



FORMAL CORRECTION REQUEST: Baseline Calculation for Application 25/01485/OUTM

To: Gemma Hill (Senior Policy and Strategy Officer)

CC: Chris Brewerton (Planning Policy); Gillian Pinna-Morrell (Case Officer)

Dear Gemma,

Thank you for your consultee comments dated 2 January 2026 regarding the Bloor Homes application at Coulter Lane.

Upon review of your comments, we wish to flag a significant technical discrepancy regarding the **Affordable Housing Baseline** used to calculate the "Golden Rule" requirements under the **NPPF 2026**.

The Policy Conflict: In your comments, you cite **Policy H2** and the **AMR 2024** to set a baseline of **28%**. However, later in your same response, you cite the **HEDNA 2025** as the current evidence base for housing needs and mix recommendations.

The Statutory Requirement (NPPF Paragraph 157): The 2026 NPPF is explicit: for Green Belt release via the "Grey Belt" mechanism, the 15% affordable housing uplift must be applied to the **"highest existing affordable housing requirement which would otherwise apply."**

1. **HEDNA 2025 Evidence:** This document (which you have cited as the current standard for need) identifies a required baseline of **35%**.
2. **AMR 2024 / Policy H2:** This cites a baseline of **28%** based on the 2015 Local Plan.

Under the "Highest Requirement" mandate of Paragraph 157, the **35% baseline** must take precedence over the 28% figure.

The Resulting Deficit:

- **Council's Current Calculation:** $28\% (\text{AMR}) + 15\% (\text{Uplift}) = 43\%$
- **NPPF Statutory Requirement:** $35\% (\text{HEDNA}) + 15\% (\text{Uplift}) = 50\%$

By applying the 28% baseline, the Council is permitting a **7% shortfall**, resulting in the loss of **18 affordable units** specifically intended for the Burntwood community. Furthermore, as the "Golden Rules" are not being met based on the highest evidence, the site fails to qualify for the Paragraph 155 "Grey Belt" exception.

Our Request: We request that the Housing Strategy team issues a **correction to their consultee comments** to reflect that the **HEDNA 2025 (35%)** is the "highest existing requirement" and that the mandatory target for this site must be **50%**.

We look forward to your response on this matter of policy soundness.

Best regards,

Burntwood Action Group