

Cannock Chase Local Plan Examination: Response to EXAM 39 – Meeting Housing Needs Topic Paper Update

Bloor Homes Limited (Land to the West of Hednesford Road, Norton Canes)

September 2025

Introduction

1. This Statement is submitted on behalf of Bloor Homes Limited ('Bloor') in response to the Meeting Housing Needs Topic Paper Update (Exam 39), which was made available on 20 August 2025.
2. Bloor is promoting Land to the west of Hednesford Road, Norton Canes (the "site") (proposed safeguarded site: S3 and SHLAA site ref: N24, N33 and N64). Details regarding the site can be found in Bloor's representations to the Regulation 19 Publication Plan (ref: A0101).

Comments in relation to Meeting Housing Needs Topic Paper Update

Impact upon Five Year Housing Land Supply (5YHLS)

3. Table 4.2 of EXAM 39 states that the deliverable supply at 1st April 2025 is 1,581 dwellings, which equates to 5.7 years. A breakdown of the 1,581 figure is provided at Appendix A of EXAM 39. This is the same position that Emery Planning assessed on behalf of Bloor Homes as set out in EXAM 38G.
4. For the reasons set out in Table 1.4 and Section 3 of the Statement by Emery Planning in EXAM 38G (PDF pages 43-46 and PDF pages 64-90), 829 dwellings should be removed from the 1,581 figure, meaning that the deliverable supply at 1st April 2025 is 752 dwellings, which equates to **2.71 years**. This is set out in Table 1.5 of the Statement by Emery Planning in EXAM 38G (PDF page 48).
5. EXAM 39 does not provide any "clear evidence" for the inclusion of the 16 sites which are disputed. The few comments the Council has provided to justify the inclusion of the 16 sites set out in Appendix C of EXAM 38H is not "clear evidence" in the context of the definition of "deliverable" in the NPPF, the associated guidance in paragraph 68-007 of the PPG and the appeal decisions by the Secretary of State and Inspectors referred to by Emery Planning in EXAM 38G (PDF pages 50-63).
6. The Council has not provided clear evidence of "firm progress" being made towards the submission of planning applications on the disputed sites and has not provided any written agreements with developers confirming their anticipated start and build out rates.
7. As set out in paragraph 1.16 of the Emery Planning Statement in EXAM 38G (PDF page 47), the Council's trajectory considers that Rugeley Power Station will be delivering dwellings now (i.e. from September 2025). However, a reserved matters application for residential development has not been made. The Council's trajectory is unrealistic.

8. In the absence of clear evidence, the 16 disputed sites are not deliverable and should be removed from the 5YHLS. The table and graph set out in Appendix A of EXAM 39 should be amended accordingly. Table 4.2 of the document should also be amended and conclude that the 5YHLS is 2.71 years.

Impact upon Affordable Housing

9. The implications of the 5YHLS for the delivery of affordable housing are severe. The 2024 Housing Needs Assessment (Document H10) identifies a need for 356 net affordable homes per annum in Cannock Chase, equivalent to 6,764 net affordable homes over the Plan Period from 2021/22 to 2039/2040 (EXAM 38G, para 13).
10. Based on the Council's estimated delivery of sites within its trajectory in EXAM 39 (which is same position assessed in EXAM 38G), and Policy SO3.2 as drafted in the submission plan, only 312 gross affordable dwellings would be delivered in the five year period, equating to 62 per annum (EXAM 38G, para 14). This is less than one fifth of the objectively assessed annual need.
11. On the trajectory position advanced by Emery Planning in EXAM 38G (which is the same as EXAM 39), 829 dwellings should be removed from the five year supply meaning gross affordable housing delivery falls to just 168 gross dwellings, equating to 34 per annum (EXAM 38G, para 15).
12. The position worsens further if the Council's proposed modifications to Policy SO3.2 are applied (EXAM 31, Action Point 86). Under these changes, affordable housing percentages are significantly reduced. On the Council's trajectory this would deliver just 226 gross affordable dwellings (45 per annum) and on Emery's trajectory only 116 dwellings (23 per annum) (EXAM 38G, para 20).
13. The reality is that both the Council's and Emery's positions indicate a substantial shortfall in delivery compared to identified need. The Council's refusal to acknowledge or address this shortfall risks entrenching disadvantage in Cannock Chase, contrary to NPPF paragraphs 62 to 65 and more fundamentally paragraph 8b (ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations).
14. To ensure soundness, the Plan must be modified to include a numerical target aligned with the 2024 HNA (356 net affordable dwellings per annum), supported by a deliverable trajectory and clear monitoring framework. Without this, and without the allocation of additional deliverable sites capable of making a meaningful contribution, the Local Plan cannot be said to provide a sound or legally robust approach to affordable housing.

Contact

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