

Council Response to Queries Raised regarding the Trajectory

Introduction

The Council seeks to address those elements considered to align with the remit of the Inspectors initial queries regarding the trajectory of the Local Plan and in turn the implications to the Five-Year Supply. Where the Council have not responded to particular points, reasoning has been applied.

This statement does not address references to Case Law nor references to approaches at other Local Plan examinations. As set out by the Inspector during the hearing sessions, the Cannock Chase Local Plan is the subject of this examination and as such, the Council are presenting justification to support this Local Plan.

Finally, the Council note that no other party raised concerns during the hearing sessions with regards to the trajectory and/or five-year supply where opportunity was provided for discussion on all matters relating to the Plan. The Council consider that procedurally, opportunity has already been provided through the hearing sessions to raise any concern with regard to these matters through this examination.

Trajectory Versions

The Council would like to clarify a few details regarding the trajectories further to those already provided, whilst greater detail will be provided throughout this response an initial description of the different trajectories is set out below.

Trajectory 1: This is the original submission identified in the Reg 19 Submission Version of the Plan that was consulted on and is set on the 2023 SHLAA figures and base date of 31st March 2023.

Trajectory 2: This trajectory is in the Meeting Housing Needs Topic Paper 2024 (HTP) which was published prior to submission of the Local Plan (November 2024) (H15). This trajectory retains the 2023 SHLAA figures (base date of 31st March 2023) but was updated in line with additional information provided on the delivery trajectory of individual sites by Developers and/or Land Promoters, and to correct errors identified from Trajectory 1. For Strategic sites SH1, SH2 and SM1, the updated build out rates were agreed in signed Statements of Common Ground (SoCG). It was intended that this trajectory would have been consulted on through proposed modifications to the plan.

Trajectory 3: This is the Proposed Modifications trajectory which is the same as Trajectory 2, however this also shows any changes arising from the modifications required through the hearing sessions. This trajectory retains the 2023 SHLAA figures (base date of 31st March 2023) and makes some minor changes to reflect the proposed modifications, a minor correction to a figure error and the inclusion of the windfall allowance incorporated in the housing figures. The main implications are in relation to two sites both of which the impact is outside of the initial Five-Year Supply.

The Council are only able to amend Trajectory 1 through the examination process. As such, the HTP set out the Councils reasoning for seeking changes to the trajectory. It

is recognised that the intention for the Council to make changes to the trajectory through the examination could have been made clearer. However, the changes were predominantly in relation to up to date information about sites and to correct errors. The intention to use a stepped trajectory was also introduced and justified through the Topic Paper. This was also set out in MIQ Q5.9. The HTP was published prior to submission and therefore was available for comment through the examination process, including through the Matter 5 MIQ's and Matter 5 hearing session.

Within this response the Council will address discrepancies that have been identified and where applicable, provide justifications for their changes as well as address relevant comments raised by third parties. Where appropriate, appendices will be provided.

Trajectory Discrepancies

The Inspector confirmed during the hearing sessions that the 2023 SHLAA (base date of 31st March) is to be maintained as the base date for the trajectory, and this is agreed by the Council.

The Council were not aware of some of the errors in the trajectory at the time of submission, and with regard to amendments to build out rates for a few key sites and the stepped trajectory, the Council consider that the examination was the appropriate forum for consideration of these modifications, which were logical to reflect updated information from site owners and to reflect that some of the larger strategic sites only make a significant contribution to completions at the mid-delivery phase.

The table below sets out which sites were subject to amendment since the original trajectory (Trajectory 1) was published for the Reg 19 consultation.

Site	Change/s in the trajectory	Reason for change
H1	Correction of missed 50 dwellings in year 2025-2026	Human error
M1	Change from 40 dwellings to 70 dwellings	To reflect correct housing figure as shown for site C504 in the 2023 SHLAA. Progress on the planning application and intelligence from the Councils economic regeneration team.
SH1	1. Amendment to build out rate	1. To reflect revised build out rate in SOCG9
SH2	1. Amendment to build out rate 2. Increase to total of 35 dwellings	1. To reflect revised build out rate in SOCG10 2. To reflect discussions in Hearing Session for Matter 11 (AP91)

M3	Loss of 35 dwellings	Site agreed to be removed as an allocation through the Councils hearing sessions (Matter 8 and Matter 11, AP104)
H34	Reduction of 18 dwellings	To reflect correct housing figure as shown for site C81 in the 2023 SHLAA. The figure was altered in the SHLAA in line with a Call for Sites submission from the landowner Staffordshire County Council.
Addition of windfall	Inclusion of windfall rate of 27 per annum from year 2028/29 to year 2039/40	As justified through HTP (Paras 4.23-4.25/page 19) and the SHLAA 2023 and 2024 (H1 and EXAM5, pages 16-19)
Introduction of the stepped trajectory	Delivery of a total 264 dwellings per annum in years 2025/26 to 2029/30 and then 314 dwellings per annum thereafter	As justified through HTP (paras 4.29-4.31/page 20)

Table 1

Note: errors with sites H1 and M1 were identified subsequent to submission of Explanatory note EXAM 38C.

Further to the Council's initial response regarding the trajectories Appendix Ai sets out how the alterations to the figures have occurred from the original version (trajectory 1) to the amended versions (trajectories 2 and 3) that have formed part of the Plan process, the justifications remain as set out in EXAM 38C, with additional years of the Plan period covered in Appendix Aii.

The Housing Land Supply figures have remained consistent throughout the Plan process. There has been no error in the total calculation for the supply of sites within the plan.

The total of 20 dwellings at H34 and the 70 dwellings at M1 have remained consistent in the plan policies and HTP and the difference in numbers are only an error within the trajectory.

The amendments to Sites SH1 and SH2 reflect the agreed build out rate in line with the signed SoCGs and had been included within the updated trajectory submitted through the HTP.

The changes identified through the proposed modifications include the addition of 35 dwellings at SH2 and the loss of site M3 comprising of 35 dwellings, as such, from a wider Housing Land Supply perspective there are no changes to the overall supply figure, as set out in Table 2 below. In terms of the trajectory as shown in Appendix Ai, site M3 was amended in Trajectory 2 to fall outside of the initial five-year supply, and the addition to SH2 has been included at the end year of the sites delivery (2035/36

to 2036/37). As such, neither proposed modification is considered to impact the five-year housing land supply

All changes to the trajectory are set out in Appendix Ai and Aii. In terms of figures across the trajectory the proposed modification changes balance each other out and only alter the position of the 35 dwellings to later in the Plan period. The amendments to Trajectory 2 (2024) see the addition of 50 dwellings at site H1 and 30 dwellings at site M1. In Trajectory 3 the correction to site H34 sees a reduction of 18 dwellings and the inclusion of the windfall allowance from Year 4 of the Five-Year supply introduced an additional 324 dwellings into the trajectory (Trajectory 3 (2025)).

The total changes from Trajectory 1 (2023) across Trajectories 2 (2024) and 3 (2025) are 386 dwellings. The Council consider that all amendments to the figures are accounted for within the trajectory graphs and additional documentation already submitted and submitted as appendices to this document. Further to this the Council maintain that the changes to the trajectory have had no detrimental impact on the overall supply figures as these have been calculated separately.

In summary, the Council maintain that the trajectory discrepancies have no detrimental impact on the overall supply figures. The appropriate process has been followed whereby the Council introduced a small but necessary number of amendments to the trajectory using the Housing Topic Paper which was published at the point of submission of the plan in November 2024 and through the response to the MIQ's on Matter 5. Other participants had the opportunity to raise issues with the topic paper or the trajectory through the hearing sessions and written statements.

Site Reference for sites subject to changes in the 3 versions of the trajectory	Total of all sites subject to change Trajectory 1 2023	Total of all sites subject to change Trajectory 2 2024	Total of all sites subject to change Trajectory 3 2025
M1	70	70	70
SH1	700	700	700
SH2	400	400	435
H34	20	20	20
M3	35	35	0
TOTAL	1,225	1,225	1,225

Table 2

Five Year Housing Land Supply

The Council consider that they have at no point in the process claimed to have a five-year supply, it can be seen that the only five-year calculation submitted as part of the Plan process is within the 2024 HTP which identified a 4.8 year supply. In lieu of the submitted statements the Council have rechecked the figures and have identified that there is an error in the division of the final five year supply requirement leading to a

higher number of dwellings per annum (dpa), there is also an error in the final calculation which states 1,631//330 instead of 1,581//330 which would have resulted in the 4.8 (rounded) years supply as identified in Table 4.2 of the HTP. However, as noted there is also an error in the division of the final five-year supply statement that states 330dpa this should be 278dpa which would lead to a five-year supply of 5.7 years.

The Council raise 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 the Estimated Capacity for the initial five years of the Plan.

To provide clarity on the Council's five-year supply position the Council submits Appendix B. This document provides all the calculations from 2023 to 2025 and sets out where any discrepancies have been accounted for. It is considered that whilst the error in the calculation shows a 4.8 year supply that the Council submitted the Plan unknowingly, with a 5.7 year supply, and the changes to the Reg 19 trajectory in the proposed modification version (Trajectory 3) have not altered this.

The figures show that the housing land supply in the Reg 19 submission version would present a 4.5 year supply, this would be altered to a 4.8 year supply when allowing for the discrepancy at site M1 and H1.

The Council consider that the total housing land supply consulted on with the Public has at no point changed, regardless of how the build out rate was presented within the trajectory. The Council throughout the Plan process have 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 and a contribution to the Housing Market Area of 500 dwellings - as set out in Policy SO3.1.

The Council have through the Plan process identified 6,444 dwellings not including the additional 324 windfall dwellings (calculated in line with the SHLAA (H1 and EXAM5) methodology) bringing the total identified dwellings to 6,768. This provides the Council with sufficient provision to meet the Local Housing Need, 500 dwelling contributions to the Housing Market Area and the required 5% buffer, as well as an additional 271 dwellings beyond the required figure.

It is considered that regardless of the change to the five-year supply to 5.7 years that the figures within the Plan have appropriately been consulted upon at all stages. The error in the final calculation was non-intentional and does not alter that other figures within the calculation are correct, nor that the Council have a five-year supply at point of submission. The Council propose to submit an updated version of the HTP to correct the errors in the final steps of the calculation prior to the Modifications Consultation to ensure that all documents are correct.

The Council oppose Turley's statement (EXAM38G) at paragraph 7 that the Council has achieved changes to the supply by increasing the number of units at three sites and the correction of figures at a fourth. As set out above, the trajectory figures had no implications for the Five-Year supply calculation in regard to any discrepancies,

and the changes to sites SH1 and SH2 were instigated by the Developer/Land Promoter in line with their own updated trajectories for submission and agreed through a signed SoCG. Further to this, the deliverable supply of 1,581 stated by Turley (EXAM38G) to be as of 1 April 2025 is clearly set out in Table 4.2 of the HTP dated November 2024, as such the Council continue the stance that the discrepancies in the trajectory have not altered the figures used to calculate the five year supply at the point of submission, and that to have not agreed an appropriate trajectory with the Developer/Land Promoters of SH1 and SH2 would have left areas of disagreement within the SoCG.

Impact upon Affordable Housing

The Council do not consider it appropriate to address comments on the impact upon Affordable Housing as this is considered to be outside the remit of the Inspector's initial queries with regards to the trajectory. It is also considered that this is reopening matters that have been fully discussed at the hearing sessions and the agreement for a proposed modification to be included with regards to the 2024 Economic Viability Study (EC10) and the amendments to Policy SO3.2 to be undertaken accordingly for the modifications consultation.

Procedural Matters

The Council have considered the Procedure Guide for Local Plan Examinations (28th August 2024)¹, with particular regard to paragraphs 6.2, and 6.7- 6.10. It is considered that the scope for significant changes to be made to Main Modifications is implicit in their justification for being necessary to make a Plan sound and legally compliant. As such, it is the Council's opinion that Turley's response relates to matters that can be addressed by way of Main Modifications and that the opinions outlined within Turley's response appear as a dismissal of the process and have little to do with the expectation of policy as to how Main Modifications, if properly progressed, should operate.

In line with the procedure guidance, the Council raises that Proposed Modifications are part of the examination process and that the Council will undertake the mandatory modifications consultation as required. It has not been raised to the Council by the Inspector at this time, that there has been anything significant to warrant a separate consultation to that required prior to adoption on the Main Modifications and the Council proposed Additional Modifications.

The Council have followed procedural guidance on undertaking consultations with the Local Public, inclusive of an extensive and in-depth consultation process at Reg 19 in lieu of Reg 18 being undertaken entirely online, in line with Covid-19 procedural requirements, as set out in the Consultation Statement (SD7).

The Council also note reference to a Grey Belt site; the Council has no evidence at this time that the site is Grey Belt. A collaborative Green Belt Assessment with neighbouring authorities is being procured to update the Green Belt Assessment in consideration of the introduction of Grey Belt sites into national policy and the site

¹ [Procedure Guide for Local Plan Examinations - GOV.UK](#)

would require assessment through a Planning Application at this time to determine its Grey Belt status. Notwithstanding this, the Local Plan is to be assessed against the September 2023 NPPF in which Grey Belt was not considered.

The Council consider that the Site Selection Process has been thoroughly discussed at the hearing sessions and that a comprehensive approach to site selection has been undertaken, the Council's identified housing land supply is beyond that required by the Government under the September 2023 Standard Method Calculation and a five-year supply has been identified upon adoption of the Plan. It is considered that the Council have taken appropriate measures to consider the future needs of the District through the release of three Safeguarded sites as set out in Policy SO7.7 and that at this time there is no requirement to bring these forward beyond the parameters set out within the Policy.

As such, the Council maintain that the 2023 figures which have been confirmed as the base date and formed the basis of both the overall housing land supply and the five-year supply have not been impacted by the unintentional discrepancies identified within the trajectory. The Council published the update to the housing trajectory prior to the examination with the intention to suggest modifications to the trajectory through the examination and subsequent Main Modifications consultation. The Council recognise the requirements of National Policy and are confident that the sites identified are deliverable and that current pre-application submissions indicate wider sites may come forward before the anticipated delivery dates within the trajectory.

The Site

Land to the west of Hednesford Road, Norton Canes represented by Turley (Safeguarded Site S3) is in part identified as Safeguarded Land, this northern part of the site has been through the Site Selection Process and consultation with the local public, it would be considered inappropriate at this time to include additional Green Belt Land of a significant scale that has been identified as not suitable for allocation at this time, nor required to meet the Housing Need, as set out above the Council has a more than sufficient provision for the Plan period.

The Council would also raise that the wording of Policy SO7.7: Amendments to the Green Belt with regards to Safeguarded Land states the following: *Amendments to the Green Belt boundary are proposed in this Local Plan to accommodate growth requirements of the District beyond the plan period or following a review of this Plan [...]*.

Paragraph 6.332 of the Plan also identifies: *The areas of land identified as safeguarded are not allocated for development at the present time and should be safeguarded from development which would prevent their long-term potential to assist in delivering the future economic and housing needs of the district and strategic network of green infrastructure.*

The Council note the reference to the primary school provision within the District, the Council have worked extensively with Staffordshire County Council Education Team on the numbers for the Local Area and the requirements to meet the needs of Norton Canes, whilst there are still outstanding issues with regards to Infrastructure provision

in Norton Canes and the extensive development had through the previous Plan period, as set out in the Spatial Strategy development has strategically been placed in Cannock, Hednesford and Heath Hayes and Rugeley over increasing the development at Norton Canes experienced in the ward within recent years. The Council acknowledge that the Lichfield Road site is within the Norton Canes Ward boundary, however, as clearly shown within the SHLAA (H1 and EXAM 5) it has always been considered to have an impact on the Heath Hayes and Wimblebury area when considering infrastructure. Nevertheless, it is considered that the provision of the primary school at SH1 will also provide capacity to those residing in Norton Canes.

Emery Planning Document

The Council note that the figures in Table 1.1 are taken from EXAM38A these are the figures as set out for the original 2023 Trajectory and do not comprise of the 2025 Proposed Modifications figures.

As such the figures from the 2025 Trajectory are as follows:

2025/26	2026/27	2027/28	2028/29	2029/30	Total
242	225	266	386	462	1,581

This figure remains consistent with the figure in Table 4.2 of the HTP 2024 setting out the Five-Year Supply Calculation.

The Council raise that the Plan is being assessed against the September 2023 NPPF which at Paragraph 74a required the inclusion of a 5% buffer as minimum, which can be seen to have been applied to the Council's Five Year Supply Calculation in the HTP - as identified in the above section the errors to the calculation have been noted and the correct calculations provided in Appendix B.

Emery Planning at Table 1.4 raise 16 disputed sites from EXAM38B. The Council have provided a response to the individual sites in Appendix C, the Council consider that sufficient information is provided within the appendix and that Section 3 of Emery Planning's document is beyond the parameters to be addressed by the Council as the Inspector has not raised concerns to the Council regarding any of the sites at this time.

The Council note Emery Planning's comments at Paragraphs 1.14 and 1.15. The Council would like to raise that a Site Selection Methodology (H13) has been submitted alongside the Plan to outline the process for identifying sites for allocation, the Council have gone into detail at the hearing sessions regarding the process including the Local Plan Member Officer Working Group and undertaking further discussions with landowners and developers as appropriate. A number of sites have been in pre-application or other discussions with the Council that remain on a confidential basis and as such cannot be used to alter sites positions within the SHLAA.

The 2024 SHLAA Table E.2 (Page 36) provides a summary of availability assessment in line with PPG guidance on Housing Supply and Delivery. On Major sites of 10 or more dwellings, it identifies for Planning status and/or correspondence evidence the following:

Detailed planning permission granted. Outline planning permission/permission in principle granted and/or Local Plan allocation with no planning permission (where supported by additional evidence of delivery).

This would place any Local Plan allocation regardless of planning status in the Deliverable (0-5years category) of the SHLAA. At the point of publishing the 2024 SHLAA, whilst sites had been identified for allocation with the Local Plan, as the Plan was not adopted it was considered inappropriate to move the sites. This is set out in the continuing comment responses from the SHLAA panel responses in Appendix C of the SHLAA (Page 32 - 33). In line with the Councils approach outlined in Appendix C, it can be seen that the relevant sites through Appendix H - L have been identified with the following statements: *The site has been allocated for residential land within the Local Plan Review Reg 19* or *The site has been allocated for mixed use land within the Local Plan Review Reg 19*².

It is considered upon adoption of the Plan that the sites would then be correctly identified in the relevant sections of the SHLAA in line with Appendix E and the trajectory. It is considered by the Council inappropriate to consider solely the sites position within the 2024 SHLAA when further works have been undertaken by the Council to identify sites for allocation throughout the Plan period.

With regards to Emery Planning's comments on Rugeley Power Station. The Council's positioning of the site within the trajectory is in line with the signed SoCG (EXAM 1) it is considered that this is key in the evidence of the deliverability of the site.

The sites position within the SHLAA is considered appropriate in line with the outline planning application, and the submission and approval of a reserved matters application for the site. It should also be noted that key infrastructure works on the site have already been completed or are continuing to be undertaken to enable residential development to come forward quickly on the site. The Council are in ongoing discussions with the Developers of the site on the timeframe for the initial residential reserved matters application and potential timelines, along with anticipated rate of delivery beyond the existing agreed trajectory.

Whilst the site covers two Local Authorities it has been demonstrated by the phasing plans provided previously and through discussions with the Developer that concurrent development of large residential sections is not anticipated to be undertaken with residential development at the Cannock Chase end of the site to be the initial phase of development. As these are pre-application discussions specific details cannot be provided but the Council remain confident that despite the current slippage in the supply that the 400 dwellings allocated to the five-year supply will come forward in the initial 5 years of the Plan from adoption.

The Council do not consider that there are grounds to remove 829 dwellings from the five year supply and consider that it has been demonstrated that the sites are deliverable. Further to this, it is considered that sites SH1 and SH2 are in similar positions to those sites disputed by Emery Planning. In particular, their positioning

² The appropriate use of strategic has been incorporated on the relevant sites.

within the trajectory without a Planning Application/Permission and with only a SoCG agreed with Developer or Land Promoter. As such the Council question the approach of Emery Planning to apply these caveats to only the smaller non-strategic sites, the Council also raise that if Emery Planning's approach were to be followed then the introduction of Bloor Homes site (Safeguarded site S3) into the site allocations would also leave it outside of the Plan's initial five-year trajectory and as such its allocation from safeguarded land would not have any beneficial impacts to the Council's five year supply.

Summary

The Councils actions in relation to the housing trajectory have been procedurally correct. The Council published the Housing Topic Paper prior to the examination with the intention to suggest modifications to the trajectory through the examination. This resulted in the Proposed Modification Trajectory Diagram (Trajectory 3) which has not yet been subject to consultation through the appropriate mechanism as the Main Modifications consultation has not yet taken place.

The Council do not consider that there is any benefit to reopening the hearings to discuss a matter which should have been adequately explored through Matter 5, had all parties raised issues with the Housing Topic Paper, or in response to the published written statements by the Council in response to Matter 5, or Matter 11 at the appropriate time during the examination. This response sets out sufficient detail for the Inspector to consider the issue through written statements.

The key identified error is to the benefit of all parties. A human error in calculating the final year of the 5 year supply means that the Council can demonstrate a 5 year supply upon adoption. This means that the plan is compliant with national policy and removes the need to consider mechanisms to address this potential issue with the plan. There are minor changes concerning 6 sites in the trajectory but crucially, no issue to the overall supply calculation or to any of the calculations or site allocations in the plan in relation to the trajectory.

The final key issue raised is to the delivery of some sites counted in the housing trajectory, particularly in the first five year supply. The Council have developed the trajectory in consideration of the evidence presented and have formed more detailed trajectories for the strategic site allocations through Statements of Common Ground with landowners as summarised in Table D. The trajectory is always an informed estimate, however there is also a buffer to the overall supply figure for the plan. The Council consider this to be in line with national policy and guidance and that the estimates made are reasonable and evidenced. Should supply dip, the Council is already obligated to immediately review the plan, and this is the appropriate mechanism to allocate sites which have been safeguarded through this plan.

Trajectory Version	Site Reference	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36	2036-37	2037-38	2038-39	2039-40
2023 Original Submission (Trajectory 1)	H1		35	50	134	94	50	50		18													
2024 Housing Topic Needs Paper (Trajectory 2)	H1		35	50	134	94	50	50	50	18													
2025 Proposed Modifications Version (Trajectory 3)	H1		35	50	134	94	50	50	50	18													
2023 Original Submission (Trajectory 1)	M1												25	15									
2024 Housing Topic Needs Paper (Trajectory 2)	M1										20	20	20	10									
2025 Proposed Modifications Version (Trajectory 3)	M1										20	20	20	10									
2023 Original Submission (Trajectory 1)	SH1											25	50	50	100	100	100	100	100	75			
2024 Housing Topic Needs Paper (Trajectory 2)	SH1										25	75	100	100	100	100	100	100					
2025 Proposed Modifications Version (Trajectory 3)	SH1										25	75	100	100	100	100	100	100					
2023 Original Submission (Trajectory 1)	SH2										15	50	50	50	50	50	50	50	35				
2024 Housing Topic Needs Paper (Trajectory 2)	SH2										25	50	50	50	50	50	50	50	25				
2025 Proposed Modifications Version (Trajectory 3)	SH2										25	50	50	50	50	50	50	50	50	10			
2023 Original Submission (Trajectory 1)	M3												25	15									
2024 Housing Topic Needs Paper (Trajectory 2)	M3														25	10							
2025 Proposed Modifications Version (Trajectory 3)	M3																						
2023 Original Submission (Trajectory 1)	H34													19	19								
2024 Housing Topic Needs Paper (Trajectory 2)	H34													19	19								
2025 Proposed Modifications Version (Trajectory 3)	H34														20								

Changes to Trajectory

Year	Change	Dwellings	Which Trajectory	Reasoning
2025/26	Correction to H1	+50	Trajectory 2 (2024)	To correct an earlier error of missing 50 dwellings off the remaining figure to be built
2027/28	Correction to M1, Change to SH1 following SoCG Change to SH2 following SoCG	+55	Trajectory 2 (2024) - M1, SH1 and SH2 Minor change in Trajectory 3 (2025) to account for error of +1 dwelling in calculations	M1 - To correct the error of only including 40 dwellings in the trajectory instead of the identified 70 dwellings in the 2023 SHLAA and in line with an update on the progress of the site. SH1 - Reflect revised build out rate in SOCG9 SH2 - Reflect revised build out rate in SOCG10
2028/29	Correction to M1 Change to SH1 following SoCG Inclusion of Windfall Allowance	+97	Trajectory 2 (2024) - M1 and SH1 Trajectory 3 (2025) inclusion of windfall allowance	M1 - To correct the error of only including 40 dwellings in the trajectory instead of the identified 70 dwellings in the 2023 SHLAA and in line with an update on the progress of the site. SH1 - Reflect revised build out rate in SOCG9 To include the windfall allowance calculated in the housing figures
2029/30	Correction to M1 Change to M3 Change to SH1 following SoCG Inclusion of Windfall Allowance	+72	Trajectory 2 (2024) - M1, M3 and SH1 Trajectory 3 (2025) - inclusion of windfall allowance	M1 - To correct the error of only including 40 dwellings in the trajectory instead of the identified 70 dwellings in the 2023 SHLAA and in line with an update on the progress of the site. M3 - alter the position within the trajectory based on updated information for Economic Development SH1 - Reflect revised build out rate in SOCG9 To include the windfall allowance calculated in the housing figures
2030/31	Correction to M1 Change to M3 Change to SH1 following SoCG Inclusion of Windfall Allowance	+53	Trajectory 2 (2024) - M1, M3 and SH1 Trajectory 3 (2025) - inclusion of windfall allowance	M1 - To correct the error of only including 40 dwellings in the trajectory instead of the identified 70 dwellings in the 2023 SHLAA and in line with an update on the progress of the site. M3 - alter the position within the trajectory based on updated information for Economic Development SH1 - Reflect revised build out rate in SOCG9 To include the windfall allowance calculated in the housing figures

2031/32	Correction to H34 Change to M3 Inclusion of windfall allowance	+3	Trajectory 2 (2024) M3 Trajectory 3 (2025) M3, H34 and inclusion of windfall allowance	M3 - alter the position within the trajectory based on updated information for Economic Development in 2024 and removal of site in 2025 proposed modifications H34 - to correct the error not picked up in the trajectory previously of the change to dwelling numbers to reflect the correct housing figure as identified in the 2023 SHLAA To include the windfall allowance calculated in the housing figures
2032/33	Change to M3 Inclusion of windfall allowance	+17	Trajectory 3(2025) - M3 and inclusion of infall allowance	M3 - to reflect the removal of the site in the proposed modifications To include the windfall allowance calculated in the housing figures
2033/34	Inclusion of windfall allowance	+27	Trajectory 3(2025)	To include the windfall allowance calculated in the housing figures
2034/35	Inclusion of windfall allowance	+27	Trajectory 3(2025)	To include the windfall allowance calculated in the housing figures
2035/36	Change to SH1 following SoCG Change to SH2 following SoCG Inclusion of windfall allowance	+58	Trajectory 2 (2024) - SH1 and SH2 Trajectory 3 (2025) - SH2 and inclusion of windfall allowance	SH1 - Reflect revised build out rate in SOCG9 SH2 - Reflect revised build out rate in SOCG10 and reflect discussions in Hearing Session for Matter 11 (AP91)
2036/37	Change to SH1 following SoCG Change to SH2 following SoCG Inclusion of windfall allowance	+38	Trajectory 2 (2024) - SH1 and SH2 Trajectory 3 (2025) - SH2 and inclusion of windfall allowance	SH1 - Reflect revised build out rate in SOCG9 SH2 - Reflect revised build out rate in SOCG10 and reflect discussions in Hearing Session for Matter 11 (AP91)
2037/38	Inclusion of windfall allowance	+27	Trajectory 3(2025)	To include the windfall allowance calculated in the housing figures
2038/39	Inclusion of windfall allowance	+27	Trajectory 3(2025)	To include the windfall allowance calculated in the housing figures
2039/40	Inclusion of windfall allowance	+27	Trajectory 3(2025)	To include the windfall allowance calculated in the housing figures

Source	Capacity	Capacity	Capacity	Capacity	Capacity
	2023 Reg 19 Figures - Original Submission	2023 Reg 19 Figures Discrepancies (not including changes to SH1 & SH2 through SoCGs)	2024 Housing Topic Paper Figures	2024 Housing Topic Paper Figures Discrepancies	2025 Proposed Modification Figures
1. Sites with planning permission (Table A - Under Construction)	41	91	91	91	91
2. Sites with planning permission, are already allocated or have a resolution to grant planning permission for housing (Table B)	146	146	146	146	146
3. Proposed Allocations (Table C - Additional sites from Development Capacity study)	427	457	462	462	462
4. Strategic Housing Allocations	590	590	725	725	725
5. Small Site Contribution (Under Construction)	29	29	29	29	29
6. Small Site Contribution (With full or outline planning permission including an 18% non-implementation rate)	74	74	74	74	74
7. Windfall Housing Land Supply (2028-2030)	54	54	54	54	54
Total Estimated Capacity	1,361	1,441	1,581	1,581	1,581
Annual Housing Target	286	286	264	264	264
Five year supply requirement	1,430 (286dpa x 5)	1,430 (286dpa x 5)	1,320 (264dpa x 5)	1,320 (264dpa x 5)	1,320 (264dpa x 5)
Add 5% buffer	71.5	71.5	66	66	66
Final Five Year Supply Requirement	1,501.5 (301dpa)	1,501.5 (301dpa)	1,386 (330 dpa)	1,386 (278dpa)	1,386 (278dpa)
Balance	-141 net dwellings	-61 net dwellings	+195 net dwellings	+195 net dwellings	+ 195 net dwellings
Years Supply	4.5 (rounded) (1,361//301)	4.8 (rounded) (1,441//301)	4.8 (rounded) (1,631//330)	5.7 (rounded) (1,581//278)	5.7 (rounded) (1,581//278)

Site Ref	Site	Council Comments
H16	Land west of Pye Green Road, Hednesford Cannock	The Council note the comments from Emery Planning, as confirmed by the Inspector during the hearing sessions the base date for the sites is to remain as 31 st March 2023 (in line with the SHLAA 2023), as such any pending Reserved Matters applications cannot be taken into consideration by the Council at this time as it would adjust the agreed upon base date.
M6	Rugeley Market Hall and Bus Station, Rugeley	As set out in MIQ 11e for site M6 the Council have been undertaking works on The Rugeley Town Centre Vision and Spatial Framework with funding through UKSPF, further UKSPF funding has been secured to enable the completion of the Masterplan, the Rugeley Market Hall and Bus Station have been identified by the Council's Economic Development team to be at the forefront of bringing forward the town centre regeneration and to come forward from year 2029/30.
H29	Land at 521 Pye Green Road, Hednesford	The site has been promoted throughout the process and has been identified as suitable and available, with the Council being in pre-application discussions with the site owner. It is acknowledged that some of the existing uses on site would need to cease or relocate and this is demonstrated by the identifying of the site not coming forward until 2029/30.
M1	Multi Storey Car Park, Market Hall and Retail Units, Church Street, Cannock	As set out in MIQ 11h and 11i for site M1 the site is part of a significant investment from a Government grant award and further Council investment to bring the site forward, including the ongoing demolition works of the site. Given the complexity of the site ongoing works including the undertaking of Phase 2 in June 2024 which centres on land acquisition to support the development has been underway. The Council consider that the Reserved Matters applications will come forward in a timely manner as required and in line with the projected timeframe.
H35	Land at Girton Road/Spring Street, Cannock	Development Management Officers are in continuing dialogue with the Developer and the Council's Legal Team on the progression of the S106 through the legal process. The Developer has confirmed that they are committed to delivering the site in a timely manner as soon as the S106 is finalised. The Council consider that the site is appropriately located within the trajectory based on the information held at base date of 31 st March 2023.

H38	Land at Walsall Road, Avon Road, Hunter Road, Hallcourt Lane, Cannock	The Council consider that the site is appropriately located within the trajectory based on the information held at base date of 31 st March 2023. It has been indicated that the site is still deliverable.
H40	Danilo Road, Car Park, Cannock	As set out in the MIQs the site is part of the wider Town Centre regeneration and requires minimal remedial works to bring forward. The site is deliverable, suitable and acceptable and has been identified to be brought forward in 2029/30 in line with the information provided by the Economic Development team.
M2	Park Road, Bus Station, Cannock	As set out in the MIQs the site is part of the wider Town Centre regeneration and requires minimal remedial works to bring forward. The site is deliverable, suitable and acceptable and has been identified to be brought forward in 2029/30 in line with the information provided by the Economic Development team.
H63	Former Rumer Hill, Industrial Estate, Cannock	The Council have undertaken pre-application advice with the developer and are awaiting the submission of the planning application.
H65	A Dunford and Son, Brindley Heath Road, Cannock	Development Management Officers are in continuing dialogue with the Developer and the Council's Legal Team on the progression of the S106 through the legal process. The Developer has confirmed that they are committed to delivering the site in a timely manner as soon as the S106 is finalised. The Council consider that the site is appropriately located within the trajectory based on the information held at base date of 31 st March 2023.
H49	Land at the Mossley, off Armitage Road	The Council consider that the site is appropriately located within the trajectory based on the information held at base date of 31 st March 2023. Development Management officers have been in dialogue with the landowner following the withdrawal of the application and the landowner has confirmed the site is still being brought forward for development.
H50	Nursery Fields, St Michaels Road, Brereton	The Council consider that the site is appropriately located within the trajectory based on the information held at base date of 31 st March 2023. The site is a County Council site available for development, and the County indicated that the site can come forward as projected.
H52	Gregory Works, Armitage Road, Brereton	The site has previously been approved for change of use to residential, the landowner has confirmed that the site is still available for development.

		The Council consider that the site is appropriately located within the trajectory based on the information held at base date of 31 st March 2023.
H53	Land off Lichfield Street, Rugeley	The Council consider that the site is appropriately located within the trajectory based on the information held at base date of 31 st March 2023. There is a live planning application on the site currently being assessed by Officers.
H69	272 Hednesford Road, Norton Canes	Development Management Officers are in continuing dialogue with the Developer and the Council's Legal Team on the progression of the S106 through the legal process. The Developer has confirmed that they are committed to delivering the site in a timely manner as soon as the S106 is finalised. The Council consider that the site is appropriately located within the trajectory based on the information held at base date of 31 st March 2023.
SM1	Rugeley Power Station, Rugeley	The trajectory submitted by the Council was formed through a signed Statement of Common Ground (EXAM1) and is considered an appropriate base line from which the Council has formed the trajectory. The Council are in ongoing confidential discussions with the landowner and developers of the site in its continuing progression of being brought forward in a timely manner. The key highway works have been completed and Staffordshire County Council are in progress on building the required school. The Council consider that the SoCG is the key evidence for consideration on the sites position within the trajectory as well as the information held at the base date of 31 st March 2023.