

Examination of the Cannock Chase District Local Plan 2018-2040

Inspector: Andrew McCormack BSc (Hons) MRTPI

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Sent via Email

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Dear Mr Piper,

**Cannock Chase District Local Plan 2018-2040
Housing Topic Paper Update and Housing Trajectory
Proposed Modifications and Consultation**

I write further to my letter dated 17 July 2025 following the completion of the Examination Hearing Sessions and to which reference should be made with regard to preparations for the consultation on proposed modifications to the submitted Plan. In addition, I have had regard to the recent correspondence and consultation responses received on updates and the correction of errors to the Council's evidence concerning, amongst other things, the housing trajectory and housing land supply.

Housing Topic Paper Update (EXAM39) and Housing Trajectory

As you are aware, following the hearings stage of the examination, the Council set about completing its assigned tasks, responding to the Action Points which arose during the hearings. Some of this work related to the Councils' Meeting Housing Needs Topic Paper (H15) and the published Housing Trajectory. Factual errors were identified for which corrections and amendments were required to be made to the original Trajectory, submitted with the Plan, for reasons of accuracy. Furthermore, updates were identified by the Council to reflect the latest position in terms of housing delivery on proposed site allocations.

Upon publication of the proposed corrections and updates, a period of one week was provided (29 July – 5 August 2025) for comments from interested parties. Two responses were received, one from RPS (for Taylor Wimpey) and one from Turley (on behalf of Bloor Homes Limited). Turley raised concerns as to the veracity and reasonableness of the Council's proposed corrections and updates, setting out extensively their views on the matters raised.

In response, and to clarify its position and reasoning, the Council produced and published an update to its Meeting Housing Needs Topic Paper 2025 (EXAM39) and the Housing Trajectory. To ensure fairness and transparency in the examination process for all participants, a further period of consultation on the proposed changes and updates to the Housing Topic Paper and Housing Trajectory took place (20 August – 10 September). Again, two responses - from RPS and Turley - were received. I have now considered the points raised and set out my response below.

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Housing Trajectory

The update work undertaken by the Council on the Housing Trajectory forms a part of its ongoing work throughout the examination. The Council has responded to numerous 'Action Points' which I identified during the hearings, and which have been recorded in the published Action Point Schedules (EXAM22, 26 and 31).

The 2024 Trajectory (EXAM38A) is noted as being based upon the original Trajectory (2023) in the Meeting Housing Need Topic Paper (HTP) (page 43, H15) but updated in line with additional information provided on the delivery of individual sites by developers and/or land promoters. It also corrected errors found to be in the original Trajectory.

Further, I note that for Strategic Sites SH1, SH2 and SM1, updated build out rates agreed in signed Statements of Common Ground (SOCG9 and SOCG10) before the examination, were also included in the updates to the 2024 Trajectory. It is understood that the Council intended for this Trajectory to be consulted on through the Proposed Modifications Consultation.

The third iteration of the Trajectory (2025) (EXAM38B), now proposed by the Council, is the same as the 2024 Trajectory but incorporates changes arising from the modifications as identified and required through the hearings. The 2025 Trajectory retains the 2023 SHLAA figures (base date 31/03/2023) and the 2024 Trajectory amendments and makes minor changes to reflect the proposed modifications, a minor correction to a figure error and the inclusion of the windfall allowance in the housing figures. The main implications in this Trajectory relate to two sites where their impact falls outside of the initial five-year supply.

Having carefully considered the submitted information, the following points are noted:

- I. In relation to figures across the Trajectory, the proposed modification changes balance each other out and only alter the position of 35 dwellings to later in the Plan period.
- II. The amendments to the second Trajectory (2024) (EXAM38A) relate to the addition of 50 dwellings at Site H1 and 30 dwellings at Site M1.
- III. The amendments to the third Trajectory (2025) (EXAM38B) relate to the correction to Site H34 which sees a reduction of 18 dwellings and the inclusion of the windfall allowance from Year 4 of the five-year supply onwards which has introduced an additional 324 dwellings into the Trajectory.

From what the Council has explained, the total changes from the original Trajectory (2023) to the most recently proposed Trajectory (2025) result in an additional 386 dwellings. I acknowledge that the intention of the Council to make changes to the Trajectory through the examination could have been made clearer. However, the changes identified above relate to the provision of up-to-date information about sites and their delivery and the correction of errors in the original Trajectory. The intention to use a stepped Trajectory was introduced and justified through the original HTP (H15). It is noted that this was set out in the Council's response to MIQ Q5.9. Furthermore, the HTP (H15)

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was published prior to the submission of the Plan and therefore was available for comment and scrutiny throughout the examination process, including through the Matter 5 MIQs and relevant hearing session.

I am satisfied that all the amendments and corrections to the Trajectory have been reasonably set out, accounted for and justified by the Council in its submissions, responding to requests I have made and to points raised by Turley. Furthermore, these changes have no detrimental impact on overall supply figures as these have been calculated separately.

Five Year Supply

To be clear, the Council has, at no point, claimed to have a 5 Year Housing Land Supply (5YHLS). The original Housing Trajectory at Regulation 19 submission (2023) (page 43, H15) does not identify a 5YHLS. However, the Trajectory (2024) (EXAM38A) within the submitted Meeting Housing Needs Topic Paper (HTP) identifies a housing land supply of 4.8 (rounded) years. In responding to the submissions from RPS and Turley on these matters (EXAM38F and EXAM38G), the Council rechecked the figures and identified an error in the division of the final five-year supply requirement leading to a higher number of dwellings per annum (dpa) (330dpa instead of 278dpa). An error was also identified in the final calculation which stated 1,631 dwellings instead of 1,581 dwellings.

As a result of these errors being corrected, the Council has explained that instead of the 5YHLS being calculated as 1,631 dwellings / 330, which would have resulted in the 4.8 (rounded) years supply (4.94 years in actual fact) identified in Table 4.2 of the HTP, the calculation should be 1,581 dwellings / 278 which leads to a 5YHLS of 5.7 years (rounded).

The Council has emphasised that it is only an error to the final calculation that has altered the five-year supply and that the rest of the calculation remains correct, including the figures used from the sites to calculate Estimated Capacity for the initial five years of the Plan. The Council's position on this is set out for clarity in Appendix B to its response (EXAM38H) to Turley's consultation comments (EXAM38G) on the HTP Update. As a result, from the evidence before me, the Council has, in fact, submitted a plan with a five-year housing land supply.

From the Council's submissions, the total housing land supply consulted on with the public throughout the Plan process has not changed, regardless of how the build out rate was presented within the Trajectory. Throughout the Plan process, I note that the Council has identified a Local Housing Need figure in line with the appropriate standard method calculation. At the Regulation 19 stage, this figure was identified as a local housing need requirement of 5,808 dwellings with a contribution to the Housing Market Area (HMA) of 500 dwellings - as set out in Policy SO3.1.

Through the Plan process, I note that the Council has identified 6,444 dwellings, not including the additional 324 windfall dwellings (calculated in line with the SHLAA (H1 and EXAM5) methodology. The inclusion of the windfall dwellings results in the total identified dwellings as being 6,768. This provides the Council and its Plan with sufficient provision to meet the Local Housing Need, 500 dwelling contributions to the HMA and the required 5% buffer, as well as a small number of additional dwellings beyond the required figure.

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To clarify the Council's position, an updated version of the HTP (2025) (EXAM39) was published on 20 August 2025 to correct errors in the final steps of the calculation prior to the Proposed Modifications Consultation and to ensure that all documents are correct. Comments on this were received from RPS (EXAM39A) and Turley (EXAM39B).

Notwithstanding the change to the five-year supply from 4.8 years to 5.7 years, I am satisfied that the total housing figures within the Plan have been publicly consulted upon at all stages of the Plan process. The changes identified through discrepancies / errors in the Trajectory have not altered the figures used to calculate the five-year supply at the point of submission. Therefore, taking into consideration all points and evidence before me, the Council is now able to demonstrate a 5YHLS upon adoption of the Plan.

Affordable Housing

Turley has expressed concern that the proposed modifications to the Trajectory and to Table 6.1 in Policy SO3.2 will result in a significant reduction in the number of affordable homes provided by the Plan in the initial five-year period. Notwithstanding this, the modifications proposed are based on the latest viability evidence available (EC10), resulting in the required percentage of affordable housing in each identified area of the District, as set out in Policy SO3.2, being reduced. This also needs to be considered in the wider environmental and economic context of the opportunities and constraints for development across the District.

The matters concerning affordable housing were discussed during the hearings, including the Council's position on whether the examination should consider the latest viability evidence provided. Further discussion on affordable housing and reopening the hearings at this stage is not considered necessary as the proposed modifications relevant to affordable housing requirements within policy are based on the most up-to-date viability evidence and having regard to the comments submitted by all interested parties. These changes will, appropriately, be subject to the forthcoming public consultation on proposed modifications to the submitted Plan. Furthermore, my overall findings on the soundness of the Plan in relation to affordable housing, and all other matters, will be set out within my final report.

Procedural Matters

In response to Turley concerning procedural matters, the actions undertaken by the Council in relation to the Housing Trajectory have been procedurally compliant. The Council published the original HTP prior to the examination with the intention to suggest modifications to the trajectory through the examination. This has resulted in the Proposed Modification Trajectory Diagram (2025) which will be subject to appropriate public consultation through the Proposed Modifications Consultation.

The request to reopen the hearings to discuss matters that could have been raised through previous opportunities and explored further through Matter 5 in terms of the HTP or in response to the published written statements of the Council relating to Matters 5 and 11, would not in my view be of any greater benefit to the examination.

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The Council published an updated HTP and the Housing Trajectory to ensure that all corrections are clearly set out and explained. Prior to the Proposed Modifications Consultation, two separate periods of public consultation have been provided. Accordingly, it is my view that sufficient opportunity has been given to all interested parties to raise points on the relevant matters, from which detailed responses have been received and considered.

I am therefore satisfied that all relevant points and matters before me have been provided and considered in accordance with procedural processes within the examination and based on my determination of those points and matters, the examination can proceed to the Proposed Modifications Consultation.

Proposed Modifications Consultation

In my letter of 17 July 2025, I indicated that the proposed main modifications would be referenced in the schedule as 'MMxxx'. On reflection, and to distinguish between the proposed main modifications for consultation and the final main modifications to be made to the Plan for soundness and adoption, the attached schedule (Appendix A) references all Proposed Main Modifications as '**PMMxxx**'. The final modifications necessary for soundness will be referenced in my final report as 'Main Modifications' (**MMxxx**).

The attached (Appendix A) is a revised schedule of proposed main modifications based on that previously provided to me by the Council. There are changes and additions to that initial schedule. Therefore, the Council should now consider this latest Schedule of Proposed Main Modifications (PMM) prior to the forthcoming consultation.

Within the attached schedule, there are also references to Action Points relevant to each modification (APxxx). I have included these primarily for the benefit of myself and the Council to cross reference modifications with responses to the Action Points. The Council may wish to consider whether it may be helpful for those responding to the PMMs to retain these additional AP references. Alternatively, it may wish to remove them to reduce any potential referencing confusion that may arise.

For consistency, it is suggested that the Council employ a similar referencing scheme for its Schedule of Proposed Additional Modifications (i.e. PAM) to distinguish the modifications consulted upon at this stage from those to be made to the Plan for adoption. These modifications should include those proposed to be made to the Policies Map, whether related to main or additional modifications.

The Council is asked to consider and advise as to whether any updates to the Sustainability Appraisal (SA) and/or Habitats Regulations Assessment (HRA) are required because of the modifications proposed. If so, this work must be undertaken and completed prior to, and be included in, the consultation on the PMMs. Any additional work required in this regard should therefore be factored into the timeline for consultation.

Prior to the consultation, the Council must have completed and ready for publication the following documents:

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- Final Schedule of Proposed Main Modifications (PMM) to the Cannock Chase District Local Plan 2018-2040
- Final Schedule of Proposed Additional Modifications (PAM) (Minor Changes) to the Cannock Chase District Local Plan 2018-2040
- Final Schedule of Proposed Modifications to the Policies Map of the Cannock Chase District Local Plan 2018-2040.
- All SA/HRA update work, where required.
- A 'Track Changed' version of the Submitted Plan with all proposed modifications noted (Main and Additional); and
- A 'Clean' version of the Plan with all proposed modifications (Main and Additional) applied.

Once the above documents have been satisfactorily produced, the Council should then progress to consultation. Following discussion with the Council's Planning Team and taking account the Council's need to consider and undertake any necessary additional work, it has been indicated that the consultation is anticipated to take place from 20 October – 1 December 2025. To my mind, this appears to be a reasonable timeframe. It should be made clear to all interested parties that representations will be sought on the proposed modifications only during the consultation and not on any wider aspect of the Plan.

I trust that the above is clear and helpful. However, should you have any queries, please do not hesitate to contact me via the Programme Officer. Please ensure that this letter is placed on the examination website.

Yours sincerely,

Andrew McCormack

Inspector

Attached:

Appendix A: Schedule of Proposed Main Modifications (PMM) to the Pre-Submission Version of the Cannock Chase District Local Plan 2018-2040