5.14. The Local Plan Viability Report<sup>22</sup> (Viability Report) was commissioned to provide a Financial Viability Assessment in respect of the draft Local Plan to form a robust and sound evidence base for the new Local Plan to be adopted and in particular planning obligations and to review the current CIL charging schedule. The Viability Assessment carried out financial residual appraisals to establish the Residual Land Value (RLV), which was then compared to the Benchmark Land Value (BLV). In addition to the RLV appraisals and BLV analysis, the assessment also prepared a series of sensitivity scenarios for each of the identified typologies, to assist in the analysis of viability and to appreciate the sensitivity of the appraisals to key variables such as: Affordable Housing percentage; infrastructure costs; density; BLV and profit; and, to consider the impact of rising construction costs.
- 5.15. The Viability Report sets out the conclusions recommendations for the viability testing for affordable housing and set the levels identified as deliverable based on the appraisal of 15 typologies across both greenfield and brownfield development and provides the following affordable housing zones<sup>23</sup>:
- Cannock (including Bridgtown): 20% affordable housing
  - Hednesford: 30% affordable housing
  - Rugeley: 35% affordable housing
  - Norton Canes/Heath Hayes: 35% affordable housing
- 5.16. This informed Local Plan Policy SO3.2: Housing Choice requirement for affordable housing provision on developments as set out in Table D of the Policy.
- 5.17. The Viability Report has subsequently been updated in 2024 providing adjustments to the recommendations. This evidence was not available to inform policies in the Reg 19 plan.

### **Provision for New Homes Policy SO3.1**

- 5.18. This policy was informed by the evidence on local and regional housing need, as set out in Chapter 3 of this Topic Paper. The policy approach is to meet local housing needs as

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<sup>22</sup> [Cannock Chase Local Plan Viability Report \(2022\) - Part 1](#)

<sup>23</sup> See Figure ES1.1 of the Viability Report (2022)

calculated by the standard methodology and supported by the Housing Needs Assessment in addition to a contribution of 500 dwellings to unmet needs of the wider Housing Market Area.

- 5.19. The policy sets out the general distribution of development focusing allocations and higher density development in more sustainable urban locations within the District and prioritising brownfield development including the former Rugeley Power Station. It also highlights that some Green Belt release is required to meet housing needs although this is set out in greater detail in Policy SO7.7 Amendments to the Green Belt which is supported by Green Belt evidence and explored in greater detail in the Green Belt Topic Paper.
- 5.20. The policy sets out the conditions where rural development will be permitted which is more limited due to the lack of service provision and sustainable transport options.

### **Housing Choice Policy SO3.2**

- 5.21. Planning can assist those in priority housing need through the provision of affordable housing. This policy is required to ensure provision reflects local District demand and helps to sustain mixed and balanced communities. A sustainable, mixed and balanced community will include a mix of:
- Tenures;
  - Housing to support households with a range of incomes;
  - Housing type and size to allow residents to move within the area as their housing needs change;
  - Sufficient range and choice to accommodate households at various lifecycle changes
- 5.22. Policy SO3.2 seeks to widen opportunities for home ownership and provides a threshold for affordable housing provision on site, alongside adopting the Government's minimum percentage for provision of First Homes (25%), with the remaining provision of affordable housing providing 65% for rent and 15% for intermediate. On 100% affordable housing schemes (as outlined below), the affordable housing provision reverts to 80% for rent and 20% for intermediate.
- 5.23. The Council's proposed thresholds within the Draft Submission Plan aim to maximise the provision of affordable housing that can be delivered by the planning system without threatening the viability of sites. The Council has demonstrated a flexible approach in the implementation of Policy SO3.2 whilst providing guidance on the affordable housing requirements for developments of 10 or more dwellings, it remains committed to considering the suitability of sites and the amount of affordable housing through negotiation and on a site-by-site basis.
- 5.24. The Council consider that the proposed thresholds for different types of affordable housing are appropriate to Cannock Chase's local circumstances, and the proposed affordable housing targets are informed by the Council's viability assessment which considered housing market data including build costs and sale prices, national requirements as well the cumulative impact of proposed policies in the DSP. The Assessment concluded the majority of site typologies are viable and therefore policies in the plan would still incentivise sites being brought forward.

- 5.25. Policy SO3.2 also aims to provide a broad mix of housing suitable for different household types so that the market provision reflects local District demand whilst continuing to meet the local need for Affordable Housing to promote and sustain mixed and balanced communities.
- 5.26. The District-wide appropriate mix of market and affordable housing is set out in Table E of Policy SO3.2. The tenure mix and type of affordable provision will be agreed with the Council's housing manager on a site-by-site basis and secured through a legal agreement.

### Affordable Rented Housing

- 5.27. The NPPF defines Affordable Housing for rent as meeting all of the following conditions:
- the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable);
  - the landlord is a registered provider, except where it is included as [art of a Build to Rent Scheme (in which case the landlord need not be a registered provider); and
  - it includes provisions to remain for alternative affordable housing provision. For Built to Rent Schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- 5.28. Most rented social housing properties are let at 'Social Rent'. Social Rents are set using a government formula. This creates a 'formula rent' for each property, which is calculated in a way that takes account of the relative value of the property, the size of the property and relative local income levels. Landlords have flexibility to set rents up to 5% above the formula rent (100% in the case of supported housing) - this is known as the 'rent flexibility level'. Formula rent is also subject to rent caps, which vary according to the size of the property.
- 5.29. In 2011, the Government introduced 'Affordable Rent' which permits rents to be set at up to 80% of market rent (inclusive of service charges). The introduction of Affordable Rent made it possible to build more homes for a given amount of up-front investment, allowing more people in housing need to have access to a good quality home at a sub-market rent. Landlords can only let new properties at Affordable Rent where certain conditions apply.

**Table 5.1: Estimated Need for Social/Affordable Rented Housing by sub-area (per annum)**

	Current Need	Newly forming housing-need	Existing households falling into need	Total Gross Need	Relet Supply	Net Need
Cannock (unparished)	16	130	38	184	119	65
Brereton & Ravenhill	3	30	8	42	17	24
Bridgtown	1	10	5	16	9	7
Brindley Heath	0	3	1	4	3	1
Cannock Wood	0	3	0	4	1	3
Heath Hayes & Wimblebury	5	41	13	59	18	41
Hednesford	7	67	19	93	36	57
Norton Canes	3	35	7	45	20	26
Rugeley	9	64	24	96	31	66
District-Wide	45	384	115	544	254	290

Source: Housing Needs Assessment (2024) - Affordable Housing Need Analysis

- 5.30. Policy SO3.2 seeks to prioritise the amount of affordable rented housing provision on site. The policy adopts the Government's minimum percentage for provision of First Homes, alongside the remaining provision of affordable homes providing 80% for rent (equating to 60% when First Homes are taken into account). On 100% affordable housing schemes as there is no requirement to apply the First Homes provision and therefore reverts to 80% rent.

### **Shared Ownership and other Intermediate Housing**

- 5.31. The NPPF definition for affordable housing tenures (that are not affordable housing for rent) as:
- b) Starter Homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
  - c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
  - d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.
- 5.32. Though the Government has a clear focus on First Homes, they also see a continued role for Shared Ownership, launching a 'New Model for Shared Ownership' in early 2021 (following a 2020 consultation) - this includes a number of proposals including the reduction of the minimum initial share from 25% to 10%. A key advantage of shared ownership over other tenures is that a lower deposit is likely to be required than for full or discounted purchase, Additionally, the rental part of the cost will be subsidised by a Registered Provider and therefore keeps monthly outgoings down.
- 5.33. When looking at the types of housing needed for households unable to rent, the 2019 LHNA suggested some 67% of households in need could not afford a social rent without subsidy - this is exactly the same proportion as the 2024 HNA suggests. The 2019 LHNA also considered shared ownership as a possible solution to the needs of this group whereas the 2024 HNA looks at shared ownership under the banner of affordable home ownership. In reality, the study shows that it would be possible to provide shared ownership at a cost affordable to those unable to afford to rent and the study would expect this cost to be somewhere between the market and an affordable rent.
- 5.34. Policy SO3.2 provides the threshold for affordable housing provision on site, alongside adopting the Government's minimum percentage for provision of First Homes (25%), and

the provision of 60% for rent - it leaves the remaining provision of 15% for intermediate housing, to be provided from the above tenures, however the preferred and most common tenure is that of Shared Ownership. As per paragraph 5.30, on 100% affordable housing schemes there is no requirement to apply the First Homes provision and therefore reverts to 20% for intermediate affordable housing.

### **First Homes**

- 5.35. The Government conducted a consultation on First Homes in February 2020. This highlighted that a 30% discount off market price should be the minimum level of discount under this scheme. The First Homes would be a compulsory requirement of the affordable housing obligation on any qualifying scheme.
- 5.36. On 6 August the Government announced that First Homes will be introduced and confirmed that these will be sold at a discount of at least 30% when the home is sold, the discount will always be passed on to the new owner with the discount applied to the new value. National Planning Practice Guidance (NPPG) identifies that first homes are the Government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. The PPG goes on to state that the First Homes criteria are the minimum requirements a housing unit must meet in order to qualify as First Home. Affordable Housing Update Written Ministerial Statement published on 24 May 2021, identified the national standards for a First Home [Para:002 Reference ID: 70-002-2021-0524]<sup>24</sup>.
- 5.37. Whilst evidence in the HNA points to a greater need for affordable rented homes, in line with national requirements, Policy SO3.2 of the DSP will adopt the Government's minimum percentage for provision of First Homes, with the exception of 100% affordable housing schemes where the First Homes provision will not apply.

### **Build to Rent**

- 5.38. The Housing White Paper (February 2017) was clear that the Government wanted to build on earlier initiatives to attract new investment into large-scale housing which is purpose-built for market rent (i.e. Build to Rent). At the time, the Government set out that this would drive up the overall housing supply, increase choice and standards for people living in privately rented homes and provide more stable rented accommodation for families.
- 5.39. The publication of the revised NPPF (2019) recognise the emergence of the strength of the private rented sector. The Framework, which continues to recognise the role of the private rented sector in the September 2023 version, says the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including those people who rent their homes (as separate from those in affordable housing need) (paragraph 62).
- 5.40. The 2024 HNA raises that there has been limited activity in the way of existing and forthcoming Build to Rent development in Cannock Chase. With only one development of Build to Rent in the District comprising of 98 units - including such development as extra-care etc. (According to the British Property Federation).

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<sup>24</sup> [First Homes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/first-homes)

5.41. It is recognised, that nationally the sector is growing however given the low levels of private renting relatively low rent it is not considered that demand from developers in the District will be significant. The Council is justified in not specifying requirements within Policy at this time, and any forthcoming Build to Rent development will be assessed in accordance with the latest NPPF, PPG and local policies and the time of decision making.

### Rural Exceptions

5.42. Policy SO3.1 ‘Provision for New Homes’ considers housing in rural areas and identifies the types of dwellings that will be permitted:

- Infill development within the defined settlement boundaries as set out on the Policies Map;
- Affordable housing for local community needs on small rural exception sites;
- Changes of use and conversion schemes;
- Development identified in Neighbourhood Plans reflecting local need and affordable housing provision respecting the local character and infrastructure of the area; and
- Dwellings to serve the essential need for an agricultural, forestry or other occupational worker in a rural area in accordance with national guidance.

5.43. The policy considers that in rural area, local planning policies should be responsive to local circumstances and support housing developments that reflect local needs, supporting opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs. However, within the non-urban areas the provision of and access to services and facilities is often limited, as such additional housing in non-urban areas should be minimised to safeguard the countryside and should only be provided to support local needs where justified.

### Exception Sites

5.44. Paragraph 72 of the NPPF states that local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is already being met within the authority’s area. The Council will support these in accordance with the latest NPPF and PPG at the time of decision making.

### Market Housing

5.45. The Council is justified in requiring the mix of market housing to reflect both the demand for homes and the changing demographic profile. The HNA (2024) recommended profile compared with other tenure groups sees a market housing mix of:

<b>1 bedroom</b>	<b>2 bedrooms</b>	<b>3 bedrooms</b>	<b>4+ bedrooms</b>
10%	35%	40%	15%

5.46. This is a District-wide assessment with conclusions at the strategic level. It should be recognised that there will be variations in need within areas due to the different role and function of a location and the specific characteristics of local households (which can vary over time).

5.47. Policy SO3.2 ‘Housing Choice’ takes this into account with the policy identifying that the Council will consider evidence set out in Housing Mix Statements in instances where a variation to the mix shown within the policy is sought.

## **Self and Custom Housebuilding**

- 5.48. The Self-build and Custom Housebuilding Act 2015 placed a duty on local planning authorities (LPAs) to keep a register of individuals and associations who have expressed an interest in acquiring serviced plots for self and custom built. The register regulations set out the requirements that LPAs must follow in preparing and keeping their registers.
- 5.49. The Housing and Planning Act 2016, places a further duty upon LPAs to grant suitable development permission in respect of enough serviced plots of land to match demand on their self-build and custom build register.
- 5.50. The Council is justified in supporting self and custom build housing within Policy SO3.2 in order to comply with the Self and Custom Housebuilding Act, the Housing and Planning Act, National Planning Policy Guidance and the needs on the self-build register.
- 5.51. The Self and Custom Housebuilding Register was established in Cannock Chase in April 2016, at the time of writing the register was under review. The number of entries has been consistently low (less than 20); therefore, the policy approach has been supportive of self and custom build and no specific policy requirements have been proposed.

## **Delivering High Quality Housing Policy SO3.3**

- 5.52. Planning can assist in meeting the needs of different groups in the community through the provision of high-quality housing, including for older persons and those with disabilities. This policy is required to set clear expectations for the quality of places to be created and how this can be maintained; and how high-quality housing can enhance the health and well-being of residents.
- 5.53. Policy SO3.3 seeks to support developments with provision of units suitable for households with health problems or disabilities including single level accommodation, alongside adopting the Building Regulation standards under Part M4(2) and Part M4(3), in line with the evidence provided within the HNA for all new build housing to meet Part M4(2) and at least 5% of housing on major development sites to meet Part M4(3) wheelchair user dwelling standards.
- 5.54. The Council's proposed thresholds within the Draft Submission Plan aim to maximise the provision of accessible and adaptable dwellings and wheelchair user dwellings that can be delivered through the planning system without threatening the viability of sites. The Council has demonstrated a flexible approach in the implementation of Policy SO3.3 whilst providing guidance on the provision of wheelchair accessible dwellings (Part M4(3)) on major development sites and on affordable housing delivered for wheelchair users, it remains committed to considering the suitability of sites and the provision of all dwellings as accessible and adaptable (Part M4(2)) for minor developments on a site-by-site basis.

## **Housing for Older and Disabled People**

- 5.55. National planning policy requires local planning authorities to plan for the needs of different groups in the community, including older people and those with disabilities.
- 5.56. In September 2020, the Government launched a consultation on raising accessibility standards of new homes, recognising the importance of suitable homes for older and disabled people, and that the provision of appropriate housing for older and disabled people makes an important contribution to safe and independent life. The consultation

sought views on options to raise the accessibility of new homes which included mandating a higher accessibility standard. The consultation is part of a full review of Part M of the Building Regulations, relating to access to, and use of, buildings.

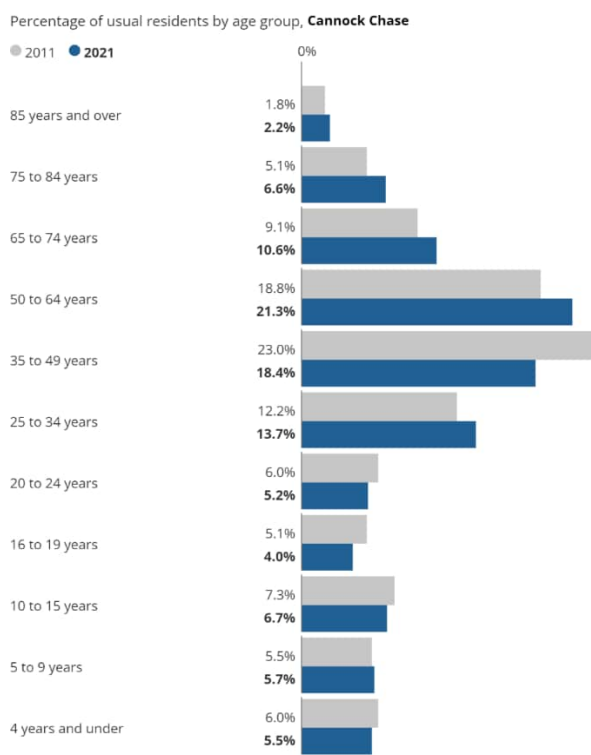
- 5.57. Following on from the consultation an update has been provided by the Government on 29 July 2022 outlining that the Government proposes that the most appropriate way forward is to mandate the current M4(2) (Category 2: Accessible and Adaptable Dwellings) requirement in Building Regulations as a minimum standard for all new homes - option 2 within the Consultation. M4(1) will apply by exception only, where M4(2) is impractical and unachievable (as detailed within the Government's response<sup>25</sup>).
- 5.58. Responses to the Preferred Options Consultation considered the local plan provision for older people and those with disabilities including the specific inclusion of properties that comply with Part M4(2) or Part M4(3) of the current Building Regulations within the policy was supported in principle, though some raised concern that the increased delivery of such properties may affect viability and overall affordable housing delivery in the District.
- 5.59. There are two Neighbourhood Plans that have been 'made' within the District at Hednesford and Cannock Wood.
- 5.60. The Hednesford Neighbourhood plan is also supportive of a range of housing being provided for older people and those with disabilities, and identifies the requirements to provide housing for older people:
- Hednesford - Policy H1: 'the building of bungalows will be supported where it is viable either as a component of the dwelling types or, on appropriate small developments as the whole development [...]'
  - Hednesford - Policy H2: 'the construction of a retirement housing development with appropriate communal facilities will be supported on land identified in Policy TC7'
- 5.61. A comparison between the 2011 and 2021 Census data shows that the average (median) age in Cannock Chase increased by two years from 40 to 42 years of age. Further to this, the number of people aged 50 to 64 years rose by around 3,100 (a 16.9% increase), while the number of residents between 35 and 49 years fell by just under 3,900 (17.3% decrease)<sup>26</sup>.

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<sup>25</sup> [Raising accessibility standards for new homes: summary of consultation responses and government response - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes)

<sup>26</sup> [How life has changed in Cannock Chase: Census 2021 \(ons.gov.uk\)](https://ons.gov.uk/people-population/age-and-life-expectancy/articles/how-life-has-changed-in-cannock-chase-census-2021)





Source: Office for National Statistics – 2011 Census and Census 2021

- 5.62. The District has seen an ageing population over the last decade with the number of people aged 65 and over increasing by 25%, and a modest decrease in the number of children and people of ‘working age’ (taken to be 16 - 64). The HNA developed a bespoke demographic projection to look at how the population might change if 264dpa were delivered over the 2021 - 2040 period. This showed continued population growth and an ageing of the population; the same pattern has been observed for the past decade.
- 5.63. The data shows that between 2021 to 2040 25.6% of the overall population growth (27,267 persons) is projected to be aged 65 and over, at which point it will represent a 38.4% change from 2021. The HNA projected change in the population of older persons between 2021 to 2040 shows an increase of 43.4% in the projected population aged 75-84 and an 88.7% projected increase in the population aged 85+.

Table 5.2: Projected population change 2021 to 2040 by broad age bands - Cannock Chase (linked to delivery of 264 dwellings per annum)

	2021	2040	Change in Population	% Change from 2021
Under 16	18,035	17,119	-916	-5.1%
16-64	62,850	62,207	-643	-1.0%
65 and over	19,705	27,267	7,562	38.4%
Total	100,590	106,593	6,003	6.0%

Source: Housing Needs Assessment (2024) - Figure 3 - Demographic Projections

Table 5.3: Projected Change in Population of Older Persons, 2021 to 2040 - Cannock Chase (linking to Standard Method)

	2021	2040	Change in population	% change
Under 65	80,885	79,356	-1,559	-1.9%
65 - 74	10,675	13,284	2,609	24.4%
74 - 84	6,744	9,669	2,925	43.4%
85+	2,286	4,314	2,028	88.7%
Total	100,590	106,593	6,003	6.0%
Total 65+	19,705	27,627	7,562	38.4%
Total 75+	9,030	13,983	4,953	54.8%

Source: Housing Needs Assessment (2024) - Figure 6.3 - Demographic Projections

- 5.64. The HNA assessed a range of data sources and statistics to consider the characteristics and housing needs of the older people population and the population with some form of disability. The older person population is projected to increase moving forward in the Plan period, and an ageing population means that the number of people with disabilities is likely to increase. The data shows that some 36% of households in the District contain someone with a disability.
- 5.65. Applying prevalence rates from PANSI (Projecting Adult Needs and Service Information) and POPPI (Projecting Older People Population Information) to estimates of population growth:

Table 5.4: Projected Changes to Population with a Range of Disabilities - Cannock Chase

Disability	Age Range	2021	2040	Change	% Change
Dementia	65+	1,189	1,892	703	59.1%
Mobility Problems	65+	3,198	4,793	1,595	49.9%
Autistic Spectrum Disorder	18-64	575	569	-6	-1.1%
Autistic Spectrum Disorder	65+	168	235	67	40.1%
Learning Disabilities	15-64	1,486	1,470	-16	-1.1%
Learning Disabilities	65+	376	517	141	37.6%
Impaired Mobility	16-64	3,284	3,160	-124	-3.8%

Source: Housing Needs Assessment (2024) - Figure 6.8 - POPPI/PANSI and Demographic Projections

- 5.66. There will be an overlap between some of these categories (i.e. some people will have both dementia and mobility problems, for example) and so the numbers for each disability cannot be added together to arrive at a total.
- 5.67. There will also be a combination of those with disabilities and long-term health problems that continue to live at home with family, those who choose to live independently with the possibility of incorporating adaptations into their homes and those who choose to move into supported housing.
- 5.68. Of particular note are the significant increases in the number of older people with dementia (increasing by 59% from 2021 to 2040) and mobility problems (increasing by 50% over the same period). When related back to the total projected change to the population, the increase of people aged 65+ with a mobility problem represents around 26% of the projected population. It is important that all those with disabilities have good and affordable housing choices. This requires that housing preferences and needs are understood when establishing the types and tenure of housing required for older people and others with disabilities.

- 5.69. The projected change in the number of people with disabilities is considered to provide clear evidence to justify delivering 'accessible and adaptable' homes (Part M4(2) of the Building Regulations), subject to viability and site suitability. This is in line with the DSP Policy SO3.3: Delivering High Quality Housing requirement for all new build housing to be built to Category M4(2) (Accessible and Adaptable dwellings) unless it is built to M4(3) standards.
- 5.70. The Viability Study to support the Local Plan concluded that Policy SO3.3 is viable.

### **Adult Social Care**

- 5.71. The HNA undertook engagement with Staffordshire County Council's (SCC) Adult Social Care team to understand their current policy towards older person's care. It is noted that the County Council undertook a major Extra Care program which began in 2007 to develop sites on their own land; this has resulted in 27 extra-care schemes in Staffordshire of which three are in Cannock Chase.
- 5.72. At the time of writing the County Council's strategy is not yet finalised, and engagement with the main social care partners is ongoing. Overall, the current SCC policy supports market housing with care and housing with support but does not involve direct investment. Further to this, SCC does not commission sheltered accommodation but oversees housing placements.
- 5.73. The HNA identifies through the engagement process that the County Council have nomination rights in several extra-care developments until recently they have not been utilising that fully, however most extra-care schemes in Cannock are at capacity. It is identified that this placement issue is particularly the care for those with complex needs who sometimes end up in residential care without needing it.
- 5.74. It was also raised that there are issues with the age and quality of some of the older schemes and if compliance with energy performance standards and building standards is to be achieved then some of the existing stock will need to be replaced. Whilst this is noted the requirement for new homes to comply with these standards and the M4(2) building standards will allow adaptation which will see more people living in their own homes for longer.

### **General Needs, Accessible and Adaptable Dwellings and housing with support**

- 5.75. Not all older people have a need for specialist accommodation. Needs can, and are, met in a variety of ways influenced by a range of factors including the availability of family support, domiciliary care and personal choice. An important part of meeting need for older people, and those with disabilities, will be through general purpose new homes built to accessible standards and which are suitable for 'downsizing'. This may include 'age-restricted general market housing' designed for people aged 55 and over and the active elderly which may include some shared amenities such as communal gardens but does not include support or care services, and the provision of market housing to accessible and adaptable, and wheelchair accessible standards.
- 5.76. As beforementioned, the Government has consolidated a wide range of housing standards based on minimum Building Regulations requirements (M4(1)) with the ability for local planning authorities to apply the optional national standards over and above these (M4(2) and M4(3)).

- 5.77. The M4(2) standard promotes the ability for people to remain in their homes as their circumstances change as it covers design measures that can allow homes to be adapted. Requiring M4(2) compliant homes is an important step towards 'homes for life' that are suitable for any occupant, regardless of whether or not they have a disability at the time of initial occupation.
- 5.78. The PPG on Housing: optional technical standards states that 'Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling [Para: 009 Ref ID: 56-009-20150327].
- 5.79. Further to this, on housing for older and disabled people the PPG states that where an identified need exists, plans are expected to make use of the optional technical housing standards (footnote 49 of the NPPF) to help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the accessible housing standards.
- 5.80. The HNA (2024) demonstrated the need to increase the supply of accessible and adaptable and wheelchair accessible dwellings as well as providing specific provision of older persons housing. The evidence supports as a start point a policy requirement that
- all dwellings (in all tenures) to meet the M4(2) standards;
  - around 5% of homes meeting M4(3) in the market sector; and
  - a higher proportion of around a tenth meeting M4(3) in the affordable sector.
- 5.81. The evidence also notes that where the Council has nomination rights M4(3) would be wheelchair accessible dwellings (constructed for immediate occupation - M4(3) (2)(b)) and in the market sector they should be wheelchair user adaptable dwellings (constructed to be adjustable for occupation by a wheelchair user - M4(3) (2)(a)).
- 5.82. The Viability Study to support the Local Plan concluded that Policy SO3.3 is viable.
- 5.83. The requirements for wheelchair housing have been set at a level that would allow Cannock Chase to meet its expected requirement. The need for wheelchair user housing is expected to grow with an ageing population, and this has been factored into the requirements.
- 5.84. Where application of the 5% requirement results in a fraction of a wheelchair user dwelling, provision will be rounded to the nearest whole dwelling. For instance, 5% of a 175 dwellings development would be 8.75, which would result in provision of 9 homes.

### **Specialist Housing and Care Homes**

- 5.85. In addition to providing more general housing that is suitable for older people, Local Plan policy needs to proactively support the provision of specialist housing and care bed provision.
- 5.86. Different terms are used for specialist housing that can provide a medium to high level of care through a Care Quality Commission (CQC) registered agency. The descriptions used for these developments include 'housing with care', 'extra care', 'assisted living', 'continuing care retirement communities', or 'retirement villages'.

- 5.87. The term ‘extra care’ housing is used to describe developments that comprise self-contained homes with design features and support services available to enable self-care and independent living. Occupants may be owners, part owners or tenants and all have legal rights to occupy underpinned by housing law (in contrast to residents in care homes).<sup>27</sup>
- 5.88. The Housing LIN notes that extra care housing is increasingly recognised as an essential component of joint commissioning by health and social care, and that extra care is now being used for intermediate care and rehabilitation as well as longer term housing. Extra care developments are considered to provide a focus for integrated working to meet housing, health and social care needs.
- 5.89. Analysis undertaken with the HNA suggests that there will be a need for housing with support (retirement/sheltered housing) with around three-fifths in the affordable sector. It also points to a strong potential for need for housing with care (e.g. extra-care) in both market and affordable sectors (two-thirds market housing). As well as suggesting a need for some additional nursing and residential care bedspaces.

Table 5.5: Specialist Housing Need using adjusted SHOP@Review Assumptions, 2021-2040 - Cannock Chase

	Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2040	Shortfall/surplus by 2040
Housing with Support - Market	47	94	423	329	232	562
Housing with Support - Affordable	82	357	745	388	409	797
Total (housing with support)	129	451	1,168	717	641	1,359
Housing with care - Market	25	41	224	183	123	306
Housing with care - Affordable	22	146	197	51	108	159
Total (housing with care)	47	187	421	234	231	464
Residential care bedspaces	41	221	374	153	205	358
Nursing care bedspaces	47	342	421	79	231	309
Total bedspaces	88	563	794	231	436	668

Source: Housing Needs Assessment (2024) - Figure 6.10 - Derived from Demographic Projections and Housing LIN/EAC

- 5.90. Policy SO3.3 ‘Delivering High Quality Housing’ takes into account supporting the provision of housing suitable for older people and the provision of specialist housing. Alongside identifying the need to meet M4(2) or M4(3) building standards, the policy identifies that development for housing with care and combines sites offering a range of housing with care (including nursing and extra-care housing developments) will be welcomed in the District to increase the choice of housing for older people.

<sup>27</sup> [What is Extra Care Housing \(housinglin.org.uk\)](https://www.housinglin.org.uk)

## 6. Other Groups

### **Students**

- 6.1. There are no higher education establishments in Cannock Chase and no significant term-time student population. The Local Plan makes no specific provision for this group.

### **Service Families**

- 6.2. The position of service personnel has been considered but as there is no Ministry of Defence presence within Cannock Chase the Local Plan therefore makes no specific provision for this group.

### **Gypsies, Travellers and Travelling Showpeople**

- 6.3. The Local Plan considers provision for Gypsies, Travellers and Travelling Showpeople and this is set out within the individual topic paper on meeting the needs of these communities within the District: Gypsy and Traveller & Travelling Showpeople Topic Paper, December 2023.

## 7. Summary

### Policy SO3.1 Provision of New Homes

- Throughout development of the Local Plan the Council have consistently used the standard method to derive the housing need figure. This is supported by the Housing Need Assessment which formed the primary evidence to determine the appropriate housing target.
- In compliance with the Duty to Cooperate, the Council has sought to contribute towards the unmet need of other authorities in the HMA. The Strategic Growth Study (2018)\_informed the policy options with regard to the level of contribution to assess.
- Options presented at an early stage provided the opportunity for respondents to comment on the emerging strategy including the amount and distribution of housing in the District. The responses helped inform the spatial strategy, however in order to meet housing needs this required greater land requirements than many respondents agreed with, including Green Belt release.
- The SA was used to help determine which options were the most sustainable, this was particularly important when considering the level of contribution towards the unmet need of the HMA.
- All sources of sites for residential development were considered and this is documented in the Development Capacity Study.
- Release of land from the Green Belt was the only way in which the development needs of the District could be met within the authority boundary. It was not considered to be a reasonable alternative to not meet the minimum housing requirement derived from the standard method. The justification for Green Belt release is explained in detail in the linked Topic Paper: Green Belt.
- The final Spatial Strategy most closely aligns with Option C2: In combination with the options for the Urban Areas and former Rugeley Power Station consider Green Belt urban extensions at Cannock/Hednesford/Heath Hayes and Norton Canes urban edges. This option was presented at Issues and Options stage and subject to testing against reasonable alternative options. However, the strategy for Norton Canes was amended following the Preferred Option consultation.
- The distribution of housing supports the Spatial Strategy set out on pages 34-37 of the Local Plan ensuring development aligns with the areas of greatest service provision and transport connections in the District.
- The Council has followed a brownfield first approach with the largest allocation of residential development focused on the Former Rugeley Power Station site. All other deliverable brownfield options have been identified to meet development needs.

### Policy SO3.2: Housing Choice

- Affordable housing has been considered throughout the Local Plan supported by the identified overall housing needs based on the Housing Needs Assessments.
- Options presented at an early stage provided the opportunity for respondents to comment on the emerging housing needs including affordable housing percentage requirements and housing mix options.
- The SA was used to help determine which option would help deliver different types of new homes which would help to address specific requirements in the District; reflect the overall affordable housing needs of the District and would be best placed to meet the up-to-date local requirements for this type of housing.

- The Viability Report sets out the levels of affordable housing identified as deliverable across both greenfield and brownfield development and informed the affordable housing thresholds.
- A flexible approach in the implementation of the policy whilst providing guidance on the affordable housing requirements for developments of 10 or more dwellings has been demonstrated.

**Policy SO3.3: Delivering High Quality Homes**

- The provision of high-quality accessible housing including for older persons and those with disabilities has been considered throughout the Plan process, guided by the Housing Needs Assessments that have informed the requirements for housing to meet the M4(2) and M4(3) standards.
- The Viability report has tested the thresholds provided within the policy to ensure that M4(2) and M4(3) housing can be delivered without threatening the viability of sites.
- A flexible approach in the implementation of the policy whilst providing guidance on the provision of M4(3) on major development sites and on affordable housing for wheelchair users has been demonstrated.



## Appendix A: Local Plan Housing Trajectory

Site Allocation	Site Name	Status	Capacity	2025-26 Year 1	2026- 27 Year 2	2027-28 Year 3	2028-29 Year 4	2029-30 Year 5
H1	Land to the West of Pye Green Road, Hednesford	Under Construction	481	50	18			
H30	Land at Rawnsley Road, Hazel Slade	Under Construction	60	10				
H25	Main Road, Brereton (between Cedar Tree Hotel and Library)	Under Construction	27	13				
H16	Land west of Pye Green Road, Hednesford Cannock	Planning Permission	51	26	25			
H45	23 Walsall Road, Cannock, WS11 0GA	Planning Permission	12			12		
M6	Rugeley Market Hall and Bus Station, Rugeley	Opportunity site within Rugeley Town Centre Area Action Plan	50					25
H48	Former Aelfgar School, Taylors Lane, Rugeley	Planning Permission	58	29	29			
H29	Land at 521 Pye Green Road, Hednesford, Cannock	Adopted Local Plan (2014) Allocation	80					38
M1	Multi Storey Car Park, Market Hall and Retail Units, Church Street, Cannock	Identified in the Cannock Development Prospectus	70			20	20	20
H35	Land at Girton Road/Spring Street, Cannock	Application awaiting determination	27				24	
H38	Land at Walsall Road, Avon Road, Hunter Road, Hallcourt Lane, Cannock	Site being promoted for development	24					24
H40	Danilo Road Car Park, Cannock	Identified in the Town Centre Prospectus	20					20
M2	Park Road Bus Station, Cannock	Identified in the Cannock	15					15

		Development Prospectus						
H63	Former Rumer Hill Industrial Estate, Cannock	Developer promoting for residential development	99				25	50
H65	A Dunford and Son, Brindley Heath Road, Cannock	Application awaiting determination	15			15		
H66	Land at the corner of Avon Road and Hunter Road, Cannock	Identified in the Cannock Development Prospectus	18		18			
H49	Land at The Mossley, off Armitage Road	Landowner promoting site for residential development	40			20	20	
H50	Nursery Fields, St Michaels Road, Brereton	County Council land surplus to requirements	35				15	20
H51	Castle Inn, 141 Main Road, Brereton, Rugeley	Application awaiting determination	27			14	13	
H52	Gregory Works, Armitage Road, Brereton	Landowner promoting site for residential development	23					23
H53	Land off Lichfield Street, Rugeley	Landowner promoting site for residential development	20	10	10			
H64	The Fairway Motel, Horse Fair, Rugeley	Application awaiting determination	17				17	
H69	272 Hednesford Road, Norton Canes	Application awaiting determination	11			11		

SH1	Land south of A5190, Lichfield Road, Heath Hayes (Phase 1)	Land agent promoting site for development	700			25	75	100
SH2	Land to the East of Wimblebury Road, Heath Hayes	Landowner/ Developer promoting site for development	400			25	50	50
SM1	Rugeley Power Station, Rugeley	Planning Permission	1,000	50	100	100	100	50
-	Small Sites	Under Construction	89	29				
-	Small Sites	Planning Permission	74	25	25	24		
	<b>Totals</b>		<b>3,543</b>	<b>242</b>	<b>225</b>	<b>226</b>	<b>359</b>	<b>435</b>

Note: Site status is taken from the 2023 SHLAA and may differ from the status identified in any future iterations

**Monitor line:** The position above or below zero represents the amount of dwellings an authority is ahead or behind their cumulative allocation at any time.  
**Source:** Local Plan Target - 5,808 Dwellings 2018-2040 (Plus an additional 500 dwelling contribution to HMA totalling 6,308)

