

Public Document Pack



Simon W. Baker B.Ed MBA MISPAL
Chief Executive

COUNCIL ASSEMBLY AGENDA

Date: Wednesday, 8 March 2017

Time: 6.30 pm

Venue: The Council Chamber, Moorlands House, Leek

28 February 2017

1. Apologies for absence, if any.
2. Urgent items of business, if any (24 hours notice to be provided to the Chairman).
3. Declarations of interest:
 - (a) Disclosable Pecuniary Interests
 - (b) Other Interests
4. To suspend Council Procedure Rules of Debate in accordance with Rules 30.3 and 26 of the Council Meeting Procedure Rules.
5. Local Plan Housing and Employment Development Requirements (**Pages 3 - 494**)

SIMON BAKER
CHIEF EXECUTIVE

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STAFFORDSHIRE MOORLANDS DISTRICT COUNCIL

Report to Council Assembly

8 March 2017

TITLE:	Local Plan Housing and Employment Development requirements
PORTFOLIO HOLDER:	Councillor Wain – Portfolio Holder for Planning, Development & Property
CONTACT OFFICER:	Pranali Parikh – Regeneration Manager
WARDS INVOLVED:	All areas outside of the Peak District National Park

Appendices Attached

Appendix 1 - Staffordshire Moorlands Strategic Housing Market Update Report

Appendix 2 – Staffordshire Moorlands Employment Land Review Update Report

Appendix 3 – Initial Sustainability Appraisal Report – Appraisal of alternative development requirements

Appendix 4 – Consultation responses regarding Preferred Options housing requirement as published in April 2016

Appendix 5 - Consultation responses regarding Preferred Options employment requirement as published in April 2016

Appendix 6 – Development requirement options analysis

1. **Reason for the Report:** To consider and agree appropriate housing and employment development requirements for the emerging Staffordshire Moorlands Preferred Options Local Plan.

2. **Recommendation**

2.1 That Councillors consider the background evidence and subsequent analysis referred to in this report and accompanying appendices.

2.2 That Councillors support the recommended housing and employment land development requirements for consultation purposes for the Local Plan Preferred Options as set out in Chapters 3 and 7.

3. **Executive Summary**

3.1 The adopted Core Strategy makes a commitment to undertake an early and comprehensive review of the plan for the period 2016 – 2031 to take account of longer term development requirements. The review of the Core Strategy would also roll it forward into a single local plan combined with site allocations.

3.2 An objectively assessed need for housing in the range of 235 to 330 homes per year has been identified in an updated assessment published in February 2017. However, an annual affordable housing need of up to 432 has also been identified. An assessment of employment land requirements concludes that 13ha to 27ha of land is required to meet the needs of the district up to the year 2031.

3.3 This report provides an assessment of the relevant evidence, national policy and guidance to recommend housing and employment land requirements to be taken forward into the Preferred Options Local Plan consultation. Other elements of the Preferred Options Local Plan, including site allocations will be considered in June.

3.4 It is recommended that an annual housing requirement of 320¹ homes per year (close to combined jobs growth scenario) is taken forward into the Preferred Options Local Plan on the basis that the scenario:

- Most closely accords with the housing policy set out in the NPPF as it fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build
- Supports the provision of approximately 870² additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with to Paragraph 21 of the NPPF
- With a pro-active approach to delivery taken by the Council, is “aspirational, but realistic” when considered in the context of an historic average delivery rate of 178 homes per year
- Is deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity

¹ 4800 gross over the plan period 2016 to 2031 and 5440 gross from the base date of the assessment - 2014

² Total workforce jobs supported under the combined jobs growth + partial catch up scenario. The recommended Preferred Option requirement (320 per year) is likely to support the delivery of slightly fewer jobs than if the full scenario housing figure was met (329)

- Is consistent with the requirement agreed by the Council in 2016. The majority of sites required for this level of development were not found to give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park
- Provides a balanced range of social, economic and environmental effects as set out in the Sustainability Appraisal the most consistent with the four aims of the Corporate Plan (2015-2019) when read as a whole

3.5 An employment land requirement of approximately 27ha is recommended up to the year 2031 for the Preferred Options Local Plan on the basis that:

- It is at the top of the OAN range for employment and so closely corresponds with the proposed housing requirement to support sustainable development
- Provides the greatest scope for business growth and wider economic benefits as identified in the Sustainability Appraisal
- There is a sufficient supply of suitable sites to accommodate this level of development
- This option is more closely aligned with the Government's economic aspirations as set out in the NPPF and the recent Industrial Strategy

4. **How this report links to Corporate Priorities**

4.1 The establishment of housing and employment development requirements will have implications for all four aims of the 2015-2019 Corporate Plan. The analysis provided in this report sets out the potential implications of the development requirement options for each of the four aims, namely:

Aim 1 -To help create a safer and healthier environment for our communities to live and work

Aim 2 - To meet our financial challenges and provide value for money

Aim 3- To help create a strong economy by supporting further regeneration of towns and villages

Aim 4 - To protect and improve the environment

5. **Options and Analysis**

5.1 Option 1 – (recommended). The housing and employment land requirements as recommended in Chapter 7 are taken forward into the Preferred Options Local Plan for consultation purposes. This option is considered to accord with relevant national policy, guidance and the Council's evidence base.

5.2 Option 2 – (not recommended). This option relates to a decision being taken by the Council to support housing and employment

development requirements lower than those recommended. This option is not supported as it is not considered that lower levels would not support a sufficient degree of employment growth. Consequently, there would be a higher risk that the Local Plan would be found “unsound” at examination.

- 5.3 Option 3 – (not recommended). This option relates to a decision being taken by the Council to support housing and employment development requirements higher than those recommended. This option is not supported as it is considered that, on the basis of current evidence, there are more likely to be significant adverse impacts and issues relating to deliverability.

6. Implications

6.1 Community Safety - (Crime and Disorder Act 1998)

None direct

6.2 Workforce

Highlighted in the report

6.3 Equality and Diversity/Equality Impact Assessment

This report has been prepared in accordance with the Council's Diversity and Equality Policies.

6.4 Financial Considerations

Highlighted in the report

6.5 Legal

The Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and the Town and Country Planning Regulations 2012 set out the requirements for the preparation of the Local Plan. The implications of various court judgements in setting the objectively assessed housing need are considered in the report. The Self-Build and Custom Housebuilding Act 2015 places a duty on councils to keep a register of individuals and community groups locally who want to acquire land for self-build homes and to have regard to these registers in carrying out its planning function.

6.6 Sustainability

A Sustainability Appraisal of potential development requirements has been undertaken (Appendix 3). Its findings are discussed in

this report.

6.7 Internal and External Consultation

A six week period of public consultation will be undertaken Local Plan Preferred Options. This will be subject to the approval of development requirements as considered in this report and separate approval of Local Plan sites and policies at later Council assembly meeting. This is scheduled for June.

6.8 Risk Assessment

If the Council supports a housing development requirement which is below that recommended in Section 5, this may increase the risk that the Local Plan will be found “unsound” at Examination. This risk will be minimised, but not eliminated, if the Council decides to support the option recommended in Section 5. The recommended Preferred Options development requirements are considered to be aspirational but realistic. However, they do come with a higher risk that a five year housing land supply is not maintained due to under delivery. This risk also applies to the new Housing Delivery Test as set out in the Housing White Paper. This risk should be mitigated if the Council commits to a pro-active approach to facilitating the delivery of housing sites.

7. **Background and Detail**

Background

- 7.1 The Staffordshire Moorlands Core Strategy was adopted in March 2014. The plan identified a housing requirement of 300 homes per year and an employment land requirement of at least 24ha over the period 2011 to 2026. However, the Inspector determined that an early and comprehensive review of the Core Strategy for the period 2016 – 2031 would be required to take account of longer term development requirements. The review of the Core Strategy would also roll it forward into a single local plan combined with site allocations.
- 7.2 In March 2016, the Council agreed new housing (320 homes per year) and employment (35ha over the plan period) development requirements for consultation purposes. The Preferred Options Sites and Boundaries consultation was subsequently published in April 2016. The responses submitted to this consultation in relation to the proposed housing and employment land requirements are considered later in this report.
- 7.3 The development requirements as agreed in March 2016 were based on the evidence available at the time, including the Strategic Housing Market Assessment (2014), Partial SHMA Update (January 2016) and Employment Land Review (2014). Since then, the Department for Communities and Local Government has issued new household

projections for the District which are the starting point for identifying the objectively assessed need for housing. New employment projections following the EU Referendum are also now available. Furthermore, on 7 February 2017, the Government published the long awaited Housing White Paper which sets out its policy aspirations to fix the country's "broken housing market". The proposals in the White Paper are subject to consultation.

7.4 Accordingly, this report seeks to review the preferred housing and employment related development requirements for the new Local Plan which will cover the period 2016 to 2031. Account should be taken of:

- Government policy and guidance, including the potential implications of emerging proposals set out in the Housing White Paper
- Evidence in relation to the objectively assessed need for housing and employment, including relevant case law
- Evidence regarding land supply and development capacity
- Consultation feedback on the previously agreed housing and employment land requirements

7.5 Once the development requirements have been agreed, this information will inform the allocation of sufficient sites to meet these requirements in the Preferred Options Local Plan. A decision on the allocations is due to be taken by the Council in June with a view to commencing a six week period of public consultation on a Preferred Options Local Plan shortly afterwards.

7.6 In setting future development requirements for the district, the Council may exercise its policy choice. However, crucially, it must also follow relevant national policy as set out in the National Planning Policy Framework, its related guidance and other evidence. These matters are discussed below.

Policy context

7.7 With regards to the policy framework for preparing Local Plans, Paragraph 182 of the National Planning Policy Framework (NPPF) states that Local Planning Authorities are required to submit a Local Plan for examination that is considered to be "sound" – namely that it is:

- ***“Positively prepared*** – *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities which it is reasonable to do so and consistent with achieving sustainable development;*
- ***Justified*** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- ***Effective*** – *the plan should be deliverable over its period and based on*

- *effective joint working on cross-boundary strategic priorities; and*
- **Consistent with national policy** – *the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.”*

7.8 In order for the Local Plan to be recommended for adoption by the Secretary of State, it must all be found to be legally compliant in terms of the relevant statutory requirements for undertaking a Local Plan. These include compliance with the Duty to Co-operate, the preparation and consideration of a Sustainability Appraisal of the plan, and compliance with consultation procedures as set out in the Council’s Statement of Community Involvement and regulations.

7.9 Paragraph 14 of the NPPF is a critical element of national planning policy both in relation to the preparation of Local Plans and in determining planning applications. As such, in order to pass the tests of soundness, it is essential that Local Planning Authorities to comply with its requirements. In relation to plan-making, the paragraph states that:

*“At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision taking.*

For plan-making this means that:

- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted³”*

7.10 Paragraph 154 states that *“Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change.”*

7.11 In relation to housing, Paragraph 47 of the NPPF goes to state that:

“To boost significantly the supply of housing, local planning authorities should:

- *use their evidence base to ensure that their Local Plan meets the*

³ *“For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or*

designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.”

full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period

- *identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land...*

- 7.12 A clear understanding of the objectively assessed need for housing is therefore a key element of the evidence base to support a Local Plan. This need should then be met in full unless the Council has other supporting evidence to demonstrate that to do so would conflict with wider policies in the NPPF. In this context, it is important to acknowledge that whilst a Local Plan may take account of development constraints in establishing its planned level of housing provision, the objective assessed need for housing cannot be influenced by such matters. Once the objective housing needs have been established, a balancing exercise may therefore be required by the Council to demonstrate that the adverse impacts of meeting the objectively assessed need for housing in full would *“significantly and demonstrably outweigh the benefits...”*. These requirements have been borne out in the High Court⁴ where the need to firstly identify full objectively assessed need for housing and then define a strategy which seeks to meet it, consistent with the Framework has been confirmed.
- 7.13 Paragraph 47 of the NPPF also makes it clear that deliverability of housing requirement in a Local Plan is critical. A rolling five year supply of housing land in line with the established requirement is required. If the Council is unable to demonstrate a five year supply, the “presumption in favour of sustainable development” applies in the determination of planning applications. Essentially, relevant Local Plan policies are considered out of date and national policy applies. This is not desirable as that Council has less influence over decision making on planning applications than would otherwise be the case.
- 7.14 The objectively assessed need for housing is often established through a Strategic Housing Market Assessment (SHMA). Paragraph 159 of the NPPF states that local planning authorities should:
- *“prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where*

⁴Gallagher Homes Limited and (2) Lioncourt Homes Limited v Solihull Metropolitan District Council [2014] EWHC 1283'

housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- *meets household and population projections, taking account of migration and demographic change;*
- *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and*
- *caters for housing demand and the scale of housing supply necessary to meet this demand...*

- 7.15 National Planning Practice Guidance issued by Government supplements the NPPF. In relation to establishing objectively assessed housing needs, it states that the household projections issued by the Department for Communities and Local Government (DCLG) should be the starting point. The guidance goes on to state that the projections are trend based and that that may require an upward adjustment when calculating needs to reflect market conditions:

“The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply” (NPPG, Reference ID: 2a-016-20150227)

- 7.16 With this in mind, a further uplift to housing needs calculations may be needed in addition to those provided to reflect market signals.

- 7.17 On a related note, the NPPG also requires that affordable housing needs should be:

“...considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.” (Reference ID: 2a-029-20140306)

- 7.18 In essence, the Council must consider the scope to meet affordable housing needs by increasing its overall housing requirement in the Local Plan. The importance of this approach has also been confirmed in the

High Court⁵. It is with these policy requirements in mind that the Council completed a Strategic Housing Market Assessment (SHMA) in 2014 and has subsequently commissioned updates to the objectively assessed need for housing in light of new information. The 2014 SHMA and related update published in February 2017 are discussed later in this report. Whilst the SHMA and recent update apply current national policy and guidance as outlined above, at present, there is no standard methodology that should be applied in the determination of the objectively assessed need for housing.

7.19 In terms of employment and the economy, the NPPF aims to support a strong and competitive economy. Paragraph 21 states that “...*local planning authorities should set out a clear economic vision and strategy for their area which positively encourages sustainable economic growth*”. Paragraph 161 goes on to require local planning authorities “*to assess the need for additional land or floorspace for economic development over the plan period.*” Accordingly, the Council completed an Employment Land Requirement Study in July 2014. A recent update to this study was published in February 2017. The detail of the update is considered later in this report.

7.20 In terms of setting employment land requirement for Local Plans, the NPPG requires housing and employment land requirements to dovetail. It states that:

“Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems.”
(Reference ID: 2a-018-20140306)

7.21 Given the above, it is clear that the Government expects Local Plans to address economic issues, not only through the provision of sufficient employment land, but also through sufficient housing and infrastructure. This is particularly the case in areas where the working age population is projected to decline as in Staffordshire Moorlands.

Housing White Paper

7.22 The recent Housing White Paper sets out potential changes to Government policy. Subject to the outcome of a current consultation on the White Paper, an update to the NPPF may be issued at a later date. As such, the proposals have yet to be formally enshrined in national policy. However, the White Paper provides a clear indication of the Government’s direction of travel on housing and planning matters and is therefore considered in this report.

⁵ Satnam Millennium Ltd vs Warrington District Council [2015] EWHC 370

- 7.23 The overall aim of the White Paper is to fix the country’s “broken housing market” by boosting the supply and mix of housing to address the ongoing housing shortage and worsening affordability which has led to both economic and social problems. Proposals to address the issues are set out under four overarching steps, namely; planning for the right homes in the right places, building homes faster, diversifying the market and helping people now.
- 7.24 The White Paper re-iterates the existing proposals being advanced through the Neighbourhood Planning Bill to ensure that up to date Local Plans are put in place. When necessary, Government may intervene to ensure that plans are put in place, so that communities in the areas affected are not disadvantaged by unplanned growth. New powers proposed in the Neighbourhood Planning Bill will strengthen the Government’s ability to do so.
- 7.25 Proposals of relevance to the Local Plan include:
- A proposal to consult on a **standard methodology for the calculation of the objectively assessed need for housing**. By April 2018, it is proposed that new methodology should be applied to calculate the five year housing land supply and as the benchmark for housing delivery. It is intended that a standard approach would provide a more transparent and consistent approach across the country. Council’s that do not apply the new methodology will need to justify why. Whilst the methodology has yet to be published, it will be informed by the recommendations of the Local Plan Expert Group (LPEG). LPEG was established by Government to review the plan making process and identify measures for improvement. Recommendations included a standard methodology for calculating housing needs which includes a streamlined approach for considering the implications of market signals and affordability when compared to the existing guidance noted earlier in this report.
 - Increased emphasis on the need to deliver against housing requirements through a **newly proposed housing delivery test**. Housing delivery will be measured using the National Statistic for net additional dwellings over a rolling three year average. From November 2017, if delivery of housing falls below 95% of the authority’s annual housing requirement, it is proposed that Councils should publish an action plan setting out how delivery will be achieved. By the same date, if delivery of housing falls below 85% of the housing requirement, authorities would in addition be expected to plan for a 20% buffer on their five-year land supply. Varying thresholds are then applied to this test up to the year 2020.
 - Re-emphasis on the need to **protect Green Belt and only to release land in “exceptional circumstances”**. This requirement exists in current national policy but further clarity is now given on

how exceptional circumstances may be demonstrated. Councils must demonstrate that there are no other reasonable alternatives before committing to Green Belt release. This can include consideration of brownfield sites, making use of surplus land, regeneration of housing estates, optimising the density of development and exploring the scope for development in neighbouring areas. Where Green Belt release is proposed, the loss should be offset by improvements to the environmental quality or accessibility of the remaining Green Belt land.

- 7.26 The implications of the proposals in the Housing White Paper and the LPEG recommendations on calculating the objectively assessed need for housing are discussed later in this report.

Industrial Strategy Green Paper

- 7.27 The Housing White Paper makes it clear that the provision of housing is critical to the success of the Government's new Industrial Strategy published in January 2017. The aim of the strategy is to "*improve living standards and economic growth by increasing productivity and driving growth across the whole country*".

Evidence

Housing needs

- 7.28 The **2014 Staffordshire Moorlands SHMA** assessed the extent of the local housing market and its characteristics. It also provided an assessment of the need for market and affordable housing. Key conclusions included:
- The objectively assessed need (OAN) for housing Staffordshire Moorlands was within the range of 260 to 440 homes per year. The bottom end of the range related to demographic needs (population and household growth). The top end of the range related to economic projections (jobs growth supported by inward migration).
 - The need for affordable housing was deemed to be 707 (gross) over the next five years. This includes newly arising needs and clearing the backlog of demand over a five year period. 172 homes a year for five years are required to clear the backlog. Affordable housing needs are calculated on a different evidential basis from the wider housing requirement with the emphasis being on the ability of a household to pay rather than demographic and economic projections. This can explain the apparent discrepancy between the identified OAN range and affordable housing needs.
 - Staffordshire Moorlands district is not a self-contained housing market area. The housing market overlaps with parts of Stoke-on-Trent. Work with Stoke on Trent City Council under the Duty to Co-operate on meeting housing needs may therefore be required.

- 7.29 In order to take account of the latest household projections issued by Government (2014-based), Planning Inspector's reports and High Court judgements (as highlighted in this report), new population and unemployment data, the **Staffordshire Moorlands SHMA Update (Appendix 1) was issued in February 2017**. This report supersedes previous updates issued in 2015 and 2016. As the most up to date evidence regarding housing needs, the 2017 assessment is a key consideration in establishing the Local Plan housing requirement.
- 7.30 As with the SHMA, the update appraised a variety of demographic and economic based scenarios. The latest 2014-based household projections are taken as the starting point with adjustments made as required following an updated review of market signals and consideration of new employment projections for the District. Employment projections sourced from both Oxford Economics and Experian are considered alongside a combined set of projections that averages jobs growth in each sector between the two data sources (see report para. 7.84 and Appendix 2, Table 4.8 for further details). The update report also revises affordable housing needs taking account of the Housing Register. The update covers the period 2014 to 2031 with separate figures also provided for the period 2014 to 2033 so that the Council has existing available evidence to inform development requirements in the event that the plan period is extended. 2014 is used as the start of the projection period as this is the base date for the 2014-based household projections.
- 7.31 The SHMA Update also refers to the potential implications of the LPEG recommendations for the methodology for calculating the objectively assessed need for housing. Consideration is also given to the need for Self-Build and Custom-Build housing developments.
- 7.32 The demographic scenarios (A – Eb) use the components of population change (births, deaths and migration) to project future population change. The economic – led scenarios (F – Ia) were assessed to identify how much additional housing may be needed to take account of employment growth, over and above demographic needs. Further details of the scope of each scenario are provided in Appendix 1.
- 7.33 The update report provides details of the projected population change, jobs growth and associated annual housing requirement for each of the scenarios tested. An extract from the report with corresponding details is provided below:

	February 2017 SHMA						Previous January 2016 SHMA Update
	Population Change	Job Growth	Dwellings 2014-2031	p.a.	Dwellings 2014-2033	p.a.	Dpa 2014- 2031
A. Baseline			2,898	170	3,127	165	181
Aa. Baseline + PCU	2,239	-1,637	3,258	192	3,525	186	199
Ab MYE + PCU	2,567	-1,579	3,331	196	3,610	190	205
B. Natural Change	-3,838	-3,802	272	16	118	6	41
C. Zero Net Migration	-2,493	-2,695	-374	-22	-556	-29	7
D. Long Term Migration			2,369	139	2,450	129	136
Da. Long Term Migration +PCU	1,022	-2,220	2,721	160	2,838	149	-
E. OE Job Growth	7,238		4,744	279	4,993	263	398
Ea. OE + Reduced Commuting	2,713	339	3,061	180	3,282	173	329
Eb. OE + PCU	7,238		5,135	302	5,425	286	-
F. Job Stabilisation			4,398	259	4,774	251	290
Fa. Job Stabilisation +PCU	6,339	0	4,787	282	5,205	274	-
G. Past Trends			7,146	420	7,893	415	290
Ga. Past Trends +PCU	13,697	3,038	7,584	446	8,383	441	-
H. Experian Job Growth			5,655	333	6,227	328	-
Experian Job Growth + PCU	9,705	1,400	6,067	357	6,688	352	-
I Combined Job Growth			5,199	306	5,608	295	-
Ia. Combined Job Growth + PCU	8,471	870	5,601	329	6,054	319	-
Affordable Housing Needs				679 / 1,309		679 / 1,309	-

Table 1: Summary of housing scenarios (2014 to 2031 and 2014 to 2033)

- 7.34 Table 1 demonstrates that as with the 2014 SHMA, the demographic scenarios would lead to lower population increases (or even decreases) from current levels. All demographic scenarios would also lead to a decline in the number of jobs available in the District. This is due to a contraction in the labour supply (people of working age) within the District related to the relatively modest levels of housing provision. Conversely, the economic scenarios indicate higher levels of population growth with corresponding levels of jobs growth or stabilisation. The higher levels of housing growth under these scenarios support the economy by enabling inward migration of people of working age to offset the decline of the labour force.
- 7.35 In line with the NPPG, the update report includes an uplift to the demographic scenarios of 10% to reflect market signals, namely the worsening affordability ratios. A further 10% uplift is then added to reflect the fact that the affordable housing need is high (see following table) as required by the NPPG, Inspector's reports and legal cases. The corresponding implications for these uplifts for the OAN are identified below:

	Dwellings per annum (2014-2031)
Demographic Starting Point	170 dpa
Adjustments to Demographic-led Needs	196 dpa
Uplift for Market Signals	216 dpa
Employment Led Needs	329 dpa
Affordable Housing Needs (@33% delivery)	679 – 1,309 dpa
Uplift to demographic led needs for Affordable Housing (@10%)	238 dpa
Full Objectively Assessed Needs (rounded)	235 dpa – 330 dpa

Table 2: OAN incorporating uplifts (2014-2031)

- 7.36 Having reviewed the scenarios, the SHMA Update recommends a **new OAN range of 235 to 330 homes per year to the year 2031**. The bottom of the range (235) relates to the demographic needs plus a 10% uplift to reflect market signals and a further 10% to respond to the high level of affordable housing need. The top of the range (330) relates to the level of housing growth required to support the projected increase in jobs. Jobs growth is supported by the higher level of housing growth as it enables a higher level of inward migration of working age people from neighbouring areas. Natural population change in the District is largely driven by an increase in the elderly population.
- 7.37 Broadly in the middle sits the job stabilisation scenario which sets out the number of new homes per year required to maintain the number of jobs in the District at current levels plus an adjustment or “partial catch up” (PCU). The adjustment increases the housing need to reflect a desirable uplift in household growth amongst 15-34 year olds to 2008 levels. There has been a decline in household growth amongst the younger population since then, largely due to the recession and continued economic constraints which have prevented younger people from establishing a home of their own.
- 7.38 In terms of affordable housing needs, the SHMA Update reviews the Housing Register as of October 2016 and current supply of affordable housing to identify a net backlog of 408. An assessment of likely newly arising affordable housing needs over the plan period is then undertaken to identify **a net annual need for affordable housing of 224 to 432 homes per year**. The lower figure of 224 would apply if allowances are made for a deposit and/or a greater proportion (35%) of income is spent on renting a property.
- 7.39 The new OAN range and affordable housing needs are lower than all those previously recommended as summarised in the table below:

Table 3: Recommended housing OAN and affordable housing requirements to up the year 2031⁶

Study	Date	Affordable housing needs per year	OAN range (homes per year)
SHMA	April 2014	250 to 707	260 to 440
SHMA Update	January 2016	As above	250 to 440
SHMA Update	February 2017	224 to 432	235 to 330

7.40 The decline in the OAN can largely be attributed to two factors:

- The latest household projections have fallen by around 11 homes per year (scenario A)
- The latest employment forecasts from Oxford Economics have fallen following the EU referendum. This results in fewer homes being required to support the projected increase in jobs.

7.41 The report goes on to provide advice on how the OAN should be considered against the NPPF:

“If the Council were to pursue a figure significantly lower than 330 dpa whilst also planning for a level of annual job growth or even job stabilisation, it would need to justify how it would mitigate or avoid the adverse housing, economic and other outcomes that a lower-growth approach would give rise to. It would also need to evidence how the adverse impacts of meeting housing need would ‘significantly and demonstrably outweigh the benefits’ [Framework §14] as well as make provision, through the duty-to-cooperate, for those needs to be met in full elsewhere within the wider HMA.” (Appendix 1, para 8.10)

7.42 Furthermore, in considering how to translate the OAN into a future housing requirement, to be included in the emerging Local Plan, the SHMA Update recommends that the Council should take the following into account:

- The need to support an appropriate level of economic growth;
- The need to provide for a better balance between jobs and population to reduce the need to travel;
- The impact that increasing in-migration to Staffordshire Moorlands could have on the surrounding areas;
- That a level below 260 homes per year is likely to lead to a continued decline in the local economy;
- That delivery above purely demographic (196 homes per year) is likely to be needed to ease the issues related to increasing house prices and worsening affordability

⁶ Separate recommendations are also made for the period up to 2033.

- The need for affordable housing. In line with the Practice Guidance, the Council should consider if a further uplift in overall housing delivery is required to help meet affordable housing needs given that the need for affordable housing (up to 432 a year) exceeds to the top of the OAN range (330);
- The ability of the District's housing market to support new housing delivery

7.43 Accordingly, the merits of the respective housing scenarios as potential Local Plan housing requirements are discussed in later this report. This includes the extent to which affordable housing needs can be accommodated and “supply side” factors such as the supply of developable land and related constraints.

7.44 The **Self-Build and Custom Housebuilding Act 2015** places a duty on councils to keep a register of individuals and community groups locally who want to acquire land for self-build homes and to have regard to these registers in carrying out its planning function. A self-build project is defined as a situation whereby a house is designed and constructed to the specifications of the person who is going to live there.

7.45 Online searches undertaken as part of the SHMA Update indicate a low level of interest in Self Build in the District with only two specific requests made via the “Build a Plot” system. However, separate analysis of the Council's Self Build Register reveals that **21 individuals/organisations have registered their interest in developing 48 Self Build plots in the District**. This identified need for housing is captured in the overall assessment of housing needs identified above. However, the Council will need to consider how to meet this need and future arising demand and develop the Local Plan accordingly. This could include policy support for Self-Build / Custom-Build and the identification of specific sites or proportions of sites for such purposes.

7.46 The SHMA Update provides an initial view on the **possible implications of the Housing White Paper on the OAN** based on the recommendations of the Government appointed Local Plan Expert Group (LPEG). LPEG recommended a simplified and streamlined approach to estimating housing needs which may result in less of an uplift being required to address market signals and the removal of economic factors in calculating OAN. Instead, economic factors could be a policy choice of the Council. The SHMA Update therefore concludes that if the LPEG recommendations were carried in to the new methodology, the objectively assessed need for housing would possibly fall towards the lower end of the current recommended range.

Housing land supply

7.47 **The Strategic Housing Land Availability Assessment (SHLAA)** published in July 2015 provides an indication of the potential supply of land for housing development. The assessment found:

- A supply of land for 2,628 homes within the next five years (completions and commitments) - 80% on brownfield, conversion or partial brownfield sites and 81% within the urban area
- A potential supply of land for 11,406 homes within six to fifteen years - 14% on brownfield, conversion or partial brownfield sites and 24% are within urban areas
- A total potential supply of land for 14,029 homes
- These conclusions did not take account of the implications of policy constraints such as Green Belt.

7.48 The SHLAA went on to compare the potential supply of housing land against the housing requirement and spatial distribution of housing as set out in the adopted Core Strategy. It found that there was more than double the supply of sufficient potential housing sites to meet the 6000 (300 per year) housing requirement in the Core Strategy. However, as stated above, this does not take account of policy constraints, nor more detailed site specific consultation feedback. The NPPG makes it clear that *“it is for the development plan itself to determine which of those sites are the most suitable to meet those needs”* (ID: 3-003-20140306).

Area	Amount	Required Provision	Completions and Commitments	Additional Developable Large SHLAA sites	Total Potential Supply
Leek	30%	1,800	1,090	2,716	3,806
Biddulph	20%	1,200	386	1,710	2,096
Cheadle	22%	1,320	285	3,428	3,713
Rural	28%	1,680	862	3,552	4,414
Total		6,000	2,623	11,406	14,029

Table 4: SHLAA potential land supply and Core Strategy requirements (300 homes per year)

7.49 The **Preferred Options Sites and Boundaries consultation** held during the Summer of 2016 used the SHLAA and feedback from the 2015 Options consultation as the basis for identifying sites. This work identified a sufficient supply of housing land to support a development requirement of 320 homes per year (4158 net additional homes up to the year 2031).

7.50 The full implications of consultations responses on the Preferred Options sites are being finalised ahead of the consideration by the Council of the Preferred Options Local Plan sites in June 2017. This includes the

consideration of further sites that were suggested during the consultation and wider policy constraints such as Green Belt. Further Focus Groups will be held with Councillors to discuss potential site allocations ahead of a decision on the Preferred Options Local Plan.

- 7.51 However, on the basis of the current analysis of the issues raised at consultation, it is still considered that there is more than a sufficient supply of potential housing land to meet the Core Strategy housing requirement. This information may be subject to change following further consultation and the consideration of new evidence relating to the suitability of sites.

Infrastructure

- 7.52 The **Infrastructure Plan** prepared in 2012 identified the infrastructure necessary to deliver the development requirements of the Core Strategy. This plan drew on the findings of the **Development Capacity Study** prepared in 2011 which considered the capacity of settlements to support development in terms of the availability of services and infrastructure. The two documents combined supported the level of development set out in the Core Strategy (300 homes per year and at least 24ha of employment land) by utilising existing infrastructure or providing additional provision where needed.
- 7.53 An **Infrastructure Delivery Plan (IDP) Baseline Report** has been prepared on behalf of the Council as part of the ongoing assessment of the viability and deliverability of the Local Plan. The reports draws upon feedback from infrastructure providers based upon the level and distribution of housing and employment growth as envisaged in the adopted Core Strategy.
- 7.54 The overall conclusion of the IDP Baseline Report is that is broadly that the level and distribution of growth as identified in the Core Strategy can be supported by current and planned infrastructure.
- 7.55 Schemes are identified which align with the spatial distribution of growth proposals in the Core Strategy and there are no significant constraints to the level of growth proposed. The IDP will evolve to more closely reflect the Local Plan as it progresses.
- 7.56 The IDP identifies a number of potential interventions to support growth. These are summarised as follows:
- In Leek - the potential interventions relate to transport, education and health. These include new link and access roads for sites, additional school provision and potential expansion of GP surgeries.
 - In Biddulph - the potential interventions relate to transport, education, management of flood risk, recreation and health. These include improved

bus and cycle services, greater primary, middle and high school provision, increased measures to prevent surface water flooding and new facilities for young people.

- In Cheadle – the potential interventions relate to transport, education and recreation. These include a potential link road, improved connectivity to Blythe Bridge (subject to a separate assessment), greater primary and high school provision and new park and play space.
- In the Larger Villages within rural areas - the potential interventions relate to transport, management of flood risk and community and cultural. These include additional parking at Blythe Bridge station, diverting watercourses around Lower Tean and Brown Edge and securing the transition of libraries in Blythe Bridge and Werrington to community management.

7.57 Whilst the existing evidence indicates that a housing requirement broadly consistent with the Core Strategy could be supported in terms of infrastructure, infrastructure constraints and delivery requirements will become more challenging if plans for growth are significantly increased.

Viability and Deliverability

7.58 The ongoing **Development Capacity, Viability and Community Infrastructure Levy Study** has assessed a sample of site options in terms of their economic viability. This factors in the potential future value of property set against development costs such as land, construction and developer contributions and other requirements of planning policy. The work to date concludes that the majority of sites are financially viable. Greenfield sites are generally found to be more viable than brownfield. However, relaxation of developer contributions may be required on some sites where viability is marginal.

7.59 It should also be noted that the volume of sales and property values are relatively low when compared to neighbouring areas such as Cheshire East and Stafford Borough. This is also reflected in the Council's own housing monitoring data which reveals that an average of 178 homes (gross) have been completed a year in Staffordshire Moorlands between 2006/7 and 2015/16. This again is comparatively low.

7.60 This information is indicative of a relatively slow housing market in the District. This should be taken into account when establishing the Local Plan housing requirement as the NPPF requires plans to be "*aspirational but realistic*". As highlighted earlier in this report, housing delivery when measured against requirements is a key focus of the NPPF with Local Plans running the risk of being considered out of date if a five year housing land supply cannot be demonstrated. The Housing Delivery Test set out in the Housing White Paper also brings this issue into sharp relief even further. In establishing the Local Plan housing requirements, it is important to reflect on this matter.

Green Belt

- 7.61 A **Green Belt Review** was completed in November 2015. The review considered the scope to release land from the Green Belt by appraising sites against the purposes of the Green Belt as set out in the NPPF. Its findings informed the selection of 2016 Preferred Options allocations. The study concluded that generally the extent of the Green Belt should be retained. However, several areas were identified as suitable for release from the Green Belt in exceptional circumstances through a Local Plan review as required by the NPPF. Land that could be released in exceptional circumstances was identified in numerous locations; including Biddulph, Cheadle, Blythe Bridge and Forsbrook, Endon, Cheddleton and clusters elsewhere in the district. This information has informed the current estimated potential capacity as identified above.
- 7.62 In response to feedback from the 2016 Preferred Options Sites and Boundaries consultation, additional sites in the Green Belt were assessed in September 2016 using the same methodology as the November 2015 report. This update identified additional sites that might be suitable for release, subject to exceptional circumstances in Werrington, Cheddleton, Biddulph, Biddulph Moor and Endon.
- 7.63 The November 2015 study clarified that “exceptional circumstances” may include the need to release suitable land from the Green Belt to assist in meeting housing needs:
- “...the NPPF is equally clear that Local Plans should meet objectively assessed needs... unless specific policies ... indicate development should be restricted. The Planning Inspectorate in emphasising the role of robust evidence to underpin local plans, has increasingly identified the importance of a comprehensive Green Belt review in this process. For example, the Inspector’s Report of the Dacorum Core Strategy acknowledged that a comprehensive Green Belt review should be undertaken “in order to ensure that a justifiable balance between meeting housing need and protecting the Green Belt can be secured. Without such comprehensive evidence a robust conclusion on the potential for the identification of additional housing sites, either for the medium/long term (as potential sites within the urban areas decrease) or for beyond the plan period, cannot be satisfactorily drawn”. (Green Belt Review, Para 1.2)*
- 7.64 Furthermore, the adopted Staffordshire Moorlands Core Strategy committed the Council to undertaking a Green Belt Review in order to identify housing allocations following consideration by the Planning Inspector.
- 7.65 However, the Green Belt remains a significant constraint to development in the District with a significant proportion recommended for retention. The recent Housing White Paper also further highlights the need to protect the Green Belt by setting out in more detail how exceptional circumstances may be demonstrated. These new tests have yet to be adopted in the NPPF. More detailed consideration of the implications of the possible new

tests should be given when the Council considers the selection of Preferred Option sites, including a review of potential additional housing sites outside of the Green Belt.

Landscape and Heritage

- 7.66 The **Landscape and Settlement Character Assessment** completed in 2008 identified ten landscape character types across the district and set out the planning implications for development within each of them. Whilst some landscape character types were deemed to be more sensitive to change than others, the assessment did not quantify limits to development potential.
- 7.67 The **Landscape, Local Green Space and Heritage Impact Study** was published on behalf of the Council in August 2016. The study reviewed the Preferred Options sites as agreed in April 2016 plus a sample of other previously considered site options in terms of their landscape and heritage impacts. Where necessary and appropriate, mitigation measures to address identified impacts were recommended.
- 7.68 In landscape terms, of the 117 sites considered, 48 were deemed to be of low sensitivity; 41 were of medium sensitivity; and 28 were of high sensitivity. In heritage terms, of the 117 allocation sites considered, 81 sites would be highly unlikely to affect the settings of designated heritage assets; 32 sites would require an appropriate mitigation strategy as part of the proposed development; and 4 sites could not be developed without substantial heritage impacts.
- 7.69 Where harm is identified, this does not necessarily preclude the scope for development. In such instances, when selecting sites for allocation, the Council will need to carefully consider the harm against the benefits of development under the terms of national policy. However, the study revealed that the majority of sites required for the previously agreed housing and employment land requirements, plus other “reserve” sites that were assessed were not likely to lead to a high level of harm.

Flood risk

- 7.70 A **Strategic Flood Risk Assessment – Level 1 (SFRA)** was completed in October 2015. The vast majority of the district was found to be a low risk of fluvial flooding (Flood Zone 1). Some areas at medium (Flood Zone 2) or high (Flood Zone 3) risk of flooding were identified adjacent to watercourses. The NPPF requires that development is directed towards Flood Zone 1 areas. The majority of Preferred Options sites were in such locations.
- 7.71 Communication with the Environment Agency in light of the Preferred Options Sites and Boundaries consultation has since revealed that more detailed consideration of flood risk matters in relation to sites in the form of

a Level 2 SFRA is not required. On the basis of the evidence, it is not considered that flood risk presents a significant constraint to the overall level of development across the district.

Duty to Co-operate

- 7.72 The 2014 SHMA identified that the housing market area for Staffordshire Moorlands overlapped with Stoke-on-Trent. The Peak District National Park Authority also acts as the local planning authority for parts of the district. Under the terms of the NPPF, if the Council is unable to meet its own housing needs within the district, it should look to work with other local planning authorities within its housing market area to ensure that needs are met in full. However, as highlighted above the NPPF makes it clear that Local Plan should meet the objectively assessed needs...unless the adverse impacts would significantly and demonstrably outweigh the benefits. There is therefore a strong presumption that objectively assessed needs should be met within the district.
- 7.73 Furthermore, should the Council decide upon a course of action that would necessitate the need to co-operate with neighbouring authorities to meet the district's housing need, there is no certainty that this would be achievable. In order for a neighbouring authority to accommodate the unmet needs of another authority, it must be in position to meet its own needs first. Further consideration of the housing market implications may also be required in these circumstances.
- 7.74 Stoke-on-Trent City Council is in the early stages of preparing a joint Local Plan with Newcastle-under-Lyme Borough Council. At this stage, the evidence to support the plan, including the objectively assessed need for housing and a Green Belt Review have yet to be completed. As such, the scope for any unmet development requirements to be provided in the Joint Local Plan area cannot be determined. Nevertheless, it should be noted that no objections have been received in response to the proposed development requirements agreed by the Council in March 2016.
- 7.75 The objectively assessed need for housing identified in this report relates to the whole district of Staffordshire Moorlands, including the Peak District National Park. Accordingly, the Peak District National Park Authority has agreed to the principle of housing completions within the relevant part of the National Park being counted towards the Staffordshire Moorlands Local Plan housing requirement. An allowance for 100 homes to be completed in the Peak District National Park was subsequently made in the Preferred Options Sites and Boundaries consultation on April 2016.
- 7.76 Given the above, it is considered that a housing requirement broadly consistent with the current agreed developments is unlikely to give rise to any Duty to Co-operate concern. However, the selection of a housing requirement significantly above the currently agreed requirements may increase the risk of objections from neighbouring authorities as higher levels of development are more likely to be dependant on higher levels of

net in-migration from such areas. This could conflict with emerging or agreed plans for housing and economic growth elsewhere.

Ecology and Habitats Regulations Assessment

- 7.77 In 2014 the Council commissioned a **Phase 1 Habitat survey** of 228 potential development sites to determine their ecological value. The study was published in July 2015 and has informed the preparation of the Local Plan to date. A further ecological appraisal was prepared in 2016 to carry out a Phase 1 Habitat Survey on Preferred Options sites that had not already been appraised. An assessment of whether sites could potentially merit protection as a local wildlife site has also been undertaken.
- 7.78 The findings are that some limited areas of the sites assessed may warrant some form of protection. However, no over-riding issue has been identified that would prohibit the delivery of the Preferred Options level of growth as agreed in March 2016
- 7.79 An ongoing **Habitats Regulation Assessment** is being prepared alongside the Local Plan. This includes consideration of sites designated under European legislation for their nature conservation value (habitats and species) to determine whether or not significant effects are likely as a result of the Local Plan. If so, the report can suggest ways in which they could be avoided such as policy requirements for mitigation. Work to date reveals that sites in Biddulph and Cheadle are unlikely to have any significant effects given the distance between these settlements and protected sites which are clustered to the north / east of the District (within or close to Peak District National Park) and to the south (Cannock Chase). Parts of the Rural Areas and Leek are closer to the protected sites and so further consideration of any effects and mitigations measures is required. However, this is unlikely to have a significant impact on the overall supply of developable land.

Employment land requirements

- 7.80 The **Employment Land Requirement Study** was completed in July 2014. The study reviewed a range of economic factors, projections relating to the performance of different sectors of the local economy and the working age population. It concluded that 25ha to 45ha of employment land was required for Staffordshire Moorlands for the period 2011 to 2031 (35% for B1a/B1b office, 40% for B1c/B2 industrial and 25% for B8 storage and distribution).
- 7.81 This sought to balance the replacement of some existing B2 stock with aspirations for heightened demand in this sector going forward; the higher growth in B1/b office requirements, the slower decline of the industrial sector and the continuing relatively limited demand of B8 warehousing.
- 7.82 The **Staffordshire Moorlands Employment Land Review Update Report** (Appendix 2) was completed in February 2017. This report updated the findings of the Employment Land Requirement Study in light

of the latest sub-national household projections (2014-based) that also form the basis of the objectively assessed need for housing. Household projection data is critical to employment land requirements as it informs assumptions regarding the future supply of labour.

- 7.83 The Update Report found that the District benefits from a relatively high value manufacturing base with linkages to sector expertise and clusters of businesses. There are a high number of small businesses and entrepreneurialism, combined with strong business survival rates. A highly skilled workforce, combined with the exceptional Peak District landscape and quality of life offer make the authority area an ideal location for knowledge and creative businesses. The visitor economy is a key sector and the local authority area provides a market for Peak District businesses and branded products. This may result in a requirement for B-class uses such as offices for tourism-related business and manufacturing premises for niche food products.
- 7.84 There is a lack of good quality small to medium-sized industrial premises, which is suppressing demand. In particular, the limited level of development in recent years has restricted the availability of sites for local businesses to expand.
- 7.85 Future realisable demand may be further restricted by the current poor and ageing existing stock, lack of public investment in infrastructure, poor access to many industrial estates/business parks, and weak inward investment offering relative to adjoining areas (notably Stoke on Trent).
- 7.86 A high level of net out-commuting is also an issue in Staffordshire Moorlands where 12,737 (previously 13,956) more people commute out to work than commute in. There is significant level of net out-commuting to Stoke-on-Trent and Newcastle-under-Lyme. The three authorities are considered to constitute a “Functional Economic Area” (FEMA). Therefore the Council is required to undertake discussions with the relevant neighbouring authorities (Stoke-on-Trent and Newcastle-Under-Lyme) to satisfy their obligation under the duty to co-operate and confirm that each authority’s needs can be met across the FEMA. As highlighted above, no concerns have been raised in relation to employment land development requirements to date by neighbouring authorities.
- 7.87 The job density⁷ ratio of 0.64 (an increase from 0.55 at the time of the 2014 ELR) in the District is very low compared to the West Midlands average of 0.78. Rebalancing the land uses of the District to ensure that more, and better quality, jobs are provided could help to reverse this trend and ‘claw-back’ out-commuters and reducing net out-commuting rates. However, this would need to be a choice made by the Council and should be supported by corporate decisions and policies in the economic strategy and emerging Local Plan.

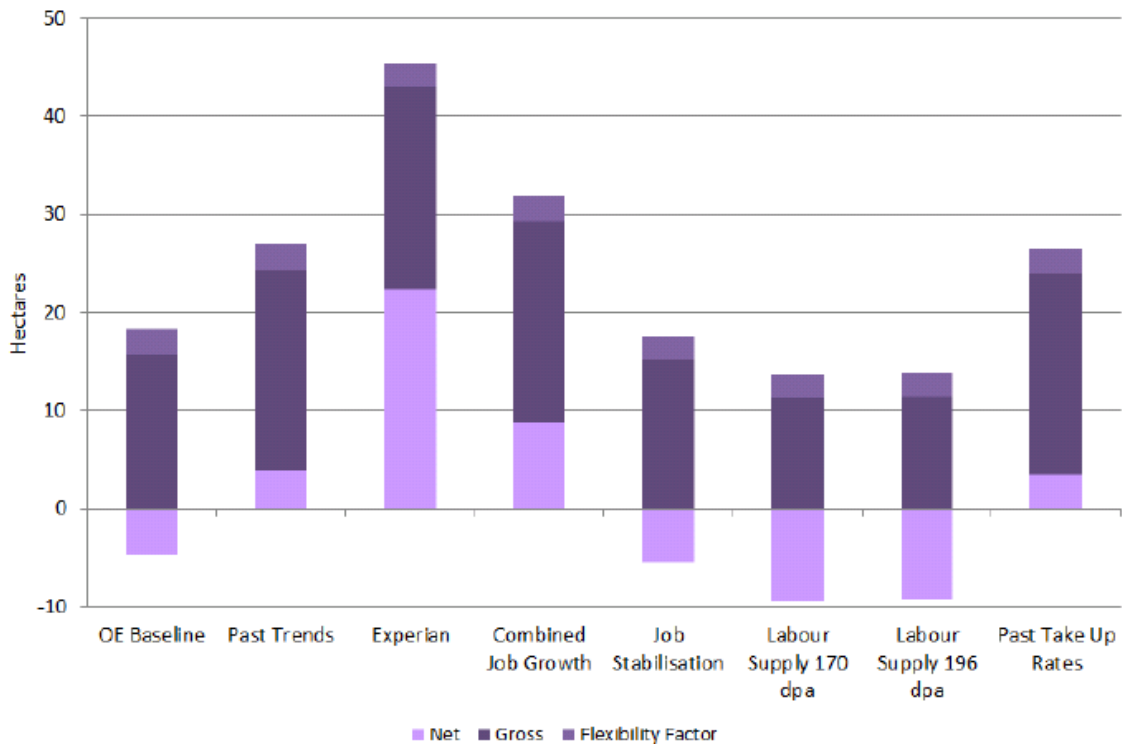
⁷ Jobs density is a measurement of the number of jobs within the District per resident of working age

7.88 **The latest post-Brexit jobs forecasts published by Oxford Economics show an increase of 288 jobs (FTE) up to 2031.** This is a significant decline from the previously forecasted 3009 jobs from the pre-Brexit forecasts. Forecasts prepared by Experian are also considered in the ELR Update. **Experian data shows an increase in 1300 jobs in the District over the same period.** Whilst both data sources are robust, this is a significant difference and may be attributed to the different methodologies applied. This has led to discrepancies in the jobs growth between sectors projected by each source. The largest difference is in manufacturing whereby Oxford Economics project a decline off 833 jobs in contrast to a growth of 829 anticipated by Experian (see Appendix 2, Table 4.8). To address this, the ELR Update recommends that a **combined jobs growth** figure is applied in the scenarios which provides an average level of jobs growth for each sector taking both data sources in to account. This **indicates a growth of 794 jobs (FTE) up to the year 2031.**

Objectively Assessed Need for employment land

7.89 The ELR considers a range of scenarios to identify the need for employment land in the District. These include; projections of labour supply (land needed to support jobs for future working age population), jobs forecasts (land needed to support Oxford Economics jobs forecasts) and consideration of past trends (amount of land developed in the District in recent years). Uplifts to the indicative requirements are then added to provide additional flexibility and to address potential future losses of employment land. A summary of the outcomes is provided below:

Figure 1: Summary of employment land requirements for scenarios up to 2031⁸



⁸ Separate conclusions are given up to the year 2033 which are more positive.

- 7.90 The majority of scenarios would lead to a negative employment land requirements without the subsequent adjustment to provide flexibility and to account for possible losses, these include; jobs forecasts (Oxford Economics baseline and zero jobs growth) and labour supply scenarios. This reflects the anticipated low demand for land for business and industry and the constrained labour supply projected for the District without sufficient levels of inward migration supported by new housing.
- 7.91 The most positive scenario is past take up in spite of average levels of development being relatively modest in the District in recent years – 1.26ha per year (2007 to 2015).
- 7.92 With the above in mind, the **ELR Update recommends an OAN range for employment of 13 to 27ha up to the year 2031**.⁹ This is a significant decline from the previously recommended range of 25 to 45ha as identified in the 2014 ELR. This can be attributed to the reduction in the forecasts levels of jobs growth by Oxford Economics, a shorter modelling period has now been applied (2014 to 2031, rather than 2011 to 2031). Take up and losses of employment land have been variable.
- 7.93 **50% of the requirement is recommended for B1a/B1b (office, R&D) use with the other 50% recommended for B1c/B2/B8 (light industry, general industry, storage and distribution)**. This takes into account past trends and forecast jobs, office vacancy and the need to replace existing poor quality industrial stock.
- 7.94 The Site Options consultation document published in 2015 identified a total of 63.41ha of potential employment land across the district. The 2016 Preferred Options Sites and Boundaries consultation identified a sufficient supply of land to support the proposed development requirement of 35ha. This did not include the 48.58ha Northern Gateway Opportunity Site at Blythe Bridge. On the basis of the current evidence, the District has a sufficient supply of suitable sites to accommodate the full range of the objectively assessed need for employment land.

Sustainability Appraisal

- 7.95 The **Initial Sustainability Appraisal Report – Appraisal of alternative development requirements (Appendix 3)** which accompanies this report has been prepared to assess the likely significant effects on sustainability of alternative options for housing and employment requirements. The options broadly relate to the top, middle and bottom of the latest OAN ranges as discussed in this report. A fourth option was also appraised to test the implications of the highest potential growth scenario identified in the latest assessment of needs (Appendix 1 and 2):

⁹ 14 to 32ha is recommended up to the year 2033.

Housing Options

- 235 homes per year (demographic needs, + allowance for catch up and 10% for market signals)
- 260 homes per year (job stabilisation)
- 330 homes per year (combined jobs growth scenario+ uplift partial catch up)
- 450 homes per year (past trends jobs growth + 10% uplift for partial catch up)

Employment Options

- 13ha (labour supply)
- 16ha (job stabilisation)
- 25ha (past trends)
- 27ha (combined jobs growth scenario)

7.96 In essence, the Sustainability Appraisal essentially determines that the highest levels of growth score most positively in terms of economic benefits and meeting affordable housing needs. However, the highest growth scenarios also score least positively in terms of adverse environmental impact. For the scenarios at the bottom of the scale, the reverse applies. The middle of the range corresponds to a balanced relationship between the environmental, economic and social effects considered in the appraisal. The full appraisal and summary of findings is provided in Appendix 3.

Consultation feedback

7.97 The 2016 Preferred Options Sites and Boundaries consultation sought views on the proposed housing (320 homes per year) and employment land (35ha in total) requirements over the period of the Local Plan up to the year 2031. Summaries of responses to these two matters are provided in Appendix 4 and 5 respectively. In broad terms they may be summarised as follows:

7.98 Housing requirement responses:

- **4 consultees supported** the requirement of 320 homes per year. The main reasons given were that the evidence justified the increase in housing requirement from the 300 homes per year identified in the adopted Core Strategy and that this would support the delivery of affordable housing

- **8 consultees submitted general comments** regarding the housing requirement. Several related to reserving the right to comment at a later date.
- **282 consultees objected because the housing requirement was too high.** Reasons given included:
 - Empty properties should be used instead
 - Government's housing projections are lower and should be used instead
 - Rate of development is not sustainable
 - Concern over loss of Green Belt and countryside
 - Over development leads to harmful landscape impacts
 - More consideration needed of supply of suitable sites
 - The assessment of need is flawed
 - The bottom of the OAN range (250) should be used instead
 - Previous objections have not been listened to
 - Concerns regarding infrastructure constraints and impacts e.g. transport, schools, open space, health and flood risk
 - Stoke-on-Trent should accommodate some of the housing need
 - Safety and amenity concerns
- **10 consultees objected because the housing requirement was too low.** Reasons given included:
 - The requirement does not meet the full OAN (440)
 - Additional sites are available to support a higher requirement
 - Housing provides economic benefits such as increased spend in local town centres
 - Housing can support the sustainability of settlements by supporting local services
 - The 2014 based projections should be used when available
 - The OAN assessment does not adequately address uplifts required to the demographic projections as a result of forecast employment growth
 - 320 homes per year does not support jobs growth and is not realistic
 - The Council has not demonstrated how the adverse impact of meeting a higher requirement would 'significantly and demonstrably outweigh the benefits' of not doing so, or how those needs would be met elsewhere in the Housing Market Area

7.99 Employment land requirement responses:

- **1 comment in support of the employment land requirement of 35ha**
- **3 general comments were received** relating to the need to protect employment sites, sites issues and the need to provide housing to support jobs
- **2 comments that the employment land requirement is too low**, namely because the figure did not support the potential for growth and was not aspirational enough
- **238 comments stated that the employment land requirement was too high.** Reasons given included:
 - Site related issues
 - There is an over-allocation in Biddulph
 - Over-supply of employment land in Leek
 - Employment land provision is not proportionate to housing growth in Cheadle and the Rural Areas
 - Modelling used to assess needs is out of date

Discussion and analysis

Housing requirement

7.100 As set out in this report, the primary test in establishing housing requirements in Local Plans is the application of paragraphs 14 and 47 of the NPPF which require objectively assessed needs for development to be met in full as far as is consistent with the policies set out in the Framework. An OAN range of 235 to 330 homes per year has been identified but this is set against a higher need for affordable housing (224 to 432 per year)

7.101 Paragraphs 7.17 and 7.18 of this report set out the requirement to consider whether affordable housing needs can be met as a viable proportion of market housing and if a further uplift to the housing requirement is necessary to help address affordable housing needs. The scope to do this is considered below.

7.102 Delivering 224 to 432 affordable homes per year at a rate of 33%¹⁰ overall would indicate a need for 679 to 1309 homes per year. This is significantly above the level of housing planned for in the adopted Core Strategy (300 homes per year) and the average annual rate of development at 178 per year 2005/06. Accordingly, such a level of growth is not considered to accord with the NPPF which requires Local Plans to be “aspirational but realistic” (NPPF, Para. 154).

¹⁰ Affordable housing requirement of adopted Core Strategy Policy H2

- 7.103 Whilst the affordable housing need is high, it should be recognised that it is calculated on an entirely different basis than the demographic and economic led OAN scenarios. For example, affordable housing needs are assessed on the ability of a household to pay and the suitability of their current housing rather than demographic change and economic growth. Affordable housing needs can often relate to existing households who are entitled to affordable housing, or who will be over the plan period, as their current housing is unsuitable due to for example, overcrowding.
- 7.104 Consequently, affordable housing need does not necessarily translate directly into the need for new housing development as households who move into suitable (affordable) housing may free up market homes to be occupied by people for whom they are suitable.
- 7.105 Furthermore, the Council is actively engaged on initiatives alongside the planning process to support the provision of, and improvements to, affordable housing in the district beyond the level supported by market housing. For example, external funding is sought from the Homes and Communities Agency (HCA) to build more new houses and refurbish underutilised property. This can help to improve on the 33% threshold that would normally be considered viable and improve the suitability of existing property
- 7.106 Nevertheless, due to high affordable housing need, it is clear that in setting the housing requirement for the Local Plan, the Council must consider the scope to improve affordable housing delivery by increasing the overall level of development, even if this does not result in the full affordable housing needs being met.
- 7.107 The implications of a series of options for a housing requirement that all incorporate the necessary uplifts are considered in Appendix 6, namely; 235, 260, 330 and 450 homes per year.
- 7.108 Consideration of various potential options based on scenarios from the assessment of objectively assessed need is set out Appendix 6. A Sustainability Appraisal of these scenarios is also provided in Appendix 3. Of the scenarios appraised within the range of the objectively assessed need, 330 homes per year provides the greatest benefits in terms of support for the local economy and the provision of affordable housing. However, given the issues raised in this report including the prevailing housing market conditions and historical low rate of development, it is considered that a Local Plan housing requirement just below the top of the range is more likely to be “aspirational but realistic” as required by the NPPF.
- 7.109 On the basis of the above, and the appraisals set out in the appendices, it is recommended that an annual housing requirement of 320 (4800 gross over the plan period 2016 to 2031 and 5440 gross from the base date of

the assessment, 2014) is taken forward into the Preferred Options Local Plan on the basis that the scenario:

- Most closely accords with the housing policy set out in the NPPF as it fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build
- Supports the provision of approximately 870¹¹ additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with to Paragraph 21 of the NPPF
- With a pro-active approach to delivery taken by the Council, is “aspirational, but realistic” when considered in the context of an historic average delivery rate of 178 homes per year
- Is deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity
- Is consistent with the requirement agreed by the Council in 2016. The majority of sites required for this level of development were not found to give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park
- Provides a balanced range of social, economic and environmental effects as set out in the Sustainability Appraisal the most consistent with the four aims of the Corporate Plan (2015-2019) when read as a whole

7.110 In terms of the previous consultation feedback on the annual requirement of 320, it is considered that the new evidence in respect of the objectively assessed needs addresses the concerns about the lack of economic benefits, aspiration and meeting housing needs. The updated evidence also draws on the latest projections as published by Government. Whilst, the majority of comments called for a reduction in the housing requirement due to issues such as a flawed methodology for assessing needs, landscape impacts and infrastructure, the evidence as outlined in this report does not support this position.

7.111 If the recommended development requirement is taken forward into the Preferred Options Local Plan, it will be particularly important for the Council to be pro-active in ensuring the delivery of housing sites in order to maintain a five year housing land supply and pass the newly proposed Housing Delivery Tests as proposed by Government. The Council has already begun to develop a strategy to accelerate delivery and incentivise starts on site. It is also considered that the certainty that a newly adopted Local Plan would give to investors and developers will also help to facilitate an uplift in development.

¹¹ Total workforce jobs support under the combined jobs growth + partial catch up scenario. The recommended Preferred Option requirement (320 per year) is likely to support the delivery of slightly fewer jobs than if the full scenario housing figure was met (329)

Employment land requirement

7.112 In drawing its conclusions, the ELR Update reports states:

“Whilst it is acknowledged that there is not a direct causal link between housing and employment land requirements, there is nevertheless a need to ensure that the two dovetail together to avoid any unsustainable outcomes.

As such, if SMDC was to consider going for the top end of the employment land range, it would need to be mindful of the housing implications by either considering a higher level of housing delivery, or reviewing other policy interventions to minimise any adverse labour force and economic implications. This could include the need to ‘claw back’ out-commuters and planning for a mix of housing which encourages the retention of residents of an economically active age or encourages younger economically active people to move into the District.

It is recognised that this may be difficult to achieve and would therefore require a strong policy intervention by the Local Authority, set out in its Local Plan”

7.113 With this and other factors in mind, an employment land requirement of approximately 27ha is recommended up to the year 2031 for the Preferred Options Local Plan on the basis that:

- It is at the top of the OAN range for employment and so closely corresponds with the proposed housing requirement to support sustainable development
- Provides the greatest scope for business growth and wider economic benefits as identified in the Sustainability Appraisal
- There is a sufficient supply of suitable sites to accommodate this level of development
- This option is more closely aligned with the Government’s economic aspirations as set out in the NPPF and the recent Industrial Strategy

7.114 In relation to the previous consultation feedback regarding the preferred option employment land requirement as agreed in March 2016 (35ha), the concerns that the level of growth is not high enough are addressed by the new evidence of need. The recommendation is to plan for the highest of the scenarios recommended by the evidence. Of the comments that made the case for a lower requirement, it is considered that the evidence does not support this position. Site related concerns will be considered separately.

Next steps

- 7.115 The agreed housing and employment land requirements to be included in the Local Plan Preferred Options will, alongside details of commitments, completions (as at 31 March 2017), a housing windfall allowance and an estimate of future housing completions in the Peak District National Park, help to determine the number and size of allocations needed in the Preferred Options Local Plan. Site allocations are due to be agreed by the Council in June ahead of public consultation on the Preferred Options Local Plan which will commence shortly afterwards.
- 7.116 It should be noted that the Preferred Options development requirements may need to be reviewed prior to the submission of the plan to the Secretary of State in response to consultation feedback and changes to national policy if the proposals set out in the recent Housing White Paper are implemented by Government. If necessary, the Council may also decide at a later date to make the case for the use of alternative methodology for calculating the objectively assessed need for housing as discussed in Paragraph 7.25 of this report.

Dai Lerner
Executive Director - Place

Web Links and

Background Papers

National Planning Policy Framework:

<https://www.gov.uk/guidance/national-planning-policy-framework>

National Planning Practice Guidance:

<https://www.gov.uk/government/collections/planning-practice-guidance>

Local Plan evidence base:

<http://www.staffsmoorlands.gov.uk/article/1163/Evidence-base>

Location

Regeneration Services
Moorlands House,
Leek

Contact details

Mark James

**Senior Regeneration
Officer (Planning
Policy)**

Tel: 01538 395400 ext
3643



**Nathaniel Lichfield
& Partners**

Planning. Design. Economics.

**Staffordshire Moorlands SHMA
Update 2017**

Staffordshire Moorlands District Council

February 2017

41306/06/MW/CR

Nathaniel Lichfield & Partners
3rd Floor
One St James's Square
Manchester M2 6DN

nlplanning.com

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Registered Office:

14 Regent's Wharf

All Saints Street

London N1 9RL

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1.0 Introduction

Preamble

1.1 This report updates the Staffordshire Moorlands SHMA (November 2014) and subsequent Objectively Assessed Need [OAN] reviews as follows:

- 1 A contextual overview exploring the reasons behind any significant changes to the forecasts since the previous SHMA was undertaken in 2014;
- 2 An analysis of the latest demographic and population release for Staffordshire Moorlands District, specifically the 2014-based SNPP and 2014-based household projections and a review of whether the declining growth in households is due to comparatively fewer residents in the older age cohorts than before;
- 3 A re-run of the demographic PopGroup model, incorporating the 2014-based ONS SNPP forecasts and headship rates from the 2014-based SNHP, taking account of the latest travel to work and migration data;
- 4 Re-running employment-led scenarios to reflect the most up to date economic projections from Oxford Economics and Experian (see below). These will be post-Brexit and accord with those used for the ELR;
- 5 A review of market signals and affordability and the extent to which this would justify an uplift to the demographic starting point of housing need;
- 6 Updating the SHMA affordable housing model to incorporate the latest household and population projections, subject to prior agreement on the preferred Objectively Assessed Need scenario; and
- 7 Commentary on the need for Starter Homes and the revised tenure split for affordable homes to take into account the need for affordable rented, intermediate, and starter homes.

1.2 Staffordshire Moorlands District Council has committed to undertaking an early review of the Local Plan as recommended by the Inspector when the Staffordshire Moorlands Core Strategy was adopted. As such, it is vital that the housing evidence is up to date and robust for the emerging plan to be found sound.

Background to the Study

1.3 NLP produced a SHMA on behalf of High Peak Borough Council and Staffordshire Moorlands District Council in April 2014.

1.4 Since then, the following updates on housing needs have been produced:

- [Housing Needs Study 2012-based SNPP Update \(August 2014\)](#);

- Staffordshire Moorlands SHMA Update (July 2015) updated to reflect the 2012 sub-national CLG household projections¹ and 2011 census data; and
- Staffordshire Moorlands SHMA Update (January 2016) prepared to take into account the latest mid-year populations estimates as well as relevant case law² relating to the derivation of housing need.

Staffordshire Moorlands Core Strategy & Supporting Evidence Base

- 1.5 The adopted Staffordshire Moorlands Core Strategy (adopted March 2014) covers the period between 2006 and 2026. Policy SS2 (Future Provision of Development) indicates that the Council will make provision for an additional 6,000 dwellings at an average annual development rate of 300 dwellings, with this figure back-loaded towards the end of the plan period.
- 1.6 Table 1.1 indicates how the OAN figure has evolved since the adoption of the Core Strategy in light of regular data releases by CLG and ONS and the interpretation of OAN in the Courts.

Table 1.1 Evolving OAN Figures for Staffordshire Moorlands District

Title	Date	OAN Figure (dwellings per annum)
Core Strategy	March 2014	300 dpa
2014 SHMA	April 2014	260 – 440 dpa
Housing Needs Study 2012-based SNPP Update	August 2014	210 – 430 dpa
SHMA Update 2015	July 2015	220 – 460 dpa
SHMA Update 2016	January 2016	250 – 440 dpa

- 1.7 As discussed above, this Report will review the implications of the latest data releases, specifically the 2014-based household projections, the 2014-based SNPP and post-Brexit economic job growth forecasts, as well as assessing the latest policy changes ahead of the Council's Local Plan Review later in 2017. It will also dovetail with an updated Employment Land Review [ELR] given the synergies between job growth and housing need. The SHMA update starts in 2014 to fall in line with the 2014-based population and household projections.
- 1.8 This report also analyses updated market signals and revisits affordable housing need in the light of the latest evidence, including updated Housing Register statistics.
- 1.9 The plan period covers 2016 – 2031 and, in the longer term, to 2033.

¹ 2012-based Sub-National Household Projections [SNHP] were released in February 2015 and supersede the 2011-based (Interim) SNHP. The 2012-based SNHP incorporate the ONS 2012-based SNPP published on 28th May 2014 and further information from the Census 2011 where available.

² Oadby and Wigston District Council vs. SoS for Communities and Local Government and Bloor Homes Limited: [2015] EWHC 1879 (Admin), dated 03/07/15. Kings Lynn and West Norfolk District Council vs. SoS for Communities and Local Government and Elm Park Holdings Ltd: [2015] EWHC 2464 (Admin), dated 09/07/15

2.0 **Implications of the Latest Projections for Staffordshire Moorlands District**

Introduction

- 2.1 We have re-modelled a number of scenarios to establish the need for housing across Staffordshire Moorlands in line with our HEaDROOM framework. This is based on different demographic, economic and housing related factors which draw upon an analysis of context and past trends which is set out below.

Demographic Context

ONS 2014-based SNPP

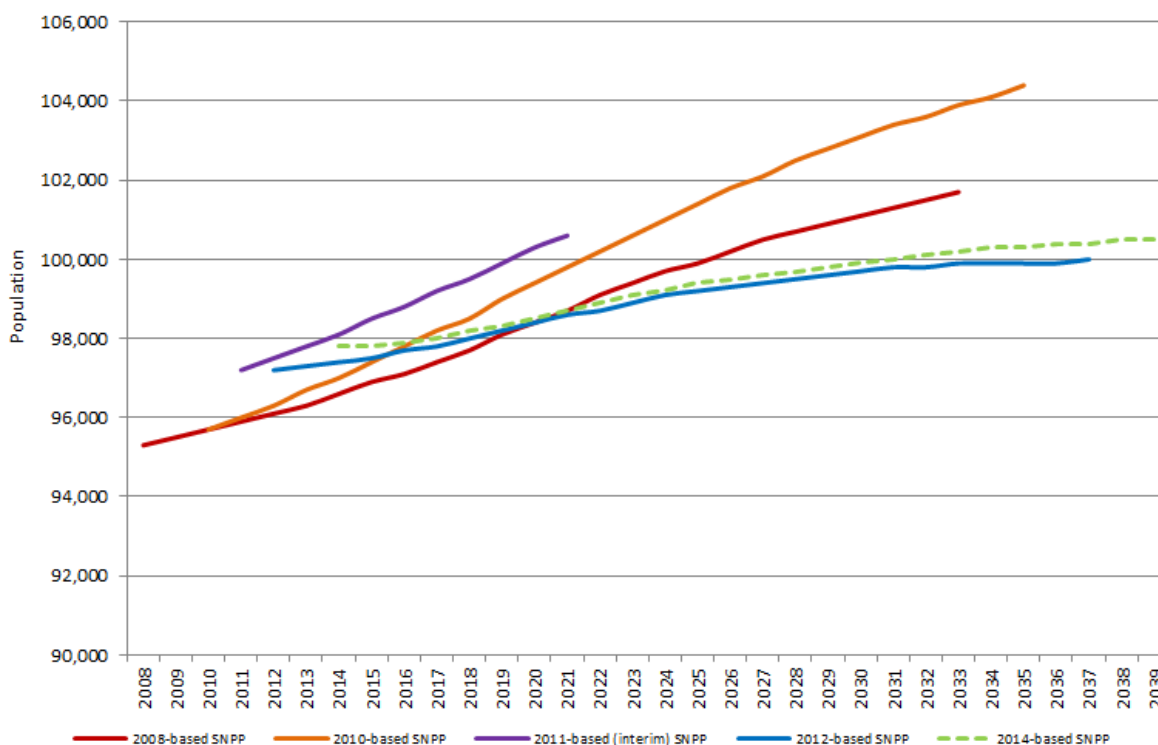
- 2.2 The 2014-based SNPP was published in May 2016. It provides the latest estimate of population growth for all local authorities across England over the period 2014 to 2039. The SNPP is consistent with the 2014-based national population projections and takes account of information from the 2011 Census. It is also based on the assumption that the demographic trends (births, deaths and in/out migration) that were experienced between 2009 and 2014 will continue in the future³. As such, they draw upon trends that were experienced partly during a time of economic downturn.
- 2.3 The projections do not take account of planned or emerging policies and no allowance is made for potential future improvements or deterioration in the national or local economy i.e. it is policy-off and unadjusted.

Historic Population Trends

- 2.4 Figure 2.1 shows that historically, Staffordshire Moorlands' population declined from 95,000 in 1991 to 92,000 in 1997, with the population only returning to 1991 levels by 2006. Since that time, the population has increased steadily, reaching 97,900 in 2015 (according to the latest MYE). The 2014-based SNPP project this increase to continue, with the District's population likely to reach 100,200 by 2033.

³ The international migration component of change is based upon past trends between 2008 and 2014.

Figure 2.1 Historic and Projected Population Growth for Staffordshire Moorlands District



Source: ONS 2008/2010/2011/2012/2014-based Sub-National Population Projections

2.5 However, as can be seen in Figure 2.1, the latest projections indicate a level of growth significantly below most previous iterations. All of the projections are based on the preceding five / six year trends for births, deaths and migration, hence growth levels amongst the projections vary. The 2010-based SNPP projected a particularly high level of growth of 9.09% over 25 years, whilst the 2012-based SNPP forecast a 2.9% growth rate to 2037 which is only slightly above the 2.8% growth to 2039 projected by the 2014-based SNPP.

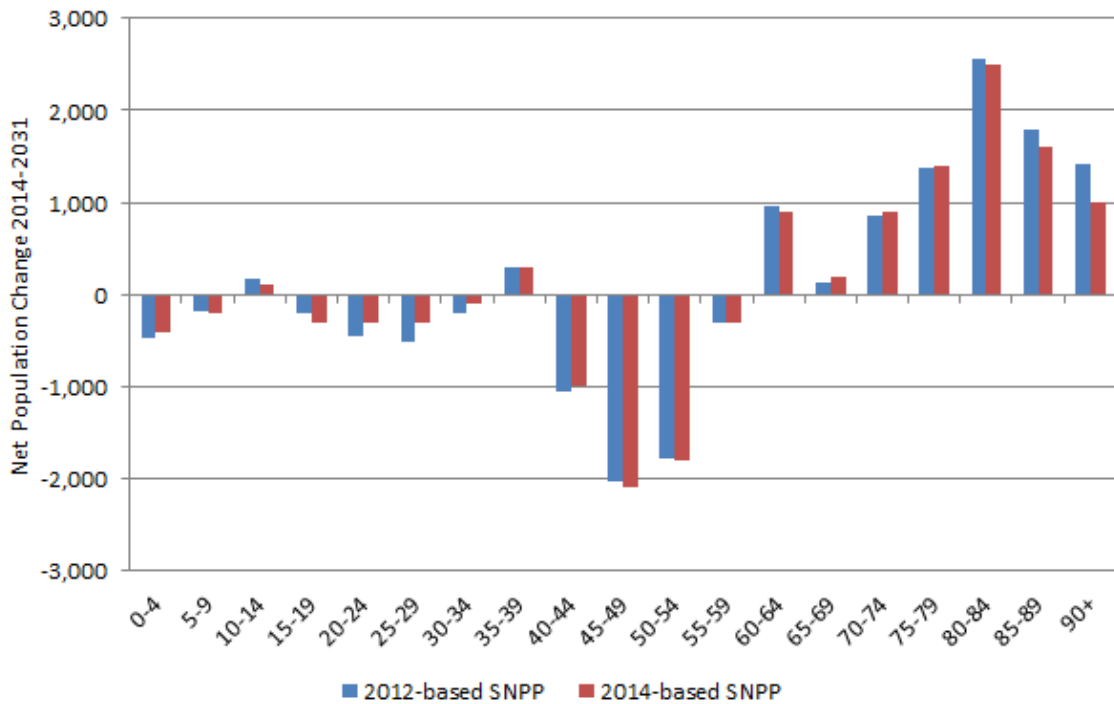
Projected SNPP Growth

2.6 The 2014-based SNPP anticipate that the population of Staffordshire Moorlands will increase by 2.3% between 2014 and 2031, which is equivalent to 132 net additional persons per annum (128 persons per annum to 2033).

2.7 As noted above, this is below the previous 2012-based SNPP, which projected growth of 2.7% to 2031, equivalent to 153 persons per annum.

2.8 Comparing and contrasting the 2014 and 2012-based SNPPs, Figure 2.2 indicates that the pattern of growth / contraction for individual age cohorts is similar between the two data sets – both reveal a reduction in the population within most of the 0-64 age groups and a sharp increase in the over 70 age groups ensuring that Staffordshire Moorlands District has an ageing population. In general, an ageing population tends to see a disproportionate increase in household growth (even when there is no population growth or even decline) as older households are more likely to form a head of household than younger age cohorts as household size declines.

Figure 2.2 Net population change by age cohort in Staffordshire Moorlands District, 2014-2031



Source: 2012-based SNPP vs. 2014-based SNPP

2.9 Figure 2.2 suggests that in terms of differences between the two datasets there is a less pronounced negative population change in 20 – 34 age groups; a greater increase in population change in the 70 – 79 age groups; and a decrease in the population estimates for the 80+ age ranges for the 2014 - based SNPP.

2.10 It is therefore unsurprising that both projections forecast a decline in the numbers of working age cohorts (generally those aged 20 – 64) and a large increase in residents of retirement age (over 65). This results in average household size reducing significantly, with smaller family units and more people living alone or in couples.

2.11 The population change in Staffordshire Moorlands District over the Local Plan period in the 2014-based SNPP is expected to be driven by both natural change and net migration from elsewhere in England. Natural change is expected to result in the loss of around 400 residents (net) over the period 2014 - 2031, whilst net inward migration is forecast to contribute 7,100 residents (net) over the same time period. International migration is expected to be broadly neutral, with around 2,000 immigrants being countered by a comparable level of emigration abroad.

Potential Implications of Brexit on the 2014-based SNPP

2.12 The full effect of Brexit is impossible to gauge at present as the UK will most likely remain a member of the EU for at least the next two years whilst the terms of any exit are negotiated. However, it is suggested that there is

currently no evidence base for arriving at an alternative set of assumptions about future expected migration until the terms of withdrawal are settled.

- 2.13 Furthermore, the ONS 2014-based National Population Projections, upon which the equivalent SNPP is derived, already assumes that net in-migration will reduce from current levels to 185,000 by 2021 and kept constant from then until 2037. According to ONS, net international migration to the UK in 2014/15 (at 336,000) had a virtual 50:50 split between EU and non-EU migration. Given that the share of net in-flows from non-EU countries is already capable of being controlled by the Government's migration policy (which since 2010 has sought to reduce it) it seems reasonable to assume no reduction to non-EU migration (i.e. c.168,000 net in-migration annually) post Brexit.
- 2.14 In theory therefore, in order for the ONS 2014-based National Population Projections' long term migration estimate (+185,000 net per annum) to be achieved, net flows from within the EU would have to fall to just 17,000 per annum, a reduction of 90%.
- 2.15 This supports the notion that the ONS National Population Projections, and by extension the 2014-based SNPP, have already adopted very cautious estimates of international migration. It is considered that there is limited evidence to support a notion that leaving the EU would see a reduction in migration of a scale that would be necessary for population estimates to fall below the 2014-based SNPP levels.

2015 Mid-Year Population Estimates

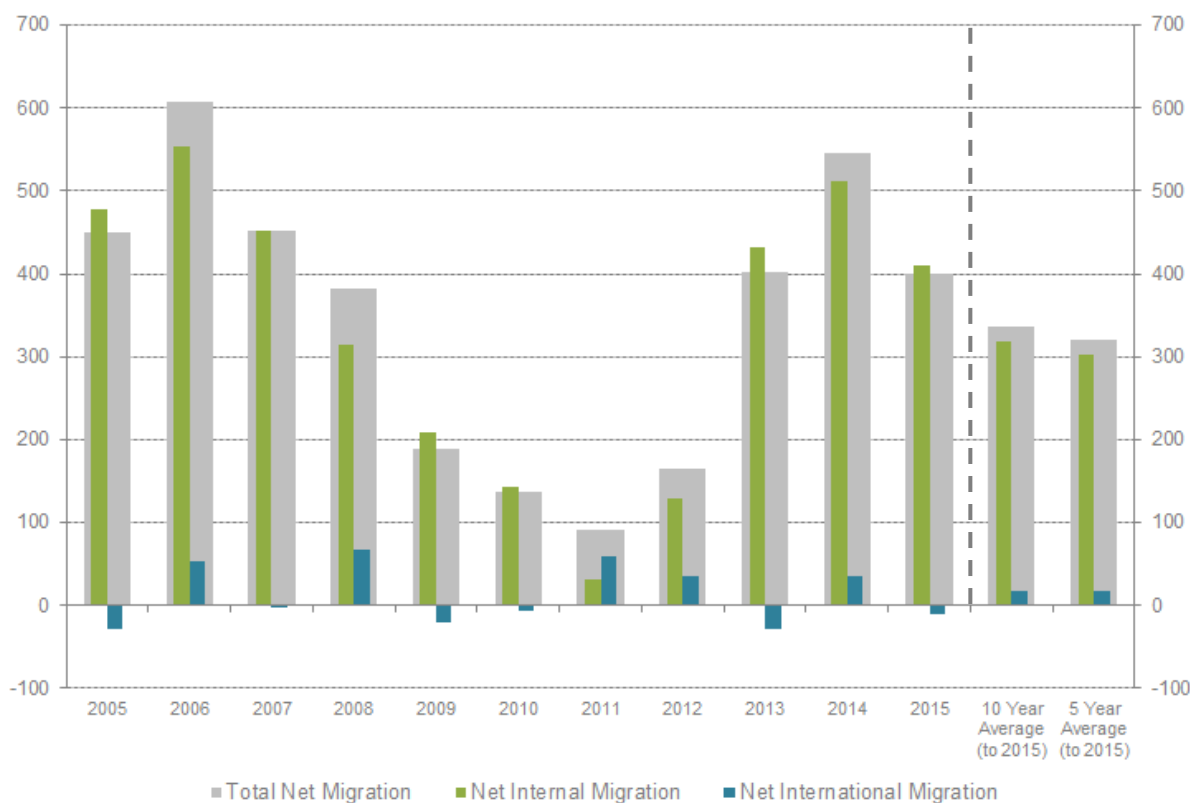
- 2.16 The 2015 MYE were published by ONS on 30th June 2016. They indicate that for Staffordshire Moorlands, the 2015 resident population was 97,881. This represents an increase of 118 residents (+0.12%) on the 2014 figure (97,763). The 2015 MYE population figure for Staffordshire Moorlands is slightly higher than was projected under the 2014 SNPP (97,800), although at only +81 this represents 0.08% of the total resident population and is unlikely to have any significant effects on the results of the data modelling. Nevertheless the 2015 MYE has been included in the modelling work as a sensitivity test to the 2014-based SNPP figures.

Migration

- 2.17 Historically, over the ten-year period to 2015, Staffordshire Moorlands District has seen average annual net in-migration of 338 people (consisting of 319 internal in migrants and 19 international in-migrants). The five year average is slightly lower, at +321 people per annum, of which net internal migration was also lower at 308 in migrants per annum, whilst net international migration was just 17 annually.
- 2.18 The migration patterns for Staffordshire Moorlands District over the last 10 years (along with five and ten year averages) are illustrated in Figure 2.3. Internal migration has been consistently high in six of the past ten years but dipped very significantly in 2008 – 2012 (during the recession and the

subsequent economic downturn). Net international migration has been more sporadic, fluctuating between a modest net gain to net loss year on year.

Figure 2.3 Migration in Staffordshire Moorlands, 2005-2015



Source: ONS Mid-Year Population Estimates

Unattributable Population Change

2.19 The ONS describes Unattributable Population Change [UPC] as follows:

“Following the 2011 Census, the inter-censal population estimates were rebased so that the midyear estimates (MYEs) for the period mid-2002 to mid-2011 were in line with the 2011 Census. After making allowances for methodological changes and estimated errors in the components during the decade, the remaining difference between the rolled forward 2011 MYEs and the 2011 Census based MYEs for England was 103,700. This is referred to as Unattributable Population Change [UPC].”⁴

2.20 The UPC was likely to result either from errors in population counts (in either census or the Mid-Year Population Estimates), in estimates of migration, or both. A review undertaken by ONS in 2014⁵ stated that is likely to be due (in the main) to an under-estimation of immigration from abroad.

2.21 UPC is therefore at least partly a correction for failings in measuring and assigning international migrants at the local authority level. This correction has

⁴ ONS (January 2014) 2012-based SNPP for England: Report on Unattributable Population Change, p.2

⁵ ONS (2014): Quality of International Migration Estimates from 2001 to 2011

not been accounted for in either the 2012-based SNPP or the 2014 – based SNPP. ONS considers it to have even less of an effect on the 2014-based SNPP, since three years of trend data are not affected by UPC.

- 2.22 At the local level UPC is more complicated. Although the initial problem may have arisen from under-counting international migrants, further issues arise in relation to the correct assignment of these migrants to local authority areas when / if they move. In the case of Staffordshire Moorlands, UPC is positive, with the Mid-2011 Census based (official) estimate recording 1,174 more residents than was anticipated at the equivalent Mid-2011 rolled forward population estimate. This adjustment is of a relatively small magnitude compared with many other parts of the country. The mid-2011 Census based official estimate for Liverpool City for example, was 17,045 higher than the rolled-forward MYE had projected.
- 2.23 The ONS data presents limited evidence and justification for adopting UPC adjustments within the demographic modelling, other than to suggest that UPC for Staffordshire Moorlands is more likely to be due to:
- *The statistical process of rolling forward from 2001 had an impact on estimates for males aged 25-39, and females aged 80-84;*
 - *The relative size of international emigration flows for males aged 25-29 and females aged 25-34; and*
 - *Possible discrepancy due to international immigration amongst males aged 35-39.*
- 2.24 This indicates that, for Staffordshire Moorlands District, the cause is at least partly due to mis-recording of the population at the time of the 2001 Census, and to a certain extent issues in the recording of international migration. As such, this will have had limited effect on the 2014-based SNPP. Therefore, it is considered that the trend data used to inform the 2014-based SNPPs should provide a more accurate picture with no allowance being made for UPC.
- 2.25 NLP considers that in this instance, adding in the UPC (which for Staffordshire Moorlands is modest in any event) is likely to over-estimate future population growth in Staffordshire Moorlands District as a result and hence this has not been incorporated into the PopGroup modelling.

Housing Factors

Household Projections

- 2.26 The methodology for the 2014-based SNHP broadly follows that used for the 2012-, 2011- and 2008-based equivalents.
- 2.27 The household projections report the total number of households by age group and marital status over the period to 2039. The 2014-based projections include information from the 2011 Census which, together with data from the

Labour Force Survey⁶ [LFS], have informed the household projections methodology at the national level.

- 2.28 The Practice Guidance states that up-to-date household projections published by CLG should provide the starting point estimate of overall housing need. The Practice Guidance goes on to state that “*plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates*”⁷.
- 2.29 Therefore, the new household projections represent an important milestone in providing evidence to inform objective assessments of housing need.
- 2.30 However, they do not represent the whole picture, because:
- a They are based upon applying headship rates (rates of household formation) to the already released ONS 2014-based SNPP. These underlying population projections are trend-based, reflecting migration patterns seen over the recession and may not be reliable in all areas.
 - b They reflect a long term and structural under-supply of housing, during periods of both recession and growth. Lack of dwellings amongst other factors constrains household formation and this historic and long term under-supply will have influenced what are firmly trend-based projections.
 - c They are influenced by recessionary trends since 2007, including mortgage rationing, financial instability and affordability constraints. Although the methodology for the household projections draws upon longer term trends since 1971, the methodology applied by CLG means that they have a greater reliance upon trends experienced over the last 10 years.
 - d The implication of this ‘recency bias’ is that the latest household projections continue to be affected by recently observed trends during the period of suppressed household formation associated with the impacts of the economic downturn, constrained mortgage finance and past housing under-supply, as well as the preceding time of increasing unaffordability which also served to suppress household formation⁸.
 - e They do not take any account of the impact of future government or local policies, changing economic conditions or other factors that might have an impact upon demographic behaviour or household consumption.
- 2.31 The Government’s population and household projections will continue to act as the starting point for considering evidence of housing need, and they provide a nationally consistent, robust starting point. However, caution should be exercised when applying them in evidence. They can, and should be, subject

⁶The Labour Force Survey (LFS) is a survey undertaken by ONS of the employment circumstances of the UK population. According to the ONS it is the largest household survey in the UK and provides the official measures of employment and unemployment.

⁷ 2a-015-20140306

⁸ This is explained on Page 19 of the *Household Projections 2012-based: Methodological Report*. Appendix 6

to adjustment where specific evidence justifies it. The advice contained in the Practice Guidance, that the projections may require adjustment to reflect local trends and circumstances, has been widely considered.

- 2.32 Many Planning Inspectors have taken the view that the 2011-based projections represented a suppression of household formation, particularly amongst younger age groups. This has been supported by analysis into the underlying projections such as the 'Holman Paper ', and whilst the 2014-based projections are more optimistic in household formation rates than their 2011-based predecessors, they remain lower than long term trends would indicate.
- 2.33 It is imperative to view the new projections through the prism of the Framework: this seeks to 'boost significantly' the supply of housing to meet housing demand (including demand arising from household formation) and address affordability. Were the planning system to treat the lower levels of household formation as a 'new normal' it would 'lock in' the implications of recent housing under-supply as a result of recession, impacting most of all on younger age groups, particularly those starting families. With the English Housing Survey having recently shown home ownership for younger age groups falling markedly, there are profoundly negative implications for economic and social well-being.
- 2.34 The potential implications for housing needs has been considered by NLP by modelling a scenario which assumes more optimistic household formation rates than currently used in the 2014-based projections.

2014-based SNHP for Staffordshire Moorlands District

- 2.35 Over the full 25-year period (2014-39) of the new projections, there is projected to be average growth of 137 households per annum. This rate of growth is lower than the level projected over comparable time periods for both the 2012-based and 2008-based household projections (as set out in Table 2.1 and Figure 2.4).
- 2.36 The Figure indicates that by 2033 the District will have around 45,331 households, 143 below the level suggested by the 2012-based household projections and around 1,669 below the level projected by the 2008-based SNHP.

Table 2.1 Projected Household Growth in Staffordshire Moorlands District

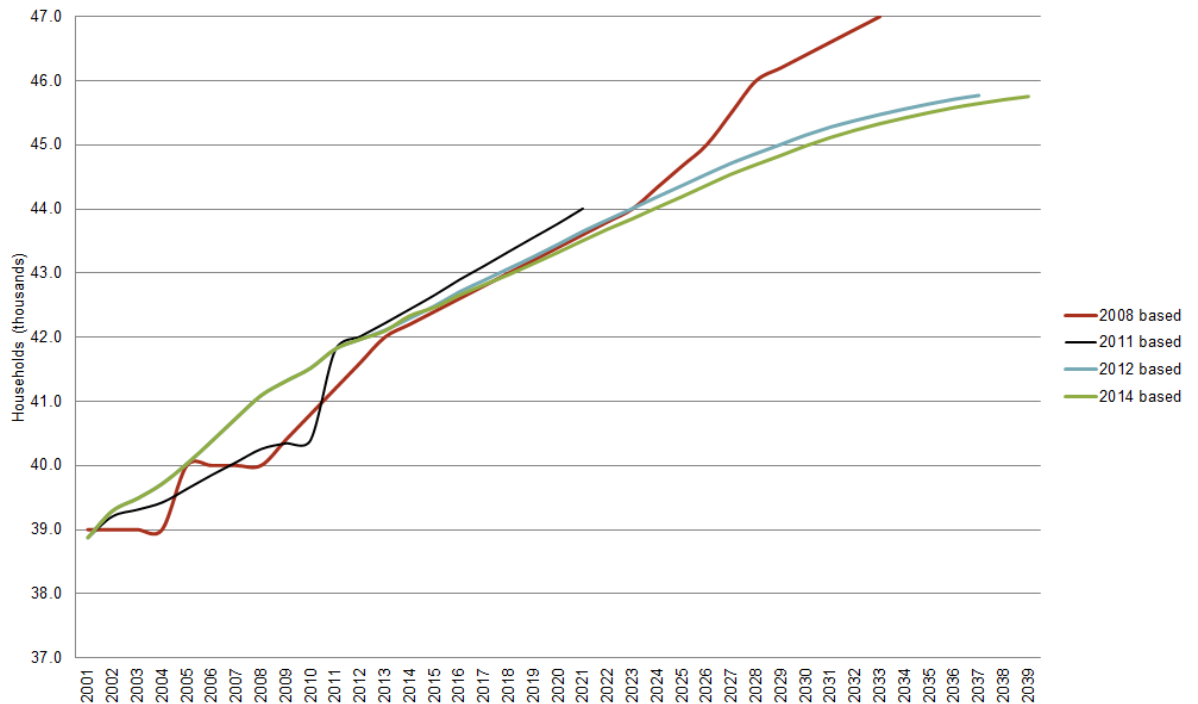
	2014-based Household Projections				2014-2037 annual H'Hold Growth		2014-2033 annual H'hold Growth	
	2014	2039	Total Growth	Annual H'holds	2014-SNHP	2012-SNHP	2014-SNHP	2008-SNHP
Staffordshire Moorlands	42,335	45,755	3,420	137	144	151	157	263

Source: CLG 2008/2012/2014-based Household Projections

Note: The time period have been adapted to align across the various SNHPs

Note: It is important to note that each of these household projections are based on their respective population projections. Hence applying household headship rates to different populations, (such as applying the 2008-based headship rates to the 2014-based population as in the 2016 update) will result in a different household growth figure than those presented above.

Figure 2.4 Household Growth Projections for Staffordshire Moorlands District



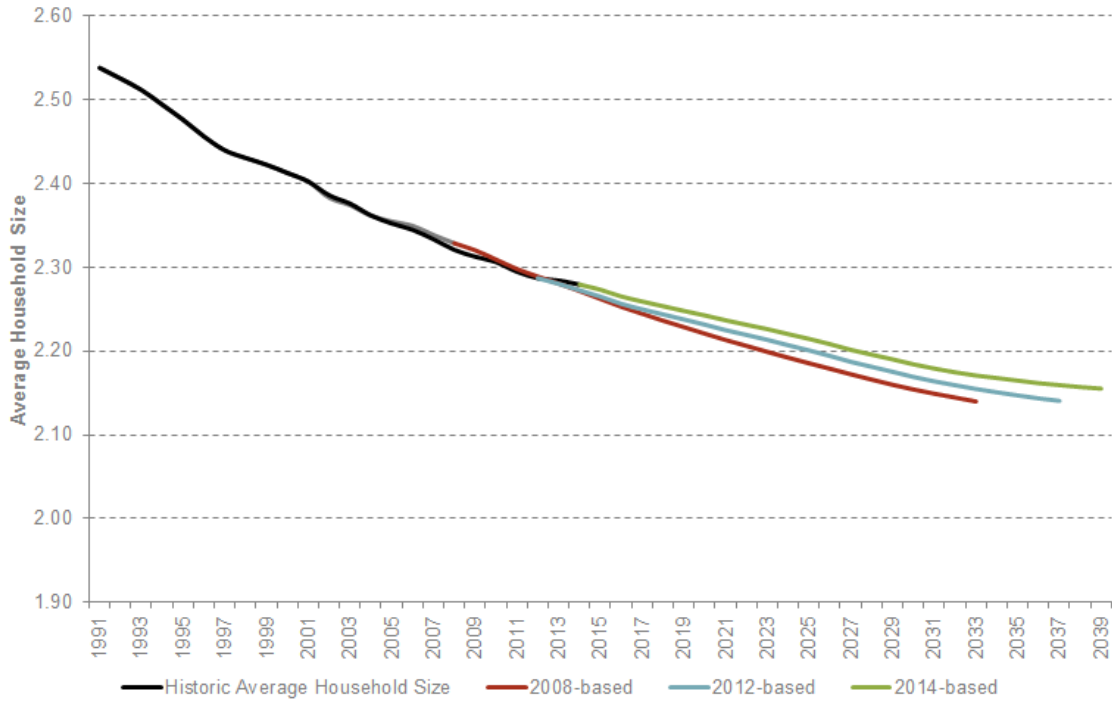
Source: CLG 2008/2011/2012/2014-based Household Projections

Household Formation

2.37 The 2014-based SNHP were, like their 2012-based predecessors (but unlike the earlier 2008-based SNHP), based on a period where household formation across England had slowed due to the impact of recessionary trends. This meant that many households which would otherwise have formed (namely younger households), were not able to. Household projections (and household formation rates) are heavily weighted towards recent trends and therefore trending forward suppressed household formation rates might not be representative of the true need and demand for housing within an area, particularly as the economy improves and there is a return to pre-recession conditions.

2.38 Figure 2.5 illustrates how the average household size in Staffordshire Moorlands has shifted historically. There has been a steep decline in average household size, and the 2008-based projections projected this to continue. The 2012-based projections however, took into account data from the 2011 Census (which the 2008-based did not) and reflected a period of suppression in household formation, and as such projected household formation rates to slow, resulting in average household size changing trajectory slightly. The 2014-based SNHP have a slightly higher starting point in 2014 than was projected by the 2008-based projections, and project average household size to decline at a slightly lower rate to both the 2012-based and 2008-based SNHP.

Figure 2.5 Historic and Projected Average Household Size

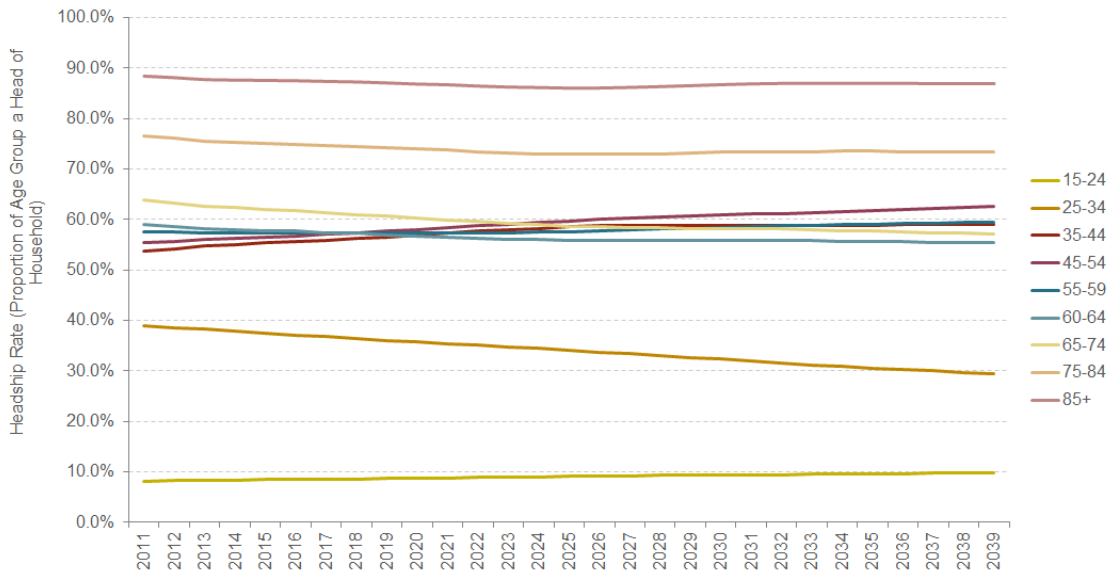


Source: NLP based on CLG 2008/2012/2014-based Household Projections

2.39

The 2014-based SNHP project forwards constrained levels of household formation. In order to assess how many new houses will actually be required in Staffordshire Moorlands over the Local Plan period (2014-2031/33), it is appropriate to consider the extent to which household formation rates might be expected to increase in the future. The 2014-based SNHP anticipates different levels of change in headship rates for different age cohorts, as set out in Figure 2.6.

Figure 2.6 Change in headship rate by age cohort – 2014-based SNHP



Source: CLG 2014-based SNHP for Staffordshire Moorlands

- 2.40 The different household formation rates by age cohort reflects the fact that few people aged between 15 and 24 are likely to be able to establish their own households and that the 25 to 34 age cohort is similarly (and increasingly) likely to face pressures in establishing households. The projection suggests that headship rates amongst 25-34 year olds are likely to decrease significantly over the plan period. By contrast, the headship rate is likely to be very high amongst older people (noting that these figures do not include those that live within institutions, such as nursing homes).
- 2.41 In accordance with the Practice Guidance, NLP has sought to test sensitivities to the 2014-based SNHP where local circumstances allow. To help rectify the impacts of suppressed household formation, NLP has devised a sensitivity to the 2014 based SNHP. For the purposes of the OAHN, NLP has modelled a 'Partial Catch Up' scenario. Because young people have been disproportionately impacted by suppressed household formation in recent years, the sensitivity focuses around those aged 15-34. Young people are having to live with parents for longer than seen historically or pay a significantly greater proportion of their earnings to rent, which leaves them unable to save for a deposit for a house.
- 2.42 The sensitivity test is based on the assumption that, post 2017 (to allow for a partial return to pre-recession trends) headship rates in the 15-34 age groups will return to an increase in line with longer term trends, such that by 2033, half of the difference between the 2012-based and 2008-based projections is made up. This results in average household size declining at a slightly faster rate than the 2014-based SNHP projection as a higher percent of young people form households.
- 2.43 Research by NHPAU⁹ found that cohorts who are less able to access home ownership earlier in their adult lives due to 'boom' or 'recession' factors impacting on affordability are nevertheless able to 'catch-up' – 80% of the gap at the age of 30 is 'caught-up' by the age of 40. There is therefore every reason to believe this finding is broadly analogous to household formation, and supports the resumption of long term trends.

Potential Implications of Brexit on Household Formation

- 2.44 As stated earlier in this section, the full effect of Brexit on factors affecting household formation is impossible to gauge at present. As the sensitivity test applied has anticipated a partial (and not full) return to pre-recession trends already, it is not considered appropriate to 'roll back' this sensitivity testing to account for Brexit. This is in lieu of the fact that Practice Guidance suggests sensitivity testing should be undertaken to account for *local circumstances* and because such an approach would be counter intuitive to the aim to 'boost significantly' the supply of houses within the Framework.

⁹ NHPAU (2010) How do Housing Price Booms and Busts Affect Home Ownership for Different Birth Cohorts?

Summary

2.45

Overall, it is considered that the most recent population and household projections for Staffordshire Moorlands (namely the 2014-based SNPP/SNHP) represent a reasonable assessment of likely future growth in the context of past trends and likely future change. The average household size in the 2014-based SNHP is projected to decline at a rate very similar to the 2012-based SNHP, although both are some way off the rate of decline projected in the 2008-based SNHP. It is likely that the ageing population is a key driver of household growth in the District, as it is with many other areas in the UK.

3.0 The Future Housing Scenarios

Introduction

- 3.1 A number of (previously agreed) scenarios, based upon demographic, economic and housing trends, have been updated to reflect the 2014- based data and the latest mid-year population estimates. The modelling work excludes any “policy-on” scenarios and includes the addition of a scenario which seeks to meet identified affordable housing needs.
- 3.2 These scenarios represent the alternatives for potential future growth within the District. They demonstrate the extent to which the population of the Staffordshire Moorlands District could change over the Plan period and how this change would be translated into households, dwellings, labour force and the number of jobs that might be supported by the local population.
- 3.3 NLP has modelled each of these scenarios using industry-standard PopGroup demographic modelling software.

Scenarios – Assumptions and Approach

- 3.4 The scenarios adopted for testing fall into three broad groups: demographic-led, economic-led and housing-led. The starting point remains the baseline scenario (A), with various data variables and assumptions applied for each of the subsequent scenarios, for the Plan period 2014-2031/33 as follows:
1. **Demographic-led** – *“How much development is required to meet projected levels of population change?”*:
 - **Scenario A: Baseline 2014 SNPP** – A scenario utilising the latest ONS 2014-based SNPP and the headship rates from the CLG 2014-based household projections;
 - **Scenario Aa: Sensitivity Test** – Applying the same assumptions as for Scenario A; however, starting post-2017, headship rates amongst 15-34 year olds will return half-way to the 2008-based projections by 2031/33. This is termed ‘partial catch-up’ [PCU];
 - **Scenario Ab: Sensitivity Test** – As Aa, but incorporating the latest 2015 mid-year population estimate;
 - **Scenario B: Natural Change** – This scenario sets all migration to 0, assuming that there is no movement into or out of the District over the Plan period. This provides an indication of the level of housing required were only current local residents’ needs were catered for;

- **Scenario C: Zero Net-Migration** – A theoretical scenario whereby in and out migration (both internal and international) is balanced, meaning there is only population churn in the District and no growth from net in-migration, i.e. migrants continue to move into and out of the District, but on a one in, one out basis;
 - **Scenario D: Long Term Migration Trends** – A scenario based upon migration trends observed for Staffordshire Moorlands over the previous 10 years (the period 2005/06 to 2014/15);
 - **Scenario Da: Sensitivity Test** – Applying the same assumptions as for Scenario D; incorporating PCU headship rates;
2. **Economic-led** – *“How much development is required to ensure forecasts of future employment change are supported by the local labour supply?”*:
- **Scenario E: Oxford Economics Job Growth** – based on (post-Brexit) policy off job growth as forecast by Oxford Economics (October 2016), based on the net additional workforce jobs over the period 2014-2031 or 2014-2033;
 - **Scenario Ea: Sensitivity Test** – based on Oxford Economics job growth forecast but reduced to account for -5% out commuting;
 - **Scenario Eb: Sensitivity Test** – based on Oxford Economics job growth forecast but incorporating PCU headship rates;
 - **Scenario F: Job Stabilisation** – Constraining the number of net additional jobs over the 17-19-year plan period to zero, to assess the level of housing needed to maintain the current number of jobs;
 - **Scenario Fa: Sensitivity Test** – based on zero net job growth but incorporating PCU headship rates;
 - **Scenario G: Past Trends Job Growth** – Taking into account the past trends job growth for the 15-year period to 2015 derived from the Oxford Economics data (0.47% annually) this scenario assumes that this will continue over the plan period; and
 - **Scenario Ga: Sensitivity Test** – based on Past Trends job growth but incorporating PCU headship rates;
 - **Scenario H: Experian Job Growth** - based on policy off job growth as forecast by Experian (December 2016), using net additional workforce jobs over the period 2014-2031 / 2014-2033;
 - **Scenario Ha: Sensitivity Test** – based on Experian job growth but incorporating PCU headship rates;
 - **Scenario I: Combined Job Growth** - based on a combination of the Oxford Economics and Experian job growth projections over the period 2014-2031 / 2033;
 - **Scenario Ia: Sensitivity Test** – based on the aforementioned combined job growth but incorporating PCU headship rates;

3. **Affordable Housing Need** – “What are the implications - in terms of the number of people, households and jobs - of delivering a certain amount of development?”:

- **SHMA Affordable Housing Need:** based on the affordable housing needs identified in Section 6.0 of this SHMA.

3.5 The above scenarios with their respective sensitivity tests provide a wide range of outputs evidencing housing and employment development needs based upon different factors under different scenarios. All scenarios provide development needs over a timeframe starting in 2014 and ending in 2031/33. There are a number of assumptions which NLP has adopted to form the basis for all modelled scenarios.

3.6 These include:

- a. A base population derived from the 2014 to 2015 Mid-Year Population Estimates by single year of age and gender is used (with the exception of the 2014-based SNPP starting point Scenario A, which uses the 2014 MYE only);
- b. Fertility rates are applied to the population using the projected Total Fertility Rate for Staffordshire Moorlands derived from the ONS 2014-based SNPP;
- c. Mortality rates are applied to the population forecast using projected Standardised Mortality Ratios for Staffordshire Moorlands from the ONS 2014-based SNPP;
- d. Inputs on headship rates are based on the 2014-based SNHP, which provide data by 5-year age group and sex for Staffordshire Moorlands from 2012 to 2031 or 2012-2033, with the exception of the PCU sensitivity tests;
- e. In Staffordshire Moorlands (as in any area) housing vacancies and second homes will result in the number of dwellings exceeding the number of resident households. In establishing future projections, it is likewise expected that the dwelling requirement will exceed the household forecast. Hence a rate of 4.02%¹⁰ has been factored into the model, based upon the most recent vacancy data available for the District;
- f. The unemployment rate is taken from the Annual Population Survey [APS] model-based estimates of unemployment for Staffordshire Moorlands. At 2014 (the base date of the modelling) this was 3.4%. It has been assumed that by 2020, the unemployment level will have fallen back to its pre-recession average (i.e. that observed over the period 2004-2008), which is 3.14%, on the basis that this better reflects the likely rate of unemployment in the area. Post 2020 this rate is held constant;
- g. It has been assumed that the Labour Force Ratio (the ratio of employed workers in an area to jobs in an area, which takes into account commuting

¹⁰ Council Tax Base for Formula Grant Purposes CTB (Average of 4.06% in 2014 and 3.97% in 2015). This has been used as it is considered that it represents a reasonably accurate reflection of the true level of vacant/second homes in the District, incorporating recent nationally-available data.

patterns and 'double-jobbing') remains static post 2015¹¹.

h. Economic activity rates by age and sex have been projected using the OBR Labour Market Participation Rate Projections¹². These have been applied to the 2011 Census rates for Staffordshire Moorlands, and have been re-based to 2014 using the Annual Population Survey. These rates take into account changes projected in younger age groups, women and older people (associated with changes to State Pension Age).

3.7 An additional driver underpinning growth in household formation is the strong trend towards smaller average household sizes nationally. Where scenarios have been demographically modelled, a full schedule of the assumptions and inputs underpinning each one is contained within Appendix 1, and the outputs from the modelling are contained within Appendix 3.

Modelling Results

Demographic-Led Scenarios

3.8 The demographic scenarios use components of population change (births, deaths and migration) to project how the future population, household composition, and consequent need for housing, will support future employment growth. The headline results for each scenario are outlined below.

Scenario A: 2014-based SNHP

3.9 This scenario represents the demographic starting point for calculating housing OAN as set out in the Practice Guidance. It simply models the 2014-based SNPP and applies the headship rates within the 2014-based SNHP.

3.10 Under this scenario, the population of Staffordshire Moorlands is projected to increase by 2,239 by 2031 (and by 2,416 to 2033). Of this population growth, all is attributable to net in-migration which counteracts the significant decrease in population associated with natural change.

3.11 2,780 new households would form to 2031 (3,002 to 2033) which equates to a need for 170 dwellings per annum [dpa] (165 dpa to 2033). The disproportionately high rate of new household formation relative to population growth is due to wider trends concerning inward migration and an ageing population, as older residents tend to form smaller households over time.

3.12 However this ageing population contributes towards a declining labour force and job losses, which could undermine economic stability in the long term.

Scenario Aa: Sensitivity for Partial Catch-Up Headship Rates

3.13 This sensitivity test assumes that the 'pent-up' demand within the younger population (15-34 age groups) will be released over time, and household

¹¹ Commuting rate kept constant at 1.31 based on 50,600 economically active Staffordshire Moorlands residents in employment as of 2015 (ONS Annual Population Survey); 2.9% unemployed (ONS APS) and 37,300 jobs (Oxford Economics).

¹² Published November 2015.

formation will return to a level which is reflective of the true demand, as opposed to recent trends which have been suppressed. This results in higher household formation in those younger cohorts (starting post-2017 to allow for a full return to pre-recessionary conditions).

- 3.14 As a result of accelerated household formation rates applied to the same population structure as set out in the 2014-based SNPP, this sensitivity test suggests a need for 192 dpa 2014-2031 (186 dpa to 2033).

Scenario Ab: MYE + Sensitivity for Partial Catch-Up Headship Rates

- 3.15 This sensitivity test effectively replicates Scenario Aa, but restricts the 2015 population to the latest MYE rather than the 2014-based SNPP figure for that year. The population was then re-based going forward applying the fertility, mortality and migration rates from the 2014 SNPP. Using this scenario, there would be a total dwelling need of 196 dpa to 2031 and 190 dpa to 2033.
- 3.16 The key outputs for Scenarios A, Aa and Ab are shown below.

Table 3.1 Summary of Population, Job and Dwelling Outputs - Scenarios A, Aa and Ab

		2014-2031	p.a.	2014-2033	p.a.
Population Change		2,239	132	2,416	127
<i>of which natural change</i>		-4,893	-288	-5,769	-304
<i>of which net migration</i>		7,132	420	8,185	431
Labour Force		-2,215	-130	-2,377	-125
Jobs		-1,637	-96	-1,764	-93
Scenario A: 2014 SNPP Baseline	Households	2,780	164	3,002	158
	Dwellings*	2,896	170	3,127	165
Scenario Aa: 2014 SNPP+ PCU	Households	3,125	184	3,383	178
	Dwellings*	3,256	192	3,525	186
Population Change		2,567	151	2,774	146
<i>of which natural change</i>		-4,630	-272	-5,473	-288
<i>of which net migration</i>		7,197	423	8,247	434
Labour Force		-2,141	-126	-2,300	-121
Jobs		-1,579	-93	-1,704	-90
Scenario Ab: MYE + PCU	Households	3,197	188	3,465	182
	Dwellings*	3,331	196	3,610	190

Source: NLP using PopGroup

*In Staffordshire Moorlands housing vacancies and second homes will result in the number of dwellings exceeding the number of households. In establishing future projections, it is likewise expected that the dwelling requirement will exceed the household forecast. Hence a rate of 4.02% has been factored into the model, based upon the most recent vacancy data available for the District.

Scenario B: Natural Change

- 3.17 This scenario excludes all inward and outward migration to/from Staffordshire Moorlands over the plan period, modelling the natural change within the

current local population only (arising from the interplay between births and deaths). This is a purely hypothetical scenario as a consequence.

- 3.18 Under this scenario it is likely that there would be a population decrease of 3,838 between 2014 and 2031, although there would still be a very modest increase in the number of newly forming households (+261) and dwellings (261, or 15 dpa). The equivalent dwelling figure up to 2033 would be a negligible 6 dpa.

Table 3.2 Summary of Population, Job and Dwelling Outputs - Scenario B

	2014-2031	p.a.	2014-2033	p.a.
Population Change	-3,838	-226	-4,461	-235
<i>of which natural change</i>	-3,838	-226	-4,461	-235
<i>of which net migration</i>	0	0	0	0
Labour Force	-4,975	-293	-5,741	-302
Jobs	-3,802	-224	-4,402	-232
Households	261	15	113	6
Dwellings	272	16	118	6

Source: NLP using PopGroup

Scenario C: Zero Net Migration

- 3.19 The zero net migration scenario represents the impacts of equalising migration (i.e. ensuring the number of internal and international migrants coming into the district equals the number moving out). Nevertheless, the profile of the population changes over time due to the different demographic profile of in-migrants and out-migrants. This has an impact on the labour force change as well as household growth.
- 3.20 This scenario would lead to a reduced population, labour force and job losses which would see a negative requirement for dwellings in the District of -22 dpa to 2031 and -29 dpa to 2033. This is not dissimilar to the +7dpa identified in the previous SHMA Update for this scenario.

Table 3.3 Summary of Population, Job and Dwelling Outputs - Scenario C

	2014-2031	p.a.	2014-2033	p.a.
Population Change	-2,493	-147	-2,896	-152
<i>of which natural change</i>	-2,493	-147	-3,685	-194
<i>of which net migration</i>	0	0	0	0
Labour Force	-3,564	-210	-3,955	-208
Jobs	-2,695	-159	-3,002	-158
Households	-359	-21	-533	-28
Dwellings	-374	-22	-556	-29

Source: NLP using PopGroup

Scenario D: Long Term Migration Trends

3.21 Over the longer term (the past ten years), net migration in Staffordshire Moorlands has been slightly lower than the level projected forward in the 2014-based SNPP. Projecting this level of migration over the plan period results in population growth, but at a lower rate; there remains a decrease in the size of the labour force, jobs losses and a dwelling need of 139 dpa to 2031 (129 dpa to 2033).

Scenario Da: Sensitivity Test

3.22 As with Scenario Aa, this sensitivity models the difference in housing need under the assumption of accelerated household formation rates in younger age groups, whilst incorporating the same population growth assumptions as per the long term migration trend (Scenario D). Such an approach would increase the dwelling requirement to 160 dpa (149 dpa to 2033).

3.23 The key scenario outputs for Scenarios D and Da are shown in Table 3.4.

Table 3.4 Summary of Population, Job and Dwelling Outputs – Scenarios D and Da

		2014-2031	p.a.	2014-2033	p.a.
Population Change		1,022	87	817	43
<i>of which natural change</i>		-4,794	-282	-5683	-299
<i>of which net migration</i>		5,816	342	6,500	342
Labour Force		-2,959	-174	-3,329	-175
Jobs		-2,220	-131	-2,511	-132
Scenario D: Long Term Migration	Households	2,274	134	2,352	124
	Dwellings	2,369	139	2,450	129
Scenario Da: Long Term Migration+ PCU	Households	2,612	154	2,724	143
	Dwellings	2,721	160	2,838	149

Source: NLP using PopGroup

3.24 Compared to the January 2016 SHMA Update, the previous Long Term Migration Scenario identified a need for 136 dpa, slightly below the 139 dpa identified above.

Employment-led Scenarios

3.25 A series of employment-led scenarios have been assessed to identify how much additional housing may be needed to take account of employment growth.

Scenario E: Oxford Economics Job Growth

3.26 This represents a 'policy-off' scenario using Oxford Economics projections of future employment growth in Staffordshire Moorlands District. This represents the 'unconstrained' potential of the area based on its existing business base, mix of sectors and inherent economic qualities. At a local level, past growth

trends (and in particular the performance of individual sectors in the local area relative to the regional performance) represent the key driver of determining future growth.

3.27 The projections indicate that for the period 2014-2031, Staffordshire Moorlands will grow by 339 jobs (20 annually). Although this seems low, this must be seen in the context of the number of jobs declining quite significantly under the 2014-based SNPP baseline. As such, to support this level of job growth there would need to be significant in-migration, necessary to support an increase in the size of the labour force sufficient to support the forecast job growth.

3.28 As summarised in Table 3.5, this would equate to population growth of +7,431 to 2031, household growth of 4,553 and a dwelling need of 4,744, or 279 dpa (falling to 263 dpa to 2033).

Scenario Ea: Oxford Economics Job Growth + 5% Reduction in Commuting

3.29 A sensitivity test was modelled, allowing for a reduction in the level of net out-commuting over the period 2014 – 2031/33 by 5%. Whilst recognising this would be challenging, this may be considered desirable in terms of delivering sustainable development.

3.30 Such an outcome would result in the level of job growth remaining the same as in Scenario E, but reducing the number of in-migrants required to take up those job opportunities as they would be more effectively serviced by the existing resident population (i.e. fewer people commute out of the District for work, taking up more of the locally based jobs instead). Under this sensitivity test, the dwelling need would reduce to 180 dpa (173 dpa to 2033).

Scenario Eb: Oxford Economics Job Growth + PCU

3.31 A final sensitivity test analysed the housing implications of pursuing the same level of modest (but positive) job growth, but applying the PCU headship rates to the Scenario E population growth. As can be seen in Table 3.5, this would increase the number of homes required to 5,135, or 302 dpa (286 dpa to 2033).

Table 3.5 Summary of Population, Job and Dwelling Outputs – Scenarios E, Ea and Eb

		2014-2031	p.a	2014-2033	p.a.
Population Change		7,236	426	7,431	391
<i>of which natural change</i>		-4,012	-236	-4,758	-250
<i>of which net migration</i>		11,249	662	12,189	642
Labour Force		305	18	116	6
Jobs		339	20	191	10
Scenario E: OE Job Growth	Households	4,553	268	4,792	252
	Dwellings	4,744	279	4,993	263

		2014-2031	p.a	2014-2033	p.a.
Population Change		2,713	160	2,881	152
<i>of which natural change</i>		-4,458	-262	-5,310	-279
<i>of which net migration</i>		7,171	422	8,191	431
Labour Force		-2,083	-123	-2,263	-119
Jobs		339	20	191	10
Scenario Ea: OE Job Growth -5% in Commuting	Households	2,938	173	3,150	166
	Dwellings	3,061	180	3,282	173
Population Change		7,236	426	7,431	391
<i>of which natural change</i>		-4,012	-236	-4,758	-250
<i>of which net migration</i>		11,249	662	12,189	642
Labour Force		305	18	116	6
Jobs		339	20	191	10
Scenario Eb: OE Job Growth PCU	Households	4,929	290	5,207	274
	Dwellings	5,135	302	5,425	286

Source: NLP using PopGroup

- 3.32 Compared to the January 2016 Update, which identified a need for 398 dpa over the period 2012 to 2031, the equivalent Scenario E figure of 279 dpa appears to be a sizeable reduction. This is due to the big difference in the level of jobs forecast by Oxford Economics in the latest projections. The previous projections forecast a net job growth of +2,250 between 2012-2031, compared to +339 between 2014 and 2031.

Scenario F: Job Stabilisation

- 3.33 This scenario assumes that the number of jobs in Staffordshire Moorlands District remains at its 2014 level over the plan period; this means that due to the ageing population, there would be a need for growth in the labour force, in-migration and ultimately housing of 259 dpa to 2031 (and 251 dpa to 2033).

Scenario Fa: Job Stabilisation + PCU

- 3.34 Applying the same employment and demographic inputs as for Scenario F, but this time applying the PCU accelerated headship rates would generate a much higher level of housing need in the order of 282 dpa to 2031.

- 3.35 A comparison of the two scenarios is presented in Table 3.7.

Table 3.6 Scenario F: Job Stabilisation

		2014-31	p.a	2014-33	p.a.
Population Change		6,339	373	6,876	362
<i>of which natural change</i>		-4,250	250	-5,006	263
<i>of which net migration</i>		10,588	623	11,882	625
Labour Force		-127	-7	-127	-7
Jobs		0	0	0	0
Scenario F: Job Stabilisation	Households	4,222	248	4,582	241
	Dwellings	4,398	259	4,774	251
Scenario Fa: Job Stabilisation + PCU	Households	4,595	270	4,996	263
	Dwellings	4,787	282	5,205	274

Source: NLP PopGroup

Scenario G: Past Trends Job Growth

3.36 The past trends scenario indicates the level of housing needed were historic job growth trends set to continue over the plan period. Over the period examined (the 15 years to 2015) job growth in Staffordshire Moorlands was impressive, with Oxford Economics recording job growth of 0.47% annually over this time period. It should be noted that much of this growth has been recorded in the two years 2013-2015, hence the significant uplift in the figures when compared to previous versions of this scenario (which modelled the period 2000-2013).

3.37 Modelling this level of growth in PopGroup would result in very significant levels of net inward migration and would generate a need for 420 dpa to 2031, or 415 dpa to 2033¹³.

Scenario Ga: Past Trends Job Growth + PCU

3.38 Applying the same employment and demographic inputs as for Scenario G, but this time applying the PCU accelerated headship rates would generate a much higher level of housing need in the order 446 dpa to 2031.

3.39 A comparison of the two scenarios is presented in Table 3.7.

¹³ Please note that the level of growth is slightly different to the figure used in the ELR, as that report uses FTEs, whereas this uses total workforce jobs (which are higher).

Table 3.7 Summary of Population, Job and Dwelling Outputs – Scenarios G and Ga

	2014-31	p.a	2014-33	p.a.	
Population Change	13,697	806	15,185	799	
<i>of which natural change</i>	-3,465	-204	-4,043	-213	
<i>of which net migration</i>	17,161	1,009	19,227	1,012	
Labour Force	3,746	220	4,222	222	
Jobs	3,038	179	3,411	180	
Scenario G: Past Trends	Households	6,859	403	7,576	399
	Dwellings	7,146	420	7,893	415
Scenario Ga: Past Trends + PCU	Households	7,280	428	8,046	423
	Dwellings	7,584	446	8,383	441

Source: NLP using PopGroup

Scenario H: Experian Job Growth

- 3.40 This represents a 'policy-off' scenario using Experian's local area-based projections of future employment growth in Staffordshire Moorlands District.
- 3.41 The Experian econometric forecasts begin with UK-wide economic variables to create a core macro-economic forecast, indicating the national demand for labour. Regional forecasts of employment change are constrained to conform to these UK-wide employment figures, and local forecasts are constrained to match the regional totals. These forecasts set out the expected levels of growth across 12 broad sectors and 38 categories.
- 3.42 The latest projections indicate that for the period 2014-2031, Staffordshire Moorlands' economy will grow by 1,400 workforce jobs (82 annually). This is significantly higher than the Oxford Economics projections, primarily due to much stronger growth in certain manufacturing sectors. To support this level of job growth there would need to be even higher levels of in-migration necessary to support an increase in the size of the labour force to support the forecast job growth.
- 3.43 As summarised in Table 3.8, this would equate to population growth of +9,705 to 2031; household growth of 5,428; and a dwelling need of 5,655, or 333 dpa (falling to 328 dpa to 2033).

Scenario Ha: Experian Job Growth + PCU

- 3.44 This sensitivity test analysed the housing implications of pursuing the same level of job growth as per Scenario H, but applying the PCU headship rates. As can be seen in Table 3.8, this would increase the number of homes required to 6,067, or 357 dpa (352 dpa to 2033).

Table 3.8 Summary of Population, Job and Dwelling Outputs – Scenarios H and Ha

		2014-2031	p.a	2014-2033	p.a.
Population Change		9,705	571	10,752	566
<i>of which natural change</i>		-3,933	-231	-4,602	-242
<i>of which net migration</i>		13,638	802	15,354	808
Labour Force		1,658	98	1,913	101
Jobs		1,400	82	1,600	84
Scenario H: Experian Job Growth	Households	5,428	319	5,977	315
	Dwellings	5,655	333	6,227	328
Population Change		9,705	571	10,752	566
<i>of which natural change</i>		-3,933	-231	-4,602	-271
<i>of which net migration</i>		13,638	802	15,354	903
Labour Force		1,658	98	1,913	101
Jobs		1,400	82	1,600	84
Scenario Ha: Experian Job Growth PCU	Households	5,824	343	6,420	338
	Dwellings	6,067	357	6,688	352

Source: NLP using PopGroup

Scenario I: Combined Job Growth

3.45 It is important to note at the outset that the two forecasting houses referenced in this SHMA, namely Experian and Oxford Economics [OE], both produce credible and robust estimates of job growth at a local area level. However, there are methodological differences between them regarding how the various job projections are derived. This can mean that in certain circumstances and in certain spatial areas, one may produce a more realistic, or appropriate, level of job growth than another.

3.46 The 2017 Staffordshire Moorlands District Employment Land Review [ELR] analysed the differences between the two sets of projections in detail and found that although certain industrial sectors (particularly under the broad sector of manufacturing) displayed significant growth variations, no coding errors were apparent. It is important to recognise that there are inevitably uncertainties and limitations associated with modelling assumptions under any of the future labour demand scenarios considered. In particular, depending upon the methodology applied, there may be data anomalies in the source data used to build the forecasts, which then have the potential to become accentuated over time.

3.47 Whilst Experian and OE provide overall methodologies setting out their broad assumptions in defining their local area based econometric models, they do not disclose the many detailed assumptions they make concerning the local and regional economy, along with the adjustments made to the raw data in order to calculate such forecasts. Because of this, it is difficult to make robust decisions concerning the comparative weight to attach to each forecast for Staffordshire Moorlands District.

- 3.48 On this basis, it was considered reasonable to model a new scenario which takes an average level of job growth across the two econometric projections.
- 3.49 Hence Scenario I combines the job growth projected by Oxford Economics (+339) and Experian (+1,400) to plan for an average level of job growth equal to **+870 jobs (794 FTEs)** over the period 2014-2031, and 893 jobs (net) (819 FTEs) to 2033 for Staffordshire Moorlands District.
- 3.50 As summarised in Table 3.8, this would equate to population growth of +8,471 to 2031, household growth of 4,991 and a dwelling need of 5,199, or 306 dpa (falling to 295 dpa to 2033).

Scenario Ia: Combined Job Growth + PCU

- 3.51 This sensitivity test analysed the housing implications of pursuing the same level of job growth as per Scenario I, but applying the PCU headship rates. As can be seen in Table 3.8, this would increase the number of homes required to 5,601, or 329 dpa (319 dpa to 2033).

Table 3.9 Summary of Population, Job and Dwelling Outputs – Scenarios I and Ia

		2014-2031	p.a	2014-2033	p.a.
Population Change		8,471	498	9,084	478
<i>of which natural change</i>		-3,972	-234	-4,680	-246
<i>of which net migration</i>		12,443	732	13,764	724
Labour Force		981	58	1,011	53
Jobs		870	51	893	47
Scenario I: Combined Job Growth	Households	4,991	294	5,382	283
	Dwellings	5,199	306	5,608	295
Population Change		8,471	498	9,084	478
<i>of which natural change</i>		-3,972	-234	-4,680	-246
<i>of which net migration</i>		12,443	732	13,764	724
Labour Force		981	58	1,011	53
Jobs		870	51	893	47
Scenario Ia: Combined Job Growth PCU	Households	5,376	316	5,811	306
	Dwellings	5,601	329	6,054	319

Source: NLP using PopGroup

Affordable Housing Need

- 3.52 This SHMA has provided an in-depth analysis for affordable housing needs in Staffordshire Moorlands, based on a range of data and analysis. Subsequent sections of this report conclude that there was a net annual need of between 224 and 432 affordable dwellings¹⁴, which, attributing an estimated delivery rate of 33% (Policy H2 of the adopted Core Strategy, March 2014) equates to a

¹⁴ Note: as set out in Section 6.0, the 432 dpa figure relates to the gross affordable housing need figure based on the standard Practice Guidance/CLG Guidance approach; the lower 224 dpa figure makes allowances for a deposit and/or a greater proportion (35%) of income to be spent upon renting a property.

total need of at least 679 dpa and potentially as high as 1,309 dpa. This does not account for the existing backlog.

Summary

3.53

The scenarios present a wide range of housing need scenarios for the period 2014 to 2031/33 based upon different drivers of housing need in Staffordshire Moorlands District. These are summarised in Table 3.10.

Table 3.10 Comparison of Scenarios

	February 2017 SHMA						Previous January 2016 SHMA Update
	Population Change	Job Growth	Dwellings 2014-2031	p.a.	Dwellings 2014-2033	p.a.	Dpa 2014- 2031
A. Baseline			2,896	170	3,127	165	181
Aa. Baseline + PCU	2,239	-1,637	3,256	192	3,525	186	199
Ab MYE + PCU	2,567	-1,579	3,331	196	3,610	190	205
B. Natural Change	-3,838	-3,802	272	16	118	6	41
C. Zero Net Migration	-2,493	-2,695	-374	-22	-556	-29	7
D. Long Term Migration			2,369	139	2,450	129	136
Da. Long Term Migration +PCU	1,022	-2,220	2,721	160	2,838	149	-
E. OE Job Growth	7,236		4,744	279	4,993	263	398
Ea. OE + Reduced Commuting	2,713	339	3,061	180	3,282	173	329
Eb. OE + PCU	7,236		5,135	302	5,425	286	-
F. Job Stabilisation			4,398	259	4,774	251	290
Fa. Job Stabilisation +PCU	6,339	0	4,787	282	5,205	274	-
G. Past Trends			7,146	420	7,893	415	290
Ga. Past Trends +PCU	13,697	3,038	7,584	446	8,383	441	-
H. Experian Job Growth			5,655	333	6,227	328	-
Experian Job Growth + PCU	9,705	1,400	6,067	357	6,688	352	-
I Combined Job Growth			5,199	306	5,608	295	-
Ia. Combined Job Growth + PCU	8,471	870	5,601	329	6,054	319	-
Affordable Housing Needs				679 / 1,309		679 / 1,309	-

Source: NLP PopGroup

3.54

The dwelling needs range from -29 dpa under Scenario C: Net Zero Migration and up to 446 dpa under Scenario Ga: Past Trends Job Growth + PCU. To meet the full affordable housing need of 226/434 dpa, a step change of at least 679 dpa and possibly as high as 1,309 dpa would be required. Although the scenarios are broadly similar to those looked at previously, the use of updated SNPP, SNHP and headship rates (plus a number of other data updates) as well as the extension of the projection period to 2033 has resulted in some quite significant variation from the initial figures, with a general downward trend reflecting the lower household and employment growth forecast.

4.0 Market Signals

Introduction

4.1 The Practice Guidance states that the housing need suggested by the household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings¹⁵.

4.2 The Guidance sets out six key market signals¹⁶:

- 1 land prices;
- 2 house prices;
- 3 rents;
- 4 affordability;
- 5 rate of development; and,
- 6 overcrowding.

4.3 It goes on to indicate that an appropriate comparison of these should be made with an upward adjustment made to planned housing numbers where there is evidence of a worsening trend in any of these indicators:

“This includes comparison with longer term trends (both in absolute levels and rates of change) in the housing market area; similar demographic and economic areas; and nationally. Divergence under any of these circumstances will require upwards adjustment to planned housing numbers compared to ones based solely on household projections”.

“In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable. The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be”¹⁷

4.4 The Practice Guidance sets out a clear and logical ‘test’ for the circumstances in which objectively assessed needs (including meeting housing demand) will be in excess of demographic-led projections.

4.5 The Local Plan Expert Group [LPEG], in its Report to the Communities Secretary and to the Minister of Housing and Planning (March 2016), recommended various changes to the Practice Guidance concerning the assessment of housing market signals.

¹⁵ 2a-018-20140306

¹⁶ 2a-019-20140306

¹⁷ 2a-020-130729

4.6 Instead of analysing 6 key market signals and considering whether an uplift is justified as the current Practice Guidance states (and which this Section will examine), the LPEG recommends examining just two indicators:

- 1 **House price affordability** – the ratio of median quartile house prices to median earnings ('The House Price Ratio' [HPR]); and,
- 2 **Rental affordability** – lower quartile rental costs as a percent of lower quartile earnings (The Rental Affordability Ratio' [RAR]).

4.7 An uplift would then be applied in line with the following benchmarks:

- 1 Where the HPR is less than 5.3 and RAR is less than 25%, no uplift is required
- 2 Where HPR is at or above 5.3 and less than 7.0, and/or the RAR is at or above 25% and less than 30%, a 10% uplift should be applied;
- 3 Where the HPR is at or above 7.0 and less than 8.7, and/or the RAR is at or above 30% and less than 9, a 20% uplift should be applied; and
- 4 Where the HPR is at or above 8.7, and/or the RAR is at or above 35%, a 25% uplift should be applied.

4.8 The LPEG report remains at the consultation stage and has no formal weight. Hence although limited weight can be given to the LPEG approach given that it is not policy or endorsed by Government, it is at least helpful in seeking to understand the general 'direction of travel' of defining housing OAN and what an appropriate response might be to define the influence of market signals and affordable housing. As such, we have applied the two indicators to Staffordshire Moorlands as part of the consideration of the requirements of the Practice Guidance.

Land Prices

4.9 There is no readily available and nationally-consistent data on unequipped agricultural land values or residential building land prices from the Valuation Office Agency [VOA] for Staffordshire Moorlands. However, CLG has published a document entitled '*Land value estimates for policy appraisal*' (February 2015) which contains post-permission residential land value estimates per hectare, for each Local Authority. For Staffordshire Moorlands this figure is £405,000 per hectare, significantly below the equivalent figure for England (excluding London) of £1,958,000.

House Prices

4.10 The Practice Guidance identifies that longer term changes in house prices may indicate an imbalance between the demand for and supply of housing. As mix-adjusted prices and/or House Price Indices are not available at local authority level, for Staffordshire Moorlands we consider price paid data is the most reasonable indicator.

4.11 Land registry price paid data displays the median prices in Staffordshire Moorlands, alongside Staffordshire and England as of 2015 (Table 4.1). These median prices illustrate lower prices in Staffordshire Moorlands compared to both the sub-region and national rates.

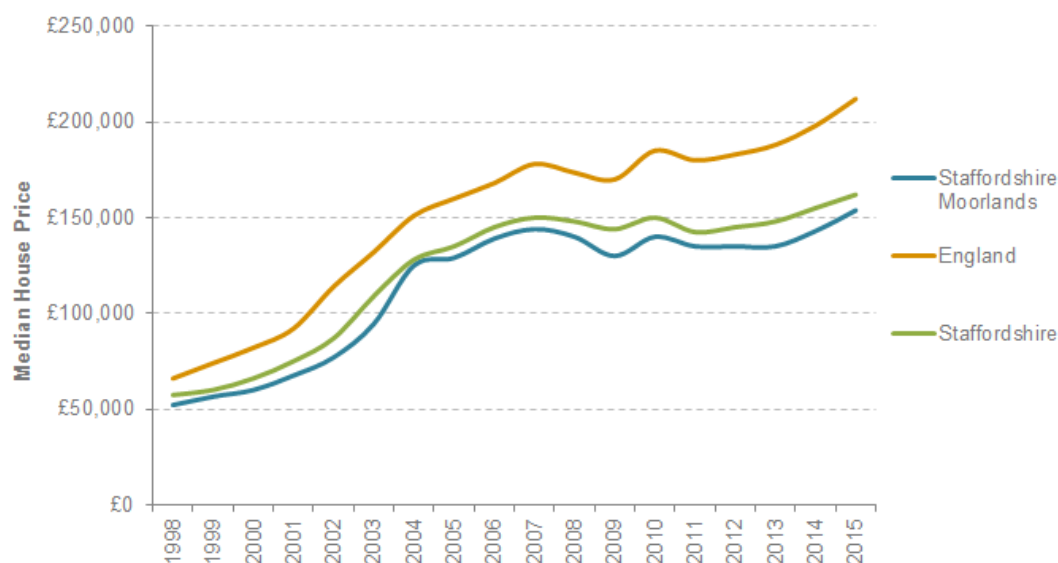
Table 4.1 Median Dwelling Price, Staffordshire Moorlands (2015)

	Median Dwelling Price
Staffordshire Moorlands	£153,750
Staffordshire	£162,000
England	£212,000

Source: Land Registry Price Paid Data

4.12 CLG publishes series data on median house prices based on the same Land Registry price paid data series. This currently runs from 1998 to 2015. This longitudinal analysis (Figure 4.1), indicates that Staffordshire Moorlands has achieved consistently lower house prices than both Staffordshire and England as a whole. The differences have remained relatively stable in recent years whilst the national median house price has generally continued to increase at a faster rate. This has resulted in an expanding gap between median house prices in Staffordshire Moorlands and the national median since 1999 (as illustrated in Figure 4.1).

Figure 4.1 Median House Prices Staffordshire Moorlands (2015)



Source: CLG Live Table 586

4.13 In 2015, median house prices in the District were 39% lower than the national average. As such, it is unsurprising that Staffordshire Moorlands ranked as being the 81st cheapest place to live in England out of 326 districts.

4.14 As set out in the Practice Guidance, higher house prices and long term rises (over an extended period) tend to indicate an imbalance between the demand for housing and the supply. In this instance, Staffordshire Moorlands' house

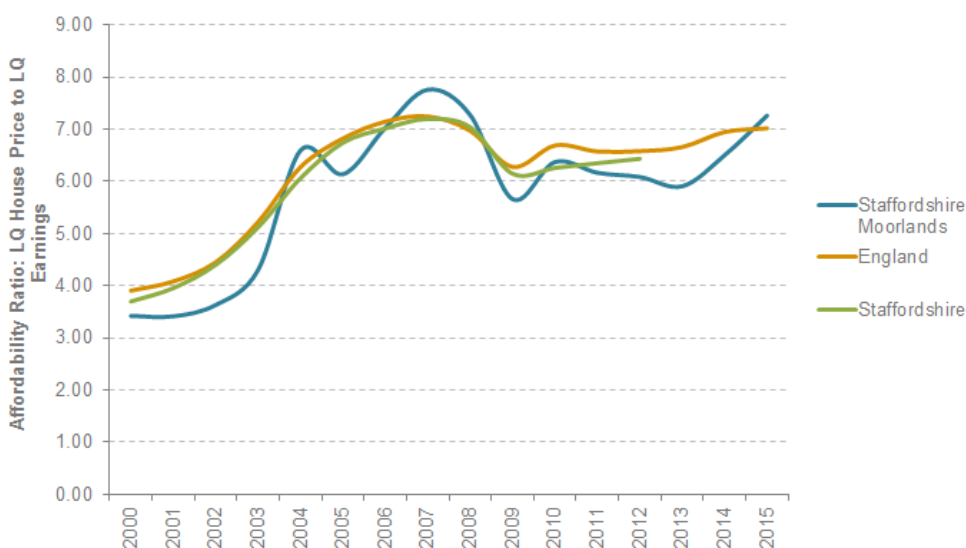
prices have been relatively stable, suggesting that the imbalance is not as severe as it has been elsewhere in the country.

- 4.15 It is important to note that there are significant differences in average house prices across the District, with the rural north east (i.e. those lying within the Peak District National Park) having significantly higher house prices than urban areas within Leek and Biddulph. Whilst the overall average fluctuates between the two extremes, it has the effect of masking significant disparities in the market.

Affordability

- 4.16 The Practice Guidance considers that assessing affordability involves comparing costs against the ability to pay, with the relevant indicator being the ratio between lower quartile house prices and lower quartile earnings.

Figure 4.2 Ratio of Lower Quartile House Price to Lower Quartile Earnings in Staffordshire Moorlands



Source: CLG Live Table 576

- 4.17 It can be seen in Figure 4.2 that over the past 15 years, the ratio of lower quartile house prices to lower quartile earnings in Staffordshire Moorlands has oscillated significantly. The affordability ratio has been volatile in comparison to the national and county trends and is currently higher than the national average, having risen sharply over the past year. In 2015 Staffordshire Moorlands was the 210th most affordable place to live in England out of 326 districts behind Derbyshire Dales and only 11 places in front of Cheshire East, which incorporates some of the most affluent areas in the North of England.
- 4.18 The House Price Ratio, the measure used within the proposed changes to the Practice Guidance by the LPEG¹⁸, equates to 5.20 for Staffordshire Moorlands District (based on NLP's analysis of median house prices set against median

¹⁸ Revised Practice Guidance text on Housing and Economic Development Needs – Appendix 6 of Local Plan Expert Group Report [ID: 2a-020-20140306]

earnings, averaged over the past three years). This would in isolation suggest that no uplift is required (the threshold being 5.3), although the difference is marginal.

Rents

- 4.19 On a similar basis, high and increasing rents in an area are a further signal of stress in the housing market. Median rents in Staffordshire Moorlands in 2016 were £475 per month, compared to £545 per month in Staffordshire. Hence median rents are cheaper in Staffordshire Moorlands than they are (on average) across Staffordshire. The lower overall median rent figure for Staffordshire Moorlands could be partly explained by the relatively cheap house prices in the District. Overall, rental values in Staffordshire Moorlands are 27% lower than the national average.
- 4.20 Series data for rents from VOA from Q2 2011 to Q1 2016 demonstrate that median rents in Staffordshire Moorlands have gone up by 5.6% since 2011, compared with growth of 14% nationally and 9% across Staffordshire. It could be inferred that affordability within the private market rental sector has therefore remained stable in Staffordshire Moorlands in recent years, indicating that there is a reasonable balance between demand and supply for private rented housing over this period.
- 4.21 This is perhaps a little surprising given that Staffordshire Moorlands has a relatively low proportion of households living in private rented accommodation. According to the 2011 Census, this sector accommodates 8.6% of all households, compared to 12.8% across the West Midlands and 15.3% nationally.
- 4.22 The Rental Affordability Ratio, the measure proposed to measure market signals within the LPEG's proposed changes to the Practice Guidance¹⁹, is 21.0% for Staffordshire Moorlands (based on NLP's analysis of a 3-year average of LQ earnings against LQ 1-bedroom rental properties). According to the LPEG threshold based approach, this would not be sufficient to require an uplift to the demographic starting point.

Rate of Development

- 4.23 The rate of development is intended to be a supply-side indicator of previous under-delivery. The Practice Guidance sets out that:
- "if the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan"*²⁰
- 4.24 The rate of development is therefore a market signal relating to the quantity of past under-supply, which will need to be made up. The relevant 'planned

¹⁹ Revised Practice Guidance text on Housing and Economic Development Needs – Appendix 6 of Local Plan Expert Group Report [2a-020-20140306]

²⁰ 2a-020-20140306

supply' figures are set out in Policy SS2 within the Staffordshire Moorlands Core Strategy (2014).

- 4.25 Policy SS2 within the Core Strategy plans for 6,000 dwellings between 2006 and 2026 in Staffordshire Moorlands. This was then subdivided as 220 dpa between 2006 and 2016, 360 dpa from 2016-2021 and 400 dpa between 2021-2026. When considering the Core Strategy the Inspector in his report agreed that previous under-delivery (2006 – 2012/13) should not be accounted for in the new housing target²¹ as it would have a significant impact upon the regeneration objectives of the neighbouring conurbation. Therefore any under-delivery would be counted from 2016 (the start of the new plan period) against the housing requirement in the Core Strategy.
- 4.26 The approach set out in Table 4.2 for considering whether the District has been meeting its CS housing target, measures delivery against the 220 dpa target identified in Policy SS2 of the Council's Core Strategy.
- 4.27 Overall, against a five-year target of 1,100, the District delivered 622 (net), an under-delivery of 478 dwellings (phased policy requirement) or an under-delivery of 798 against the annual average target.

Table 4.2 Rate of delivery against the Core Strategy Target [dpa]

AMR Year	CS Target	Houses Built (net)	Under / Over Delivery	CS Target (un-phased)	Under / Over Delivery
2011/12	220	71	-149	300	-229
2012/13	220	96	-124	300	-124
2013/14	220	78	-142	300	-222
2014/15	220	278	+58	300	-22
2015/16	220	99	-121	300	-201
TOTAL	1,100	622	-478	1,500	-798

Source: SMDC and NLP Analysis

- 4.28 It is duly acknowledged that the Inspector did not seek to incorporate the existing backlog within the housing targets over the plan period. However, the Inspector did seek a commitment from the Council to undertake an early review in light of the delicate relationship between the need to meet the District's housing requirements and ensure that the regeneration objectives of the nearby Stoke conurbation were not unduly affected.
- 4.29 In these circumstances, NLP takes the view that under-delivery for the period 2011- 2016 should be considered because:
- 1 By back-loading the housing target, the under-lying 'need' for housing has not gone away. The Council has failed to deliver the 220 dpa identified since 2011 with the exception of 2014/15.

²¹ Paragraph 25 of the Staffordshire Moorlands District Council Core Strategy, Inspector's Report, January 2014

2 The 220 dwelling target over the 3-year period is a supply-side response, that may be realistic, but which does not actively address existing needs in the short term.

4.30 The clear implication of this is that the rate of delivery in the Staffordshire Moorlands HMA is currently falling short of meeting the 6,000 net requirement over the plan period, with a backlog of 478 - 798 dwellings accrued over the past five years. Overall, therefore, NLP considers that the rate of housing delivery in Staffordshire Moorlands District has fallen short of planned supply. This may have contributed towards some of the other housing market signals which indicate that there has been increasing stress in the housing market as a product of demand not being met.

Overcrowding and Homelessness

4.31 Indicators on overcrowding, sharing households and homelessness demonstrate un-met need for housing within an area. The Practice Guidance suggests that long-term increases in the number of such households may be a signal that planned housing requirements need to be increased.

4.32 The Guidance states that indicators on:

“...overcrowding, concealed and sharing households, homelessness and the number in temporary accommodation demonstrate unmet need for housing. Longer term increases in the number of such households may be a signal to consider increasing planned housing numbers...”²²

4.33 Table 4.3 illustrates that overcrowding against the occupancy rating in Staffordshire Moorlands is not considered to be severe, with just 3.07% of households living in a dwelling that is too small for their household size and composition. This compares to 8.7% nationally. It represents a marginal increase from that recorded in Staffordshire Moorlands a decade earlier (in 2001) which is again below the national trend which increased from 7.1% to 8.7% in 2011.

Table 4.3 Overcrowding: Household Room Occupancy Rating

	2001			2011		
	Total Households	-1 room occupancy or less	-1 room occupancy or less (%)	Total Households	-1 room occupancy or less	-1 room occupancy or less (%)
Staffordshire Moorlands	38,788	1,098	2.83%	41,772	1,283	3.07%
England	20,451,427	1,457,512	7.1%	22,063,368	1,928,596	8.7%

Source: Census 2001 / Census 2011

Note: the definition of the Census 'bedroom standard' is slightly different from the 'occupancy rating' that informs the Government's Under-Occupancy Charges, i.e. the Census states that 'two persons of the same sex aged between 10 and 20' can occupy one bedroom, whilst the Under Occupancy Charge changes this to 'any two children of the same sex aged under 16'. It is possible that if the Government's policy continues into the long term, then changes will be made to the categorisation of the Census's Occupancy Rating to bring the two datasets into line

²² 2a-019-20140306

4.34 The Census also recorded the number of concealed families (i.e. where there is more than one family present in a household). Nationally, this rose significantly between 2001 and 2011, at least in part due to the impact of recession on younger household's ability to afford their own home. This meant that many younger people, including families, remained in the family home for longer than might have been expected in the past, either through choice (to save money) or through necessity.

4.35 At the time of the 2011 Census, 1.9% of all families in England were concealed; this represented 275,954 families. This is a rise compared to 2001 when 1.2% of families were concealed. In Staffordshire Moorlands, a lower percentage of families were concealed (1.17%) as nationally (1.9%). This represents a rise from 0.91% in 2001 as shown in Table 4.4.

Table 4.4 Concealed Families in Staffordshire Moorlands, North West and England 2001-2011

	Concealed Families	
	2001	2011
Staffordshire Moorlands	0.91%	1.17%
West Midlands	1.4%	2.2%
England	1.2%	1.9%

Source: Census 2001 / 2011

4.36 The levels of overcrowding and concealed households in Staffordshire Moorlands are low when compared with the national and regional averages and have increased at a much slower rate than in the West Midlands as a whole.

4.37 Those levels of overcrowding that exist are likely to be a symptom associated with restricted incomes in Staffordshire Moorlands, with people either willing to accept sub-optimal living conditions (e.g. living in smaller houses to manage costs) or forced into accepting such housing outcomes (e.g. are priced out and have to share with friends/family). For example, the gross median Weekly Earnings by Residence in Staffordshire Moorlands was £498.50 in 2015, compared to £492.50 across the West Midlands and £529.60 across Great Britain as a whole²³. In such circumstances, overcrowding and concealed households may be indicative of insufficient supply to meet demand.

4.38 In terms of homelessness, CLG provides data on households in Local Authority area who are in 'priority need' and in temporary accommodation. For Staffordshire Moorlands, 2015/16 data on the homelessness incidence rate is 1.67 per 1,000 households, higher than the comparable Staffordshire rate of 1.24 and the fourth highest in Staffordshire. However, this is still below the national rate of 2.52. Since 2004/05, this represents a 67% decrease. By comparison, the equivalent rate in Staffordshire fell by 72%, whilst the national rate fell by 56%.

²³ Source: ONS annual survey of hours and earnings - resident analysis 2015

Table 4.5 Homelessness Incidence Rate

	Homelessness Incidence rate (per 1,000 households) 2015/16	Change in homelessness Incidence rate 2004/05 – 2015/16 (%)
Staffordshire Moorlands	1.67	67.4%
Staffordshire	1.24	72.3%
England	2.52	56.0%

Source: CLG Live Table 784 / P1e Returns

Synthesis of Market Signals

- 4.39 Drawing together the individual market signals above begins to build a picture of the current housing market in and around Staffordshire Moorlands, the extent to which demand for housing is not being met and the outcomes that are occurring because of this.
- 4.40 It is clear from this analysis in Table 4.6 that whilst Staffordshire Moorlands' housing market faces some challenges, most are not noticeably worse than nearby areas and there is limited evidence of a divergence from the county-wide and national signals. Nevertheless, there is substantial variation across the District especially between the rural and Peak District National Park areas.
- 4.41 However, there has been a significant change in affordability between 2000 and 2015, and as house price levels remain relatively low, this could be indicative of fluctuations in real incomes. Affordability has worsened between 2014 and 2015 above the trend in house price growth and above both the county and national averages.
- 4.42 Whilst the Council over-delivered in respect of housing targets in 2014/15, this is partly due to Ascent, a joint venture between Staffordshire Moorlands District Housing and Your Housing Group, to build significant levels of affordable housing units across Staffordshire Moorlands District. This year aside, delivery figures have been historically low, and since 2011 have averaged less than half of the Core Strategy target.
- 4.43 As such, the spread of delivery over the period 2011 to 2015 may be exacerbating problems of affordability, generating adverse outcomes for people who still need to access the housing market, although it is possible that the relatively cheap (compared to the county average) rented sector is lessening the impact of this.

Table 4.6 Summary of Staffordshire Moorlands' Market Signals against Staffordshire and England

Market Signal	Staffordshire		England	
	Absolute Figure	Rate of Change	Absolute Figure	Rate of Change
House Prices	Better	Worse	Better	Better
Private Rents	Better	Better	Better	Better
Affordability Ratios	~	~	Worse	Worse
Homelessness (Households in Temporary Accommodation)	Worse	Worse	Worse	Worse
Homelessness (Households in Priority Need)	Better	Worse	Better	Better
Overcrowding (Overcrowded Households)	Better	Better	Better	Better
Overcrowding (Concealed Families)	Better	Better	Better	Better

Source: NLP Analysis

Footnote: Worse = performing worse against the average

Better = performing the same or better against the average

~ = date not available

4.44 To draw meaningful conclusions regarding the extent to which these market signals indicate housing market stress within Staffordshire Moorlands, and a level of supply that is not meeting demand, the Practice Guidance suggests that comparisons of absolute levels and rates of change in such indicators should be made with similar areas and nationally. For this reason, Staffordshire Moorlands has been compared and ranked against other local authority areas, and England as a whole.

4.45 These comparator centres have been chosen on the following basis:

- 1 Other areas within Staffordshire and areas where high levels of migration and commuting have been identified:
 - Derbyshire Dales
 - Cheshire East UA
 - Stafford
 - High Peak
 - East Staffordshire
 - Newcastle-under-Lyme
 - Stoke-on-Trent
- 2 The Practice Guidance also states that market signals must be compared with authorities which are not necessarily close geographically, but which share characteristics in terms of economic and demographic factors. These authorities have been chosen by examining the 'OAC *Supergroup Area Classification Map*', produced by the ONS in 2015, which groups each local authority into various socio-economic classifications. Staffordshire Moorlands, as a 'English and Welsh Countryside' authority, has been compared with other (inland) communities similarly classified

within this ranking and which share similar socio-economic characteristics:

- Amber Valley
- Hambleton
- Lichfield
- Shropshire UA
- Wyre Forest
- Eden
- North Kesteven
- Craven

4.46

England has been used as the final comparator for both sets of tables. A comparison across the range of housing market signals within the authorities identified above is presented in Table 4.7 to Table 4.10. A higher ranking in these tables suggests a worse, or comparatively poorer performing, housing market for that indicator.

Table 4.7 Staffordshire Moorlands Market Signals Comparator Table – Cost of Housing [Neighbouring Authorities]

Rank	House Prices			Affordability			Rents		
	Median (2015)	% Change (2000-2015)	Absolute Change (2000-2015)	Ratio (2015)	% Change (2000-2015)	Absolute Change (2000-2015)	Median (Q1 2016)	% Change (Q2 2011-Q1 2016)	Absolute Change (Q2 2011-Q1 2016)
1	Derbyshire Dales	Stoke-on-Trent	Derbyshire Dales	Derbyshire Dales	Derbyshire Dales	Derbyshire Dales	England	England	England
2	England	Derbyshire Dales	England	Stafford	Staffordshire Moorlands	Staffordshire Moorlands	Derbyshire Dales	Stafford	Stafford
3	Cheshire East UA	East Staffordshire	Cheshire East UA	Staffordshire Moorlands	Newcastle-under-Lyme	Stafford	Cheshire East UA	East Staffordshire	Derbyshire Dales
4	Stafford	England	Stafford	England	East Staffordshire	High Peak	Stafford	Derbyshire Dales	East Staffordshire
5	High Peak	Staffordshire Moorlands	High Peak	Cheshire East UA	High Peak	East Staffordshire	Staffordshire	Staffordshire	Staffordshire
6	Staffordshire	High Peak	East Staffordshire	High Peak	Stafford	England	East Staffordshire	Cheshire East UA	Cheshire East UA
7	East Staffordshire	Stafford	Staffordshire	East Staffordshire	England	Newcastle-under-Lyme	High Peak	Staffordshire Moorlands	Staffordshire Moorlands
8	Staffordshire Moorlands	Newcastle-under-Lyme	Staffordshire Moorlands	Newcastle-under-Lyme	Stoke-on-Trent	Stoke-on-Trent	Newcastle-under-Lyme	Newcastle-under-Lyme	Newcastle-under-Lyme
9	Newcastle-under-Lyme	Staffordshire	Newcastle-under-Lyme	Stoke-on-Trent	Staffordshire	Staffordshire	Staffordshire Moorlands	Stoke-on-Trent	Stoke-on-Trent
10	Stoke-on-Trent	Cheshire East	Stoke-on-Trent	~	~	~	Stoke-on-Trent	High Peak	High Peak
Source:	CLG Live Table 586/Land Registry	CLG Live Table 586/Land Registry	CLG Live Table 586/Land Registry	CLG Live Table 576/Land Registry/ASHE	CLG Live Table 576/Land Registry/ASHE	CLG Live Table 576/Land Registry/ASHE	VOA Private Rental Market Statistics	VOA Private Rental Market Statistics	VOA Private Rental Market Statistics

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Table 4.8 Staffordshire Moorlands Market Signals Comparator Table - Overcrowding and Homelessness [Neighbouring Authorities]

Rank	Overcrowded Households			Households in Priority Need			Concealed Households		
	Overcrowded Households, % (2011)	Change (%) (2001-2011)	Change (percentage points) (2001-2011)	Households in Priority Need, per 1,000 Households (2014/15)	% Change (2004/05-2014/15)	Absolute Change (2004/05-2014/15)	Concealed Families, % (2011)	Change (%) (2001-2011)	Change (percentage points) (2001-2011)
1	England	East Staffordshire	England	England	East Staffordshire	East Staffordshire	England	East Staffordshire	East Staffordshire
2	Stoke-on-Trent UA	Stafford	East Staffordshire	East Staffordshire	Derbyshire Dales	Derbyshire Dales	East Staffordshire	Stafford	England
3	East Staffordshire	England	Stoke-on-Trent UA	Stoke-on-Trent UA	England	Cheshire East UA	Stoke-on-Trent UA	England	Stoke-on-Trent UA
4	High Peak	Stoke-on-Trent UA	Stafford	Derbyshire Dales	Staffordshire Moorlands	Newcastle-under-Lyme	Staffordshire	Staffordshire	Staffordshire
5	Newcastle-under-Lyme	Staffordshire	High Peak	Staffordshire Moorlands	Staffordshire	Staffordshire	Stafford	Stoke-on-Trent UA	Stafford
6	Staffordshire	High Peak	Staffordshire	Staffordshire	Stoke-on-Trent UA	England	Staffordshire Moorlands	Cheshire East UA	Cheshire East UA
7	Stafford	Cheshire East UA	Cheshire East UA	High Peak	Cheshire East UA	Staffordshire Moorlands	Newcastle-under-Lyme	Newcastle-under-Lyme	Newcastle-under-Lyme
8	Cheshire East UA	Staffordshire Moorlands	Newcastle-under-Lyme	Cheshire East UA	High Peak	Stafford	Cheshire East UA	Staffordshire Moorlands	Staffordshire Moorlands
9	Derbyshire Dales	Newcastle-under-Lyme	Staffordshire Moorlands	Stafford	Stafford	High Peak	Derbyshire Dales	High Peak	High Peak
10	Staffordshire Moorlands	Derbyshire Dales	Derbyshire Dales	Newcastle-under-Lyme	Newcastle-under-Lyme	Stoke-on-Trent UA	High Peak	Derbyshire Dales	Derbyshire Dales
Source:	Census 2011	Census 2001, Census 2011	Census 2001, Census 2011	CLG Live Table 784 (P1e Returns)	CLG Live Table 784 (P1e Returns)	CLG Live Table 784 (P1e Returns)	Census 2011	Census 2001, Census 2011	Census 2001, Census 2011

Table 4.9 Staffordshire Moorlands Market Signals Comparator Table – Cost of Housing [‘English and Welsh Countryside’ Authority Comparisons]

Rank	House Prices			Affordability			Rents		
	Median (2015)	% Change (2000-2015)	Absolute Change (2000-2015)	Ratio (2015)	% Change (2000-2015)	Absolute Change (2000-2015)	Median (Q1 2016)	% Change (Q2 2011-Q1 2016)	Absolute Change (Q2 2011-Q1 2016)
1	Hambleton	Amber Valley	Hambleton	Hambleton	Staffordshire Moorlands	Hambleton	England	England	England
2	England	Craven	England	Eden	Craven	Eden	Lichfield	Lichfield	Lichfield
3	Lichfield	Eden	Craven	Lichfield	Eden	Craven	Hambleton	Staffordshire Moorlands	Hambleton
4	Craven	England	Lichfield	Craven	Hambleton	Staffordshire Moorlands	Craven	Wyre Forest	Craven
5	Eden	North Kesteven	Eden	Shropshire UA	England	Lichfield	Shropshire UA	Eden	Shropshire UA
6	Shropshire UA	Staffordshire Moorlands	Shropshire UA	North Kesteven	North Kesteven	North Kesteven	North Kesteven	Craven	Wyre Forest
7	North Kesteven	Hambleton	North Kesteven	Staffordshire Moorlands	Wyre Forest	Shropshire UA	Wyre Forest	Shropshire UA	Eden
8	Wyre Forest	Shropshire UA	Amber Valley	Wyre Forest	Shropshire UA	England	Eden	North Kesteven	North Kesteven
9	Staffordshire Moorlands	Lichfield	Staffordshire Moorlands	England	Amber Valley	Wyre Forest	Amber Valley	Hambleton	Staffordshire Moorlands
10	Amber Valley	Wyre Forest	Wyre Forest	Amber Valley	Lichfield	Amber Valley	Staffordshire Moorlands	Amber Valley	Amber Valley
Source:	ONS HPSSA	ONS HPSSA	ONS HPSSA	CLG Live Table 576 (2016 Update)	CLG Live Table 576 (2016 Update)	CLG Live Table 576 (2016 Update)	VOA Private Rental Market Statistics	VOA Private Rental Market Statistics	VOA Private Rental Market Statistics

Table 4.10 Staffordshire Moorlands Market Signals Comparator Table – Overcrowding and Homelessness ['English and Welsh Countryside' Authority Comparisons]

Rank	Overcrowded Households			Households in Priority Need			Concealed Families		
	Overcrowded Households, % (2011)	Change (%) (2001-2011)	Change (percentage points) (2001-2011)	Households in Priority Need, per 1,000 Households (2014/15)	% Change (2004/05-2014/15)	Absolute Change (2004/05-2014/15)	Concealed Families, % (2011)	Change (%) (2001-2011)	Change (percentage points) (2001-2011)
1	England	Stafford	England	Wyre Forest	Wyre Forest	West Lindsey	England	England	England
2	Wyre Forest	England	Stafford	England	Derbyshire Dales	North Kesteven	Lichfield	North Kesteven	Lichfield
3	Shropshire UA	Lichfield	Shropshire UA	Derbyshire Dales	West Lindsey	Derbyshire Dales	Wyre Forest	Shropshire UA	Shropshire UA
4	Stafford	Shropshire UA	Lichfield	Shropshire UA	North Kesteven	Wyre Forest	Shropshire UA	Lichfield	Hambleton
5	Lichfield	Staffordshire Moorlands	Wyre Forest	Staffordshire Moorlands	England	Lichfield	Staffordshire Moorlands	Hambleton	Amber Valley
6	South Staffordshire	Wyre Forest	Staffordshire Moorlands	Lichfield	Staffordshire Moorlands	South Staffordshire	Hambleton	Amber Valley	North Kesteven
7	Derbyshire Dales	Derbyshire Dales	Derbyshire Dales	North Kesteven	Lichfield	England	Amber Valley	Craven	Craven
8	Staffordshire Moorlands	South Staffordshire	South Staffordshire	West Lindsey	Shropshire UA	Staffordshire Moorlands	Eden	Eden	Wyre Forest
9	North Kesteven	North Kesteven	North Kesteven	South Staffordshire	South Staffordshire	Shropshire UA	Craven	Wyre Forest	Eden
10	West Lindsey	West Lindsey	West Lindsey	Stafford	Stafford	Stafford	North Kesteven	Staffordshire Moorlands	Staffordshire Moorlands
Source:	Census 2011	Census 2001, Census 2011	Census 2001, Census 2011	CLG Live Table 784 (P1e Returns)	CLG Live Table 784 (P1e Returns)	CLG Live Table 784 (P1e Returns)	Census 2011	Census 2001, Census 2011	Census 2001, Census 2011

- 4.47 The comparative assessment of market signals highlights the moderate scale of housing market stress within Staffordshire Moorlands District. Overall, Staffordshire Moorlands is a mid-to low-ranking authority which is performing better than the national average under all of the indicators outlined in the Table 4.7 with the exception of the affordability ratio where Staffordshire Moorlands performs very poorly when compared to other areas.
- 4.48 Of note is the rate of development (Table 4.2), which has been below the required overall level compared against the adopted Core Strategy Policy SS2 and which could lead to the aforementioned market signals worsening over the coming years.
- 4.49 These market signals therefore provide an indication of demand and suggest that there needs to be some improvement in affordability within Staffordshire Moorlands and a requirement to boost the past under-delivery of housing, if the Council is to meet the requirements within its Core Strategy over the plan period.
- 4.50 The extent to which the demographic 'starting point' for identifying OAN for housing needs to be boosted to address market signals at this point in time is an area of judgement; the Practice Guidance is clear that the more significant the affordability constraints and the stronger other indicators of high demand, the larger the improvement in affordability needed and, therefore the larger the additional supply response should be. As such, it is considered that some upward adjustment could be necessary, particularly to address the affordability ratio. Whilst the LPEG approach would suggest a zero uplift, the situation is clearly worsening and the two indicators for Staffordshire Moorlands are only marginally below the thresholds identified by LPEG.
- 4.51 On this basis, NLP considers that the scale of adjustment to housing supply over and above demographic-led projections at this time would be moderate, in line with the Practice Guidance, and that 10% uplift would be justified for Staffordshire Moorlands District. This is consistent with the conclusion of the previous January 2016 Update. This approach may need to be revisited by SMDC depending upon the findings of the Government's consultation on identifying a consistent approach to defining housing need following the recommendations of the Housing White Paper (February 2017), which is anticipated to address the issue of market signals uplift.

5.0

An Objective Assessment of Housing Need

Introduction

5.1

In practice, applying the Framework requires a number of key steps to be followed in order to arrive at a robustly evidenced housing target:

The starting point for Local Plans is to meet the full objectively assessed development needs of an area, as far as consistent with the policies set out in NPPF as a whole [§§6, 47 & 156].

An objective assessment of housing need must be a level of housing delivery which meets the needs associated with population and household growth, addresses the need for all types of housing including affordable and caters for housing demand [§159].

Every effort should be made to meet objectively assessed needs for housing and other development, and there should be positive response to wider opportunities for growth. Market signals, including affordability should be taken into account when setting a clear strategy for allocating suitable and sufficient land for development [§17].

In choosing a housing requirement which would not meet objectively assessed development needs, it must be evidenced that the adverse impacts of meeting needs would significantly and demonstrably outweigh the benefits, when assessed against the policies within the Framework as a whole; unless specific policies indicate development should be restricted [§14].

Where an authority is unable to meet its objectively assessed development needs or it is not the most appropriate strategy to do so, e.g. due lack of physical capacity or harm arising through other policies, it must be demonstrated under the statutory duty-to-cooperate that the unmet need is to be met in another local authority area in order to fully meet development requirements across housing market areas [§179 & §182 bullet point 1].

5.2

It is against these requirements of the Framework which Staffordshire Moorlands District's housing need will be identified. This has been brought into sharp focus following the high court judgement '(1) *Gallagher Homes Limited and (2) Lioncourt Homes Limited v Solihull Metropolitan District Council [2014] EWHC 1283*' which reiterated that the imperative need to firstly identify full objectively assessed need for housing and then define a strategy which seeks to meet it, consistent with the Framework.

5.3

The Government's Practice Guidance states that '*household projections published by CLG should provide the starting point estimate of overall housing need.*' It also states that the household projection may require adjustment to reflect factors affecting local demography and household formation rates which are not necessarily captured in past trends²⁴. To comply with the Practice Guidance, this 2017 SHMA has used the latest 2014-based SNHP to derive

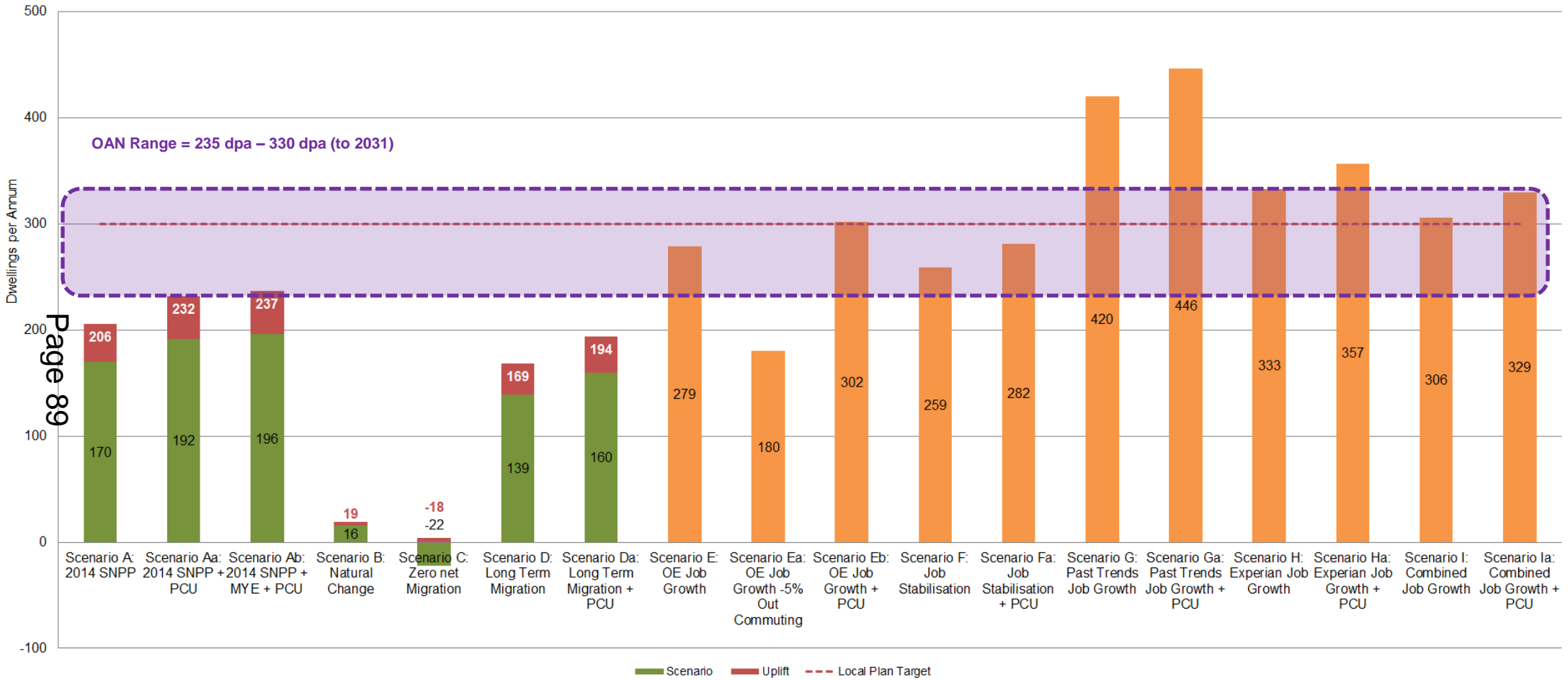
²⁴ 2a-015-20140306

the baseline demographic need, which acts as the 'starting point' when determining the housing OAN. Thereafter, various assumptions, adjustments and sensitivities have been applied to take account of local factors and economic aspirations.

- 5.4 Figure 5.1 (2014-2031) and Figure 5.2 (2014-2033) set out the annual dwelling need under each scenario as identified by NLP's modelling work.

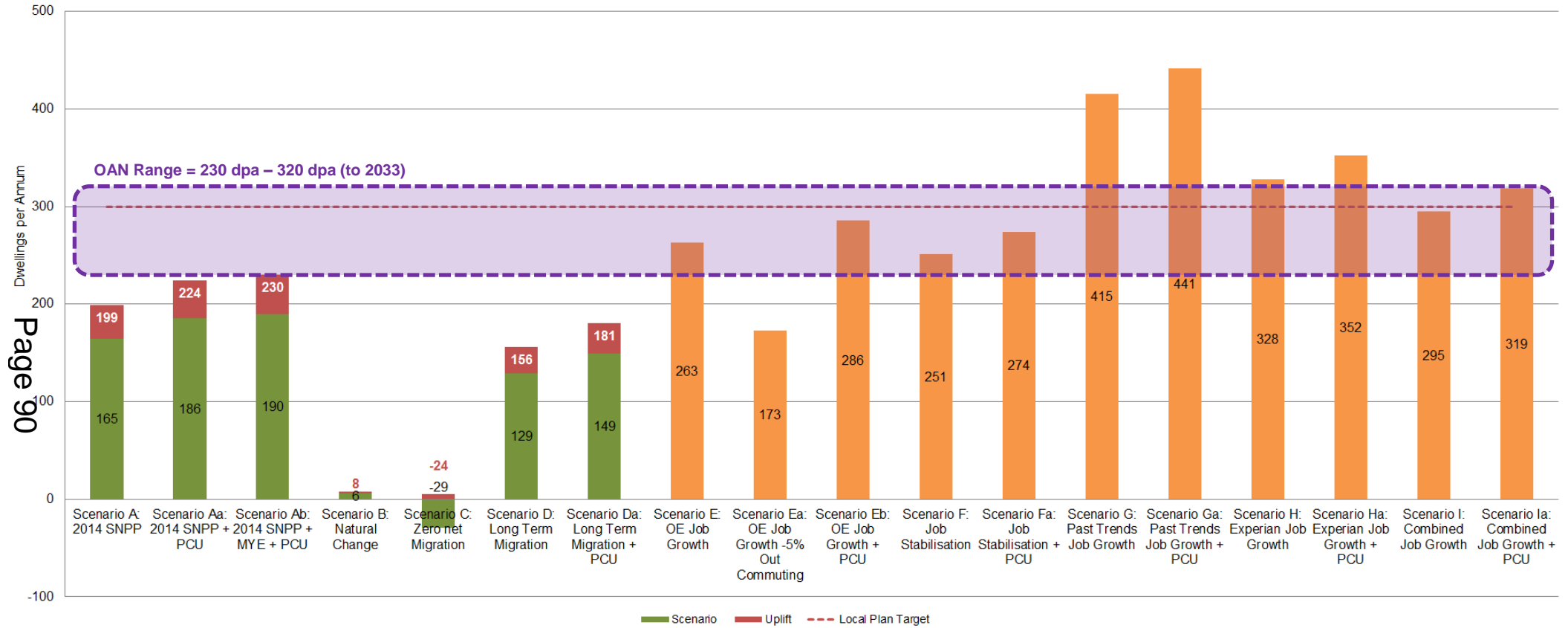
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Figure 5.1 Model Outputs Staffordshire Moorlands: Dwellings per Annum 2014-2031



Source: NLP Analysis

Figure 5.2 Model Outputs Staffordshire Moorlands: Dwellings per Annum 2014-2033



Source: NLP Analysis

The Starting Point – Demographic Needs

- 5.5 The CLG 2014-based household projections indicate a need for 170 dpa in Staffordshire Moorlands between 2014 and 2031, falling slightly to 165 dpa to 2033. NLP's analysis suggests that the 2009/2010 recession and subsequent economic downturn, as experienced elsewhere, led to Staffordshire Moorlands' housing market becoming less affordable for first time buyers and younger households in general. A suitable adjustment to accelerate the headship rates for younger households under Scenario Aa (factoring in a partial catch up to longer term headship rates amongst 15-34 year olds) would increase the level of housing need to 192 dpa to 2031 (186 dpa to 2033). Factoring in the latest (higher) Mid-Year Population Estimates for 2015 (Scenario Ab) increases the need still further, to **196 dpa to 2031** and to 190 dpa to 2033. NLP considers that as long term migration rates (Scenarios B and Ba) would represent a lower rate of population growth in this instance, 196 dpa represents the appropriate demographic-led need for housing and would be the **minimum necessary** to meet the District's future housing needs to 2031 (190 dpa to 2033).
- 5.6 Both the 'zero net migration' and natural change scenarios are provided for illustrative purposes only and are considered to be unrealistic given that constraints cannot be placed on people moving into or out of an area.

Do Market Signals indicate a need for an upward adjustment to purely demographic-led needs?

- 5.7 The market signals analysis undertaken in Section 4.0 of this report indicates that some form of upwards adjustment to levels of housing provision (above purely demographic needs) may be needed in Staffordshire Moorlands. The picture is complicated, as on a number of indicators, Staffordshire Moorlands District appears to be relatively low risk. However, it has a very high and sharply rising LQ affordability ratio above the national average; has under-delivered housing in recent years compared to Development Plan targets, and is only marginally below the 10% threshold identified by the LPEG indicators.
- 5.8 As such, a further moderate upwards adjustment to the preferred demographic scenario (Ab) is considered reasonable. The Practice Guidance²⁵ states that in areas where an upward adjustment is required, plan makers should set this adjustment at a level that is 'reasonable', with the more significant the affordability constraints, the larger the improvement in affordability needed. Whilst an element of judgement is required, it is suggested that the level of uplift required should only be moderate, given that the area appears to be relatively low risk in terms of most of the market indicators.
- 5.9 In terms of what may constitute a 'moderate' uplift to the demographic starting point, a number of recent Inspector's Reports at Local Plan EIPs have helped

²⁵2a-020-20140306

to clarify the issue. For example, Preliminary Conclusions of the Inspector examining the Eastleigh District Local Plan concluded that overall, market signals justified an upward adjustment above the housing need derived from demographic projections only.²⁶

“It is very difficult to judge the appropriate scale of such an uplift. I consider a cautious approach is reasonable bearing in mind that any practical benefit is likely to be very limited because Eastleigh is only a part of a much larger HMA. Exploration of an uplift of, say, 10% would be compatible with the “modest” pressure of market signals recognised in the SHMA itself.” [§36]

- 5.10 In addition, the Inspector at the Examination of the Uttlesford Local Plan²⁷, also concluded that the application of a nominal **10% uplift** to the demographic projections to reflect market signals and affordable housing needs would be appropriate.

LPEG Market Signals Sensitivity Test

- 5.11 This analysis has been complicated by the more recent recommendations of the Local Plan Expert Group [LPEG], which includes a standardisation of the appraisal of market signals and the extent of any uplift to the demographic starting point. The LPEG Report suggests taking account of just two market indicators, namely house price affordability and rental affordability.
- 5.12 Whilst it provides a useful attempt to objectify the scale of market signals uplift, it is noted that the LPEG report is (at the time of writing) merely a consultation document and one that does not yet carry any formal weight.
- 5.13 Given that both the HPR and RAR indicators for Staffordshire Moorlands are only marginally below the 10% uplift threshold, and as on the basis of the existing Practice Guidance analysis of the 6 key market signals, there is evidence of worsening affordability at a rate greater than the national level and consistent under delivery, it is still recommended that an uplift be applied to the demographic projections in the order of 10%.
- 5.14 Applying a 10% uplift to the 196 dpa adjusted demographic starting point would generate a figure of **216 dpa** to 2031, or 209 dpa to 2033.

Economic/Employment Trend Scenarios

- 5.15 The Practice Guidance²⁸ requires plan-makers to assess likely employment growth based on past trends and/or economic forecasts. Where the labour force supply is projected to be less than the forecast job growth, the Practice Guidance states that this could result in unsustainable commuting patterns which could potentially reduce the resilience of local businesses.

²⁶ Preliminary Conclusions on Housing Needs and Supply and Economic Growth 28 November 2014.

²⁷ Examination of the Uttlesford Local Plan (ULP) Summarised conclusions of the Inspector after the hearing session on 3 December 2014

²⁸ 2a-018-20140306

- 5.16 A number of scenarios have been modelled to demonstrate the impact of a range of likely growth scenarios based on existing trends and forecasts. These scenarios also show the scale of change that would be required if demographic trends were to be reversed. Figure 5.1 and Figure 5.2 illustrate the clear divergence between the trend-based and forecast scenarios despite the fact that the Oxford Economics employment projections in particular are rather more pessimistic compared to those modelled in the January 2016 SHMA Update.
- 5.17 As all of the demographic led scenarios result in job losses, the (positive) economic forecasts for Staffordshire Moorlands indicate that additional housing above the demographic needs would be necessary in order to meet the District's future growth potential.
- 5.18 The project total job growth forecasts range from zero (Scenario F, Job Stabilisation), through to +339 (Scenario E: Oxford Economics), +1,400 (Scenario H: Experian), +870 (Scenario I: Combined) up to +3,038 (Scenario G: Past Trends). Planning for a stabilisation of the job market, whilst it may sound uninspiring, may actually be challenging for Staffordshire Moorlands District given that the 2014-based SNPP suggests that there will be a decline in the size of the labour force over the period to 2031. This scenario would suggest a need for 259 dpa, rising to 282 dpa if PCU headship rates are applied.
- 5.19 As for the Oxford Economics Scenarios, these suggest a need for between 180 dpa (reducing out commuting) up to 302 dpa if higher PCU headship rates are applied. The Experian Scenarios suggest that this need could be considerably higher, between 333 dpa and 327 dpa, whilst a Combination of the OE and Experian projections would indicate a need for between 306 dpa and 329 dpa. The Past Trends Scenarios result in by far the highest dwelling needs, from 420 dpa to 446 dpa depending upon whether the higher PCU headship rates are applied or not.
- 5.20 Whilst it is undesirable to plan for decline, at the same time there is a need to look at what is realistic and achievable, taking into account past performance. If job stabilisation was sought, (Scenario Fa), at least 282 dpa would be required to 2031 (274 dpa to 2033).
- 5.21 The latest Oxford Economics forecasts (Scenario E) indicate more pessimistic levels of job growth compared with past trends. However, even to support this level of job growth (+339), there would need to be a significant amount of in-migration into the District, in the order of +11,249 (net), which is more than 50% higher than the level of net migration forecast in the 2014-based SNPP. In contrast, the Experian projections would suggest that a figure of up to 357 dpa could be appropriate.
- 5.22 As noted above, in terms of commenting upon which of these two scenarios is likely to be most appropriate for Staffordshire Moorlands District, there are inevitably uncertainties and limitations associated with modelling assumptions under any of the future labour demand scenarios considered. Whilst Experian

and OE provide overall methodologies setting out their broad assumptions in defining their local area based econometric models, they do not disclose the many detailed assumptions they make concerning the local and regional economy, along with the adjustments made to the raw data in order to calculate such forecasts. Because of this, it is difficult to make robust decisions concerning the comparative weight to attach to each forecast for Staffordshire Moorlands.

- 5.23 Both forecasting houses produce credible and robust estimates of job growth at a local area level, and no obvious anomalies have been revealed from the analysis undertaken in the SMDC 2017 ELR, albeit the strong growth in some of the manufacturing sectors appeared optimistic in the light of past trends. On this basis, it would appear reasonable to attach greater weight to the Combined Job Growth Scenario 1a, which suggests a need for up to 329 dpa, once suitable allowances have been made for accelerated household formation rates.
- 5.24 This would be challenging enough in itself. However, to achieve the 420 dpa / 446 dpa that would be required based on a continuation of past job growth rates would require a 6-fold increase in net population growth compared to the 2014-based SNPP, and would require more than 10,000 additional migrants from elsewhere across the UK/abroad to move into the District.
- 5.25 Given that this scenario produces a level of housing need far in excess of any of the other scenarios, and would appear to be considerably at variance with the most recent job growth projections for the District, we consider that the Past Trends scenarios should be considered as outliers and excluded from the overall housing OAN range.
- 5.26 As such, we consider that in this instance, Scenario Ha, Combined Job Growth + PCU, which is equal to **329 dpa**, would be appropriate to inform the employment-led upper end of the housing OAN range.

Is there a need to increase housing supply to aid the delivery of affordable housing?

- 5.27 With regards to the incorporation of affordable housing needs into the total housing figures included in Local Plans, the Practice Guidance²⁹ sets out the following:

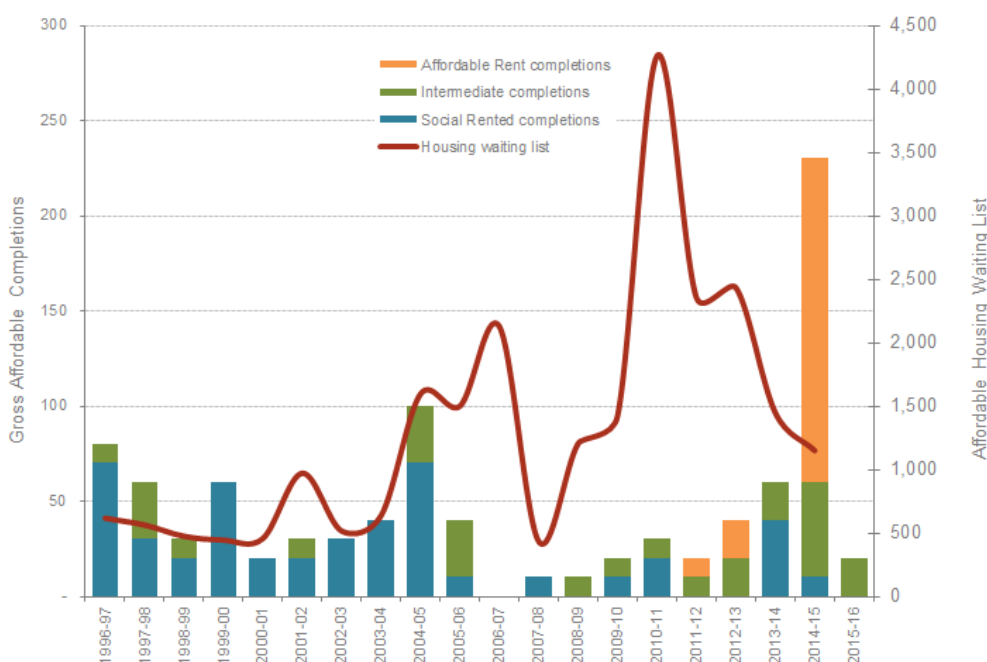
“The total affordable housing need should... be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”

²⁹ 2a-029-20140306

- 5.28 The Practice Guidance states that *‘the total housing figures’* are about much more than just demographic need and should consider increases towards meeting full affordable housing needs.
- 5.29 The importance of considering affordable housing needs in an objective assessment of housing need calculation has been recently (19/02/15) confirmed in the High Court judgment *Satnam Millennium Ltd vs Warrington District Council*³⁰. It sets out the requirement for an objective assessment of housing need to cater for affordable housing needs within its calculation. The judgment found that the adopted objective assessment of housing need figure proposed in Warrington’s Local Plan was not in compliance with policy because (para 43) “the assessed need was never expressed or included as part of the OAN”. The decision found that the “proper exercise” had not been undertaken, namely:
- “(a) having identified the OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes;*
- (b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPF, §14 and 47.”*
- 5.30 It is evident that affordable housing needs may justify an upward adjustment to the overall OAN. On the basis that the economic-led needs, excluding affordable housing, amounts to 329 dpa to 2031 or 319 dpa to 2033, this could provide approximately 109 affordable dpa (to 2031) based on a delivery rate of 33% on all sites – at a rate of 20%, affordable housing delivery would fall to 66 dpa. The demographic-led need, at 237 dpa (to 2031), could deliver 78 affordable dpa (2031) (at 33% delivery).

³⁰ [2015] EWHC 370 (Admin) Case No: CO/4055/2014 <http://www.bailii.org/ew/cases/EWHC/Admin/2015/370.html>

Figure 5.3 Affordable Housing Completions and Waiting List in Staffordshire Moorlands 1996/97 - 2011/12



Source: CLG 2013

- 5.31 Even the lower level of delivery would be above the level achieved over the longer term (which has averaged 46 dpa since 1996/97), whilst at the upper end of the range this could potentially result in the provision of affordable housing at levels more than 50% above past delivery rates.
- 5.32 Even so, considering this against the high need for affordable housing identified in Section 6.0 of this report, there is a clear need to consider an uplift the figures to take account of the affordable housing need in Staffordshire Moorlands.
- 5.33 The full affordable housing OAN equates to between 224 - 432 dpa to 2031, which would require a total OAN of 679 - 1,309 dpa. In practice it is extremely unlikely that anywhere near this level of housing delivery will ever be achieved in Staffordshire Moorlands, which has yet to deliver more than 230 affordable dwellings (net) in any one year.
- 5.34 Nevertheless, an additional 10% uplift to the demographic-led OAN (in addition to the uplift accounting for market signals) would go some way towards meeting the high level of affordable housing need identified for Staffordshire Moorlands and therefore be representative of OAN.
- 5.35 Given the high level of affordable housing need it would be up to SMDC to exercise its policy choice to test whether the delivery of 224-432 affordable dpa would require a further uplift to the Local Plan housing requirement on the basis of whether this would be economically realistic; and also taking into account a variety of considerations including deliverability and viability as set out in the Framework.

Conclusions on Staffordshire Moorlands' Housing OAN

- 5.36 This SHMA provides a forward-looking objective assessment of future housing needs using a base date of 2014 up to 2031/33, to match the time horizon of the emerging Staffordshire Moorlands Local Plan.
- 5.37 The scale of objectively assessed need is a judgement and the different scenarios and outcomes set out within this report provide alternative levels of housing growth for Staffordshire Moorlands. NLP considers these to be as follows:
- 1 170 dpa (2031) / 165 dpa (2033) equates to the 2014-based household projections, rising to 196 dpa (2031) / 190 dpa (2033) dpa with necessary adjustments being made to headship rates in the younger age categories (and rebasing the figures to align with the latest 2015 MYE). In Staffordshire Moorlands a level below this would be unlikely to meet local demographic needs;
 - 2 A worsening of some market signals suggests the need to improve affordability to stabilise the increasing house prices and affordability ratios. This would justify a modest uplift to the figures over and above the level suggested by the demographic projections. The Practice Guidance states that this should be set at a level which could be reasonably expected to improve affordability. A 10% uplift to the demographic starting point would indicate a minimum demographic OAN of 216 dpa (2031) / 209 dpa (2033);
 - 3 259 dpa (2031) / 251 dpa (2033) represents the level at which the District's economy would stabilise, i.e. there would be zero job growth over the Plan period. Housing delivery below this figure would potentially result in a reduction in jobs which would conflict with the Framework's aspiration to ensure that the planning system '*does everything it can to support sustainable economic growth*' [§19];
 - 4 329 dpa (2031) / 319 dpa (2033) represents the level of housing growth necessary to provide a sufficiently large labour force to support a combination of the latest Oxford Economics and Experian job growth forecasts for the District;
 - 5 The scale of affordable housing needs, when considered as a proportion of market housing delivery, implies even higher estimates of total need, although whether such estimates will ever be realistically achievable is open to question. Nevertheless in light of the high level of affordable housing need identified, it is considered that this supports a further additional uplift of 10% above the level identified by demographic needs alone or a minimum OAN of 237 dpa (2031) or 230 dpa (2033).
 - 6 **The resultant housing OAN range would therefore be in the order of 235 dpa – 330 dpa to 2031 (230 dpa – 320 dpa to 2033) (rounded).**
- 5.38 This process is summarised in Table 5.1.

Table 5.1 Approach to OAN for Staffordshire Moorlands 2014-2031/33

	Dwellings per annum (2014-2031)	Dwellings per annum (2014-2033)
Demographic Starting Point	170 dpa	165 dpa
Adjustments to Demographic-led Needs	196 dpa	190 dpa
Uplift for Market Signals	216 dpa	209 dpa
Employment Led Needs	329 dpa	319 dpa
Affordable Housing Needs (@33% delivery)	679 – 1,309 dpa	679 – 1,309 dpa
Uplift to demographic led needs for Affordable Housing (@10%)	238 dpa	230 dpa
Full Objectively Assessed Needs (rounded)	235 dpa – 330 dpa	230 dpa – 320 dpa

- 5.39 Any figure below this objective assessment of needs would require the Council to clearly demonstrate how the adverse housing, economic and other outcomes identified in this report would be avoided and mitigated and how *“any adverse impacts...would significantly and demonstrably outweigh the benefits when assessed against the policies in [the] Framework taken as a whole; or that specific policies in [the] Framework indicate development should be restricted”*³¹. It would also need to make provision, through the duty to co-operate, for any unmet needs to be met in full elsewhere within the wider strategic level housing market area, for example, within the land area of a relevant adjoining authority.
- 5.40 As an alternative to the high levels of in-migration necessary to provide the additional labour force needed to support the higher economic growth scenarios, Staffordshire Moorlands District Council could seek to:
- influence commuting patterns (beyond the 5% accounted for), to ‘claw back’ local residents currently commuting to jobs in adjoining Districts;
 - increase economic activity rates;
 - reduce unemployment and worklessness, assuming that people will then be able to take up jobs within Staffordshire Moorlands rather than within the surrounding area; and
 - provide robust evidence setting out the measures that would be taken to actively deliver a reduction in net out commuting or to drive up economic activity, which may be beyond the scope of the Local Plan to control.
- 5.41 In considering whether the Council should align the Local Plan Housing Requirement with the upper end of the full objectively assessed need range, the Council will also need to consider Staffordshire Moorlands’ economic role within the sub-region and whether there is a realistic prospect of this changing significantly over the plan period. This is particularly the case in the light of the comments made by Stoke on Trent at the Examination in Public for the adopted Core Strategy.

³¹The Framework, paragraph 14

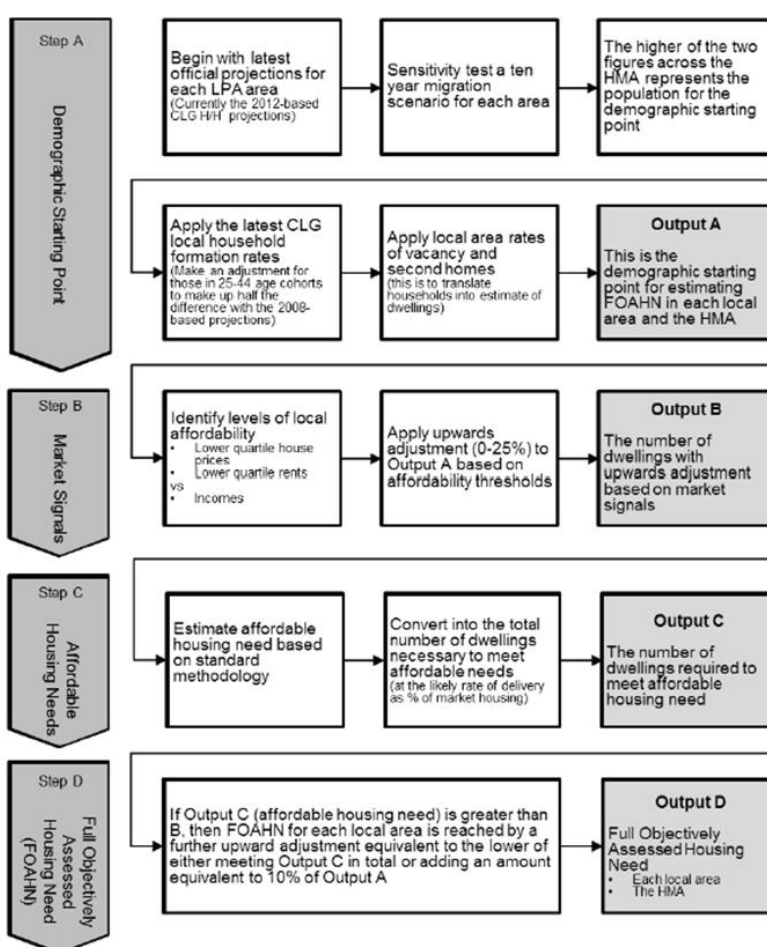
- 5.42 A higher figure will be necessary were the Council to seek to significantly increase the workforce. However, as there is a highly complex relationship between job growth and housing need, were economic activity to accelerate in the older age categories at a higher rate than the OBR economic activity rate of increase suggests, then the existing residential population could sustain a significantly higher number of jobs without the need to accommodate higher numbers of in-migrants.
- 5.43 It is also worth recognising that were the Council able to robustly demonstrate that the proportion of vacant homes was going to fall by the end of the plan period as a result of programmes designed to bring empty homes back into use, then this could potentially justify a lower figure at the bottom end of the range. However, this is a policy response for the Council to consider in defining their housing requirement, rather than influencing the objectively assessed need for housing in this report.
- 5.44 Ultimately it is for the Council to consider how this objectively assessed need translates into their housing requirement and the extent to which it aligns with their economic objectives and the delivery of sufficient affordable housing to meet identified needs, in line with national policy and guidance.
- 5.45 In considering how to translate this OAN into a future housing 'requirement', to be included in the emerging Local Plan, Staffordshire Moorlands Council should therefore take the following into account:
- a The need to support an appropriate level of economic growth;
 - b The need to provide for a better balance between jobs and population to reduce the need to travel;
 - c The impact that increasing in-migration to Staffordshire Moorlands could have on the surrounding areas;
 - d That a level below 260 dpa is likely to lead to a continued decline in the local economy;
 - e That delivery above purely demographic (196 dpa) is likely to be needed to ease the issues related to increasing house prices and worsening affordability identified in Section 4.0 of this report;
 - f The need for affordable and specialist housing identified in Section 6.0 of this report; and
 - g The ability of the District's housing market to support new housing delivery.
- 5.46 Further analysis outside the scope of this report, will also be needed, to take account of issues related to viability, environmental constraints, the capacity of existing infrastructure and any other constraints that may apply to future new development.

Comparison with LPEG Approach

5.47 Applying the LPEG approach should be treated with caution at this stage given that it is not policy nor endorsed by Government and it will only be justified once/if the Practice Guidance is updated. It must also be seen in the context of the whole LPEG methodology and its purpose.

5.48 As noted above, LPEG has recommended various changes to the Practice Guidance³², which includes a standardisation and streamlining of SHMAs, and in particularly the approach taken to identifying the objectively assessed need for housing. To reduce the level of complexity and debate, LPEG recommends the approach to identify OAN set out in Figure 5.4.

Figure 5.4 LPEG recommended approach to identify Housing OAN



Source: LPEG 2016

5.49 This approach has broad similarities with the approach applied by NLP in identifying Staffordshire Moorlands’ housing OAN in this SHMA:

- a Both approaches begin with the latest 2014-based SNHP, which take into account the 2014 MYE (and subsequently the 2015 MYE);

³² Local Plans Expert Group (March 2016): Local Plans Report to the Communities Secretary and to the Minister of Housing and Planning

- b Both approaches sensitivity test a 10-year long term migration scenario and adopt the higher (2014-based SNHP) approach;
- c Both utilise local vacancy/second home rates;
- d Both adjust the CLG 2014-based household formation rates upwards for those in younger age cohorts to make up half the difference with the 2008-based SNHP; and,
- e Both uplift the housing OAN by 10% to account for unmet affordable housing needs.

5.50 The LPEG suggests that where the total number of homes that would be necessary to meet affordable housing need is greater than the adjusted demographic-led housing OAN, then this figure should be uplifted by a further 10%. It should be noted that the 10% uplift is specifically intended to provide a streamlined approach that removes judgement and debate from the process of setting OAN (as opposed to what might be the most accurate under current Practice Guidance) and given the status of LPEG at present, this approach should be treated with caution.

5.51 The main differences relate to the interpretation of housing market signals (with the LPEG approach suggesting 0% uplift, and the NLP Practice Guidance-based approach indicating that an additional higher uplift of 10% could be justified) and the LPEG view that future employment growth is a 'policy on' housing requirement consideration rather than part of the OAN calculation.

5.52 Therefore, and whilst recognising that limited weight can be taken of its recommendations for now, based on the LPEG approach, the OAN is likely to be **towards the lower end of the 235 – 330 dpa identified range.**

5.53 We have set out our reasoning above as to why it is considered that an additional moderate upward adjustment for worsening market signals of 10% would be appropriate and recent case law supports NLP's view that for the present, economic forecasting remains a part of the housing OAN, rather than the housing requirement. Should the recommendations of the LPEG be adopted in full by CLG and incorporated into the Framework and Practice Guidance, then the OAN should be revisited accordingly.

6.0 Affordable Housing Needs

Introduction

6.1 In this section a calculation of affordable housing need, which fulfils all the requirements of the Practice Guidance (and for some more specific details the former CLG SHMA Guidance³³ 2007), has been undertaken for Staffordshire Moorlands to inform the assessment of the scale of housing affordability as well as arriving at an estimate of future housing need.

6.2 The basic approach to this is:

Total Current Housing Need (gross) to be addressed	
Plus	PPG ID 2a-025-20140306
Total Newly Arising Housing Need (gross per annum)	
Less	PPG ID 2a-026-20140306
Annual Supply of Affordable Housing	
Equals	PPG ID 2a-027-20140306
Net Housing Need	

6.3 Current housing need seeks to identify those households in Staffordshire Moorlands who currently lack their own housing or live in unsuitable homes and cannot afford to meet their needs in the housing market. Components of housing need are not definitive and can encompass drawing together statistics from a wide range of sources. Although potentially not including all households in need of housing, and conversely including those who do not fall within the definition of being in need of affordable housing, the local Housing Register forms the starting point for estimating what the need and demand for affordable housing is.

Number of Current and Future Households in Need

Data Sources for Stages 1 & 2

6.4 This Section estimates the number of current and future households in need (Stages 1 & 2 of the CLG Guidance). Table 6.1 summarises the data sources used by Stages One and Two of the affordable housing model.

³³ Strategic Housing Market Assessment: Practice Guidance (August 2007)

Table 6.1 Summary of Data Required for Stages 1 & 2

Stage of the Model	Data Items
Stage One: Current Housing Need (Chapter 6)	
Affordability Test	Land Registry House Price Data (2015/16), Rightmove (November 2016), Experian Income Data (base date 2011)
1.1: Homeless Households and those in temporary Accommodation	Estimate from P1e Quarterly Homeless Returns (CLG Data) (Question E1.1) - Average from past 3 years data (Q3 2013 to Q2 2016)
1.2 and 1.3: Households in Unsuitable Housing	Staffordshire Moorlands Housing Register (October 2016) Bands A-C
1.4: Total Current Housing Need (Gross)	Step 1.1 PLUS 1.2 PLUS 1.3. Divide total by results of the affordability test.
Stage Two: Future Housing Need (Chapter 6)	
2.1: New Household Formation	NLP PopGroup Modelling (Scenario Ab: 2014-based SNPP, adjusted for PCU and 2015 MYE)
2.2: Number of Newly Forming Households Unable to Buy or Rent in the Market (Annual)	Land Registry House Price Data (2015/16), Rightmove (November 2016), Experian Income Data (2011)
2.3: Existing Households Falling into Need	CORE data (2012/13-2014/15), Land Registry House Price Data (2015), Rightmove (November 2016) Experian Income Data (2011)
2.4: Total newly arising housing need (gross per year)	Step 2.1 PLUS Step 2.2 PLUS 2.3

Affordability

- 6.5 Steps 1.4, 2.2 and 2.3 of the affordable housing calculation refer to the results of an affordability test. Information in respect of local house prices, market rents and household income levels is set out as part of the contextual analysis in Section 2.0. This data has informed an affordability test which estimates the ability of households to afford market housing.
- 6.6 In order to consider affordability of housing in the market, entry level prices must be utilised. In this regard the former CLG Practice Guidance³⁴ identifies that lower quartile prices provide the best proxy for entry level prices, with prices below that marker often associated with housing that is poor quality.
- 6.7 In order to understand what income would be required to sustain ownership or occupation of such properties, it is necessary to consider how much households can afford to spend on their housing. The CLG SHMA Practice Guidance sets out that a household can be considered able to afford to buy a home if it costs 3.5 times the gross household income for a single earner or 2.9 times the gross household income for a dual income household. However, the Practice Guidance does not prescribe exactly how affordability calculations should be undertaken other than to say that access to lower quartile (entry level) market housing is the relevant barometer.
- 6.8 The household income data utilised for Staffordshire Moorlands does not

³⁴ CLG (2007): Strategic Housing Market Assessments: Practice Guidance

differentiate between single earners and dual earners, and as such a 3.5 multiplier is considered appropriate in order to test best-case outcomes (although it is noted that the former Practice Guidance also states that where possible, allowance should be made for access to capital that could be used towards the cost of home ownership – this data is not presently available for Staffordshire Moorlands). NLP has complemented this with evidence from the Council of Mortgage Lenders, who identified that in Q1 2012, the median loan-to-value ratio for first time buyers was 80% with an income multiple of 3.3. Although there may be difficulties in newly forming households in being able to secure a 20% deposit, there are options available including Government initiatives such as Help to Buy, the much publicised Starter Homes initiative as well as traditional sources of deposits such as parents. On this basis it is considered a useful sensitivity to test.

- 6.9 In respect of renting, there is no official, or definitive, threshold for how much a household can spend on rent before it is unaffordable. The former CLG SHMA Practice Guidance (2007) sets out that a household can be considered able to afford renting on the private market in cases where the rent payable was up to 25% of their gross household income. These affordability criteria have been applied to the identified rental costs to arrive at an income threshold to support ownership/occupation of entry level market housing.
- 6.10 However, there is more up to date evidence which suggests that the proportion of gross income household spend on rent may be higher than 25%. For example, data released more recently than the former CLG SHMA Guidance estimates that the national average is 34.4% of gross household income (including state assistance) is spent on rent³⁵. Other sources³⁶ also suggest broad rules of thumb between 25% and 35% gross income as being the appropriate threshold (equating to c.33%-45% of net income).
- 6.11 The affordability test has therefore been calculated by identifying the costs of entry level market housing (including private rented). This utilised the following data:
- 1 Land Registry house price data. House price data was obtained at a local authority level and amalgamated to reflect the study's four sub areas (Biddulph, Cheadle, Leek and Rural areas) using postcodes. It is acknowledged that the geographical boundaries of postcodes and the sub areas do not accord exactly. However, a best-fit was made, by placing postcodes which cover more than one settlement area into the settlement area in which the majority of the postcode is located. An assumption regarding average 'entry level' house prices (i.e. the average price households entering the housing ladder at the bottom rung have to pay) was then made using lower quartile house prices in the District as a proxy;

³⁵ CLG English Housing Survey 2010/11

³⁶ For example see: Shelter Private Rent Watch Report one: Analysis of local rent levels and affordability (October 2011), Shelter.

- 2 Due to the lack of up-to-date settlement area data on private rents, an internet search of advertised private sector rental costs was undertaken to identify entry level (lower quartile) rents for each of the settlement areas;
- 3 Using the above information on market housing costs to estimate the minimum income required to access entry level market housing. The calculation assumes that households can afford a 3.5 x income multiplier to purchase a home or up to 25% of gross household income on rent. These assumptions are in accordance with the former CLG Guidance, which whilst no longer extant, still represents a useful guidance source that is still widely referenced by practitioners. Two sensitivity tests applying a 3.3 x income multiplier with a 20% deposit to purchase a home, or up to 35% of gross household income on rent have also been modelled;
- 4 Using the above data to compare entry-level house prices and rents with household incomes to calculate the proportion of households unable to afford access to market housing.

- 6.12 Separate affordability calculations have been carried out in respect of existing households (used in Steps 1.4 and 2.3 of the model) and newly forming households (used in Steps 2.2). This is because newly forming households generally have lower than average incomes. The English Housing Survey [EHS] has been used, which shows that newly forming households have approximately 83% of the average income of all households³⁷. This proportion was applied to the income data provided by Experian to enable a separate affordability calculation to be undertaken identifying the (higher) un-affordability levels of newly forming households.
- 6.13 The proportions of households estimated to be unable to afford lower quartile market housing are set out in Table 6.2 (for existing households) and Table 6.3 (for newly forming households). For Staffordshire Moorlands District as a whole, given the generally higher monthly costs of servicing a mortgage³⁸ than renting mean that a higher proportion of households are unable to buy than are unable to rent. Therefore, it is assumed that all of those households who can afford to buy a market house could also afford to rent.
- 6.14 Table 6.2 shows Biddulph and Leek as having the highest proportion of existing households unable to purchase or rent market housing. The highest proportion of newly forming households unable to rent are found in Biddulph (again) and Leek (Table 6.3). Table 6.2 and Table 6.3 demonstrate that (unsurprisingly) a change in income has a significant impact on the proportion unable to afford market housing, particularly in the private rental market.

³⁷ EHS 2014

³⁸ This is despite the current bank of England base rate of 0.25%.

Table 6.2 Affordability Test Results - Proportion of **Existing** Households Unable to Afford LQ Market Housing

Area	% Unable to Afford to Buy		% Unable to Afford to Rent	
	(assuming 3.5 income multiple)	20% deposit & 3.3 income multiple	(assuming 25% income)	(assuming 35% income)
Area 1) Biddulph	92.9%	88.4%	58.1%	29.0%
Area 2) Cheadle	88.9%	82.3%	54.1%	28.6%
Area 3) Leek	90.4%	85.9%	55.0%	29.3%
Area 4) Staffordshire Moorlands Rural	82.9%	78.1%	35.4%	25.8%
Staffordshire Moorlands	85.8%	80.2%	51.3%	24.9%

Source: Land Registry Data (2015/16), Rightmove 2016, Experian Income Data (2011)

Table 6.3 Affordability Test Results - Proportion of **Newly Forming** Households Unable to Afford LQ Market Housing

Area	% Unable to Afford to Buy		% Unable to Afford to Rent	
	(assuming 3.5 income multiple)	20% deposit & 3.3 income multiple	(assuming 25% income)	(assuming 35% income)
Area 1) Biddulph	95.2%	92.7%	72.1%	43.0%
Area 2) Cheadle	92.7%	89.3%	69.2%	39.4%
Area 3) Leek	93.7%	90.8%	69.1%	39.7%
Area 4) Staffordshire Moorlands Rural	88.3%	83.6%	69.8%	40.3%
Staffordshire Moorlands	90.5%	86.3%	66.3%	37.5%

Source: Land Registry (2015/16), Rightmove (2016), Experian Income Data (2011)

6.15 It is accepted that the figures in Table 6.2 and Table 6.3 which strictly follow the former CLG approach (i.e. 3.5 x income multiple and 25% income spent on rent) are likely to over-estimate the proportion of households likely to be unable to afford to buy a property, as due to a lack of primary data sources, the analysis does not allow for any savings that households may have to put towards the purchase of their property. The analysis also does not allow for residents transferring equity from their existing property into the purchase of a new dwelling, which is provided for in the sensitivity test.

6.16 There will also be many instances where households with comparatively low income levels (i.e. older residents) are asset rich and may already own their own home, hence they would not necessarily be in housing need. However, given the lack of data available for the District and the complexity involved, it has not been possible to model the detailed quantitative implications of this.

Current Housing Need (Stage 1) Steps 1.1 to 1.4

6.17 The first stage of the assessment considers current (backlog) affordable housing need. The Practice Guidance³⁹ is clear that an estimate should be made of the number of households who lack their own housing or live in

³⁹ 2a-022-20140306

unsuitable housing and who cannot afford to meet their housing needs in the open market.

- 6.18 The Practice Guidance provides an indication of the types of households that can be considered in housing need:
- 1 Homeless households;
 - 2 Households in temporary accommodation;
 - 3 Overcrowded housing;
 - 4 Concealed households;
 - 5 Existing affordable housing tenants in need; and,
 - 6 Households from other tenures in need and those that cannot afford their own homes⁴⁰.
- 6.19 Current housing need therefore seeks to identify those households in Staffordshire Moorlands who currently lack their own housing, or live in unsuitable housing and cannot afford to meet their needs in the housing market. Components of housing need are not definitive and can draw together statistics from a wide range of sources.
- 6.20 The Housing Register for Staffordshire Moorlands contains households in Priority Bands A – D. For the purpose of this study, those in Priority Bands A – C are considered to be in affordable housing ‘need’ as defined by the Practice Guidance⁴¹.
- 6.21 Therefore, NLP has considered the components of housing need as those in need and within a priority need banding (e.g. in need for affordable housing for a variety of reasons including homelessness, overcrowding etc.), currently concealed households and other groups in need, for which the existing Housing Register has been used as a best case proxy.
- 6.22 As of October 2016, the local Housing Register indicates that there are currently 1,141 households seeking social housing in Staffordshire Moorlands. This comprises **729 in Bands A-C**. As per the Practice Guidance, those seeking transfers are netted off to avoid double counting as they themselves will free up an affordable home as they transfer. On this basis, recent data from Staffordshire Moorlands Council suggests that 24.2%, (or 177) of these households, are likely to comprise transfers (i.e. they are existing social rented or affordable rent tenants seeking a move), meaning that the remaining **552 households** are living in other tenures and in need across bands A-C.
- 6.23 To provide an estimate of those within key priority banding, data from CLG and the 2001/2011 Census has been utilised to illustrate the extent to which households identified as being in need are either homeless or within concealed households. Whilst this is consistent with the Practice Guidance, given the potential for double counting and the age of some of the concealed households

⁴⁰ 2a-023-20140306

⁴¹ 2a-023-20140306

data, the current Housing Register provides a more appropriate gross estimate of housing need in this instance.

Table 6.4 Current Backlog of Housing Need

	Households	Source
Housing Register Priority Bands A - C	729	Housing Register October 2016
...of which Homeless households (including those in temporary accommodation)	17	Estimate from P1E Quarterly Homeless Returns (CLG Data) – average past 3 years data (Q3 2013 to Q2 2016)
...of which Concealed households	349	Estimate from Census 2011 based upon Concealed Families
Gross Estimate of Current Housing Need	729	Households in priority bandings
...of which current occupiers of affordable housing	177	Housing Register October 2016
Net Estimate of Current Housing Need (Backlog)	552	

- 6.24 Whilst the former SHMA Practice Guidance suggested that transfers should be added in at the supply stage (i.e. units becoming available when existing tenants are re-housed), NLP has presented this in the 'need' stage to reflect the fact that some of those currently in need of affordable housing and on the Housing Register are current occupiers, and that the net backlog is reduced accordingly at this stage. This backlog will need to be factored into future provision in order to reduce the scale of those in need of housing.
- 6.25 Although existing households in need already occupying affordable housing are excluded from the affordable housing calculation, it is noted that they do still have a requirement for the right type of affordable housing to become available to meet their needs. If an appropriate unit does not become available (e.g. due to shortage of supply of a specific type or size of unit) then these households will remain in need, despite not contributing to a net need requirement. New affordable housing provision provides the opportunity to focus on the size/type of provision to balance affordable housing mix, as set out in Section 7.0.

Future Housing Need (Stage 2)

- 6.26 Future housing need is split into two components. The Practice Guidance⁴² sets out firstly that *“the process should identify the minimum household income required to access lower quartile (entry level) market housing”*. This could be either through purchasing a dwelling or renting privately. The second element of forecasting likely future affordable housing needs involves estimating the number of existing households likely to fall into need.

⁴² 2a-025-20140306

New Household Formation (Step 2.1)

- 6.27 The Practice Guidance⁴³ recommends that gross household formation (under 45 years of age) should be used as the measure of newly forming households, as opposed to net household growth which takes into account household dissolution. This is required to ensure that household dissolution is not double counted in the calculation, once as a net loss of households and potentially again as a re-let of the house they may have occupied. However, gross household formation is typically much higher than net rates, and may represent an overestimate of the amount of households seeking new housing in each year within Staffordshire Moorlands. For example, as referenced earlier in the document, the 2014-based SNHP indicates a net annual household growth of just 137 annually for the District, whilst the gross figure is several times higher than this (see Table below).
- 6.28 Newly forming households have been calculated using the demographic modelling noted previously. Each of the scenarios modelled provide outputs on estimates of household change by type and by age band. The demographic-led Scenario Ab: 2014-based SNPP, adjusted for PCU headship rates and the 2015 MYE (Scenario Ab) has been used for the purposes of considering future newly forming households, as this represents what NLP considers to be the most appropriate demographic starting point for identifying housing OAN. Naturally, if an alternative scenario with lower or higher rates of household growth is adopted for the purposes of assessing future need, the inferred newly arising need would also be commensurately different. Table 6.5 presents the number of newly forming households (gross) in the District.

Table 6.5 Number of Newly Forming Households Annually (gross)

	No. Newly Forming Households Annually (gross)
Staffordshire Moorlands	722

Source: NLP / CLG 2014-based SNPP / Scenario Ab: 2014-based SNPP, adjusted for PCU and 2015 MYE

- 6.29 This output of future housing need should be treated with caution. Using gross household formation takes no account of the balance of overall structural housing demand based upon demographic-led estimates, excluding as it does household dissolution. Such gross estimates may include people that form several different households over the period at different stages of their life, but does not account for their previous household no longer existing.

Newly Forming Households Unable to Buy or Rent in the Market (Step 2.2)

- 6.30 This stage of the assessment involves the affordability test. Information in respect of local house prices, market rents and household income levels has informed the test which estimates the ability of households to afford lower quartile market housing. The affordability test has been calculated by

⁴³ 2a-025-20140306

identifying the costs of entry level (lower quartile) market housing, the costs of which have been obtained from the Land Registry, as well as private rental costs obtained from Rightmove.

- 6.31 As discussed in detail above, newly forming households generally have lower than average incomes and hence an adjustment was made to the income data provided by Experian to enable a separate affordability test to be undertaken identifying the (higher) unaffordability levels of newly forming households.
- 6.32 As with Stage 1, the affordability test identifies the proportion of households unable to buy or rent in the market in accordance with the Practice Guidance.
- 6.33 This analysis estimated that 66.3% of newly-forming households in Staffordshire Moorlands are likely to be unable to meet their housing needs in the private market (although if more generous assumptions are made concerning the proportion of household income is spent on rent, this could fall to 37.5%). This is applied to the gross household formation identified in Table 6.5 to identify the likely scale of newly forming households that will fall below the minimum income threshold for market housing, and will therefore require affordable housing.
- 6.34 This enables the number of newly forming households unable to access market housing (per year) to be estimated, as shown in Table 6.6.

Table 6.6 Affordability Test Results - Proportion of **Newly Forming** Households Unable to Afford LQ Market Housing

Area	% Unable to Afford to Buy		% Unable to Afford to Rent	
	(assuming 3.5 income multiple)	20% deposit & 3.3 income multiple	(assuming 25% income spent on rent)	(assuming 35% income spent on rent)
Staffordshire Moorlands	90.5%	86.3%	66.3%	37.5%

Source: Land Registry (2015-16), Rightmove (2016), Experian Income Data (2011)

- 6.35 Based upon the above, the calculation of future need based on gross household formation must therefore be seen only as one factor in assessing and considering an objective assessment of future housing need and demand. The calculation also takes no account of the viability of providing up to 66.3% (or 37.5% with a higher income contribution) of total dwellings as affordable tenures (as would be inferred by the Practice Guidance's methodology), with factors such as viability affecting the proportion of housing that will be able to be delivered as affordable.
- 6.36 In general, NLP considers that gross household formation is a relatively abstract concept in the identification of affordable housing needs. In not accounting for future dissolution of households it inevitably arrives at a need figure which is disproportionate to net household formation (as set out by the household projections, which are the starting point for identifying objectively assessed needs).

- 6.37 Furthermore, household dissolution is projected to increase in the future, with an ageing population, and this factor is not reflected in the SHMA's estimate of re-lets based on backwards looking trend data (i.e. leading to undercounting in supply, rather than double counting of dissolution). This is a further statistical limitation to applying gross household formation rates.
- 6.38 The outcome of using gross household formation and the higher levels of affordable (and overall) housing needs that such an approach invariably indicates, takes no account of the moderating effect that such high levels of supply would have upon prices and affordability. Whilst the analysis indicates that currently 66.3% of newly forming households in Staffordshire Moorlands may be unable to afford housing in the market (and this assumption is applied going forward), if housing were delivered at a rate above that indicated as structurally required to meet demographic-led needs (i.e. the household projections) then this, by virtue of supply and demand, would moderate affordability and reduce that proportion from 66.3%.
- 6.39 The extent to which this would occur is obviously difficult to assess and the Practice Guidance advises against doing so, stating that "*plan makers should not attempt to estimate the precise impact of an increase in housing supply.*"⁴⁴ It stands, however, that in using gross household formation, there would be significant downward pressure on the 66.3%/37.5%.
- 6.40 Whilst NLP recognises the limitations set out above, the Practice Guidance⁴⁵ is clear that it is the gross household formation that should be applied.

Existing Households Falling into Need (Step 2.3)

- 6.41 Step 2.3 uses secondary data for the number of households who move house each year (based on past trends) to estimate the number of existing households falling into need annually. Using data for the number of people actually moving (from the Land Registry and CORE data) provides a good indicator of need, as it shows actual moves; whereas the Housing Register only provides an indication of intentions to move.
- 6.42 Existing households falling into need is therefore based upon an analysis of recent trends of movements from the private sector into the social sector as a proxy for existing households falling into need. These figures were averaged from CORE data.
- 6.43 The resultant calculation is set out in Table 6.7.

⁴⁴ 2a-020-20140306

⁴⁵ 2a-024-20140306

Table 6.7 Existing Households Falling into Need in Staffordshire Moorlands

	Staffordshire Moorlands
Fiscal Calendar 2014/15	100
Fiscal Calendar 2013/14	146
Fiscal Calendar 2012/13	107
Number of new lettings per year (identified from CORE data – average from past 3 years) – previous tenure either owner occupation OR private rented sector	118

Source: CORE data 2012/13 - 2014/15

- 6.44 It is recognised that these figures only relate to those households who were successful at gaining entry to social housing and therefore under-estimates need. There will be a proportion of households in need and unable to afford market housing who either do not apply for affordable housing or are not successful in gaining entry, and as such the figures in Table 6.7 could be an under-estimation.

Total Newly Arising Housing Need (gross per year) (Step 2.4)

- 6.45 Step 2.4 simply adds together the number of newly forming households unable to access market housing (Steps 2.1 and 2.2 above) to the number of existing households falling into need (Step 2.3). This provides an annual gross figure for future households in need. The resulting figures are set out in Table 6.8.

Table 6.8 Total Newly Arising Need (per year)

Staffordshire Moorlands	25% Gross Income on rent	35% Gross Income on rent
Newly forming households unable to access market housing net (Steps 2.1/2.2)	479	271
Existing households falling into need (Step 2.3)	118	118
Total Newly Arising Housing Need (per year)	597	389

Source: NLP Analysis

Core Output 3: Estimate of Backlog and Newly Arising Households in Need

It is estimated that there will be 597 newly arising households in need of affordable housing in Staffordshire Moorlands per annum based on the gross household formation approach, reduced to 389 if an allowance is made for a higher proportion of household income to be spent on rent every month.

This should be set alongside the existing backlog affordable housing need of 552 dwellings in Staffordshire Moorlands. This does not take into account the existing and future likely supply of affordable housing.

Supply of Affordable Housing (Stage 3)

- 6.46 This Section estimates the existing and forthcoming stock of affordable housing as per the Practice Guidance. This stage examines housing stock

that can accommodate households in housing need. The information is required in order to calculate net affordable housing requirements. The model considers both current affordable housing stock (including how much of this is available) as well as the level of future annual new supply.

6.47 The Practice Guidance⁴⁶ sets out the current components of housing stock used to accommodate current households in affordable housing need as well as future supply:

- 1 Affordable dwellings that are going to be vacated by current occupiers that are fit for use by other households;
- 2 Surplus stock (vacant dwellings);
- 3 Committed supply of new affordable units; and
- 4 Identifying units to be taken out of management (demolition or replacement).

6.48 Table 6.9 summarises the data sources used by Stage Three of the affordable housing model.

Table 6.9 Summary of Data Required for Stage Three

Stage of the Model	Data Items
Stage Three: Affordable Housing Supply	
3.1: Affordable Dwellings Occupied by Households in Need	None - already netted off at Stage 1 (Step 1.4)
3.2: Surplus Stock	CLG Data: Table 100 (2015) and Table 615 (2015)
3.3: Committed Supply of New Affordable Housing	Local Authority Information
3.4: Units to be taken out of management	Local Authority Information
3.5: Total Affordable Housing Stock Available	Step 3.1 PLUS 3.2 PLUS 3.3 MINUS 3.4
3.6: Future Annual Supply of Social re-lets (net)	CORE Data (2012/13-2014/15)
3.7: Future Annual Supply of Intermediate affordable housing available for re-let or resale at sub market levels	CORE Data (2012/13-2014/15)
3.8: Annual Supply of Affordable Housing	Step 3.6 PLUS 3.7

Affordable Dwellings occupied by Households in Need (Step 3.1)

6.49 The purpose of Step 3.1 is to identify the number of affordable dwellings which become available but are occupied by households in housing need. Thus, this step considers transfers within the affordable housing stock. The movement of these households (within affordable housing) will have a nil effect overall in terms of housing need. These households have already been netted off at Stage 1 of the calculation and the figure for this step is therefore zero.

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Surplus Stock (Step 3.2)

- 6.50 A certain level of voids are normal and allow for transfers and works to properties. CLG's former SHMA Guidance (page 48) notes that a social housing vacancy rate in excess of 3%, and properties which are vacant for considerable periods of time, should be counted as surplus stock.
- 6.51 An analysis has been undertaken utilising vacancy level data for the last 3 years. This indicates a social housing vacancy level of 0.8% in 2015.⁴⁷
- 6.52 Therefore, as the current vacancy rate is below the 3% rate recommended by CLG, a surplus stock rate of zero has been included within the model.

Committed Supply of New Affordable Housing (Step 3.3)

- 6.53 The CLG's former SHMA Guidance states that this step of the model should utilise information about new social rented and intermediate affordable dwellings which are committed at the point of assessment. The LAHS data no longer shows the number of planned and proposed affordable units. However, data on committed supply of affordable housing has been provided by Staffordshire Moorlands Council (Table 6.10) and suggests that a limited amount of affordable housing is currently in the development pipeline.

Table 6.10 Total Supply of New Affordable Units

	Staffordshire Moorlands
Supply of New Affordable Housing (Committed Supply) 2015/16-2017/18	144

Source: Local Authority Information (provided by Staffordshire Moorlands Council Officers in 2016), and includes units under construction after 30/03/16 and/or other undeveloped sites with full extant planning permission for affordable housing

Units to be taken out of Management (Step 3.4)

- 6.54 The former CLG SHMA Guidance states that this stage should "*estimate the numbers of social rented or intermediate affordable housing units that will be taken out of management.*" This includes properties which are planned to be demolished or redeveloped (with a net loss of stock).
- 6.55 Staffordshire Moorlands Council provided information in 2016 that confirmed that no units were planned to be taken out of management; hence a figure of zero has been incorporated into the model.

Total Affordable Housing Stock Available (Step 3.5)

- 6.56 This step calculates total affordable housing stock available by simply adding together steps 3.1 (affordable dwellings occupied by households in need), 3.2 (surplus stock) and 3.3 (committed additional housing stock) and subtracting 3.4 (units to be taken out of management). This is presented in Table 6.11.

⁴⁷ CLG Data: Table 100 (2015) and Table 615 (2015)

Table 6.11 Current Supply of Affordable Housing

	Staffordshire Moorlands
Step 3.1 (Affordable Dwellings Occupied by households in need)	0 (already taken off need identified by Step 1.4)
PLUS Step 3.2 (Surplus Stock)	0
PLUS Step 3.3 (Committed Supply of New Affordable Housing)	144
MINUS Step 3.4 (Units to be taken out of management)	0
EQUALS Step 3.5 Current Supply of Affordable Housing	144

Source: CLG Data Table (2015) and Table 615 (2015) Local Authority Information

Future Annual Supply of Social Re-Lets (Step 3.6)

6.57 The Practice Guidance⁴⁸ also requires the calculation of social re-lets and intermediate affordable housing (excluding transfers) to be assessed as future components of affordable housing supply:

“plan makers should calculate the level of likely future affordable housing supply taking into account future annual supply of social housing re-lets (net), calculated on the basis of past trends (generally the average number of re-lets over the previous three years should be taken as the predicted annual levels)”.

6.58 Steps 3.6 and 3.7 therefore focus on the future supply of affordable housing arising from existing stock. The former CLG SHMA Guidance recommends that the number of social re-lets per year should be assessed by looking at past trends over the previous 3 years.

6.59 CORE data in respect of the number of lettings by RPs in the last 3 years has therefore been assessed. This excludes transfers from other affordable dwellings as they were removed from the assessment of ‘need’ at Step 2.3. The average figure for the last 3 years has been used in the model (Table 6.12).

Table 6.12 Future Annual Supply of Social Re-lets in Staffordshire Moorlands

	Number of Social Re-lets (excluding transfers)
2012/13	159
2013/14	234
2014/15	152
Average	182

Source: CORE Data (2012/13-2014/15)

6.60 The level of stock turnover due to re-lets was around 8% in 2015. The former CLG SHMA Guidance states that for this stage of the SHMA assessment, in areas where the stock base of affordable housing is changing substantially (e.g. due to high levels of Right to Buy) it may be appropriate to take into

⁴⁸ 2a-027-20140306

account the changing stock base when predicting the future levels of future voids.

- 6.61 It is possible that the Government's renewed endorsement of the scheme⁴⁹, and more specifically the provision of greater discounts being offered to social tenants to buy their property, and the extension of the programme (albeit on a voluntary basis) to RPs, could increase the level of RTB in Staffordshire Moorlands substantially over the next few years.
- 6.62 From May 2015, the eligibility criteria for RTB has been reduced from five years public sector tenancy to three. This means you now have to be a tenant for three years instead of five before you can apply to buy your home. The Government also increased the discount; this is now up to £77,900 outside of London⁵⁰. The Government is still seeking to achieve one-for-one replacement (for England as a whole) whilst ensuring value for money.
- 6.63 This clearly has long-term implications for Staffordshire Moorlands, which has significant social housing stock currently owned by RPs. As such, it is possible that there will be an increase in the number of sales per annum in future, which could reduce the long-term capacity of Staffordshire Moorlands to meet its own housing needs. This would clearly need to be closely monitored by RPs and the Council.

Future Annual Supply of Intermediate Affordable Housing (Step 3.7)

- 6.64 This step takes into account the very low number of shared ownership affordable homes which become available as a result of re-sales each year. CORE data on re-sales of intermediate (shared ownership) housing for the 2 years 2012/13 and 2013/14 has been assessed. This has totalled 14 over the past two years, equating to an annual average rate of 7 dpa.

Annual Supply of Affordable Housing (Step 3.8)

- 6.65 This is simply the sum of Step 3.6 (social re-lets) and Step 3.7 (shared ownership re-sales). The results are shown in Table 6.13.

⁴⁹ Recent Government announcements have confirmed plans to extend the RTB scheme although the housing minister has confirmed that RPs cannot be compelled by regulators to sell their homes under this Government's Right To Buy extension.

⁵⁰ www.righttobuy.gov.uk

Table 6.13 Annual Supply of Affordable Housing

	Staffordshire Moorlands
Step 3.6 (Future Annual Supply of Social re-lets)	182
PLUS Step 3.7 (Future Supply of Intermediate Affordable Housing)	7
EQUALS Step 3.8 Annual Supply of Affordable Housing	189

Affordable Housing Needs

6.66 This section provides an assessment of net affordable housing need for Staffordshire Moorlands. This section also examines the type of accommodation most appropriate to meet this need.

Estimate of Net Affordable Housing Need

6.67 The starting point in calculating the net affordable housing need is the Total Current Housing Need established at Step 1.4. This figure takes account of any backlog in provision. Deducting the current available stock of affordable housing (step 3.5) results in a net backlog of 552 dwellings for Staffordshire Moorlands (based on the Housing Register approach). Annualised over 17 years this equates to a backlog of 27 dpa.

6.68 In defining newly arising need, the future annual supply of affordable housing identified in Step 3.8 (189 dpa) is removed from the annual future housing need of 597/389 dpa gross as set out in Table 6.14. When added to the backlog, this indicates that Staffordshire Moorlands has a net annual need of 408 based on the Housing Register approach⁵¹. This reflects gross household formation and does not account for household dissolutions, with the implication that needs may be inflated under this approach. The sensitivity test reduces this need to 200 dwellings.

Table 6.14 Net Annual Housing Need

	Housing Register	
	25% income / 3.5 x income	35% income / 3.3 x income + 20% deposit
Current Need (Including Backlog)		
Total Current Need (Step 1.4)	552	
MINUS Total Available Stock of Affordable Housing (Step 3.5)	144	
Equates to Net Current Need	408	
Net Backlog: Annualised (17 years) (A)	24	
Total Newly Arising Need		
Newly Arising Housing Need (Annual) (Step 2.4)	597	389
MINUS Future Annual Supply of Affordable Housing (Step 3.8)	189	
Equates to Net Newly Arising Need (net) (B)	408	200
NET ANNUAL NEED = A+B	432	224

⁵¹ Excluding the sensitivity test of assuming 3.3 x income and a 20% deposit

Core Output 6: Estimate of Net Annual Affordable Housing Need

Applying the current (backlog) affordable housing need to the newly arising housing need annually suggests that Staffordshire Moorlands has an affordable housing need of **432 dpa over 17 years** based on gross affordable household formation (using the Housing Register approach). This figure would reduce to 224 dpa if allowances are made for a deposit and/or a greater proportion (35%) of income is spent on renting a property.

Summary of Affordable Housing Requirements

- 6.69 Although it is not clear to what extent the outcomes of the above affordable housing need scenarios represent “*future scenarios that could be reasonably expected to occur*”,⁵² as is required by the Practice Guidance, it is clear that under either of the two main scenarios highlighted above, there is a high level of affordable housing need in Staffordshire Moorlands.
- 6.70 A strict interpretation of the Practice Guidance and former CLG Guidance would suggest that the **432 dpa** figure would be more policy compliant. However data released more recently than the former CLG SHMA Guidance estimates that the national average is 34.4% of gross household income (including state assistance) is spent on rent. Applying a 35% income threshold would lower the affordable housing need to **224 dpa**.
- 6.71 The 432 dpa is lower than the 707 dpa reported in the 2014 SHMA primarily due to the significant reduction in the number of applicants on the Housing Register, which has fallen from 1,408 to 729 Bands A-C, and the spreading of this backlog over the plan period (rather than the 5 years targeted previously).
- 6.72 Consideration of similar issues at Local Plan examinations has highlighted the care that should be applied to interpreting such scenarios. For example, in considering housing needs during the West Lancashire Local Plan Examination, the Inspector concluded:
- “At the other end of the range is one scenario which seeks to meet the full level of affordable housing need by building at least twice the number of houses required to meet any of the population-based household projections. It appears to me that this approach would result in a substantial surplus of market houses and so would be economically unrealistic.”*⁵³
- 6.73 Notwithstanding, in line with the Practice Guidance Staffordshire Moorlands District Council needs to consider if an uplift in overall housing delivery is required to meet these affordable housing needs.

⁵² 2a-003-20140306

⁵³ West Lancashire Local Plan, Inspector’s Report (September 2013) – §47

7.0 Key Issues for Future Policy

Introduction

7.1 This section of the report considers the implications of future policy changes on the delivery of affordable housing and particularly the impacts of changes in housing costs. It also examines affordable housing requirements as a proportion of overall supply and the tenure mix.

Implications of 'Help to Buy'

7.2 The Government's 'Help to Buy' mortgage guarantee scheme has been hailed by both the development industry and the Government as being a key factor (alongside the gradual economic recovery) of stimulating the housing market. This helps to facilitate the provision of mortgage finance to households (often, but not exclusively, first time buyers) who might otherwise struggle to provide a sufficient deposit.

7.3 Under the Government's **Help to Buy Equity Loan scheme**, a buyer is only required to put down a minimum 5% deposit on a new home (older homes are excluded), and the government provides an equity loan (through the HCA) of up to 20% of the property's value up to a maximum purchase price of £600,000. The remaining amount is then covered through a standard mortgage. At the end of the mortgage or when the property is sold, the household must repay the equity loan, which will be 20% of the value at the time of sale. There is no fee applied to the equity loan for the first 5 years, after which an annual fee of 1.75% is payable, rising by RPI plus 1% each year.

7.4 The Government's **Help to Buy Mortgage Guarantee scheme** helps households to purchase a home with a deposit of just 5% of the purchase price. This is open to both first time buyers as well as existing home owners, for new build homes in the UK (again with a purchase price of up to £600,000). The government provides a guarantee to the mortgage lender. In general, bank lending rates are higher under this scheme than if a purchaser were to apply for a mortgage independently, with an initial interest rate of 5.2% for the first five years typical.

7.5 The Government has also instigated the **Help to Buy ISA**, by which the Government will boost savings into the account by 25%. The maximum Government bonus that can be received is £3,000 (and a minimum of £400), and is available to each first time buyer, not each household (meaning that a couple with two separate Help to Buy ISAs, each saving up to £12,000, could receive a £6,000 bonus from the Government to go towards buying your first home). As this can be used in conjunction with the other Help to Buy schemes, this could further increase the amount of deposit households can put down for their first home.

- 7.6 The latest figures ⁵⁴ provided by the Government indicate that Help to Buy equity loans have helped more than 91,000 people to buy a new home so far, with over 80% of sales going to people taking their first step onto the housing ladder. 32 people were granted equity loans in Staffordshire Moorlands between October 2013 and June 2014.
- 7.7 An analysis has been undertaken of the extent to which the advent of Help to Buy allows both existing and newly forming households to purchase a new property. The analysis has looked at both the Help to Buy Mortgage Guarantee Scheme, which assumes that households would have access to a 5% deposit; and the HTB Equity Loan Scheme, whereby the Government provides an additional equity loan (through the HCA) of 20% of the property's value; thus the total property value against which a mortgage is obtained is just 75%.
- 7.8 Using typical new build average house prices over the past year, and similar assumptions have been made that newly forming households will have incomes 83% of the level of existing households. It should be noted that the analysis makes no allowance for any fees involved; nor does it analyse the implications of the household failing to sell the property (or reduce the size of the equity loan) within the first five years and incurring increasing interest charges on the outstanding equity loan.

Table 7.1 Affordability Test Results – Implications of the Help to Buy Scheme

% Unable to Buy/Rent Lower Quartile House:	Staffordshire Moorlands
Currently (EXISTING HOUSEHOLDS)	36,938 (85.8%)
With 20% Deposit and 3.3 x income	34,515 (80.2%)
With HTB Equity Loan (25%) deposit	33,598 (78%)
With HTB mortgage guarantee (5%) deposit	37,435 (86.9%)
Currently (NEW HOUSEHOLDS)	38,960 (90.5%)
With 20% Deposit and 3.3 x income	37,178 (86.3%)
With HTB Equity Loan (25%) deposit	36,884 (85.7%)
With HTB mortgage guarantee (5%) deposit	39,291 (91.3%)

Source: Land Registry Data (2016), Rightmove (2016), Experian Income Data (2011)

- 7.9 The results are presented in Table 7.1. They suggest that the HTB Equity Loan scheme could have a positive effect on people's ability to purchase a new build property in Staffordshire Moorlands. For example, the number of existing households who in theory could not afford to buy a new build property in Staffordshire Moorlands could fall from 86% to 78%. This suggests that the true level of affordability for both new and existing households in Staffordshire Moorlands could be somewhat lower than has been modelled in preceding Sections, although this of course assumes that householders are able to afford a 5% deposit in the first place (the HTB ISA could of course go some way towards assisting new households in being able to provide the necessary deposit).

⁵⁴ www.opendatacommunities.org/data/housing-market/help-to-buy/num-loans/loan-type-postcode-dis

Starter Homes

- 7.10 The Housing and Planning Act 2016 introduced a statutory duty on local authorities to promote the delivery of Starter Homes, with a requirement for a proportion of starter homes to be provided on all 'reasonably sized' housing development sites.
- 7.11 The Act defines starter homes as comprising new dwellings available to first time buyers between the ages of 23 and 40, sold at a discount of at least 20% of market value. This is defined as below £450,000 in London and £250,000 elsewhere, with a minimum time limit on resale (5 years) before the discount can be removed.
- 7.12 The Government has made it clear that Annex 2 to the Framework (the Glossary) will be revised to include starter homes within the overall definition of Affordable Housing on the grounds that affordable housing is about supporting households to access home ownership.
- 7.13 A Technical Consultation was undertaken and ended on 30th June 2016 regarding the level at which this requirement should be set. However, secondary legislation has yet to be finalised. Whilst this secondary legislation is not strictly necessary for Councils to treat Starter Homes as affordable housing, NLP is aware of only two schemes⁵⁵ to date that have successfully negotiated an element of starter homes as an affordable housing element.
- 7.14 The Government announced in the Autumn Statement 2016 the launch of the Affordable Homes Programme, which will allow Local Authorities, RPs and developers to access a £4.7 billion fund to provide Affordable Homes. The Minister for Housing confirmed that this would be split equally between rent to buy, starter homes and affordable rented. As such, Starter Homes are no longer seen as the only mechanism available to promote low cost home ownership.
- 7.15 NLP has undertaken an analysis of the potential pool of households who may be eligible and able to purchase a starter home over the plan period 2016-2031. This process is summarised in Table 7.2.

⁵⁵ Bellway Homes, Sopley, Hampshire New Forest District Council and HCA, Wolverhampton City Centre, City of Wolverhampton Council.

Table 7.2 Potential Starter Homes Eligibility in Staffordshire Moorlands (2014-2031)

	Potential First Time Buyers 2014-31	% Who can afford to purchase a new property @20% discount	Number able to afford a starter home	
			Total	Annual
Existing Households with a HRP* under 40	2,597	17.2%	446	26
Newly Forming Households with a HRP* under 40	7,695	12.7%	975	57
TOTAL	10,292	-	1,421	83

Source: 2011 Census Land Registry Data (2015), Rightmove (2016), Experian Income Data (2011), 2016 PopGroup PCU/Long Term Migration Scenario

*HRP: Household Reference Person

*Note: For existing households with a Household Reference Person [HRP] under the age of 40, it has been assumed that if they are currently living in rented accommodation then they would not previously have owned a home and would therefore be eligible for a starter home. Whilst this is likely to be true for the majority of cases, it will necessarily under-estimate the total number of households who have, for whatever reason, decided to rent having purchased a property in the past.

- 7.16 In the absence of any data on the likely purchase price of typical starter homes in Staffordshire Moorlands, it has been assumed that this is likely to equate to the typical (mean) sales price of new build properties in Staffordshire Moorlands. The price paid figure for such properties over the year to August 2016 (as recorded by HM Land Registry) was £132,142. Discounted by 20%, this would suggest a typical discounted price of £105,714 which would require a household income of at least £30,204 (assuming a standard 3.5 x income multiple).
- 7.17 Table 7.2 indicates that this would typically price out 83% of existing households with an HRP under 40, and 87% of newly forming households with an HRP under 40. Applied to the total number of households in this age bracket (23 – 39), this would suggest that there is potentially an total reservoir of **1,421 households** (both existing and emerging) over the next 17 years who would be eligible and theoretically able to purchase a starter home (83 annually).
- 7.18 It is of course noted that this figure is based on a number of assumptions regarding individuals' ability to pay and how the starter homes discount is likely to work in practice. We do not of course know how this will play out in Staffordshire Moorlands District, and whether given the comparatively low house prices generally, there will be substantial interest in this discounted product from either developers or potential occupiers.
- 7.19 For example, it is likely that the demand for starter homes will come from households who are either able to afford market or shared ownership properties, rather than affordable rented/social rented housing. It is unlikely therefore to have an impact on social housing, although it is possible that there will be some overlap with intermediate housing needs. This is examined in further detail below.
- 7.20 Clause 4 of the Housing and Planning Act states that an English planning authority "*must carry out its relevant planning functions with a view to*

promoting the supply of starter homes in England'. Furthermore, Clause 5 - Planning permission: provision of starter homes, contains a new duty that applies to decisions on planning applications. The Explanatory Notes accompanying the Act suggest that the clause would enable the SoS, through regulations, to require that in relation to applications for residential development above a certain size there must be a s.106 planning obligation securing a certain proportion of starter homes on the site.

- 7.21 The regulations may also specify that certain types of residential development should be exempt, or that certain areas should have a higher starter home requirement, or that LPAs should have discretion about certain requirements. The requirements could include the provision of a particular number or proportion of starter homes on site or the payment of a commuted sum to the local planning authority for the provision of starter homes. The SoS will have flexibility to apply different requirements to different types of residential developments and to different areas, including conferring discretions on LPAs. It is understood that the Bill also gives the option to developers whether to build starter homes or affordable homes, including where there is a current s.106 agreement in place.
- 7.22 The Government has yet to provide a figure in the Practice Guidance / Framework regarding what the 'certain proportion of starter homes' provided on suitably-sized starter home schemes, is likely to be. Without this, it is very difficult to suggest the scale of need at this stage, or what proportion (if any) of the affordable housing requirement should be 'netted off' for the provision of starter homes. A figure of 20% has been suggested.
- 7.23 The CLG's "*Starter Homes Regulations Technical consultation*" (March 2016) is seeking views on a tapered approach which enables the starter home to be sold at an increasing proportion of market value, stepping up to 100% over time, for between 5 and 8 years. The Consultation also seeks views on whether there should be a minimum percentage requirement to be applied uniformly on all sites over 10 units to provide a single requirement across the country, and whether 20% represents a reasonable requirement for most areas.
- 7.24 Discussions with various RPs suggested that demand is likely to be limited for starter homes in eastern parts of Staffordshire Moorlands in particular due to the relatively low property prices in certain areas.
- 7.25 As such, the Council will need to monitor the situation and prepare suitable policy responses, based on viability assessments, to ensure that demand can be met without harming the wider property market (for either market or social rented properties).

Build to Rent

- 7.26 Build to Rent was launched by the Government in December 2012 in response to the Montague report on barriers to institutional investment in private rented homes. Its purpose is to stimulate investment in large-scale development of

homes built specifically for private rent by professional organisations. The initial Build to Rent budget of £200 million was increased to £1 billion in the Budget 2013. Whilst the build to rent fund has been withdrawn, it has been replaced by a Home Building Fund of £3 billion with the Housing Minister indicating that Build to Rent will be addressed shortly.

7.27 To date, approximately £300 million has been allocated to Round 1 projects, and contracts have been signed for 6 projects totalling £359 million in Round 2 (announced in July 2015), none of which are located in Staffordshire Moorlands.

7.28 Research published by EC Harris in November 2013 (Build to Rent –Pushing the Boundaries) indicates that Build to Rent is likely to be viable across more than half of England’s local authority areas. Staffordshire Moorlands (in common with most of Staffordshire) is an area whereby build to rent is unlikely to be viable, even if delivery costs and unit sizes were reduced.

Self-Build

7.29 The Framework [§50] requires LPAs to plan for a mix of housing including for people wishing to build their own homes. The Government wants to enable more people to build their own home and wants to make this form of housing a mainstream housing option. There is strong industry evidence of significant demand for such housing, as supported by successive surveys. The Practice Guidance⁵⁶ states that LPAs should plan to meet the strong latent demand for such housing. A self-build project is defined as a situation whereby a house is designed and constructed to the specifications of the person who is going to live there.

7.30 At present around 10,000 self-build homes a year are built in the UK; the Housing Minister aims to double this figure to 20,000 a year or more. This would also qualify for the £3 billion Home Building Fund.

7.31 The first stage would involve self-builders formally registering for a new building plot with their local authorities (similar to the way people currently register on a council housing waiting list). Only people who had lived in a local authority area for two to three years would be eligible to register, and they might also need to prove they had the resources to buy a plot once the council makes them available.

7.32 Each council would need to take note of the level of demand there was in its area and facilitate suitable building plots to match the local demand. There is a statutory duty on LPAs to grant sufficient permissions to meet demand, however the Self-Build and Custom Housebuilding Regulations 2016 indicate that LPAs can apply for exemption to the statutory duty where LPAs have a legitimate housing shortage.

7.33 The Self-Build and Custom Housebuilding Act 2015 places a duty on councils to keep a register of individuals and community groups locally who want to

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acquire land for self-build homes and to have regard to these registers in carrying out its planning function. The Council is looking at gathering evidence to see if there is a demand for this type of development within Staffordshire Moorlands. If the Council then becomes aware of land that may be suitable for self-build it can highlight this information to relevant parties.

In terms of how this initiative relates to Staffordshire Moorlands Council, the Practice Guidance⁵⁷ advises that additional local demand over and above current levels of delivery can be identified from secondary data sources such as: building plot search websites; 'Need-a-Plot' information available from the Self Build Portal; and enquiries for building plots from local estate agents.

7.34 A review of the 'Need a Plot' information suggests that the level of demand for plots in Staffordshire Moorlands is low, with only **two** specific requests for a plot identified in Staffordshire Moorlands at the time of search.

7.35 Such data is unlikely on its own to provide reliable local information on the local demand for people wishing to build their own homes, particularly as neighbouring authorities Shropshire Council and Stoke on Trent Council were part of a flagship scheme and granted access to £550,000 worth of funding as part of the Right to Build consultation. This may have displaced possible demand.

Rent to Buy

7.36 Rent to Buy is a Government scheme designed to ease the transition from renting to buying a home by providing subsidised rent. With Rent to Buy, households rent a newly built home at approximately 20% below the market rate for up to five years. During that time period, households have the option to buy the property or to buy part of the property under a Shared Ownership scheme. When the end of the time period is reached, households either have to buy part of the property or leave.

7.37 Inside Housing reports that the Government is considering changing its Starter Homes policy to include rent to buy homes similar to the London Living Rent product recently announced by the Greater London Authority. Inside Housing understands that CLG could adopt a rent conversion model where part of a household's rent each month goes towards a deposit on a house.

Suggested Affordable Housing Need

Proportion of Housing to be Affordable

7.38 An overall housing OAN has been identified (Section 6.0) of **235 – 330 dpa** for Staffordshire Moorlands District, equivalent to 3,995 to 5,610 additional dwellings over the plan period 2014 to 2031.

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- 7.39 An affordable housing need has been identified (Section 6.0) of between 224 – 432 dpa based on the Housing Register Approach.
- 7.40 An assessment of the amount of net annual affordable housing need identified as a proportion of the total housing requirement suggests that, in quantitative terms at least, theoretically Staffordshire Moorlands would need between **68%-95%** of its total annual housing OAN to comprise affordable housing if it is to meet all of its affordable housing need (even using the most optimistic assumptions concerning the level of affordable housing need). This does not take into account the continued ability of the Private Rented Sector to accommodate households in need, which in practice occurs through the payment of housing benefit.
- 7.41 The Practice Guidance states that the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. *‘An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.’*⁵⁸
- 7.42 However, the Practice Guidance also states that any assessment of need *‘should be realistic in taking account the particular nature of that area’*. There may therefore be a need to balance delivery of affordable housing against the viability concerns of much of Staffordshire Moorlands.
- 7.43 However, there remains a clear requirement to balance the need to boost the delivery of affordable housing against viability concerns for parts of Staffordshire Moorlands District.
- 7.44 Ultimately, the affordable housing target to be established by SMDC is a decision to be made through the emerging Local Plan. The Council will need to establish a balance between housing need requirements and viability of delivery. The quantitative need for affordable housing in Staffordshire Moorlands is considerable. In particular, affordability and the supply of both market and affordable housing must be tackled to prevent the problem from becoming more acute.
- 7.45 This should be monitored given that the sector is in a state of flux at the time of writing, with the Housing White Paper and subsequent consultations, likely to have significant impacts on the sector with requirements to ensure the provision of a range of affordable homes including starter homes on all reasonably sized sites, as well as a host of other measures including Rent to Buy and the (voluntary) extension of Right to Buy for RP tenants.

Suggested Affordable Housing Split

- 7.46 An assessment has also been undertaken to establish a suggested split between social rent, affordable rent and intermediate affordable housing.

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Again, the targets to be established are a policy decision for Staffordshire Moorlands District Council to make through its Local Plan formulation process, subject to the Government's proposals for starter homes. This overview is therefore indicative.

7.47 This assessment has been undertaken by examining the interaction between housing costs and household income. The suggested tenure split has been informed by our analysis of the ability of households with insufficient income to access market housing to afford different types of affordable housing.

7.48 Housing costs have been examined by looking at the following sources:

- 1 **Social rent levels:** CORE data;
- 2 **Intermediate housing costs:** CORE data setting out the market value of shared-ownership purchases has been assessed. Indicative monthly housing costs have been identified using lower-quartile market values and based on the purchaser buying a 50% equity share in the property. Monthly mortgage costs are calculated based on 4% interest rate mortgage on the 50% equity. Rent levels are calculated on the basis that 3% of the equity retained by the RP is paid per year. For example, for a typical new build property in Staffordshire Moorlands valued at £132,142, where 50% is rented, rental costs are assumed to be £518 per month;
- 3 **Private rent levels:** Rightmove data on advertised rents, cross-checked against VOA data;
- 4 **Affordable Rent levels:** (assuming affordable rent is at 80% LQ market rents): 80% of private rented costs.

7.49 This has identified average housing costs, which are set out in Table 7.3. These only represent the situation at a particular point in time and Staffordshire Moorlands District Council should continue to review their housing evidence when new data sources become available.

Table 7.3 Monthly Rents and Costs

	Social Rent (average £359 pcm)	Affordable Rent (80% market rent = £336 pcm)	LQ Private Rent (£420 pcm)	LQ Home Ownership (£120,000)	Intermediate shared ownership (50% equity)*	Starter Homes*	New Home Ownership (10% deposit)*
Income required	£17,243	£16,128	£20,160	£34,286	£24,845	£30,204	£33,979
% of Existing Staffordshire Moorlands Residents who cannot afford	37.0%	31.4%	51.3%	85.8%	68.4%	82.8%	85.6%

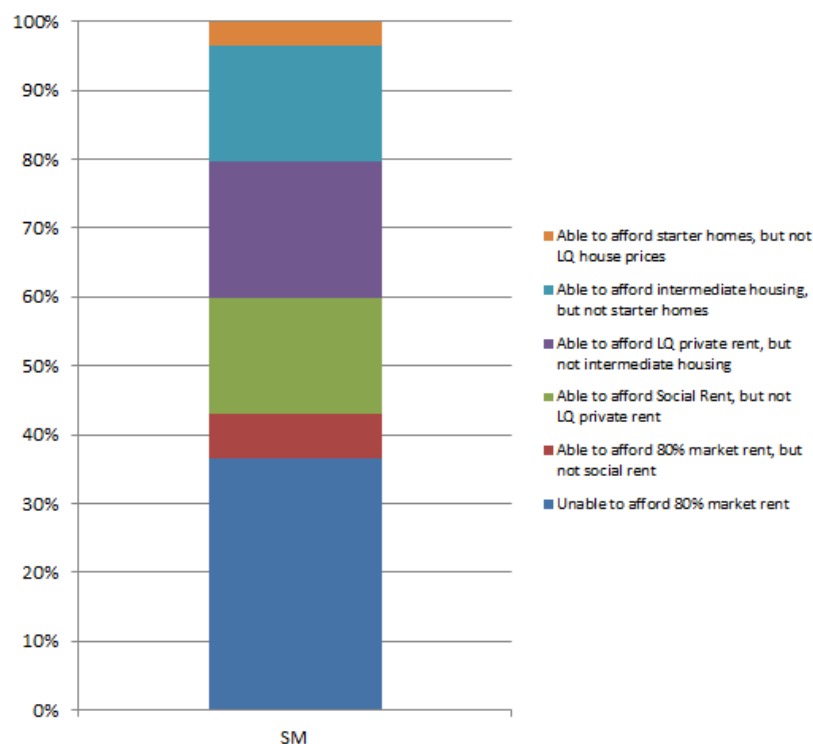
Source: CORE (2016), Land Registry (2016) and Rightmove (2016)

*Note: HM Land Registry data for Staffordshire Moorlands District indicates that the median price paid for a new home in the Borough (excluding detached) was £132,142 for the year to August 2016

7.50 Information on household income has been obtained from Experian data, which estimates the number of households with a household income in ten different income bands. The income data used to inform this analysis does not take into account benefits received by households (such as Housing Benefit).

- 7.51 The analysis then seeks to estimate the number of households unable to afford market housing. This assumes that a household does not spend more than 25% of their income on rent (or for intermediate properties, combined mortgage/rent payments). Thus, to afford a lower quartile private rented monthly rent of £420, a household would require a yearly income of £20,160; 80% market rent would require an income of £16,128; to afford intermediate housing, a household income of £24,845 would be required; to afford social rent, a household would need a household income of £17,243, whilst to (potentially) afford a starter home, a household would need an income of £33,979.
- 7.52 In total, it is estimated that around 37% (Table 7.3) of all households in the District cannot afford social rent, particularly as this is more expensive than affordable rent.
- 7.53 The analysis has enabled an estimate to be made of the proportion of households with insufficient income to afford market rent and therefore requiring affordable housing. The analysis at Figure 7.1 relates specifically to households unable to afford private-rented market housing (i.e. households in need of affordable housing). It shows the proportion of these households:
- 1 Unable to afford affordable rent;
 - 2 Able to afford affordable rent, but not social rent;
 - 3 Able to afford social rent but not LQ private rent (without benefits);
 - 4 Able to afford LQ private rent, but not intermediate housing;
 - 5 Able to afford intermediate housing, but not starter homes;
 - 6 Able to afford starter homes, but not an LQ market home.

Figure 7.1 Existing Households Unable to Access a New Home – Affordability



Source: Experian, CORE, Rightmove 2016

7.54

Figure 7.1 shows that in theory, all forms of social housing are more affordable than either starter or intermediate homes (unsupplemented by housing benefit/Universal Credit) in the District. However, clearly the situation is considerably more complicated than this; it presupposes that the remaining 57% of households who in theory can afford social rented housing, have an income source that would enable them to meet the monthly payments. In practice, there is very limited difference between affordable rented and social rented properties:

- 1 Of the 36,938 households in Staffordshire Moorlands District who cannot afford to purchase a LQ house on the open market without some form of subsidy, 37% have such low household incomes that they cannot even afford 'affordable rent', and a further 6% cannot afford social rent. Following on from the changes to the Local Housing Allowance Rates to the social sector from April 2018, it is anticipated that the difference between those that can afford social and / or affordable rent will reduce. These households cannot access even the most affordable type of housing without assistance from the state in the form of additional benefit payments to cover the difference. It is considered that these households are most appropriately housed in social housing with the support of benefit payments to cover the difference in rent. In total, 17% of the 36,938 households can afford either social or affordable rented properties, but not LQ private rent;
- 2 Furthermore, an additional 17% of these 36,938 households can afford intermediate housing, but not starter homes;

3 A further 3% are likely to be able to afford starter homes but not lower quartile house prices.

7.55 In addition, it might ordinarily be supposed that there will be a noticeable overlap between households in need of a shared ownership property, and those eligible for/able to buy a starter home. Whilst it is impossible to estimate at present the likely extent of any 'switch' between intermediate and starter homes in Staffordshire Moorlands District due to the absence of any further information at this time from Government concerning costs and future requirements, it appears that for Staffordshire Moorlands at least the impact on affordable housing needs will be fairly modest.

7.56 The need for starter homes is likely to be particularly pressing in surrounding rural areas and those areas within Staffordshire Moorlands close to the Peak District National Park, given the higher house prices in these locations (although it is difficult to gauge the extent of this given the very low level of development outside the urban areas in recent years due to Green Belt restrictions.

7.57 The indicative percentage split for social rent/affordable rent/intermediate affordable housing (based on identified net requirements) is set out in Table 7.4.

7.58 This is based on the analysis above and the progressive move at a national level away from social rented towards affordable rented tenure provision. As noted above, the Government has introduced measures to facilitate the provision of affordable rented properties at the expense of social rented dwellings. There is therefore a need to rebalance the stock to reflect this shift.

Table 7.4 Suggested Social Rent/Intermediate/Starter Homes Split

	Staffordshire Moorlands
Net Annual Affordable Housing Need	224 – 432 dpa
% Social / Affordable Rented	60%
% Intermediate Tenure / Starter Homes / Rent to Buy	40%

7.59 It is accepted that the financing of social rented accommodation is becoming increasingly difficult, as funding streams to RPs are more constrained for this form of tenure. In addition, social rented accommodation is the most expensive form of affordable tenure for housebuilders to provide as it requires a greater subsidy from the developer and may have knock on effects on the sale value of other properties on the site.

7.60 In recognition of this, the Government unveiled within the Autumn Statement 2016 £4.7 billion to the 'Affordable Homes Programme' which the Housing Minister indicated would be split equally between rent to buy, starter homes and affordable rented properties. Notwithstanding this, SMDC will still need to consider the delivery implications of the social/affordable renting tenure split in formulating their policy. If the provision of social rent adversely affects viability, and thereby the overall provision of affordable housing units, the proportion of

social rented accommodation may need to be reduced accordingly. This is a policy choice which the Council will need to consider carefully.

- 7.61 It is emphasised that the above recommended split has been based upon an assessment of affordability of different forms of affordable housing for those in need. Policy choices on the delivery of affordable housing will need to balance affordability against the viability of delivering social rented, affordable rented and intermediate tenures (intermediate/starter homes being generally cheaper to deliver per unit than social rented and affordable rent offering a new choice and opportunity for delivery).
- 7.62 It is accepted that there has been relatively limited take up of intermediate tenure property in Staffordshire Moorlands. However, it is a relatively cheap form of affordable tenure (see Figure 7.1) and offers significant benefits to the occupants by providing them with a financial stake in the property, real or otherwise.
- 7.63 In addition, this tenure is often preferred by housebuilders as it is cheaper to deliver and does not have an impact on the marketability of the adjacent open market housing.
- 7.64 The amount of income from affordable housing varies depending on the type of tenure proposed. This is not generally related to the costs of building the dwelling (although the specification may be slightly higher for intermediate rather than social rent) but to the sale price to RPs. RPs are generally able to pay more for intermediate stock because they receive part of the purchase price and market rent from the future occupier. This means that housebuilders receive a premium for this type of tenure which assists the viability of the development as a whole. In addition, housebuilders are often able to make a greater provision of intermediate housing due to the reduced implications on market sales and the higher premium from RPs. This form of tenure also provides tenants part ownership of their property which helps first time buyers to enter the property market, and potentially, reduce pressures on the waiting list if these younger households have been unable to afford a property on the open market.
- 7.65 Housebuilders determine the affordable housing they prefer to provide based on the financial implications for the development. In particular, housebuilders prefer to provide intermediate housing because there is less market resistance amongst house purchasers to buy houses next to intermediate tenures; much of the concern over social housing relates to the implications for house sales nearby. As a consequence, the plots adjacent to affordable housing units are generally sold at a discount with the greatest discount reserved for those properties close to social rented accommodation.
- 7.66 It is noted that this analysis has been undertaken before the affordability and deliverability implications of the new starter homes tenure have become apparent. However, emerging decisions indicate that Starter Homes may be more viable than traditional forms of affordable housing. To date, NLP is only aware of two schemes where starter homes have been permitted. In one of

these instances, the level of starter home provision was negotiated in place of an element of affordable housing on viability grounds. This is likely to impact on affordable housing provision and will overlap (to an extent) with intermediate housing needs/provision.

- 7.67 This emerging role of starter homes will require close monitoring and if new evidence emerges on the affordability impacts of social rented and intermediate properties then the recommended tenure split may require amendment. Policy decisions on the required split should also take into account the comparative deliverability and viability of affordable rent, social rent, intermediate tenure and starter homes going forward.
- 7.68 Rent to Buy is unlikely to impact significantly upon affordability given that it will be managed by RPs and would fall within the definition of intermediate housing included in Annex 2 of the Framework.

Conclusions

- 7.69 Sensitivity testing has been undertaken to examine the impacts on net affordable housing requirements of an increase or reduction in housing costs, including making allowance for the Help to Buy initiative (see Table 7.1). It demonstrates the moderate impact which a relatively minor change in rental levels would have on affordable housing requirements. This reinforces the importance of monitoring the situation and updating the affordable housing calculation if significant changes in the costs of market housing occur.

Summary

An assessment has been undertaken of the split required between social rent, affordable rent and intermediate housing. Affordable housing targets are a policy decision to be made through the Local Plan. However, the following indicative percentage split for affordable housing is recommended in this report (bearing in mind that there is very limited difference between the affordability of social rented and affordable rented homes in the District):

- 60% Social / Affordable Rented: 40% Intermediate / Starter Homes.

It is recommended that SMDC takes a flexible approach to affordable housing requirements when dealing with housing applications in the District, as the lower level of housing viability in certain parts of the District could be compromised by an excessive affordable housing requirement. This applies not only to the amount of affordable housing to be provided, but also the tenure type, with social rented accommodation generally being less profitable for a volume house builder than intermediate, or shared, ownership. Therefore in weighing the amount of affordable housing to be provided, the LPA should treat each case on its merits.

There are considerable uncertainties as to what the new starter homes requirement is likely to mean for affordable housing provision and the extent to which this will overlap with intermediate housing provision in particular.

Therefore in weighing the amount of affordable housing to be provided, the LPA should treat each case on its merits.

It is acknowledged that levels of intermediate housing provision in Staffordshire Moorlands have been low to date. However, the provision of this tenure is becoming increasingly popular across the Country as it offers developers a more profitable and lower risk affordable housing alternative to social rented properties. The provision of intermediate housing can thus assist in improving the viability of development, which is a key issue in Staffordshire Moorlands. This form of tenure also provides tenants part ownership of their property which helps first time buyers to enter the property market. It is therefore considered that the popularity of intermediate housing will increase in Staffordshire Moorlands over time, hence the 40% recommendation, which may also include starter homes.

Housing Needs by Size and Type

- 7.70 The modelling undertaken for Staffordshire Moorlands, discussed in detail in Section 5.0, has provided a range of housing requirements for the District. This section provides a more detailed update on the requirements split by size and type, and by settlement area.

Housing Requirements Split by Size and Type

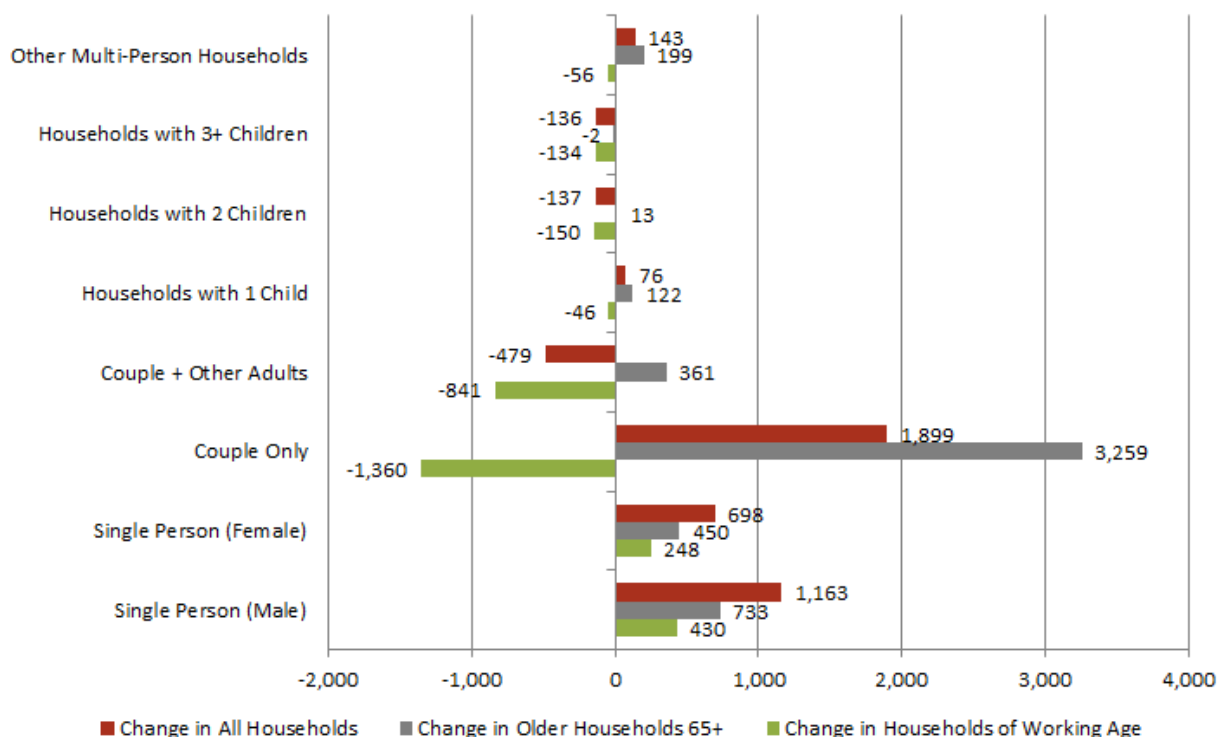
- 7.71 There is no exact formula for setting the approach to defining housing size and type requirements, and no way to 'model out' the need for judgement when balancing a range of different factors. The starting point for the analysis involves revisiting the outputs of the PopGroup model. This splits the population forecasts into various household groupings based on 8 ONS derived codes (i.e. single household, married couple with two children etc.). This is significantly lower than the 17 codes that underpinned the previous CLG household projections, which makes it harder to break down the likely household composition than before.
- 7.72 Table 7.5 indicates that 29% of all households in Staffordshire Moorlands are currently single people, with the number expected to increase by over 1,800 to 2031. The proportion that are couples is even higher, at around a third of all households, with the number expected to increase by almost 1,900 by 2031. Whilst the number of households with 1 child is set to increase slightly by 2031, the number of households with 2 or more children is expected to shrink by 274 households over the same time period.

Table 7.5 Estimated Household Type

	Staffordshire Moorlands	
	2014	2031
Single Person (Male or Female)	12,229 (29%)	14,090 (31%)
Couple Only	13,841 (33%)	15,739 (35%)
Couple + Other Adults	3,655 (9%)	3,176 (7%)
Households with 1 Child	5,086 (12%)	5,162 (11%)
Households with 2 Children	4,175 (10%)	4,038 (9%)
Households with 3+ Children	1,357 (3%)	1,220 (3%)
Other Multi-Person Households	1,925 (5%)	2,068 (5%)
TOTAL	42,267 (100%)	45,493 (100%)

Source: NLP / PopGroup Scenario Ab mid-year estimate and partial catch up Model Run 2016

Figure 7.2 Change in Household Type in Staffordshire Moorlands District, 2014-2031



Source: NLP / PopGroup Scenario Ab mid-year estimate and partial catch up Model Run 2016

7.73

It is possible to link the changes in household characteristics with the housing types/sizes they are likely to require, based on assumptions stated in the Government's Survey of English Housing (2008) and Housing Vision⁵⁹. The very broad assumptions made are presented in Table 7.6.

Table 7.6 Estimated Housing Size required by Household Type, by Age of Head of Household

Age Range 2013	Single Person Male	Single Person Female	Couple Only	Couple + Other Adults	Households w/ 1 child	Households w/ 2 children	Households w/ 3+ children	Other Multi-Person
0-14	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
15-24	1 bed flat/house	1 bed flat/house	2 bed flat/house	3 bed house	2 bed flat/house	3 bed house	4 bed house	3 bed house
25-34	1 bed flat/house	1 bed flat/house	2 bed flat/house	3 bed house	2 bed flat/house	3 bed house	4 bed house	3 bed house
35-44	2 bed flat/house	2 bed flat/house	2 bed flat/house	3 bed house	3 bed house	3 bed house	4 bed house	3 bed house
45-59	2 bed flat/house	2 bed flat/house	2 bed flat/house	3 bed house	3 bed house	3 bed house	4 bed house	3 bed house
60-84	1 bed flat/house	1 bed flat/house	2 bed flat/bungalow	3 bed flat/bungalow	3 bed house	3 bed house	4 bed house	3 bed house
85+	Housing with care	Housing with care	Housing with care	Housing with care	Housing with care	Housing with care	Housing with care	Housing with care

Source: NLP after Survey of English Housing 2008

7.74

This table has been defined on the basis of the following assumptions:⁵⁹

- 1 Smaller flatted accommodation or houses will be more suitable for meeting the initial requirements of married couples until the age they have a family. Those households without children could occupy either houses or flats of the appropriate size;
- 2 Cohabiting couples and lone parents will want and require similar sizes of housing to married couples. Those households without children could occupy either houses or flats of the appropriate size;
- 3 Smaller flatted accommodation or houses will be more suitable to meeting the requirements of single person households;
- 4 According to their composition, flatted provision such as a residential care home, hostel or houses in multiple occupation will be more suitable for multi-person households;
- 5 Further qualitative allowances will need to be made of households at retirement age who are likely to continue living in their previous home unless more manageable two bed flats, houses and bungalows are available; and,
- 6 The requirement for housing with care, including supported housing and extra care provision, is likely to increase at 85 and above.

7.75

Applying the matrix to the PopGroup data allows an initial (and given the limitations of the data, very much indicative) understanding of the composition of future dwelling type needs (as opposed to aspirations) in Staffordshire Moorlands.

⁵⁹ Source: adapted from *Northern Peninsula SHMA (December 2008)*.

7.76 Table 7.7 demonstrates that due to the high numbers of one-person households and couples in the area by 2031, together with an ageing population, the need for smaller units exceeds the need for larger, family units for Staffordshire Moorlands, and that the trend is likely to become accentuated over time. The need for housing with care could increase substantially from 5% in 2014, to 9% in 2031.

Table 7.7 Estimated Housing Type and Size 'needed'

	Staffordshire Moorlands	
	2014	2031
1 bed flat	17%	16%
2 bed flat/house/bungalow	43%	44%
3 bed house/bungalow	32%	28%
4 bed house	3%	3%
Housing with Care	5%	9%
TOTAL	100.0%	100.0%

Source: NLP / PopGroup Scenario Ab 2014 SNPP + MYE and PCU Model Run 2016

7.77 The figures are indicative and do not take into account a range of critical qualitative considerations. In particular, the modelling does not fully address people's aspirations, individual needs (i.e. a spare room for carers, or visitors) or the viability of developing particular dwelling types. As a result, the modelling shows a relatively weak match with the current 'stock' of house sizes in the District.

7.78 For example, whilst the modelled need for 1-bed properties is high in Staffordshire Moorlands currently, the actual stock of 1-bed homes recorded in the 2011 Census was around 6 % (itself a small proportion of the stock when compared with the national average of 12%). There is also limited correlation between the need for 4-bed accommodation and the actual representation of larger properties in the District.

7.79 There is therefore a need to recognise that in practice, providing a range of dwelling sizes specifically to match the quantitative need may not address people's aspirations and could discourage more affluent households from moving to/remaining in the District.

7.80 It should be recognised as well that the data presented in the Census for this category does not provide a separate figure for Housing with Care.

7.81 In this regard, the Housing Learning and Improvement Network [LIN] was formerly responsible for managing the Department of Health's [DH] Extra Care Housing capital programme. LIN provides information from a network of housing, health and social care professionals in England involved in planning, commissioning, designing, funding, building and managing housing with care for older people.

7.82 The Strategic Housing for Older People [SHOP] tool produced by LIN provides estimates of current and future need for older person's housing across different Local Authority areas.

Table 7.8 Estimated Future Specialist Housing Need in Staffordshire Moorlands District

	Supply	Demand			
	2014	2014	2020	2030	2035
Sheltered Housing	435	1,238	1,550	2,088	2,263
Enhanced Sheltered	51	198	248	334	362
Extra Care	88	248	310	418	453
Residential Care	262	644	806	1,086	1,177
Nursing Care	520	446	558	752	815

Source: SHOP 2016

- 7.83 Table 7.8 demonstrates significant growth in demand for specialist housing is estimated for older people across Staffordshire Moorlands up to 2030, particularly for sheltered housing (with needs increasing by almost 60%), where there is already a very significant mismatch between demand and supply.
- 7.84 SHOP also projects that between 2014 and 2030 there will be an increase from 4,939 older people (75+) living alone to 8,067, an increase of 63%. These trends will have a significant impact on the type of housing required by Staffordshire Moorlands' residents over the plan period and suggest a clear need for specific elderly care provision going forward.

Aspirations and Viability Considerations

- 7.85 Research by CABE shows that semi-detached and detached houses are the preferred house type for the majority of households, particularly families (but not limited to this household type). Older couples also aspire to live in detached houses. In terms of past supply, 1 and 2-bed flats have contributed significantly to supply over recent years. They are viewed as a short-term housing option for many households, with a large number of purchases resulting from their relative affordability and their generally more central locations⁶⁰.
- 7.86 Underlying trends in the wider economy - and particularly the ability of households to pay for 'more' housing than they strictly need - has resulted in increasing housing consumption (in terms of numbers of rooms for most household types), especially in owner occupation. This is accentuated by the generally progressive nature of housing aspirations.
- 7.87 Aspirations are generally for larger homes and the size of dwelling that people actually 'need' (as calculated in Table 7.7) is often significantly smaller than the size of dwelling they actually want, or can afford. At the present time (2017), viability is also presenting a barrier to policy makers seeking to influence the size and mix of new housing developments. Many developers quite correctly cite squeezed development margins in a risk averse commercial market as a barrier to making amendments to the mix of dwellings where any such changes might be 'sub optimal' in terms of sales and marketing.

⁶⁰ CABE 2005, 'What home buyers want: attitudes and decision making among consumers'

- 7.88 Further uncertainties concerning any forthcoming starter homes requirement is further clouding matters in the District, as it is throughout the country.
- 7.89 In the public sector, changes to the benefits system (especially the Government's fiscal penalty for under-occupancy and changes to Local Housing Allowance [LHA] Rates from 2018) is incentivising households to move to smaller properties in order to avoid a reduction in the level of housing benefit they receive.
- 7.90 For example, the Government will apply the relevant Local Housing Allowance (LHA) rates as maxima for Housing Benefit paid in the social rented sector. This will include the Shared Accommodation Rate for single claimants aged under-35, pension age tenants and supported / specified accommodation. The cap will apply from April 2018 but only to tenancies signed less than two years earlier. Additional Discretionary Housing Payment funding will be available to Councils to protect vulnerable tenants including those in supported accommodation.
- 7.91 RPs and others have expressed serious concerns that this will result in a decrease in household's weekly entitlement in many areas, meaning that Housing Benefit will not cover the full amount of the eligible rent and service charge as it does currently. This would require some tenants to make up the shortfall from other sources of income. It is likely to have a particular impact upon the Shared Accommodation Rate for single claimants under the age of 35 without dependent children. This policy development may make RPs more reluctant to construct smaller 1-bedroomed properties as it could expose them to greater levels of risk as a result of tenants' increased inability to pay the weekly rent.
- 7.92 Discussions with a number of RPs has indicated that the under-occupancy penalty is having a significant impact on household's requirements (in the social sector), with a substantial increase in the number of respondents wanting 2-bed properties and a commensurate reduction in the number of households asking for 3-bed properties. This is presenting significant problems for RPs as there is insufficient 2-bed stock to meet this demand.

Housing Size and Type Summary and Qualitative Balancing

- 7.93 In summary, the evidence base suggests that there is a need to encourage the development of smaller properties to provide choice in terms of both size and price, particularly in the social rented sector. Through the application of various assumptions on housing need by household type, the results suggest that, based on the characteristics of existing and new residents in Staffordshire Moorlands District in the period up to 2031, there would be a need for the following:
- 1 An increase in the need for 1 and 2-bed apartments / houses / bungalows, particularly in the social rented sector;
 - 2 A static need for 4-bed semi-detached and detached houses/bungalows;
 - 3 A very substantial increased need for housing with care, particularly

residential care; and also a need for more sheltered housing.

7.94 However, this level of 'need' does not factor in critical issues such as aspirations and viability. Realistically, although a couple aged 65+ living in the large former family home, may only 'need' a 1 or 2 bed dwelling, they are quite likely to remain and 'under-occupy' their existing, larger house (particularly if they own their own home), or even move to a similarly sized property. Similarly, families will often seek a spare bedroom if affordability permits.

7.95 Furthermore, an over-representation of smaller 1/2 bed apartments could be detrimental to the viability of many proposed developments in the District. As such, a rational, balanced approach needs to be taken using the modelled approach to guide, rather than dictate, the proposed mix of units. The aspirations of local residents have been obtained from the Housing Register.

7.96 The Housing Register, suggests the following (summarised in Table 7.9):

All housing tenures:

- 1 The modelled need and aspirations for 2-bedroomed properties is significantly above the stock of properties according to the 2011 Census for Staffordshire Moorlands, suggesting a clear need for such properties;
- 2 In Staffordshire Moorlands the stock of 3-bed properties is currently in excess of the total need;
- 4 The greatest imbalance is in the 4+ bed properties, which comprise around 19% of the total stock in Staffordshire Moorlands, yet only a fraction of the modelled 'need' going forward.

Affordable Housing:

- 5 The Housing Register data suggests a pronounced need for additional 1-bedroom properties in Staffordshire Moorlands at a level significantly above current stock levels. The need for smaller properties in the social rented sector is also much greater than the aspirations of existing households who can afford market housing.

Table 7.9 Estimated Housing Size 'needed' / aspired to

Staffordshire Moorlands	All Stock (2011 Census)	Social Rented Stock (2011 Census)	All Housing Tenures		Affordable Housing
			'Need' (PopGroup Modelling, redistributing housing with care)		Minimum Required (Housing Register)*
	2011	2011	2014	2031	2016
1 bed flat	6%	33%	20%	22%	57%
2 bed flat / house / bungalow	27%	29%	44%	46%	26%
3 bed house / bungalow	47%	36%	33%	29%	12%
4 bed+ house	19%	2%	3%	3%	6%

Source: Census 2011 / NLP / Housing Register 2016

7.97 Firstly it is recognised that the results in Table 7.9 are not dramatically different to those included in the 2014 SHMA. In addition, even if 235 – 330 dpa were delivered over the plan period this would still only comprise relatively small percentage of the total dwelling stock in the District by 2031. As such, it would

take a substantial amount of time to rebalance the stock to meet identified needs.

Table 7.10 Policy Advice – Property Size and Type 2014-2031

	Staffordshire Moorlands (%)	
	All Property Types	Affordable
1 bed flat / house / bungalow	60%	
2 bed flat / house / bungalow		
3 bed house / bungalow	40%	
4 bed house		

Source: NLP

7.98

The future requirements for Staffordshire Moorlands District are justified on the following grounds:

- 1 **Smaller 1 / 2 bed dwellings:** there is a need for continued provision of smaller housing in Staffordshire Moorlands District over the course of the plan period. This is as a result of a combination of social change, with more people living longer, and alone. Households' aspirations in the District (as identified in the Housing Register) tip towards smaller 1/2 bedroomed dwellings over larger 3/4 bed properties. However, this is set against the shift towards smaller properties as set out in the PopGroup 'need' based modelling. There is a very modest stock of small properties in the District. As a consequence, and bearing in mind viability considerations (which would need to be considered in greater detail by the Council as this is outside the scope of this SHMA Update), it is suggested that around 60% of all new units in Staffordshire Moorlands could comprise 1 / 2-bed units.
- 2 As regards affordable housing, the changes to the benefits system has forcing more residents to consider smaller housing options than before to avoid losing part of their housing benefit. This is supported by the Housing Register, with 83% of all applicants in Staffordshire Moorlands needing a 1/2 bed property.
- 3 **Larger 3/4 bed dwellings:** there is a higher proportion of larger properties in Staffordshire Moorlands than might be expected when compared to the regional and national averages, with 47% of Staffordshire Moorlands' total stock comprising 3 bed units in the 2011 Census, compared to 45% across the North West and 41% nationally. In terms of the physical 'need' for such properties, the trend over the study period is declining. For example, despite comprising 56% of the total stock at present (according to the 2011 Census), it is estimated that Staffordshire Moorlands District would ultimately 'need' only around 3% of its total stock to comprise this house size by 2031. However, there is a still a need to provide larger, better quality dwellings in the District and meet aspirational needs.
- 4 On this basis, it is suggested that the amount of larger units be set around the 40% level. As noted above, there is a clear need to reverse the current trends of high levels of net out-migration of the more affluent,

younger and aspirational residents elsewhere. This will help ensure that there remains a clearly defined housing ladder within the District.

- 5 As regards the need for **larger affordable housing**, larger properties in particular are becoming increasingly hard to let as a result of the fiscal penalties associated with under-occupation. Furthermore, the Housing Register clearly shows there to be a far greater need for smaller properties in the District. Adjusting the balance between 'need' and aspirations suggests that Staffordshire Moorlands should provide around 40% of the total affordable stock as 3/4-bed in future.

Summary

An assessment has been undertaken of the split required between affordable / market housing type and size over the Plan period. Such housing targets are a policy decision to be made through the Local Plan. However, the following percentage targets are suggested for Staffordshire Moorlands with the intention of rebalancing the stock away from small terraced properties towards better quality, aspirational property types designed to reduce the high levels of net out-migration to adjoining areas. There is also a need for more good quality accommodation designed specifically for the growing elderly population.

Property Sizes: 60% 1/2-bed; 40% 3/4-bed dwellings overall

It is recommended that Officers take a flexible approach to applying this advice when dealing with housing applications in the District, as relatively lower levels of housing viability in urbanised parts of the District could be compromised by an unsuitable housing mix. **This advice, which is primarily needs based, must be subjected to further detailed assessment through the Council's housing viability work to test the deliverability of these rates.**

SMDC must also align these objectives with their economic objectives.

8.0 **Conclusions and Recommendations**

8.1 This report has been prepared by NLP to advise Staffordshire Moorlands District Council on the housing requirements necessary for its emerging Local Plan. It updates the previous SHMA undertaken by NLP in November 2014 and is restricted to advising on the scale of housing need for both market and affordable housing in the District in the light of new data, as well as a review of the size and type of market housing required.

Housing Needs

8.2 Taking into account the scenarios tested and the core constraints on development delivery as shown by current evidence, it is NLP's recommendation that the housing OAN range for Staffordshire Moorlands is between **235 and 330 dpa**. It provides a realistic level of housing provision which will address economic growth requirements, affordable housing need, worsening market signals and the demographic challenges that are present.

8.3 The latest available Census 2011 data on migration and commuting patterns suggests that Staffordshire Moorlands District in isolation does not comprise a self-contained Housing Market Area. The 235-330 dpa housing OAN therefore relates only to part of the wider HMA that Staffordshire Moorlands sits within (as it is based upon the population expected to be living within the District's administrative boundaries over the period to 2031). Through the Duty to Co-operate process SMDC must consider the housing issues of adjoining authorities, particularly Stoke on Trent, and assess any additional need required to be met. The target requirement is for the authorities within the HMA to judge based on the evidence provided to them.

8.4 Staffordshire Moorlands' range takes the CLG's most recent 2014-based household projections (170 dpa) as the starting point for identifying need as defined in the Practice Guidance. A judgement was made to accelerate household formation for the younger age groups to allow for the return to growth and their increased ability to form a household going forward, as well as making an adjustment for the latest Mid-Year Population Estimates, increases this starting point to 196 dpa (to 2031). In terms of whether an adjustment should be made to address worsening market signals it is considered that some upward adjustment could be necessary relative to adjoining areas.

8.5 This was due in part to the high rate of change in the affordability ratio and house price rises more generally, although it is recognised that there are substantial spatial discrepancies across the District and particularly between the rural areas and those outlying the Peak District National Park and the rest of the District. It was considered that the scale of adjustment to housing supply over and above demographic-led projections at this time should be moderate, in line with the Practice Guidance, and that a rate of 10% would be appropriate in this instance.

- 8.6 Whilst recognising that there is not a direct causal relationship between employment growth and dwelling requirements, clearly the two are fundamentally related. As such, at the top end of the range, the level of housing growth for Staffordshire Moorlands District is broadly aligned with Combined Job Growth Scenario + PCU, at 330 dpa (rounded).
- 8.7 Even if Staffordshire Moorlands were to deliver housing at the top end of this range, this would be well below the affordable housing need of 224 dpa / 432 dpa (based on the Housing Register approach). At a delivery rate of 33%, this would result in an affordable housing OAN of at least 679 dpa and potentially as high as 1,309 dpa which is very unlikely to be consistently achieved in Staffordshire Moorlands District.
- 8.8 It is considered that this could justify an uplift to the housing OAN range, with NLP's judgement suggesting that a 10% uplift to the figures would go some way towards meeting this affordable housing need (which is distinct from, and in addition to, the 10% market signals uplift). This would uplift the lower end of the range, to **between 235 dpa to 330 dpa (rounded)**.
- 8.9 Clearly if Staffordshire Moorlands District Council was to target a greater level of affordable housing provision then a higher overall housing target may be a reasonable policy choice open to them.
- 8.10 If the Council were to pursue a figure significantly lower than 330 dpa whilst also planning for a level of annual job growth or even job stabilisation, it would need to justify how it would mitigate or avoid the adverse housing, economic and other outcomes that a lower-growth approach would give rise to. It would also need to evidence how the adverse impacts of meeting housing need would '*significantly and demonstrably outweigh the benefits*' [Framework §14] as well as make provision, through the duty-to-cooperate, for those needs to be met in full elsewhere within the wider HMA.

Affordable Housing Need

- 8.11 The starting point in calculating the net affordable housing need is the Total Current Housing Need established at step 1.4. This figure takes account of any backlog in provision. Deducting the current available stock of affordable housing (step 3.5), results in a net backlog of 408 dwellings for Staffordshire Moorlands (based on the Housing Register approach). Annualised over 17-years this equates to a backlog of 24 dpa.
- 8.12 In defining newly arising need, the future annual supply of affordable housing identified in Step 3.8 (189 dpa) is removed from the annual future housing need of 597/389 dpa gross. When added to the backlog, this indicates that Staffordshire Moorlands has a net annual need of between 224 dpa and 432 affordable dpa. This reflects gross household formation and does not account for household dissolutions, with the implication that needs may be inflated under this approach.

- 8.13 This largely reflects the high levels of gross household formation that are projected to occur. Such outputs are clearly outliers flowing from an affordable housing need methodology that is largely hypothetical and not related to any realistic estimate of household growth in the Staffordshire Moorlands authority area; nevertheless, the affordable housing need will still be considerable.
- 8.14 Based on these figures, Staffordshire Moorlands would need to provide at least 75% of its total annual housing requirement to comprise affordable housing if it is to meet all of its need even under the most favourable assumptions. This is neither achievable nor realistic.
- 8.15 The above calculations produce a result below the 707 dpa affordable housing need suggested by the District's previous 2014 SHMA, primarily due to a significant fall in the number of people currently on the District's Housing Register. Even so, both figures are well beyond what can realistically be achieved in terms of delivery.
- 8.16 Ultimately, the affordable housing target to be established by SMDC is a decision to be made through the emerging Local Plan. The Council will need to establish a balance between housing need requirements and viability of delivery. This study has demonstrated that the quantitative need for affordable housing in Staffordshire Moorlands is considerable. In particular, affordability and the supply of both market and affordable housing must be tackled to prevent the problem from becoming more acute.

Tenure Split and Property Sizes

- 8.17 The recommended percentage split for social rent/affordable rent/intermediate/starter homes (based on the identified net requirements) is summarised in Table 8.1. This is based on the analysis in Section 7.0 and the progressive move at a national level away from social rented towards affordable rented and intermediate provision.

Table 8.1 Suggested Social Rent/Intermediate Affordable Housing Split

	Staffordshire Moorlands
Net Annual Affordable Housing Need	224 -432 dpa
% Social / Affordable Rented	60%
% Intermediate Tenure / Starter Homes	40%

- 8.18 It is accepted that there has been relatively limited use of intermediate tenure property in Staffordshire Moorlands. However, it is a relatively cheap form of affordable tenure and offers significant benefits to the occupants by providing them with a financial stake in the property. In addition, this tenure is often preferred by housebuilders as it is cheaper to deliver and does not have an impact on the marketability of the adjacent open market housing.
- 8.19 An assessment has been undertaken of the split required between housing size over the Plan period. Such housing targets are a policy decision to be made through the Local Plan early review. However, the following indicative

percentage targets are recommended for Staffordshire Moorlands, with the intention of rebalancing the stock away from small terraced properties towards better quality, aspirational property types designed to reduce the high levels of net out-migration to adjoining areas. There is also a need for more good quality accommodation designed specifically for the growing elderly population:

- **Property Sizes: 60% 1/2 bed, 40% 3/4 bed dwellings.**

8.20

It is recommended that SMDC Officers take a flexible approach to applying this advice when dealing with housing applications in their District, as relatively lower levels of housing viability in certain urbanised parts of the District could be compromised by an unsuitable housing mix. This advice, which is primarily needs based, must be subjected to further detailed assessment through the Council's housing viability work to test the deliverability of these rates.

DRAFT

Appendix 1 Inputs and Assumptions

Demographic Scenarios	Scenario A: 2014-based SNPP/SNHP / Aa + PCU	Scenario Ab: 2014-SNPP re-based to 2015 MYE with PCU	Scenario B: Natural Change	Scenario C: Zero Net Migration	Scenario D: Long Term Migration	Scenario Da: Long Term Migration + PCU
Population						
Baseline Population	A 2014 baseline population is taken from the ONS 2014-based SNPP. This population is split by single year of age and gender.		A 2014 to 2015 baseline population is taken from the 2014/2015 MYEs. This population is split by single year of age and gender.			
Births	The number of projected births in Staffordshire Moorlands from the ONS 2014-based SNPP is used.		Fertility Rates derived from the 2014-based SNPP for Staffordshire Moorlands are used.			
Deaths	The number of projected deaths in Staffordshire Moorlands from the ONS 2014-based SNPP is used.		Standardised Mortality Ratios derived from the 2014-based SNPP for Staffordshire Moorlands are used.			
Internal Migration	Gross domestic in and out migration flows are adopted based on forecast migration in Staffordshire Moorlands from the ONS 2014-based SNPP are used.		All migration flows are set to 0.	Migration flows from the 2014-based SNPP for Staffordshire Moorlands are equalised to create a net flow of zero.	Migration flows for 2011/12 to 2014/15 are taken from the Mid-Year Estimates for Staffordshire Moorlands. Thereafter, a long term ten-year average for 2005/06 to 2014/15 is used.	
International Migration	As above but for international flows					
Propensity to Migrate (Age Specific Migration Rates)	Age Specific Migration Rates (ASMigR) for both in and out domestic migration are based upon the age profile of migrants to and from Staffordshire Moorlands in the 2014-based SNPP. These identify a migration rate for each age cohort (for both in and out flows separately) which is applied to each individual age providing an Age Specific Migration Rate. This then drives the demographic profile of those people moving into and out of the District (but not the total numbers of migrants).					

Employment-led Scenarios (and Supply-Led Scenarios)	Scenario E: OE Job Growth / Ea + PCU	Scenario F: Job Stabilisation / Fa + PCU	Scenario G: Past Trends / Ga + PCU	Scenario H: Experian Job Growth / Ha + PCU	Scenario I: Combined Job Growth / Ia + PCU
Population					
Baseline Population	A 2011 to 2015 baseline population is taken from the 2015 MYE. This population is split by single year of age and gender.				
Births	The Total Fertility Rate for Staffordshire Moorlands (as derived from the 2014-based SNPP) is applied.				
Deaths	The Standardised Mortality Ratios for Staffordshire Moorlands (as derived from the 2014-based SNPP) are applied.				
Internal Migration	Migration is inflated/constrained according the change in number of jobs (or homes for 'supply-led' scenarios) over the projection period.				
International Migration	As above but for international flows.				
Propensity to Migrate (Age Specific Migration Rates)	Age Specific Migration Rates (ASMigR) for both in and out domestic migration are based upon the age profile of migrants to and from Staffordshire Moorlands in the 2014-based SNPP. These identify a migration rate for each age cohort (for both in and out flows separately) which is applied to each individual age providing an Age Specific Migration Rate. This then drives the demographic profile of those people moving into and out of the District (but not the total numbers of migrants).				

	All Scenarios
Housing	
Headship Rates	Headship rates specific to Staffordshire Moorlands taken from the CLG 2014-based household projections are used. These are split by five year age group and sex. Partial Catch Up Sensitivity – as above, however rates in the 15-34 age groups are projected to make up 50% of the difference between the 2014-based and 2008-based projections by 2033.
Population Not in Households	The number of population not in households (e.g. those in institutional care) is similarly taken from the assumptions used to underpin the 2014-based CLG household forecasts. This is applied as a number below age 75 and a rate above age 75. No change is assumed in the rate of this from the CLG identified rate.
Vacancy / 2 nd Home Rate	A vacancy and second homes rate is applied to the number of households, representing the natural vacancies/not permanently occupied homes which occur within the housing market and mean that more dwellings than households are required to meet needs. The average rate of vacant/second homes in Staffordshire Moorlands over the 2014-15 period has averaged 4.02%. This has been taken from CLG Council Tax Base data.
Economic	
Economic Activity Rate	Economic activity rates by age and sex have been projected using the OBR Labour Market Participation Rate Projections. These have been applied to the 2011 Census rates for Staffordshire Moorlands, and have been re-based to 2014 using the Annual Population Survey. These rates take into account changes projected in younger age groups, women and older people (associated with changes to State Pension Age).
Labour Force Ratio	A standard net commuting rate is inferred through the modelling using a Labour Force ratio which is worked out using the formula: (A) Number of employed workers living in area ÷ (B) Number of workers who work in the area (number of jobs). In Staffordshire Moorlands, APS and Experian data indicate that for 2015 the LF ratio equated to 1.31. This was applied and held constant over the projection period.
Unemployment	A model-based estimate of unemployment taken from the Annual Population Survey is used. For 2014 the figure for unemployment is 3.4%. It is assumed that by 2020, unemployment in Staffordshire Moorlands will reach its pre-recession level of 3.14%. From 2020 onwards this is held constant.

Appendix 2 PopGroup Output Sheets

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario A: 2014-based SNPP

Year beginning July 1st	2014-15	2015-16	2016-17	2017-18	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
Births																									
Male	424	422	423	427	425	427	427	427	427	427	425	423	420	418	416	414	412	411	410	410	411	412	413	415	417
Female	404	402	402	406	405	407	406	407	406	407	405	403	400	398	396	394	391	391	390	390	391	392	393	395	397
All Births	828	824	825	833	831	834	833	833	833	834	830	826	821	816	812	808	805	802	801	800	800	802	804	806	810
TFR	1.73	1.73	1.73	1.76	1.75	1.76	1.77	1.77	1.77	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.79	1.79	1.79	1.79	1.79	1.79	1.79
Births input																									
Deaths																									
Male	533	498	509	515	515	523	527	534	542	549	558	564	573	583	589	597	605	612	622	629	635	643	649	655	661
Female	571	533	544	545	545	541	546	552	556	561	569	576	584	592	599	608	617	625	633	642	653	661	670	677	683
All deaths	1,104	1,031	1,054	1,069	1,069	1,064	1,073	1,084	1,095	1,105	1,119	1,134	1,149	1,167	1,182	1,196	1,213	1,229	1,247	1,262	1,278	1,296	1,310	1,324	1,338
SMR: males	107.0	97.6	96.6	94.5	91.6	90.0	87.9	85.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.1	71.2	70.2	69.6	68.9	68.1	67.6	67.6
SMR: female	111.6	103.0	103.0	101.4	99.6	96.9	96.5	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1	74.4
SMR: person	109.3	100.3	99.8	98.0	96.5	93.4	91.6	89.9	88.2	86.6	85.2	83.7	82.4	81.2	79.9	78.6	77.6	76.6	75.6	74.6	73.7	73.1	72.3	71.4	70.9
Expectation	78.5	79.8	79.8	80.1	80.5	80.6	80.9	81.2	81.4	81.7	81.9	82.3	82.3	82.7	82.9	83.0	83.2	83.3	83.5	83.7	83.8	84.0	84.2	84.3	84.3
Expectation	82.3	83.2	83.2	83.3	83.5	83.8	83.9	84.1	84.3	84.5	84.7	84.8	85.0	85.1	85.3	85.5	85.6	85.7	85.9	86.0	86.1	86.2	86.4	86.5	86.7
Expectation	80.5	81.5	81.6	81.8	82.0	82.2	82.5	82.7	82.9	83.1	83.3	83.5	83.7	83.8	84.0	84.2	84.3	84.5	84.6	84.8	84.9	85.0	85.2	85.4	85.5
Deaths input																									
In-migration from the UK																									
Male	1,780	1,788	1,795	1,803	1,810	1,816	1,821	1,824	1,828	1,831	1,836	1,841	1,848	1,855	1,861	1,868	1,874	1,880	1,886	1,892	1,896	1,900	1,904	1,910	1,915
Female	1,828	1,839	1,846	1,853	1,859	1,864	1,868	1,872	1,876	1,879	1,883	1,887	1,891	1,895	1,899	1,903	1,907	1,911	1,915	1,919	1,923	1,927	1,931	1,935	1,939
All	3,708	3,719	3,728	3,741	3,749	3,760	3,761	3,764	3,768	3,767	3,769	3,768	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769
SMigr: male	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
SMigr: female	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Migrants input																									
Out-migration to the UK																									
Male	1,658	1,659	1,653	1,645	1,635	1,638	1,636	1,624	1,628	1,630	1,628	1,630	1,637	1,638	1,640	1,641	1,632	1,632	1,632	1,634	1,637	1,640	1,645	1,645	1,648
Female	1,797	1,783	1,762	1,766	1,758	1,758	1,742	1,730	1,730	1,724	1,726	1,731	1,735	1,740	1,741	1,739	1,741	1,744	1,747	1,751	1,747	1,751	1,754	1,756	1,756
All	3,453	3,441	3,415	3,411	3,393	3,372	3,360	3,351	3,357	3,356	3,356	3,361	3,371	3,380	3,381	3,380	3,381	3,385	3,389	3,390	3,390	3,391	3,395	3,399	3,403
SMigr: male	87.1	87.4	87.4	87.4	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5
SMigr: female	103.3	103.5	103.1	103.6	103.9	103.6	103.5	103.7	103.9	104.3	103.9	104.0	104.2	104.2	104.3	104.3	104.3	104.3	104.3	104.3	104.4	104.5	104.6	104.7	104.7
Migrants input																									
In-migration from Overseas																									
Male	131	115	116	115	113	110	109	109	109	109	108	109	109	110	111	111	111	111	110	110	110	111	110	109	108
Female	110	106	103	102	99	96	94	94	94	94	93	93	93	94	93	95	95	95	96	96	96	97	97	96	95
All	241	221	218	217	212	207	203	204	203	202	202	202	204	204	207	206	206	206	206	206	206	207	207	205	203
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SMigr: female	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Migrants input																									
Out-migration to Overseas																									
Male	97	93	95	96	96	94	94	94	94	95	93	95	95	96	97	97	96	95	95	95	95	96	95	94	93
Female	84	86	86	86	85	83	82	82	82	82	82	82	82	82	82	84	84	84	84	84	84	84	86	85	84
All	182	181	182	181	181	177	176	176	176	176	174	176	177	178	179	179	181	180	179	179	179	181	180	178	176
SMigr: male	43.2	41.5	42.6	43.0	43.3	42.6	42.8	43.0	43.2	43.7	43.2	43.9	44.1	44.7	44.9	45.1	44.6	43.9	44.0	43.8	43.9	44.2	44.0	43.5	42.9
SMigr: female	48.8	51.1	50.7	50.8	50.8	50.3	50.1	50.5	50.9	51.8	51.4	51.5	53.5	52.1	51.3	52.7	52.6	52.4	52.5	52.5	52.6	53.5	53.1	52.9	52.5
Migrants input																									
Migration - Net Flows																									
UK	+255	+278	+313	+329	+356	+383	+400	+410	+406	+404	+423	+426	+427	+438	+442	+455	+475	+493	+508	+516	+519	+522	+523	+532	+540
Overseas	+59	+40	+37	+35	+31	+26	+26	+26	+26	+25	+25	+25	+25	+25	+25	+26	+26	+26	+26	+27	+27	+27	+27	+27	+27
Summary of population change																									
Natural chan	-776	-207	-229	-226	-229	-230	-240	-251	-261	-275	-294	-313	-333	-355	-374	-391	-410	-428	-447	-462	-476	-492	-504	-514	-524
Net migration	+314	+318	+390	+385	+388	+412	+426	+436	+432	+429	+448	+448	+451	+452	+463	+468	+480	+501	+518	+535	+542	+546	+549	+550	+558
Net change	+238	+110	+161	+159	+159	+182	+186	+185	+171	+164	+155	+133	+119	+108	+94	+90	+90	+90	+90	+90	+90	+90	+90	+90	+90
Crude Birth f	8.47	8.42	8.42	8.45	8.44	8.44	8.42	8.37	8.32	8.26	8.20	8.15	8.10	8.06	8.03	8.01	7.99	7.99	7.99	7.99	7.99	8.01	8.03	8.06	
Crude Death	11.29	10.54	10.75	10.80	10.78	10.81	10.88	10.98	11.06	11.15	11.27	11.40	11.54	11.71	11.84	11.97	12.13	12.29	12.45	12.59	12.74	12.92	13.05	13.18	
Crude Net M	3.21	3.25	3.67	3.72	3.66	4.19	4.32	4.42	4.37	4.33	4.21	4.14	4.04	3.94	3.84	3.84	3.84	3.84	3.84	3.84	3.84	3.84	3.84	3.84	
Summary of Population estimates/forecasts																									
<i>Population at mid-year</i>																									
0-4	2,014	2,015	2,016	2,017	2,018	2,019	2,020	2,021	2,022	2,023	2,024	2,025	2,026	2,027	2,028	2,029	2,030	2,031	2,032	2,033	2,034	2,035	2,036	2,037	2,038
5-10	4,573	4,441																							

Population Estimates and F Staffordshire Moorlands October 2016

Aa 2014 SNPP + PCU

	Year beginning July 1st																													
	2014-15	2015-16	2016-17	2017-18	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					
Births																														
Male	424	422	423	427	425	427	427	427	427	425	423	420	418	416	414	412	411	410	410	410	411	412	413	415	417					
Female	404	401	402	406	405	407	406	407	406	403	403	400	398	396	394	391	391	390	390	391	392	393	395	397						
All Births	828	823	825	833	831	834	833	833	833	828	826	821	816	812	808	805	802	801	800	800	802	804	806	810	814					
TFR	1.73	1.73	1.73	1.76	1.75	1.76	1.77	1.77	1.76	1.75	1.74	1.73	1.72	1.71	1.70	1.69	1.68	1.68	1.68	1.69	1.70	1.71	1.72	1.73						
Births input																														
Deaths																														
Male	533	494	509	515	515	523	527	534	542	549	558	564	573	583	589	597	605	612	622	629	635	643	649	655	661					
Female	571	522	544	545	545	544	545	550	556	561	569	576	584	592	599	608	617	625	633	642	653	661	670	677						
All deaths	1,104	1,016	1,054	1,060	1,060	1,067	1,073	1,094	1,108	1,119	1,127	1,134	1,169	1,187	1,196	1,213	1,229	1,247	1,262	1,278	1,296	1,310	1,324	1,338						
SMR: males	107.0	97.6	96.6	94.5	91.6	90.0	87.9	85.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.9	72.1	71.2	70.2	69.6	68.9	68.1						
SMR: female	111.6	103.0	103.0	101.4	99.6	96.9	96.5	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1						
SMR: person	109.3	100.3	99.8	98.0	95.6	93.4	91.6	89.9	88.2	86.6	85.2	83.7	82.4	81.2	79.9	78.6	77.6	76.6	75.6	74.6	73.7	73.1	72.3	71.4						
Expectation 1	78.7	79.7	79.8	80.1	80.5	80.7	80.9	81.2	81.4	81.7	81.9	82.3	82.3	82.5	82.8	82.9	83.1	83.3	83.5	83.7	83.9	84.0	84.2	84.4						
Expectation 1	82.4	83.3	83.3	83.4	83.6	83.8	84.0	84.2	84.4	84.5	84.7	84.8	85.0	85.2	85.3	85.5	85.6	85.8	85.9	86.1	86.2	86.3	86.5	86.6						
Expectation 1	80.6	81.6	81.6	81.8	82.1	82.3	82.5	82.7	82.9	83.1	83.3	83.5	83.7	83.9	84.1	84.3	84.4	84.6	84.7	84.9	85.0	85.2	85.4	85.5						
Deaths input																														
In-migration from the UK																														
Male	1,780	1,788	1,795	1,803	1,810	1,816	1,821	1,824	1,828	1,831	1,836	1,841	1,848	1,855	1,861	1,868	1,874	1,880	1,886	1,892	1,896	1,900	1,904	1,910	1,915					
Female	1,828	1,839	1,845	1,851	1,857	1,862	1,867	1,871	1,875	1,879	1,883	1,887	1,891	1,895	1,899	1,903	1,907	1,911	1,915	1,919	1,923	1,927	1,931	1,935						
All	3,708	3,719	3,728	3,741	3,749	3,761	3,767	3,769	3,767	3,766	3,736	3,760	3,767	3,756	3,800	3,822	3,836	3,850	3,865	3,879	3,891	3,900	3,918	3,930						
SMigr: male	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1						
SMigr: female	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1						
Migrants input																														
Out-migration to the UK																														
Male	1,656	1,659	1,653	1,645	1,635	1,638	1,636	1,624	1,628	1,630	1,628	1,630	1,637	1,638	1,640	1,641	1,632	1,632	1,632	1,634	1,637	1,640	1,645	1,645	1,648					
Female	1,797	1,783	1,762	1,766	1,758	1,758	1,742	1,727	1,730	1,733	1,722	1,726	1,731	1,735	1,740	1,741	1,742	1,740	1,739	1,741	1,744	1,747	1,751	1,754	1,756					
All	3,453	3,441	3,415	3,411	3,393	3,392	3,360	3,351	3,357	3,363	3,354	3,356	3,369	3,373	3,380	3,381	3,375	3,373	3,371	3,375	3,381	3,387	3,395	3,399						
SMigr: male	87.1	87.1	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5	87.5						
SMigr: female	103.3	103.5	103.1	103.6	103.9	103.6	103.5	103.7	103.9	104.4	104.0	104.1	104.2	104.2	104.3	104.3	104.3	104.3	104.3	104.3	104.4	104.5	104.6	104.7						
Migrants input																														
In-migration from Overseas																														
Male	455	362	117	116	115	112	110	111	112	111	112	111	112	114	114	115	114	113	113	113	114	115	115	115	114					
Female	425	391	107	106	103	100	97	98	98	99	97	97	100	99	98	100	100	100	100	100	101	101	101	101						
All	880	753	224	222	218	212	208	210	209	210	213	213	212	215	214	215	214	212	213	214	215	216	216	215						
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0						
SMigr: female	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0						
Migrants input																														
Out-migration to Overseas																														
Male	431	425	97	97	98	95	96	96	97	96	96	96	98	98	100	100	101	99	98	98	98	99	100	100	99					
Female	491	375	90	90	87	86	87	87	87	86	86	85	90	88	87	89	88	88	88	88	88	89	89	89	89					
All	742	800	187	187	187	183	182	183	183	185	183	184	188	188	187	190	189	186	187	188	188	189	189	188						
SMigr: male	151.4	190.3	43.3	43.7	44.2	43.3	43.6	44.0	44.3	44.8	44.6	45.4	45.7	46.5	46.9	46.0	45.4	45.6	45.4	45.9	46.1	46.3	46.1	46.8						
SMigr: female	231.5	218.7	53.0	53.1	53.3	52.6	52.3	53.3	53.3	53.5	54.3	53.9	54.1	55.1	55.2	54.7	55.6	55.8	55.2	55.3	55.4	55.3	55.9	55.7						
Migrants input																														
Migration - Net Flows																														
UK	+255	+278	+313	+329	+356	+383	+400	+410	+406	+404	+423	+426	+427	+438	+442	+455	+475	+493	+508	+516	+519	+522	+523	+532	+540					
Overseas	+139	+47	+37	+35	+31	+28	+26	+26	+26	+25	+25	+25	+25	+25	+25	+25	+26	+27	+27	+27	+27	+27	+27	+27						
Summary of population change																														
Natural chan	-776	-199	-229	-226	-229	-230	-240	-251	-261	-275	-294	-313	-333	-355	-374	-391	-410	-428	-447	-462	-476	-492	-504	-514	-524					
Net migration	+394	+230	+349	+365	+388	+412	+426	+436	+432	+429	+448	+448	+451	+452	+463	+468	+480	+501	+518	+535	+542	+546	+549	+550	+558					
Net change	+118	+31	+121	+136	+159	+182	+186	+185	+171	+164	+155	+133	+119	+108	+94	+89	+90	+90	+90	+90	+90	+90	+90	+90						
Crude Birth f	8.47	8.41	8.42	8.49	8.45	8.47	8.45	8.42	8.37	8.32	8.26	8.20	8.15	8.10	8.06	8.03	8.01	7.99	7.99	7.99	7.99	8.01	8.03	8.06	8.10					
Crude Death	11.28	10.44	10.75	10.80	10.78	10.81	10.88	10.98	11.06	11.15	11.27	11.40	11.54	11.71	11.84	11.97	12.13	12.29	12.45	12.59	12.74	12.92	13.05	13.18	13.31					
Crude Net M	4.02	2.36	3.57	3.72	3.95	4.19	4.32	4.42	4.37	4.33	4.51	4.54	4.54	4.64	4.69	4.81	5.01	5.18	5.34	5.41	5.47	5.48	5.56	5.64						
Summary of Population estimates/forecasts																														
<i>Population at mid-year</i>																														
0-4	2,014	2,015	2,016	2,017	2,018	2,019	2,020	2,021	2,022	2,023	2,024	2,025	2,026	2,027	2,028	2,029	2,030	2,031	2,032	2,033	2,034	2,035	2,036	2,037	2,038	2,039				
5-10	4,573	4,480	4,340	4,237	4,130	4,331	4,341	4,341	4,341	4,341	4,341	4,341	4,341	4,341	4,341	4,341	4,341	4,341	4,341	4,341	4,341	4,341	4,341	4,341	4,341					
11-15	6,026	6,149	6,211	6,234	6,232	6,140	6,065	5,948	5,851	5,833	5,810	5,828	5,840	5,852	5,861	5,869	5,862	5,840	5,823	5,802	5,778	5,756	5,734	5,718	5,707					
16-17	5,286	5,259	5,237	5,237	5,296	5,423	5,504	5,593	5,736	5,711	5,684	5,690	5,683	5,387	5,353	5,330	5,343	5,359	5,372	5,381	5,383	5,380	5,373	5,360	5,342					
18-59Female	2,302	2,279	2,219	2,112	2,082	2,115	2,199	2,295	2,382	2,333	2,360	2,392	2,367	2,268	2,227	2,189	2,189	2,197	2,209	2,217	2,219	2,219	2,219	2,220	2,221					
60-65-74	53,234	52,882	52,692	52,411	52,067	51,825	51,551	51,163	50,913	50,643	50,253	49,918	49,620	49,277	48,934	48,588	48,295	47,962	47,638	47,440	47,288	47,106	47,000	46,900	47,038					
75-84	16,544	16,780	1																											

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario Ab: 2014-based SNPP, adjusted for PCU and 2015 MYE

Year beginning July 1st	2014-15	2015-16	2016-17	2017-18	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
Births																									
Male	424	422	422	427	426	427	427	428	429	427	425	423	420	419	417	416	414	413	413	414	414	414	415	417	418
Female	404	401	402	407	405	407	407	408	406	406	404	402	400	399	397	396	395	394	393	393	394	395	396	397	398
All Births	828	823	824	834	831	834	834	835	837	833	829	825	821	817	814	811	809	807	807	807	807	809	811	813	816
TFR	1.73	1.73	1.73	1.76	1.76	1.76	1.77	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.79	1.79	1.79	1.79	1.79	1.79	1.79
Births input																									
Deaths																									
Male	533	494	504	508	507	514	519	526	534	541	550	557	566	576	582	590	599	606	616	624	630	638	644	650	656
Female	571	528	538	537	536	533	533	542	545	549	555	564	571	579	588	594	603	613	621	629	639	650	659	667	674
All deaths	1,104	1,022	1,042	1,046	1,043	1,047	1,052	1,069	1,079	1,091	1,106	1,120	1,136	1,155	1,170	1,185	1,202	1,219	1,237	1,253	1,269	1,288	1,309	1,317	1,331
SMR: males	107.0	97.6	96.6	94.5	91.6	90.0	87.8	85.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.9	72.1	71.2	70.3	69.6	68.9	68.1	67.6
SMR: female	111.6	103.0	103.0	101.4	99.6	96.9	96.5	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1	74.4
SMR: person	109.3	100.3	99.8	98.0	95.5	93.4	91.6	89.9	88.2	86.6	85.2	83.7	82.4	81.2	79.9	78.6	77.6	76.6	75.7	74.6	73.7	73.1	72.3	71.4	70.9
Expectation 1	78.7	79.7	79.8	80.1	80.4	80.6	80.9	81.1	81.3	81.6	81.8	82.1	82.3	82.5	82.7	82.9	83.1	83.3	83.4	83.6	83.8	83.9	84.2	84.3	84.4
Expectation 1	82.4	83.3	83.3	83.4	83.6	83.8	84.0	84.1	84.3	84.5	84.7	84.8	85.0	85.2	85.3	85.5	85.6	85.7	85.9	86.1	86.2	86.3	86.5	86.6	86.8
Expectation 1	80.6	81.6	81.8	81.8	82.0	82.3	82.5	82.7	82.9	83.1	83.3	83.5	83.7	83.8	84.1	84.2	84.4	84.5	84.7	84.9	85.0	85.1	85.3	85.5	85.6
Deaths input																									
In-migration from the UK																									
Male	1,780	1,788	1,795	1,803	1,810	1,816	1,821	1,824	1,828	1,831	1,836	1,841	1,848	1,855	1,861	1,868	1,874	1,880	1,886	1,892	1,896	1,900	1,904	1,910	1,915
Female	1,028	1,029	1,036	1,042	1,049	1,056	1,062	1,067	1,071	1,074	1,077	1,080	1,083	1,086	1,089	1,092	1,095	1,098	1,101	1,104	1,107	1,110	1,113	1,116	1,119
All	3,708	3,719	3,728	3,741	3,749	3,761	3,766	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769	3,769
SMigr: male	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
SMigr: female	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Migrants input																									
Out-migration to the UK																									
Male	1,658	1,659	1,653	1,645	1,635	1,638	1,636	1,624	1,628	1,630	1,628	1,630	1,637	1,638	1,640	1,641	1,632	1,632	1,632	1,634	1,637	1,640	1,645	1,645	1,648
Female	1,797	1,783	1,762	1,766	1,768	1,776	1,780	1,783	1,782	1,778	1,778	1,781	1,785	1,784	1,782	1,781	1,774	1,770	1,769	1,768	1,767	1,765	1,761	1,754	1,756
All	3,455	3,441	3,415	3,411	3,398	3,372	3,360	3,351	3,367	3,363	3,352	3,369	3,371	3,380	3,381	3,375	3,373	3,371	3,375	3,381	3,387	3,395	3,399	3,399	3,403
SMigr: male	87.1	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4	87.4
SMigr: female	103.3	103.5	103.1	103.4	103.6	103.2	103.1	103.3	103.5	103.8	103.4	103.5	103.7	103.7	103.7	103.5	103.7	103.8	104.0	104.2	104.2	104.3	104.4	104.5	104.5
Migrants input																									
In-migration from Overseas																									
Male	455	73	69	69	66	65	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63
Female	425	56	54	53	51	50	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49
All	880	129	123	122	117	115	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SMigr: female	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Migrants input																									
Out-migration to Overseas																									
Male	431	48	49	49	49	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
Female	401	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38
All	742	86	87	87	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88
SMigr: male	151.4	21.7	21.9	22.1	22.3	22.5	22.6	22.7	22.8	22.9	23.0	23.0	23.0	23.0	22.9	22.8	22.8	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7
SMigr: female	231.5	21.9	22.2	22.6	22.9	23.2	23.5	23.6	23.8	23.9	24.0	24.1	24.1	24.1	24.1	24.1	24.1	24.1	24.1	24.1	24.1	24.2	24.2	24.2	24.3
Migrants input																									
Migration - Net Flows																									
UK	+255	+278	+313	+329	+356	+383	+400	+410	+406	+404	+423	+426	+427	+438	+442	+455	+475	+493	+508	+516	+519	+522	+523	+532	+540
Overseas	+139	+43	+35	+30	+27	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24
Summary of population change																									
Natural chan	-276	-199	-217	-211	-212	-213	-223	-233	-243	-257	-276	-296	-316	-337	-356	-373	-393	-412	-431	-447	-462	-479	-492	-504	-515
Net migrator	+394	+321	+349	+364	+386	+410	+424	+434	+431	+428	+447	+447	+451	+462	+467	+479	+500	+517	+533	+540	+543	+546	+547	+556	+564
Net change	+118	+122	+132	+153	+174	+197	+201	+188	+171	+171	+171	+155	+135	+125	+111	+105	+107	+105	+102	+93	+82	+67	+55	+52	+50
Crude Birth f	8.47	8.40	8.41	8.44	8.44	8.44	8.44	8.39	8.33	8.28	8.22	8.18	8.14	8.10	8.07	8.04	8.03	8.02	8.02	8.03	8.04	8.07	8.07	8.09	
Crude Death	11.28	10.43	10.62	10.64	10.60	10.63	10.70	10.80	10.88	10.98	11.11	11.24	11.39	11.55	11.69	11.83	11.99	12.14	12.31	12.46	12.61	12.79	12.93	13.06	13.19
Crude Net M	4.02	3.27	3.56	3.71	3.92	4.16	4.29	4.39	4.34	4.31	4.49	4.52	4.62	4.66	4.78	4.88	5.15	5.30	5.37	5.40	5.42	5.43	5.51	5.59	
Summary of Population estimates/forecasts																									
<i>Population at mid-year</i>																									
0-4	2,014	2,015	2,016	2,017	2,018	2,019	2,020	2,021	2,022	2,023	2,024	2,025	2,026	2,027	2,028	2,029	2,030	2,031	2,032	2,033	2,034	2,035	2,036	2,037	2,038
5-10	6,026	6,149	6,243																						

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario B: Natural Change

Year beginning July 1st	2014-15	2015-16	2016-17	2017-18	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
Births																									
Male	423	419	419	423	423	427	430	434	440	443	445	447	449	451	453	454	454	453	451	449	447	443	440	435	429
Female	403	399	399	403	403	407	409	414	419	422	424	426	428	430	432	432	432	430	428	426	422	419	414	409	403
All Births	826	819	818	827	827	834	839	848	859	865	869	873	877	881	885	886	886	885	881	878	872	866	858	848	838
TFR	1.73	1.73	1.73	1.75	1.75	1.76	1.76	1.77	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.79	1.79	1.79	1.79	1.79	1.79	1.79
Births input																									
Deaths																									
Male	533	494	503	506	504	511	515	521	529	535	543	549	556	567	573	580	588	594	603	609	614	620	624	628	631
Female	571	526	532	530	527	522	525	529	533	538	546	553	560	569	575	583	593	600	607	616	625	632	639	644	644
All deaths	1,104	1,020	1,035	1,036	1,031	1,033	1,040	1,050	1,069	1,088	1,098	1,105	1,116	1,127	1,142	1,155	1,171	1,187	1,203	1,216	1,220	1,245	1,256	1,266	1,275
SMR: males	107.0	97.6	96.6	94.4	91.6	90.0	87.9	86.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.9	72.1	71.2	70.2	69.6	68.9	68.1	67.6
SMR: female	111.6	103.0	103.0	101.4	99.6	96.9	95.5	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1	74.4
SMR: person	109.3	100.3	99.8	97.9	95.5	93.4	91.6	89.9	88.2	86.6	85.1	83.7	82.3	81.2	79.9	78.6	77.5	76.6	75.6	74.6	73.7	73.0	72.3	71.4	70.8
Expectation 1	78.7	79.7	79.8	80.1	80.4	80.6	80.9	81.1	81.3	81.6	81.8	82.1	82.3	82.5	82.8	82.9	83.1	83.3	83.4	83.7	83.9	84.0	84.2	84.4	84.5
Expectation 1	82.4	83.3	83.3	83.4	83.5	83.8	83.9	84.1	84.3	84.4	84.6	84.8	84.9	85.1	85.3	85.5	85.6	85.7	85.9	86.1	86.2	86.3	86.5	86.6	86.8
Expectation 1	80.6	81.6	81.6	81.8	82.0	82.2	82.5	82.7	82.8	83.1	83.2	83.5	83.6	83.8	84.0	84.2	84.4	84.5	84.7	84.9	85.0	85.1	85.4	85.5	85.6
Deaths input																									
In-migration from the UK																									
Male	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
All	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SMigr: female	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Migrants input																									
Out-migration to the UK																									
Male	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
All	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SMigr: female	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Migrants input																									
In-migration from Overseas																									
Male	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
All	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SMigr: female	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Migrants input																									
Out-migration to Overseas																									
Male	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
All	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SMigr: female	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Migrants input																									
Migration - Net Flows																									
UK	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overseas	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Summary of population change																									
Natural chan	-278	-201	-217	-209	-205	-198	-201	-202	-200	-204	-213	-222	-233	-246	-257	-269	-285	-302	-322	-339	-357	-380	-398	-418	-437
Net migration	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Net change	-278	-201	-217	-209	-205	-198	-201	-202	-200	-204	-213	-222	-233	-246	-257	-269	-285	-302	-322	-339	-357	-380	-398	-418	-437
Crude Birth f	8.46	8.41	8.42	8.53	8.54	8.64	8.71	8.82	8.95	9.03	9.09	9.16	9.22	9.29	9.35	9.39	9.42	9.44	9.43	9.42	9.40	9.37	9.33	9.26	9.19
Crude Death	11.31	10.47	10.65	10.68	10.66	10.70	10.79	10.92	11.03	11.16	11.32	11.49	11.68	11.88	12.07	12.24	12.45	12.65	12.87	13.06	13.25	13.48	13.65	13.82	13.99
Crude Net M	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Summary of Population estimates/forecasts

Population at mid-year	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	
0-4	4,573	4,362	4,184	4,125	4,080	4,100	4,108	4,129	4,159	4,230	4,264	4,298	4,328	4,350	4,371	4,388	4,401	4,409	4,402	4,389	4,369	4,343	4,310	4,271	4,231	4,191	4,151
5-10	6,026	6,043	6,002	5,908	5,786	5,675	5,591	5,173	4,994	4,944	4,899	4,927	4,940	4,970	5,011	5,049	5,092	5,131	5,169	5,203	5,229	5,250	5,268	5,290	5,284	5,281	5,281
11-15	5,266	5,153	5,108	5,027	4,893	5,019	5,008	5,034	4,917	4,770	4,588	4,357	4,179	4,121	4,076	4,056	4,104	4,125	4,154	4,187	4,228	4,260	4,295	4,324	4,347	4,367	4,387
16-17	2,302	2,228	2,205	2,124	2,070	2,011	2,004	2,003	2,004	2,002	2,007	2,004	2,007	2,004	1,984	1,739	1,670	1,624	1,636	1,626	1,606	1,645	1,653	1,665	1,679	1,689	1,699
18-59Female	53,234	52,386	52,655	52,325	51,920	51,804	51,231	50,721	50,334	49,920	4																

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario C: Zero Net Migration

	Year beginning July 1st																													
	2014-15	2015-16	2016-17	2017-18	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					
Births																														
Male	426	429	435	445	449	456	461	467	472	474	474	474	473	473	471	470	468	467	465	464	464	463	463	463	463	463				
Female	406	409	414	424	428	435	439	444	449	451	452	451	451	450	449	448	446	445	443	442	441	441	441	441	441	441				
All Births	832	838	849	869	877	891	900	911	921	925	926	925	924	923	920	918	914	911	909	907	905	904	904	904	904	905				
TFR	1.73	1.73	1.73	1.75	1.75	1.75	1.77	1.77	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.79	1.79	1.79	1.79	1.79	1.79	1.79					
Births input																														
Deaths																														
Male	533	492	498	499	496	500	502	506	511	515	521	525	530	537	540	545	549	553	559	562	564	567	569	570	572					
Female	511	523	528	528	523	518	511	514	517	523	527	532	537	542	548	551	547	554	558	562	568	574	578	581	584					
All deaths	1,044	1,015	1,026	1,027	1,014	1,018	1,013	1,020	1,025	1,038	1,047	1,057	1,067	1,079	1,088	1,096	1,106	1,117	1,124	1,132	1,141	1,147	1,152	1,156	1,159					
SMR: males	107.0	97.6	96.6	94.5	91.6	90.0	87.9	86.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.9	72.1	71.2	70.6	69.9	69.1	68.1	67.6					
SMR: female	111.6	103.0	103.0	101.4	99.6	96.9	95.6	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1	74.4					
SMR: person	109.3	100.3	100.3	99.8	97.9	95.5	93.4	91.6	89.9	88.2	86.6	85.1	83.7	82.3	81.2	79.9	78.6	77.5	76.6	75.6	74.7	73.7	73.1	72.3	71.4					
Expectation	78.7	79.7	79.8	80.1	80.4	80.6	80.9	81.1	81.3	81.5	81.8	82.1	82.3	82.5	82.8	82.9	83.1	83.3	83.4	83.7	83.8	84.0	84.2	84.4	84.5					
Expectation	82.4	83.3	83.3	83.4	83.5	83.8	83.9	84.1	84.3	84.4	84.6	84.8	84.9	85.1	85.3	85.5	85.6	85.7	85.9	86.1	86.2	86.3	86.5	86.6	86.7					
Expectation	80.6	81.6	81.6	81.8	82.0	82.2	82.3	82.5	82.7	82.8	83.1	83.3	83.5	83.6	83.8	84.0	84.2	84.4	84.5	84.7	85.0	85.1	85.3	85.5	85.6					
Deaths input																														
In-migration from the UK																														
Male	1,930	1,939	1,946	1,956	1,963	1,969	1,973	1,976	1,978	1,980	1,984	1,989	1,996	2,000	2,010	2,017	2,024	2,033	2,041	2,047	2,052	2,057	2,063	2,070	2,077					
Female	1,778	1,785	1,791	1,797	1,798	1,796	1,796	1,796	1,796	1,796	1,796	1,796	1,796	1,796	1,796	1,796	1,796	1,796	1,796	1,796	1,796	1,796	1,796	1,796	1,796					
All	3,708	3,719	3,728	3,741	3,749	3,755	3,760	3,761	3,764	3,766	3,773	3,780	3,790	3,822	3,836	3,850	3,865	3,879	3,891	3,900	3,908	3,918	3,930	3,943						
SMigr: male	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1						
SMigr: femal	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1						
Migrants inps																														
Out-migration to the UK																														
Male	1,938	1,945	1,951	1,953	1,960	1,969	1,972	1,970	1,970	1,972	1,976	1,981	1,989	1,996	2,003	2,011	2,016	2,026	2,035	2,041	2,046	2,051	2,056	2,063	2,070					
Female	1,771	1,774	1,777	1,788	1,789	1,786	1,784	1,784	1,784	1,784	1,784	1,784	1,784	1,784	1,784	1,784	1,784	1,784	1,784	1,784	1,784	1,784	1,784	1,784	1,784					
All	3,709	3,719	3,728	3,741	3,749	3,755	3,760	3,761	3,764	3,766	3,773	3,780	3,790	3,822	3,836	3,850	3,865	3,879	3,891	3,900	3,908	3,918	3,930	3,943						
SMigr: male	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3	101.3					
SMigr: femal	101.9	101.5	101.3	101.2	101.3	101.5	101.7	101.9	102.0	102.3	102.7	103.0	103.3	103.7	104.0	104.6	105.3	106.1	106.8	107.4	107.8	108.3	108.6	109.1	109.5					
Migrants inps																														
In-migration from Overseas																														
Male	79	70	67	66	64	63	61	61	61	61	61	61	61	61	61	61	61	61	61	61	61	61	61	61	61					
Female	66	59	56	56	54	52	51	51	51	51	51	51	51	51	51	51	51	51	51	51	51	51	51	51	51					
All	145	129	123	122	117	115	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113					
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
SMigr: femal	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
Migrants inps																														
Out-migration to Overseas																														
Male	82	73	70	69	66	65	64	64	64	64	64	64	64	64	64	64	64	64	64	64	64	64	64	64	64					
Female	63	56	54	53	51	50	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49					
All	145	129	123	122	117	115	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113					
SMigr: male	36.4	32.2	30.5	30.1	28.8	28.1	27.5	27.5	27.6	27.7	27.8	27.8	27.9	27.9	27.9	27.9	28.0	28.1	28.1	28.2	28.3	28.4	28.5	28.5						
SMigr: femal	36.4	32.2	30.5	30.1	28.8	28.1	27.5	27.5	27.6	27.7	27.8	27.8	27.9	27.9	27.9	27.9	28.0	28.1	28.1	28.2	28.3	28.4	28.5	28.5						
Migrants inps																														
Migration - Net Flows																														
UK	0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0					
Overseas	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0	-0					
Summary of population change																														
Natural chan	-271	-177	-177	-154	-137	-120	-114	-109	-104	-106	-113	-122	-133	-147	-158	-168	-182	-195	-208	-218	-226	-237	-243	-247	-251					
Net migration	0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0	+0					
Net change	-271	-177	-177	-154	-137	-120	-114	-109	-104	-106	-113	-122	-133	-147	-158	-168	-182	-195	-208	-218	-226	-237	-243	-247	-251					
Crude Birth f	8.53	8.60	8.73	8.95	9.05	9.21	9.32	9.44	9.54	9.60	9.62	9.63	9.63	9.63	9.62	9.60	9.59	9.58	9.57	9.57	9.58	9.59	9.61	9.64	9.67					
Crude Death m	11.30	10.42	10.56	10.53	10.46	10.45	10.49	10.57	10.62	10.69	10.79	10.90	11.02	11.15	11.27	11.37	11.50	11.62	11.76	11.86	11.97	12.10	12.19	12.28	12.35					
Crude Net M	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00						
Summary of Population estimates/forecasts																														
Population at mid-year																														
0-4	2,014	2,015	2,016	2,017	2,018	2,019	2,020	2,021	2,022	2,023	2,024	2,025	2,026	2,027	2,028	2,029	2,030	2,031	2,032	2,033	2,034	2,035	2,036	2,037	2,038					
5-10	4,573	4,407	4,287	4,287	4,297	4,266	4,243	4,283	4,540	4,588	4,629	4,																		

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario D: Long Term Migration

Year beginning July 1st	2014-15	2015-16	2016-17	2017-18	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	
Births																										
Male	424	422	423	427	425	426	425	425	424	421	418	415	412	409	406	403	400	398	396	395	394	393	393	393	393	
Female	404	402	403	407	405	406	405	405	404	401	398	395	392	389	386	384	381	379	377	376	375	374	374	374	374	
All Births	828	824	826	834	830	833	831	830	828	823	817	810	804	798	792	787	782	777	774	771	769	767	767	767	767	
TFR	1.73	1.73	1.73	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	
Births input																										
Deaths																										
Male	533	495	505	509	508	515	519	526	534	541	549	555	564	573	579	587	595	601	611	618	624	631	637	641	647	
Female	571	529	540	539	539	546	554	560	568	576	585	595	603	610	617	624	631	640	644	654	664	672	679	685	696	
All deaths	1,104	1,025	1,045	1,048	1,047	1,061	1,080	1,097	1,108	1,117	1,134	1,150	1,167	1,183	1,196	1,211	1,228	1,243	1,257	1,275	1,288	1,301	1,313	1,319		
SMR: males	107.0	97.6	96.6	94.5	91.6	90.0	87.9	85.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.9	72.1	71.2	70.2	69.6	68.9	68.1	67.6	
SMR: female	111.8	103.0	103.0	101.4	99.6	96.9	95.5	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1	74.4	
SMR: person	109.3	100.3	99.8	98.0	96.6	93.4	91.6	89.9	88.2	86.6	85.2	83.7	82.4	81.2	79.9	78.6	77.6	76.6	75.7	74.6	73.7	73.1	72.3	71.4	70.9	
Expectation 1	78.7	79.7	79.8	80.1	80.4	80.6	80.9	81.1	81.3	81.6	81.8	82.1	82.3	82.5	82.7	82.9	83.1	83.4	83.6	83.8	83.9	84.2	84.2	84.2	84.4	
Expectation 1	82.4	83.3	83.3	83.4	83.6	83.8	84.0	84.1	84.3	84.5	84.7	84.8	85.0	85.2	85.3	85.5	85.6	85.7	85.9	86.1	86.2	86.3	86.5	86.6	86.8	
Expectation 1	80.6	81.6	81.6	81.8	82.0	82.3	82.5	82.8	83.0	83.1	83.3	83.5	83.7	83.8	84.1	84.2	84.4	84.5	84.7	84.9	85.0	85.1	85.3	85.5	85.6	
Deaths input																										
In-migration from the UK																										
Male	1,774	1,777	1,780	1,782	1,784	1,787	1,790	1,793	1,795	1,797	1,798	1,799	1,800	1,800	1,800	1,800	1,799	1,799	1,798	1,797	1,797	1,797	1,796	1,796	1,796	
Female	1,822	1,814	1,816	1,818	1,820	1,821	1,822	1,823	1,824	1,825	1,826	1,827	1,828	1,829	1,830	1,831	1,832	1,833	1,834	1,835	1,836	1,837	1,838	1,839	1,840	
All	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	
SMigr: male	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	
SMigr: femal	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	
Migrants input																										
Out-migration to the UK																										
Male	1,611	1,626	1,632	1,628	1,625	1,637	1,641	1,634	1,634	1,634	1,638	1,637	1,639	1,638	1,636	1,635	1,630	1,632	1,632	1,632	1,632	1,632	1,632	1,632	1,632	
Female	1,754	1,746	1,739	1,745	1,746	1,734	1,737	1,737	1,733	1,733	1,733	1,732	1,735	1,735	1,735	1,740	1,739	1,739	1,739	1,739	1,739	1,739	1,738	1,738	1,738	
All	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	
SMigr: male	85.1	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	
SMigr: femal	100.9	101.3	101.6	102.1	103.0	103.4	103.7	104.4	104.5	105.0	105.1	105.2	105.2	105.2	105.2	105.3	105.8	106.1	106.5	106.6	106.8	107.1	107.2	107.5	107.7	
Migrants input																										
In-migration from Overseas																										
Male	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	
Female	60	59	60	59	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	
All	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
SMigr: femal	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Migrants input																										
Out-migration to Overseas																										
Male	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	
Female	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	
All	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	
SMigr: male	29.8	29.9	30.1	30.2	30.3	30.5	30.6	30.8	30.9	31.1	31.3	31.4	31.5	31.5	31.5	31.5	31.6	31.7	31.8	31.9	32.0	32.1	32.2	32.2	32.2	
SMigr: femal	30.3	30.4	30.7	30.9	31.2	31.5	31.9	32.2	32.4	32.7	32.9	33.1	33.2	33.3	33.3	33.4	33.4	33.5	33.6	33.7	33.8	33.9	34.1	34.2	34.4	
Migrants input																										
Migration - Net Flows																										
UK	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	
Overseas	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	
Summary of population change																										
Natural chan	-275	-201	-219	-215	-217	-218	-229	-241	-252	-268	-288	-308	-330	-353	-374	-392	-414	-434	-455	-472	-489	-508	-521	-534	-546	
Net migration	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	
Net change	+67	+141	+123	+127	+125	+124	+113	+101	+80	+74	+54	+34	+12	-11	-31	-50	-72	-92	-113	-130	-147	-165	-179	-192	-204	
Crude Birth f	8.47	8.42	8.42	8.42	8.42	8.42	8.42	8.41	8.39	8.33	8.26	8.19	8.12	8.06	8.00	7.95	7.91	7.87	7.84	7.82	7.81	7.81	7.82	7.83	7.85	
Crude Death	11.29	10.47	10.66	10.68	10.65	10.68	10.76	10.86	10.94	11.04	11.17	11.31	11.46	11.63	11.78	11.92	12.10	12.27	12.45	12.61	12.78	12.98	13.14	13.29	13.44	
Crude Net M	3.50	3.49	3.49	3.48	3.48	3.48	3.47	3.47	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.50	3.50	
Summary of Population estimates/forecasts																										
Population at mid-year																										
0-4	2,014	2,015	2,016	2,017	2,018	2,019	2,020	2,021	2,022	2,023	2,024	2,025	2,026	2,027	2,028	2,029	2,030	2,031	2,032	2,033	2,034	2,035	2,036	2,037	2,038	2,039
5-10	4,573	4,446	4,354	4,338	4,338	4,362	4,366	4,366	4,366	4,366	4,366	4,333	4,311	4,284	4,253	4,221	4,190	4,160	4,132	4,107	4,					

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario Da: Long term Migration + PCU

	Year beginning July 1st																													
	2014-15	2015-16	2016-17	2017-18	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					
Births																														
Male	424	422	423	427	425	426	425	425	425	424	421	418	415	412	409	406	403	400	398	396	395	394	393	393	393	393				
Female	404	402	403	407	405	406	405	405	405	404	401	398	395	392	389	386	384	381	379	377	376	375	374	374	374	374				
All Births	828	824	826	834	830	833	831	830	830	828	823	817	810	804	798	792	787	782	777	774	771	769	767	767	767	767				
TFR	1.73	1.73	1.73	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75				
Births input																														
Deaths																														
Male	533	495	505	509	508	515	519	526	534	541	549	555	564	573	579	587	595	601	611	618	624	631	637	641	647	647				
Female	571	529	540	539	539	547	550	544	547	550	556	563	570	578	586	592	601	610	617	624	634	644	652	659	666	666				
All deaths	1,104	1,025	1,045	1,048	1,047	1,062	1,069	1,078	1,091	1,091	1,105	1,118	1,134	1,151	1,165	1,179	1,196	1,211	1,228	1,243	1,257	1,275	1,288	1,301	1,313	1,313				
SMR: males	107.0	97.6	96.6	94.5	91.6	90.0	87.9	85.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.9	72.1	71.2	70.2	69.6	68.9	68.1	67.6					
SMR: female	111.6	103.0	103.0	101.4	99.6	96.9	95.5	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1	74.4					
SMR: person	109.3	100.3	99.8	98.0	96.6	94.1	91.6	89.9	88.2	86.6	85.2	83.7	82.4	81.2	79.9	78.6	77.6	76.6	75.7	74.6	73.7	73.1	72.3	71.4	70.9					
Expectation 1	78.7	79.7	79.8	80.1	80.4	80.6	80.9	81.1	81.3	81.6	81.8	82.1	82.3	82.5	82.7	82.9	83.1	83.4	83.6	83.8	83.9	84.2	84.2	84.2	84.2	84.4				
Expectation 1	82.4	83.3	83.3	83.4	83.6	83.8	84.0	84.1	84.3	84.5	84.7	84.8	85.0	85.2	85.3	85.5	85.6	85.7	85.9	86.1	86.2	86.3	86.5	86.5	86.5	86.8				
Expectation 1	80.6	81.6	81.6	81.8	82.0	82.3	82.5	82.7	82.9	83.1	83.3	83.5	83.7	83.8	84.1	84.2	84.4	84.5	84.7	84.9	85.0	85.1	85.3	85.3	85.5	85.6				
Deaths input																														
In-migration from the UK																														
Male	1,774	1,777	1,780	1,782	1,784	1,787	1,790	1,793	1,795	1,797	1,798	1,799	1,800	1,800	1,800	1,800	1,799	1,799	1,798	1,797	1,797	1,797	1,797	1,796	1,796	1,796				
Female	1,822	1,814	1,816	1,818	1,820	1,821	1,822	1,823	1,824	1,825	1,826	1,827	1,828	1,829	1,830	1,830	1,830	1,830	1,830	1,830	1,830	1,830	1,830	1,830	1,830	1,830				
All	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696	3,696				
SMigr: male	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1				
SMigr: femal	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1				
Migrants input																														
Out-migration to the UK																														
Male	1,611	1,626	1,632	1,628	1,625	1,637	1,641	1,634	1,634	1,634	1,638	1,637	1,639	1,638	1,636	1,635	1,630	1,632	1,632	1,632	1,632	1,632	1,632	1,632	1,632	1,632				
Female	1,754	1,746	1,739	1,745	1,746	1,734	1,737	1,737	1,733	1,733	1,733	1,732	1,735	1,735	1,735	1,735	1,730	1,730	1,730	1,730	1,730	1,730	1,730	1,730	1,730	1,730				
All	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371	3,371				
SMigr: male	85.1	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3				
SMigr: femal	100.9	101.3	101.6	102.1	103.0	103.4	103.7	104.4	104.5	105.0	105.1	105.2	105.2	105.2	105.2	105.3	105.8	106.1	106.5	106.6	106.8	107.1	107.2	107.5	107.7					
Migrants input																														
In-migration from Overseas																														
Male	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77	77				
Female	60	59	60	59	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60				
All	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136	136				
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0				
SMigr: femal	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0				
Migrants input																														
Out-migration to Overseas																														
Male	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67	67				
Female	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52				
All	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120				
SMigr: male	29.8	29.9	30.1	30.2	30.3	30.5	30.6	30.8	30.9	31.1	31.3	31.4	31.5	31.5	31.5	31.5	31.6	31.7	31.8	31.9	32.0	32.1	32.2	32.2	32.2					
SMigr: femal	30.3	30.4	30.7	30.9	31.2	31.5	31.9	32.2	32.4	32.7	32.9	33.1	33.2	33.3	33.3	33.4	33.4	33.5	33.6	33.7	33.8	33.9	34.1	34.2	34.4					
Migrants input																														
Migration - Net Flows																														
UK	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325	+325				
Overseas	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17	+17				
Summary of population change																														
Natural chan	-275	-201	-219	-215	-217	-218	-229	-241	-252	-268	-288	-308	-330	-353	-374	-392	-414	-434	-455	-472	-489	-508	-521	-534	-546	-546				
Net migration	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342	+342				
Net change	+67	+141	+123	+127	+125	+124	+113	+101	+80	+74	+54	+34	+12	-11	-31	-50	-72	-92	-113	-130	-147	-165	-179	-192	-204					
Crude Birth f	8.47	8.42	8.42	8.45	8.45	8.43	8.41	8.39	8.33	8.26	8.19	8.12	8.06	8.00	7.95	7.91	7.87	7.84	7.82	7.81	7.81	7.82	7.83	7.83	7.85					
Crude Death M	11.29	10.47	10.66	10.68	10.65	10.68	10.76	10.86	10.94	11.04	11.17	11.31	11.46	11.63	11.78	11.92	12.10	12.27	12.45	12.61	12.78	12.98	13.14	13.29	13.44					
Crude Net M	3.50	3.49	3.49	3.48	3.48	3.47	3.47	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.46	3.47	3.47	3.48	3.48	3.49	3.50	3.50					
Summary of Population estimates/forecasts</																														

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario E: Oxford Economics Job Growth

	2014-15	2015-16	2016-17	2017-18	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
Births																									
Male	424	434	439	440	439	442	446	453	459	462	464	463	460	458	456	454	452	450	448	446	444	442	441	440	440
Female	404	413	418	419	418	421	425	431	437	440	444	441	439	437	434	433	430	428	427	424	423	421	420	419	419
All Births	828	848	857	859	856	862	870	884	896	902	908	903	899	895	891	887	882	878	875	870	867	863	861	859	859
TFR	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73
Births input																									
Deaths																									
Male	533	498	509	511	511	518	524	532	541	550	559	566	575	585	592	600	608	616	626	634	640	647	654	659	666
Female	571	533	545	543	542	539	545	552	556	561	568	576	583	591	600	606	615	625	633	640	650	661	669	677	684
All deaths	1,104	1,032	1,053	1,054	1,053	1,057	1,069	1,084	1,097	1,111	1,127	1,142	1,168	1,176	1,191	1,206	1,223	1,240	1,259	1,274	1,290	1,308	1,322	1,336	1,350
SMR: males	107.0	97.6	96.6	94.5	91.6	90.0	87.9	85.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.9	72.1	71.2	70.2	69.6	68.9	68.1	67.6
SMR: female	111.6	103.0	103.0	101.4	99.6	96.9	95.5	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1	74.4
SMR: person	109.3	100.3	99.8	98.0	95.6	93.4	91.6	89.9	88.2	86.6	85.2	83.8	82.4	81.2	79.9	78.6	77.6	76.6	75.7	74.6	73.7	73.1	72.3	71.4	70.9
Expectation 1	78.7	79.8	79.8	80.1	80.4	80.6	80.9	81.1	81.3	81.6	81.8	82.1	82.3	82.5	82.7	82.9	83.1	83.3	83.4	83.6	83.8	83.9	84.1	84.3	84.4
Expectation 1	82.4	83.3	83.3	83.4	83.6	83.8	84.0	84.2	84.3	84.5	84.7	84.8	85.0	85.2	85.3	85.5	85.6	85.7	85.9	86.1	86.2	86.3	86.5	86.6	86.8
Expectation 1	80.6	81.6	81.6	81.8	82.0	82.3	82.5	82.7	82.9	83.1	83.3	83.5	83.7	83.9	84.1	84.2	84.4	84.5	84.7	84.9	85.0	85.1	85.3	85.5	85.6
Deaths input																									
In-migration from the UK																									
Male	2,076	1,880	1,688	1,684	1,833	1,926	1,978	1,963	1,968	1,969	1,864	1,854	1,861	1,864	1,861	1,861	1,877	1,888	1,853	1,865	1,862	1,876	1,877	1,893	1,892
Female	2,248	2,064	1,864	1,864	2,057	2,162	2,282	2,289	2,287	2,289	2,167	2,155	2,161	2,164	2,162	2,162	2,176	2,187	2,152	2,164	2,162	2,176	2,177	2,203	2,204
All	4,324	3,944	3,552	3,548	3,890	4,140	4,260	4,257	4,257	4,136	4,031	3,985	3,981	3,985	3,981	3,985	3,985	3,985	3,985	3,985	3,985	3,985	3,985	3,985	3,985
SMiGr: male	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	
SMiGr: female	0.2	0.1	0.1	0.1	0.1	0.1	0.2	0.2	0.2	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	
Migrants input																									
Out-migration to the UK																									
Male	1,361	1,567	1,761	1,646	1,612	1,527	1,478	1,485	1,508	1,532	1,609	1,617	1,624	1,627	1,620	1,647	1,630	1,625	1,666	1,661	1,671	1,665	1,672	1,662	1,671
Female	1,476	1,684	1,876	1,765	1,732	1,617	1,558	1,580	1,603	1,629	1,702	1,712	1,717	1,725	1,719	1,748	1,730	1,725	1,775	1,770	1,780	1,780	1,771	1,760	1,780
All	2,837	3,251	3,637	3,411	3,344	3,144	3,066	3,111	3,161	3,131	3,311	3,330	3,341	3,352	3,339	3,395	3,359	3,350	3,385	3,440	3,450	3,451	3,438	3,451	3,451
SMiGr: male	71.8	81.8	85.8	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	85.3	
SMiGr: female	84.9	95.4	106.4	101.2	101.1	94.3	90.5	90.8	91.2	92.2	96.0	96.5	96.6	96.9	97.9	97.6	97.3	99.9	99.8	100.5	100.3	100.7	100.4	100.8	
Migrants input																									
In-migration from Overseas																									
Male	82	73	69	69	66	65	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63
Female	63	56	54	53	51	50	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49
All	145	129	123	122	117	115	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	
SMiGr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
SMiGr: female	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Migrants input																									
Out-migration to Overseas																									
Male	48	48	49	49	49	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	
Female	37	38	38	38	38	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39	
All	85	86	87	87	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	
SMiGr: male	21.3	21.1	21.2	21.6	21.8	22.0	21.9	21.8	21.7	21.6	21.5	21.6	21.6	21.6	21.6	21.5	21.5	21.5	21.5	21.6	21.6	21.7	21.7	21.8	
SMiGr: female	21.6	21.3	21.4	22.0	22.3	22.6	22.7	22.5	22.4	22.3	22.3	22.3	22.4	22.4	22.4	22.4	22.4	22.5	22.5	22.5	22.6	22.7	22.8	22.9	
Migrants input																									
Migration - Net Flows																									
UK	+1,487	+658	-131	+332	+454	+839	+1,048	+982	+900	+807	+500	+479	+482	+476	+524	+428	+485	+523	+369	+406	+379	+420	+411	+462	+445
Overseas	+60	+43	+37	+35	+30	+27	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	
Summary of population change																									
Natural chan	-276	-184	-196	-196	-196	-195	-198	-200	-201	-209	-221	-239	-259	-281	-301	-319	-341	-362	-384	-404	-423	-445	-461	-477	-490
Net migration	+1,546	+701	-94	+387	+484	+866	+1,072	+1,006	+924	+831	+525	+504	+508	+501	+548	+453	+510	+547	+394	+430	+463	+445	+435	+487	+469
Net change	+1,271	+517	-290	+191	+287	+671	+874	+806	+723	+622	+303	+265	+247	+219	+248	+134	+165	+161	+10	+27	50	-10	-26	+10	-21
Crude Birth f	8.42	8.54	8.62	8.64	8.60	8.62	8.70	8.75	8.75	8.75	8.70	8.64	8.58	8.52	8.47	8.41	8.36	8.32	8.27	8.24	8.23	8.23	8.18	8.17	
Crude Death	11.22	10.39	10.60	10.61	10.57	10.56	10.60	10.66	10.71	10.78	10.89	11.00	11.12	11.27	11.39	11.51	11.66	11.80	11.97	12.11	12.26	12.43	12.57	12.70	
Crude Net M	15.71	7.06	-0.95	1.69	4.86	8.65	10.63	10.60	9.02	8.06	5.07	4.85	4.86	4.80	5.24	4.32	4.86	5.20	3.74	4.09	3.83	4.23	4.14	4.63	
Summary of Population estimates/forecasts																									
0-4	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038
5-10	6,206	6,230	6,313	6,309	6,307	6,227	6,185	6,115	6,075	6,107	6,132	6,162	6,220	6,256	6,285	6,307	6,319	6,323	6,321	6,299	6,272	6,240			

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario Ea: Oxford Economics Job Growth + 5% Reduction in Net Out-Commuting

	2014-15	2015-16	2016-17	2017-18	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
Births																									
Male	424	432	434	433	429	430	432	436	440	441	440	437	433	429	425	422	418	410	410	408	407	407	407	408	409
Female	404	411	414	412	409	409	411	410	420	420	416	412	409	405	402	398	391	390	389	388	387	388	388	388	390
All Births	828	843	848	844	838	839	843	851	859	860	856	853	845	838	830	824	816	801	800	797	795	794	795	796	799
TFR	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	
Deaths																									
Male	533	498	508	510	509	516	521	529	537	545	554	560	568	578	584	592	599	605	615	623	629	636	642	648	654
Female	571	533	543	540	539	536	541	547	551	556	562	569	576	583	591	597	605	612	621	629	638	649	657	666	673
All deaths	1,104	1,030	1,051	1,050	1,048	1,051	1,062	1,076	1,088	1,101	1,116	1,129	1,144	1,161	1,179	1,191	1,204	1,217	1,236	1,251	1,267	1,286	1,300	1,313	1,327
SMR: males	107.0	97.6	96.6	94.5	91.6	90.0	87.8	85.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.9	72.1	71.2	70.2	69.6	68.9	68.1	67.6
SMR: female	111.8	103.0	103.0	101.4	99.6	98.9	96.5	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1	74.4
SMR: person	109.3	100.3	99.8	98.0	96.6	95.4	91.6	89.9	88.2	86.6	85.2	83.8	82.4	81.2	79.9	78.6	77.6	76.6	75.7	74.6	73.7	73.1	72.3	71.4	70.9
Expectation 1	78.7	79.7	79.8	80.1	80.4	80.6	80.9	81.1	81.3	81.6	81.8	82.1	82.3	82.5	82.7	82.9	83.4	83.4	83.6	83.8	83.8	83.9	84.2	84.3	84.4
Expectation 1	82.4	83.3	83.3	83.4	83.6	83.8	84.0	84.2	84.3	84.5	84.7	84.8	85.0	85.2	85.3	85.5	85.6	85.7	85.9	86.1	86.2	86.3	86.5	86.6	86.8
Expectation 1	80.6	81.6	81.6	81.8	82.0	82.3	82.5	82.7	82.9	83.1	83.3	83.5	83.7	83.9	84.1	84.2	84.4	84.5	84.7	84.9	85.0	85.1	85.3	85.5	85.6
In-migration from the UK																									
Male	2,017	1,825	1,839	1,754	1,783	1,874	1,925	1,909	1,894	1,876	1,802	1,803	1,811	1,814	1,831	1,813	1,718	1,699	1,660	1,673	1,670	1,684	1,686	1,693	1,703
Female	2,146	1,971	1,984	1,884	1,916	2,002	2,050	2,027	2,006	1,982	1,901	1,908	1,912	1,920	1,911	1,811	2,005	1,965	1,879	1,876	1,891	1,895	1,901	1,905	2,013
All	4,201	3,796	3,844	3,638	3,694	3,876	3,975	3,937	3,900	3,858	3,704	3,718	3,726	3,741	3,723	3,529	3,704	3,626	3,547	3,561	3,575	3,585	3,681	3,716	
SMigr: male	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	
SMigr: female	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	
Migrants input																									
Out-migration to the UK																									
Male	1,420	1,621	1,810	1,696	1,662	1,579	1,532	1,530	1,561	1,585	1,661	1,669	1,674	1,677	1,669	1,666	1,787	1,614	1,658	1,653	1,663	1,656	1,663	1,652	
Female	1,540	1,743	1,929	1,819	1,786	1,672	1,614	1,637	1,699	1,686	1,777	1,767	1,770	1,771	1,799	1,908	1,720	1,767	1,767	1,771	1,764	1,770	1,761	1,761	
All	2,960	3,364	3,740	3,514	3,448	3,252	3,146	3,176	3,221	3,271	3,418	3,435	3,444	3,454	3,441	3,495	3,695	3,334	3,424	3,414	3,434	3,420	3,432	3,413	
SMigr: male	74.7	80.7	79.8	80.1	80.4	80.6	80.9	81.1	81.3	81.6	81.8	82.1	82.3	82.5	82.7	82.9	83.4	83.4	83.6	83.8	83.8	83.9	84.2	84.3	
SMigr: female	88.6	99.2	110.4	106.6	105.0	99.5	96.0	96.6	97.4	98.7	102.8	103.6	104.0	104.5	104.3	106.1	113.0	103.3	105.9	105.7	106.3	105.9	106.2	105.6	
Migrants input																									
In-migration from Overseas																									
Male	82	73	69	69	66	65	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	
Female	63	56	54	53	51	50	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	
All	145	129	123	122	117	115	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113		
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0		
SMigr: female	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0		
Migrants input																									
Out-migration to Overseas																									
Male	48	48	49	49	49	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50		
Female	37	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38		
All	85	86	87	87	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88		
SMigr: male	21.3	21.2	21.3	21.8	22.1	22.4	22.4	22.4	22.4	22.4	22.4	22.5	22.6	22.6	22.7	22.9	22.9	22.9	22.9	23.0	23.0	23.0	23.0		
SMigr: female	21.6	21.4	21.7	22.3	22.8	23.2	23.3	23.3	23.3	23.3	23.4	23.6	23.7	23.8	23.8	24.0	24.3	24.3	24.3	24.3	24.4	24.4	24.5		
Migrants input																									
Migration - Net Flows																									
UK	+1,241	+432	-336	+124	+246	+624	+829	+761	+680	+587	+286	+268	+274	+272	+321	+228	-165	+570	+402	+438	+413	+455	+449	+503	
Overseas	+60	+43	+37	+35	+30	+27	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24		
Summary of population change																									
Natural chan	-776	-187	-203	-206	-210	-212	-219	-225	-229	-240	-256	-276	-299	-323	-345	-365	-388	-416	-436	-454	-472	-491	-505	-518	
Net migration	+1,301	+475	-299	+159	+275	+651	+853	+786	+704	+511	+310	+293	+299	+296	+345	+253	-141	+594	+426	+462	+437	+480	+473	+527	
Net change	+525	+288	-202	-47	+165	+439	+634	+557	+474	+255	+155	+165	-5	-27	-40	-112	-529	+178	10	88	-35	-11	-32	+10	
Crude Birth f	8.43	8.52	8.58	8.57	8.50	8.49	8.48	8.52	8.55	8.53	8.51	8.43	8.36	8.21	8.15	8.10	7.97	7.95	7.92	7.90	7.89	7.90	7.91		
Crude Death	11.23	10.41	10.63	10.66	10.63	10.64	10.69	10.77	10.83	10.91	11.04	11.17	11.31	11.48	11.62	11.76	11.95	12.10	12.28	12.43	12.59	12.77	12.82		
Crude Net M	13.23	12.81	13.03	13.17	13.19	13.19	13.19	13.17	13.13	13.07	12.97	12.91	12.96	13.01	13.04	13.01	13.01	13.01	13.01	13.01	13.01	13.01	13.01		
Summary of Population estimates/forecasts																									
0-4	4,573	4,015	4,316	4,392	4,370	4,389	4,417	4,458	4,491	4,516	4,533	4,553	4,566	4,480	4,448	4,416	4,377	4,309	4,290	4,281	4,241	4,221	4,209	4,203	
5-10	6,206	6,214	6,282	6,263	6,245	6,148	6,089	6,000	5,939	5,948	5,949	5,974	5,984	5,992	5,995	5,990	5,975	5,926	5,914	5,884	5,849	5,812	5,777	5,743	
11-15	5,266	5,254	5,287	5,260	5,213	5,437	5,533	5,651	5,779	5,794	5,762	5,674	5,557	5,464	5,435	5,416	5,435	5,437	5,446	5,454	5,465	5,462	5,444	5,429	
16-17	2,302	2,253	2,252	2,154	2,132	2,096	2,131	2,221	2,225	2,238	2,329	2,374	2,415	2,436											

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario Eb: OE JoB Growth + PCU

Year beginning July 1st	2014-15	2015-16	2016-17	2017-18	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
Births																									
Male	424	434	439	440	439	442	446	453	459	462	464	463	460	458	456	454	452	450	448	446	444	442	441	440	440
Female	404	413	418	419	418	421	425	431	437	440	442	441	439	437	434	433	430	428	427	424	423	421	420	419	419
All Births	828	848	857	859	856	862	870	884	896	902	906	903	899	895	891	887	882	878	875	870	867	863	861	859	859
TFR	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73
Births input																									
Deaths																									
Male	533	498	509	511	511	516	524	532	541	550	559	566	575	585	592	600	608	616	626	634	640	647	654	659	666
Female	571	533	545	543	542	539	545	552	556	561	568	576	583	591	600	606	615	625	633	640	650	661	669	677	684
All deaths	1,104	1,032	1,053	1,054	1,053	1,057	1,069	1,084	1,097	1,111	1,127	1,142	1,168	1,176	1,191	1,206	1,223	1,240	1,259	1,274	1,290	1,308	1,322	1,336	1,350
SMR: males	107.0	97.6	96.6	94.5	91.6	90.0	87.9	85.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.9	72.1	71.2	70.2	69.6	68.9	68.1	67.6
SMR: female	111.6	103.0	103.0	101.4	99.6	96.9	95.5	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1	74.4
SMR: persor	109.3	100.3	100.3	99.8	98.0	95.6	93.4	91.6	89.9	88.2	86.6	85.2	83.8	82.4	81.2	79.9	78.6	77.6	76.6	75.7	74.6	73.7	73.1	72.3	71.4
Expectation 1	78.7	79.8	79.8	80.1	80.4	80.6	80.9	81.1	81.3	81.5	81.8	82.1	82.3	82.5	82.7	82.9	83.1	83.3	83.4	83.6	83.8	83.9	84.1	84.3	84.4
Expectation 1	82.4	83.3	83.3	83.4	83.6	83.8	84.0	84.2	84.3	84.5	84.7	84.8	85.0	85.2	85.3	85.5	85.6	85.7	85.9	86.1	86.2	86.3	86.5	86.6	86.8
Expectation 1	80.6	81.6	81.6	81.8	82.0	82.3	82.5	82.7	82.9	83.1	83.3	83.5	83.7	83.9	84.1	84.2	84.4	84.5	84.7	84.9	85.0	85.1	85.3	85.5	85.6
Deaths input																									
In-migration from the UK																									
Male	2,076	1,880	1,898	1,894	1,833	1,926	1,978	1,963	1,968	1,929	1,864	1,854	1,861	1,864	1,881	1,881	1,877	1,888	1,853	1,865	1,862	1,876	1,877	1,893	1,892
Female	2,248	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064	2,064
All	4,324	3,944	3,962	3,958	3,897	3,990	4,042	4,032	4,032	4,032	3,928	3,918	3,925	3,925	3,945	3,945	3,941	3,952	3,917	3,929	3,926	3,940	3,941	3,957	3,956
SMigr: male	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
SMigr: femal	0.2	0.1	0.1	0.1	0.1	0.1	0.2	0.2	0.2	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Migrants input																									
Out-migration to the UK																									
Male	1,567	1,567	1,761	1,646	1,612	1,527	1,478	1,485	1,508	1,532	1,609	1,617	1,624	1,627	1,620	1,647	1,630	1,625	1,666	1,681	1,671	1,665	1,672	1,682	1,671
Female	1,476	1,684	1,676	1,765	1,732	1,617	1,558	1,580	1,603	1,629	1,702	1,712	1,717	1,725	1,719	1,748	1,730	1,725	1,775	1,770	1,773	1,780	1,771	1,780	1,780
All	3,043	3,251	3,437	3,411	3,349	3,144	3,066	3,111	3,161	3,131	3,311	3,329	3,341	3,352	3,339	3,396	3,355	3,350	3,441	3,451	3,444	3,451	3,451	3,451	3,451
SMigr: male	71.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8	81.8
SMigr: femal	84.9	95.4	106.4	101.2	101.1	94.3	90.5	90.8	91.2	92.2	96.0	96.5	96.6	96.9	97.9	97.6	97.3	99.9	99.8	100.5	100.3	100.7	100.4	100.8	100.8
Migrants input																									
In-migration from Overseas																									
Male	82	73	69	69	66	65	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63
Female	63	56	54	53	51	50	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49
All	145	129	123	122	117	115	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SMigr: femal	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Migrants input																									
Out-migration to Overseas																									
Male	48	48	49	49	49	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
Female	37	38	38	38	38	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39	39
All	85	86	87	87	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88
SMigr: male	21.3	21.1	21.2	21.6	21.8	22.0	21.9	21.8	21.7	21.6	21.5	21.6	21.6	21.6	21.6	21.5	21.5	21.5	21.5	21.6	21.6	21.7	21.7	21.8	21.8
SMigr: femal	21.6	21.3	21.4	22.0	22.3	22.6	22.7	22.5	22.4	22.3	22.3	22.3	22.4	22.4	22.4	22.4	22.5	22.5	22.5	22.6	22.7	22.8	22.9	22.9	23.0
Migrants input																									
Migration - Net Flows																									
UK	+1,487	+658	-131	+332	+454	+839	+1,048	+982	+900	+807	+500	+479	+482	+476	+524	+428	+485	+523	+369	+406	+379	+420	+411	+462	+445
Overseas	+60	+43	+37	+35	+30	+27	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24
Summary of population change																									
Natural chan	-78	-184	-196	-196	-196	-195	-198	-200	-201	-209	-221	-239	-259	-281	-301	-319	-341	-362	-384	-404	-423	-445	-461	-477	-490
Net migration	+1,546	+701	-94	+387	+484	+866	+1,072	+1,006	+924	+831	+525	+504	+508	+501	+548	+453	+510	+547	+394	+430	+403	+445	+435	+487	+469
Net change	+1,271	+517	-290	+191	+287	+671	+874	+806	+723	+622	+303	+265	+247	+219	+248	+134	+165	+161	+10	+27	-20	-41	-26	+10	-21
Crude Birth f	8.42	8.54	8.62	8.64	8.60	8.62	8.70	8.75	8.75	8.75	8.75	8.75	8.75	8.75	8.75	8.75	8.75	8.75	8.75	8.75	8.75	8.75	8.75	8.75	8.75
Crude Death	11.22	10.39	10.60	10.61	10.57	10.56	10.60	10.66	10.71	10.78	10.89	11.00	11.12	11.27	11.39	11.51	11.66	11.80	11.97	12.11	12.26	12.43	12.57	12.70	12.83
Crude Net M	15.71	7.06	-0.95	1.69	4.86	8.65	10.63	10.60	9.02	8.06	5.07	4.85	4.86	4.86	5.24	4.32	4.86	5.20	3.74	4.09	3.83	4.23	4.14	4.63	4.46
Summary of Population estimates/forecasts																									
<i>Population at mid-year</i>																									
0-4	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038
5-10	4,573	4,500	4,470	4,446	4,441	4,48																			

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario F: Job Stabilisation

Year beginning July 1st	2014-15	2015-16	2016-17	2017-18	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	
Births																										
Male	424	420	425	432	434	439	442	446	448	449	449	447	446	445	445	445	444	445	446	445	446	446	448	449	451	
Female	404	400	404	411	414	418	421	425	427	428	428	426	425	424	424	424	423	424	424	424	424	425	426	428	430	
All Births	828	820	829	843	848	857	863	870	875	876	877	873	871	869	868	869	868	868	870	870	870	871	874	877	881	
TFR	1.73	1.70	1.75	1.76	1.76	1.76	1.76	1.77	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.79	1.79	1.79	1.79	1.79	1.79	1.79	
Births input																										
Deaths																										
Male	533	495	505	510	510	516	523	531	539	546	556	562	571	582	589	597	606	614	625	633	639	647	654	660	667	
Female	571	529	540	541	542	539	545	550	553	558	564	572	579	588	597	604	613	624	632	640	651	662	670	679	687	
All deaths	1,104	1,023	1,045	1,051	1,052	1,057	1,068	1,081	1,092	1,104	1,119	1,134	1,150	1,169	1,186	1,201	1,219	1,237	1,257	1,273	1,290	1,309	1,324	1,339	1,354	
SMR: males	107.0	97.6	96.6	94.5	91.6	90.0	87.9	85.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.1	71.2	70.2	69.6	68.9	68.1	67.6		
SMR: female	111.6	103.0	103.0	101.4	99.6	96.9	95.5	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1	74.4	
SMR: person	109.3	100.3	99.8	98.0	96.6	93.4	91.6	89.9	88.2	86.6	85.2	83.8	82.4	81.2	79.9	78.6	77.6	76.6	75.7	74.6	73.7	73.1	72.4	71.4	70.9	
Expectation 1	78.7	79.7	79.8	80.1	80.4	80.6	80.9	81.1	81.3	81.6	81.8	82.1	82.3	82.5	82.7	82.9	83.1	83.3	83.4	83.6	83.8	83.9	84.2	84.3	84.4	
Expectation 1	82.4	83.3	83.3	83.4	83.6	83.8	84.0	84.2	84.3	84.5	84.7	84.8	85.0	85.2	85.3	85.5	85.6	85.7	85.9	86.1	86.2	86.3	86.5	86.6	86.8	
Expectation 1	80.6	81.6	81.8	82.0	82.3	82.5	82.7	82.9	83.1	83.3	83.5	83.7	83.9	84.1	84.2	84.4	84.5	84.7	84.9	85.0	85.1	85.3	85.5	85.6	85.8	
Deaths input																										
In-migration from the UK																										
Male	1,744	1,879	1,865	1,888	1,877	1,883	1,896	1,872	1,881	1,885	1,846	1,874	1,890	1,899	1,919	1,902	1,919	1,930	1,896	1,908	1,904	1,918	1,920	1,906	1,905	
Female	1,889	1,928	1,928	1,911	2,011	2,019	1,982	1,948	1,975	1,991	1,991	2,001	2,023	2,055	2,023	2,038	2,053	2,016	2,012	2,028	2,031	2,049	2,046			
All	3,632	3,908	3,874	3,918	3,888	3,894	3,915	3,860	3,873	3,876	3,794	3,849	3,882	3,901	3,942	3,907	3,968	3,898	3,924	3,916	3,946	3,951	3,956	3,964		
SMigr: male	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1		
SMigr: female	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1		
Migrants input																										
Out-migration to the UK																										
Male	1,693	1,567	1,583	1,561	1,568	1,570	1,561	1,576	1,574	1,577	1,617	1,598	1,596	1,592	1,582	1,607	1,588	1,583	1,623	1,618	1,629	1,622	1,629	1,619	1,629	
Female	1,836	1,686	1,687	1,686	1,686	1,663	1,676	1,673	1,671	1,682	1,686	1,687	1,678	1,705	1,695	1,687	1,729	1,724	1,735	1,728	1,734	1,736	1,734			
All	3,529	3,252	3,269	3,238	3,254	3,233	3,246	3,248	3,253	3,259	3,299	3,281	3,279	3,290	3,281	3,294	3,311	3,282	3,370	3,342	3,364	3,349	3,362	3,346	3,363	
SMigr: male	89.3	82.7	83.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	82.4	
SMigr: female	105.6	98.1	98.2	97.2	97.9	97.1	96.0	97.3	96.9	97.0	98.9	97.7	97.1	96.7	96.7	96.8	96.0	95.5	97.7	97.3	97.8	97.3	97.5	96.9	97.1	
Migrants input																										
In-migration from Overseas																										
Male	82	73	69	69	66	65	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	
Female	63	56	54	53	51	50	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	
All	145	129	123	122	117	115	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
SMigr: female	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Migrants input																										
Out-migration to Overseas																										
Male	48	48	49	49	49	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	
Female	37	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	
All	85	86	87	87	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	
SMigr: male	21.3	21.6	21.7	21.8	21.9	22.0	22.0	22.0	22.0	22.1	22.1	22.1	22.1	22.1	21.9	21.8	21.7	21.6	21.6	21.6	21.6	21.6	21.6	21.6	21.5	
SMigr: female	21.6	22.0	22.1	22.3	22.5	22.7	22.8	22.9	22.9	22.9	23.0	23.0	23.0	23.0	22.9	22.8	22.7	22.6	22.6	22.6	22.6	22.6	22.6	22.6	22.6	
Migrants input																										
Migration - Net Flows																										
UK	+154	+656	+605	+680	+633	+661	+709	+608	+626	+623	+465	+560	+601	+622	+682	+595	+690	+698	+547	+582	+552	+597	+589	+640	+620	
Overseas	+60	+43	+37	+35	+24	+27	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	
Summary of population change																										
Natural chan	-276	-203	-216	-207	-203	-199	-205	-211	-217	-228	-242	-261	-280	-300	-317	-332	-352	-369	-387	-403	-419	-437	-450	-462	-473	
Net migration	+163	+699	+641	+715	+663	+688	+733	+633	+650	+648	+489	+584	+625	+646	+706	+620	+684	+723	+571	+606	+576	+621	+613	+664	+645	
Net change	-112	-406	-425	-408	-405	-405	-422	-443	-423	-427	-323	-346	-346	-346	-349	-327	-332	-353	-184	-233	-167	-184	-163	-202	-172	
Crude Birth f	8.48	8.38	8.43	8.54	8.59	8.61	8.64	8.65	8.62	8.60	8.54	8.49	8.45	8.41	8.38	8.35	8.33	8.32	8.30	8.29	8.30	8.31	8.34			
Crude Death	11.30	10.45	10.63	10.63	10.59	10.59	10.65	10.73	10.79	10.86	10.88	11.09	11.21	11.36	11.48	11.59	11.73	11.87	12.02	12.15	12.29	12.45	12.58	12.70	12.81	
Crude Net M	1.67	7.14	6.24	6.68	6.89	7.31	6.28	6.42	6.37	4.80	5.71	6.10	6.28	6.83	6.58	6.58	6.58	6.58	5.46	5.79	5.49	5.91	5.83	6.30	6.10	
Summary of Population estimates/forecasts																										
<i>Population at mid-year</i>																										
0-4	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039
5-10	4,573	4,432	4,463	4,379	4,398	4,440	4,462	4,467	4,462	4,462	4,462	4,462														

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario G: Past Trends Job Growth

	Year beginning July 1st																													
	2014-15	2015-16	2016-17	2017-18	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					
Births																														
Male	424	424	432	444	450	460	467	475	482	487	491	492	495	497	500	503	506	509	512	514	517	520	524	528	532					
Female	404	404	412	423	429	438	445	452	459	463	467	469	471	474	476	478	482	484	488	490	493	496	499	503	507					
All Births	828	828	844	867	879	897	911	927	941	950	958	961	966	971	976	983	987	993	1,000	1,004	1,010	1,016	1,023	1,030	1,039					
TFR	1.73	1.73	1.75	1.78	1.78	1.79	1.77	1.77	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.79	1.79	1.79	1.79	1.79	1.79	1.79					
Births input																														
Deaths																														
Male	533	496	507	513	514	522	528	537	546	555	565	573	583	594	603	612	622	631	644	653	661	670	679	686	695					
Female	571	530	543	545	546	546	552	558	562	568	575	584	592	602	612	621	632	643	662	674	687	697	707	716	726					
All deaths	1,104	1,026	1,050	1,059	1,060	1,068	1,085	1,095	1,108	1,122	1,140	1,157	1,175	1,197	1,215	1,233	1,254	1,275	1,297	1,316	1,335	1,357	1,375	1,393	1,411					
SMR: males	107.0	97.6	96.6	94.5	91.6	90.0	87.9	86.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.9	72.1	71.2	70.6	69.9	69.1	68.1	67.6					
SMR: female	111.6	103.0	103.0	101.4	99.6	96.9	95.5	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1	74.4					
SMR: persor	109.3	100.3	99.8	98.0	95.6	91.6	90.0	88.2	86.6	85.2	83.8	82.4	81.3	79.9	78.6	77.6	76.6	75.7	74.7	73.7	73.1	72.4	71.5	70.9	70.3					
Expectation	78.7	79.7	79.8	80.1	80.4	80.0	80.9	81.1	81.3	81.6	81.8	82.1	82.3	82.5	82.7	82.9	83.4	83.6	83.8	83.8	83.9	84.1	84.3	84.4	84.4					
Expectation	82.4	83.3	83.3	83.4	83.6	83.8	84.0	84.2	84.3	84.5	84.7	84.8	85.0	85.2	85.3	85.5	85.6	85.7	85.9	86.1	86.2	86.3	86.5	86.6	86.8					
Expectation	80.6	81.6	81.6	81.8	82.0	82.3	82.5	82.7	82.9	83.1	83.3	83.5	83.7	83.9	84.1	84.2	84.4	84.5	84.7	84.9	85.0	85.1	85.3	85.5	85.6					
Deaths input																														
In-migration from the UK																														
Male	1,835	1,969	1,905	1,979	1,969	1,976	1,990	1,967	1,976	1,980	1,941	1,970	1,986	1,995	2,015	1,997	2,014	2,025	1,989	1,989	2,000	1,996	2,000	2,009	2,024	2,021				
Female	1,988	2,138	2,050	2,106	2,082	2,082	2,048	2,076	2,082	2,048	2,076	2,082	2,082	2,102	2,124	2,105	2,104	2,138	2,101	2,114	2,109	2,124	2,125	2,142	2,140					
All	3,823	4,095	4,061	4,105	4,078	4,068	4,038	3,989	4,046	4,078	4,096	4,102	4,138	4,138	4,102	4,138	4,102	4,138	4,102	4,138	4,138	4,135	4,165	4,162	4,162					
SMigr: male	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1					
SMigr: femal	0.1	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.1	0.1	0.1	0.1	0.1	0.1					
Migrants input																														
Out-migration to the UK																														
Male	1,601	1,477	1,492	1,470	1,477	1,477	1,467	1,482	1,480	1,481	1,523	1,502	1,500	1,497	1,486	1,512	1,493	1,488	1,530	1,526	1,538	1,531	1,540	1,532	1,542					
Female	1,737	1,588	1,590	1,577	1,587	1,584	1,574	1,573	1,575	1,611	1,591	1,586	1,587	1,577	1,564	1,586	1,631	1,626	1,688	1,631	1,639	1,639	1,642	1,642						
All	3,338	3,065	3,082	3,047	3,064	3,061	3,042	3,058	3,053	3,132	3,093	3,086	3,083	3,064	3,115	3,087	3,075	3,161	3,162	3,176	3,163	3,179	3,179	3,164	3,185					
SMigr: male	84.2	75.6	75.6	74.6	75.6	75.6	74.6	75.6	75.6	74.6	75.6	75.6	74.6	75.6	74.6	75.6	74.6	75.6	74.6	75.6	74.6	75.6	74.6	75.6	74.6					
SMigr: femal	99.9	91.7	91.3	89.6	89.6	88.2	86.6	87.4	86.5	86.1	87.4	85.8	84.8	84.1	82.8	83.4	82.3	81.5	83.2	82.5	82.6	81.9	81.7	80.9	80.8					
Migrants input																														
In-migration from Overseas																														
Male	82	73	69	69	66	65	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63					
Female	63	56	54	53	51	50	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49					
All	145	129	123	122	117	115	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113					
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
SMigr: femal	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
Migrants input																														
Out-migration to Overseas																														
Male	48	48	49	49	49	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50					
Female	37	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36					
All	85	86	87	87	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88					
SMigr: male	21.3	21.5	21.4	21.4	21.3	21.3	21.3	21.1	21.0	20.8	20.7	20.7	20.6	20.4	20.2	20.1	19.9	19.7	19.6	19.5	19.4	19.3	19.2	19.1	19.0					
SMigr: femal	21.6	21.8	21.7	21.8	21.7	21.7	21.7	21.6	21.5	21.4	21.3	21.2	21.1	20.9	20.8	20.6	20.4	20.2	20.1	20.0	19.9	19.8	19.7	19.6	19.5					
Migrants input																														
Migration - Net Flows																														
UK	+484	+1,203	+979	+1,059	+1,014	+1,045	+1,096	+997	+1,015	+1,016	+856	+953	+993	+1,013	+1,075	+987	+1,051	+1,089	+929	+963	+929	+970	+956	+1,001	+977					
Overseas	+60	+43	+37	+35	+20	+27	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24					
Summary of population change																														
Natural chan	-276	-198	-206	-191	-181	-170	-169	-168	-168	-173	-182	-195	-209	-226	-239	-250	-267	-281	-297	-311	-325	-341	-353	-363	-372					
Net migration	+544	+1,073	+1,016	+1,094	+1,044	+1,072	+1,040	+1,040	+880	+977	+1,017	+1,037	+1,099	+1,011	+1,075	+1,113	+953	+987	+953	+996	+980	+1,026	+1,001							
Net change	+268	+875	+810	+903	+863	+902	+871	+872	+692	+799	+844	+842	+890	+810	+856	+863	+656	+676	+628	+653	+628	+653	+629							
Crude Birth f	8.46	8.41	8.50	8.65	8.70	8.80	8.86	8.94	8.96	9.00	9.01	8.98	8.94	8.92	8.91	8.89	8.88	8.88	8.87	8.87	8.87	8.88	8.89	8.92						
Crude Death	11.27	10.42	10.57	10.56	10.49	10.47	10.50	10.56	10.59	10.64	10.72	10.81	10.90	11.02	11.10	11.18	11.29	11.39	11.51	11.61	11.72	11.84	11.94	12.02	12.11					
Crude Net M	5.56	10.90	10.23	10.92	10.33	10.52	10.89	9.84	8.28	8.28	9.13	9.43	9.55	10.10	9.17	9.68	9.95	8.46	8.71	8.68	8.68	8.51	8.65	8.59						
Summary of Population estimates/forecasts																														
<i>Population at mid-year</i>																														
0-4	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039				
5-10	6,026																													

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario Ga: Past Trends Job Growth + PCU

	Year beginning July 1st																													
	2014-15	2015-16	2016-17	2017-18	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					
Births																														
Male	424	424	432	444	450	460	467	475	482	487	491	492	495	497	500	503	506	509	512	514	517	520	524	528	532					
Female	404	404	412	423	429	438	445	452	459	463	467	469	471	474	476	478	482	484	488	490	493	496	499	503	507					
All Births	828	828	844	867	879	897	911	927	941	950	958	961	966	971	976	983	987	993	1,000	1,004	1,010	1,016	1,023	1,030	1,039					
TFR	1.73	1.73	1.75	1.78	1.78	1.78	1.77	1.77	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.79	1.79	1.79	1.79	1.79	1.79	1.79					
Births input																														
Deaths																														
Male	533	496	507	513	514	522	528	537	546	555	565	573	583	594	603	612	622	631	644	653	661	670	679	686	695					
Female	571	530	543	546	546	546	552	558	562	568	575	584	592	602	612	621	632	643	652	662	674	687	697	707	716					
All deaths	1,104	1,026	1,050	1,067	1,060	1,067	1,080	1,095	1,108	1,122	1,140	1,157	1,175	1,197	1,215	1,233	1,254	1,275	1,297	1,316	1,335	1,357	1,375	1,393	1,411					
SMR: males	107.0	97.6	96.6	94.5	91.6	90.0	87.9	86.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.9	72.1	71.2	70.6	69.9	69.1	68.1	67.6					
SMR: female	111.6	103.0	103.0	101.4	99.6	96.9	95.5	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1	74.4					
SMR: persor	109.3	100.3	99.8	98.0	95.6	91.6	90.0	88.2	86.6	85.0	83.8	82.4	81.3	79.9	78.6	77.6	76.6	75.7	74.7	73.7	73.1	72.4	71.5	70.9	70.3					
Expectation 1	78.7	79.7	79.8	80.1	80.4	80.0	80.9	81.1	81.3	81.6	81.8	82.1	82.3	82.5	82.7	82.9	83.1	83.4	83.6	83.8	83.9	84.1	84.3	84.4	84.5					
Expectation 1	82.4	83.3	83.3	83.4	83.6	83.8	84.0	84.2	84.3	84.5	84.7	84.8	85.0	85.2	85.3	85.5	85.6	85.7	85.9	86.1	86.2	86.3	86.5	86.6	86.8					
Expectation 1	80.6	81.6	81.6	81.8	82.0	82.3	82.5	82.7	82.9	83.1	83.3	83.5	83.7	83.9	84.1	84.2	84.4	84.5	84.7	84.9	85.0	85.1	85.3	85.5	85.6					
Deaths input																														
In-migration from the UK																														
Male	1,835	1,969	1,905	1,979	1,969	1,976	1,990	1,967	1,976	1,980	1,941	1,970	1,986	1,995	2,015	1,997	2,014	2,025	1,989	1,989	2,000	1,996	2,000	2,009	2,024	2,021				
Female	1,988	2,138	2,062	2,108	2,092	2,082	2,088	2,098	2,098	2,092	2,048	2,076	2,092	2,102	2,124	2,105	2,124	2,138	2,101	2,114	2,109	2,124	2,125	2,142	2,140					
All	3,823	4,095	4,067	4,105	4,078	4,068	4,078	4,065	4,068	4,073	3,989	4,046	4,078	4,096	4,138	4,102	4,138	4,163	4,098	4,114	4,105	4,135	4,135	4,165	4,162					
SMigr: male	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1					
SMigr: femal	0.1	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.1	0.1	0.1	0.1	0.1	0.1					
Migrants input																														
Out-migration to the UK																														
Male	1,601	1,477	1,492	1,470	1,477	1,477	1,467	1,482	1,480	1,481	1,523	1,502	1,500	1,497	1,486	1,512	1,493	1,488	1,530	1,526	1,538	1,531	1,540	1,532	1,542					
Female	1,737	1,588	1,590	1,577	1,587	1,584	1,576	1,573	1,575	1,611	1,591	1,586	1,587	1,577	1,564	1,586	1,631	1,626	1,638	1,631	1,639	1,639	1,642	1,642						
All	3,338	3,065	3,082	3,047	3,064	3,061	3,012	3,058	3,053	3,097	3,133	3,093	3,085	3,083	3,064	3,115	3,087	3,075	3,161	3,162	3,176	3,163	3,179	3,164	3,185					
SMigr: male	84.2	77.6	77.6	75.6	75.6	75.6	74.6	74.6	74.6	74.6	74.6	74.6	74.6	74.6	74.6	74.6	74.6	74.6	74.6	74.6	74.6	74.6	74.6	74.6	74.6					
SMigr: femal	99.9	91.7	91.3	89.6	89.6	88.2	86.6	87.4	86.5	86.1	87.4	85.8	84.8	84.1	82.8	83.4	82.3	81.5	83.2	82.5	82.6	81.9	81.7	80.9	80.8					
Migrants input																														
In-migration from Overseas																														
Male	82	73	69	69	66	65	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63					
Female	63	56	54	53	51	50	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49					
All	145	129	123	122	117	115	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113					
SMigr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
SMigr: femal	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0					
Migrants input																														
Out-migration to Overseas																														
Male	48	48	49	49	49	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50					
Female	37	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36	36					
All	85	86	87	87	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88					
SMigr: male	21.3	21.5	21.4	21.4	21.3	21.3	21.3	21.1	21.0	20.8	20.7	20.7	20.6	20.4	20.2	20.1	19.9	19.7	19.6	19.5	19.4	19.3	19.2	19.1	19.0					
SMigr: femal	21.6	21.6	21.7	21.6	21.7	21.7	21.7	21.6	21.5	21.4	21.3	21.2	21.1	20.9	20.8	20.6	20.4	20.2	20.1	20.0	19.9	19.8	19.7	19.6	19.5					
Migrants input																														
Migration - Net Flows																														
UK	+484	+1,203	+979	+1,059	+1,014	+1,045	+1,096	+997	+1,015	+1,016	+856	+953	+993	+1,013	+1,075	+987	+1,051	+1,089	+929	+963	+929	+970	+956	+1,001	+977					
Overseas	+60	+33	+37	+35	+30	+27	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24					
Summary of population change																														
Natural chan	-276	-198	-206	-191	-181	-170	-169	-168	-168	-173	-182	-195	-209	-226	-239	-250	-267	-281	-297	-311	-325	-341	-353	-363	-372					
Net migration	+484	+1,073	+1,016	+1,094	+1,044	+1,072	+1,121	+1,040	+1,040	+880	+977	+1,017	+1,037	+1,099	+1,011	+1,075	+1,113	+953	+987	+953	+995	+980	+1,026	+1,001						
Net change	+208	+876	+810	+903	+863	+902	+853	+872	+869	+698	+782	+820	+812	+869	+761	+820	+856	+676	+628	+628	+628	+628	+628	+628						
Crude Birth f	8.46	8.41	8.50	8.65	8.70	8.80	8.86	8.94	8.96	9.00	9.01	8.98	8.94	8.92	8.91	8.89	8.88	8.87	8.87	8.87	8.87	8.87	8.89	8.92						
Crude Death M	11.27	10.42	10.57	10.56	10.49	10.47	10.50	10.56	10.59	10.64	10.72	10.81	10.90	11.02	11.10	11.18	11.29	11.39	11.51	11.61	11.72	11.84	11.94	12.02	12.11					
Crude Net M	5.56	10.90	10.23	10.92	10.33	10.52	10.89	9.84	9.86	8.28	8.13	9.43	9.55	10.10	9.17	9.68	9.95	8.46	8.71	8.68	8.68	8.51	8.65	8.59						
Summary of Population estimates/forecasts																														
<i>Population at mid-year</i>																														
0-4	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039				
5-10																														

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario H: Experian Job Growth

Year beginning July 1st	2014-15	2015-16	2016-17	2017-18	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	
Births																										
Male	424	427	427	432	437	444	449	453	460	463	465	466	469	470	472	472	473	475	478	479	481	483	486	489	492	
Female	404	407	407	412	416	423	428	431	438	441	443	444	447	448	449	450	451	453	455	457	458	460	463	465	469	
All Births	828	833	834	844	853	867	877	884	898	904	909	909	916	918	921	921	924	928	933	936	940	944	949	954	961	
TFR	1.73	1.73	1.73	1.76	1.76	1.76	1.77	1.77	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.78	1.79	1.79	1.79	1.79	1.79	1.79	1.79	
Births input																										
Deaths																										
Male	533	496	508	510	511	519	525	532	542	550	559	567	577	588	596	604	613	622	633	642	649	658	666	672	680	
Female	571	531	541	541	542	542	542	542	547	552	557	562	568	577	586	595	605	612	622	633	642	651	662	674	683	701
All deaths	1,104	1,027	1,047	1,051	1,053	1,069	1,071	1,084	1,098	1,111	1,128	1,144	1,163	1,183	1,200	1,216	1,236	1,255	1,276	1,293	1,311	1,332	1,349	1,365	1,381	
SMR: males	107.0	97.6	96.6	94.5	91.6	90.0	87.8	85.3	84.6	83.0	81.6	80.0	78.7	77.6	76.2	75.0	73.9	72.9	72.1	71.2	70.2	69.6	68.9	68.1	67.6	
SMR: female	111.6	103.0	103.0	101.4	99.6	96.9	95.5	93.8	92.0	90.4	89.0	87.8	86.3	85.2	83.9	82.5	81.5	80.6	79.5	78.4	77.5	76.9	76.0	75.1	74.4	
SMR: person	109.3	100.3	99.8	98.0	95.6	93.4	91.6	90.0	88.2	86.6	85.2	83.8	82.4	81.3	79.9	78.6	77.6	76.6	75.7	74.7	73.7	73.1	72.4	71.4	70.9	
Expectation 1	78.7	79.7	79.8	80.1	80.4	80.6	80.9	81.1	81.3	81.6	81.8	82.1	82.3	82.5	82.7	82.9	83.4	83.6	83.8	84.4	85.6	83.8	83.9	84.1	84.3	84.4
Expectation 1	82.4	83.3	83.3	83.4	83.6	83.8	84.0	84.2	84.3	84.5	84.7	84.8	85.0	85.2	85.3	85.5	85.6	85.7	85.9	86.1	86.2	86.3	86.5	86.6	86.8	
Expectation 1	80.6	81.6	81.6	81.8	82.0	82.3	82.5	82.7	82.9	83.1	83.3	83.5	83.7	83.9	84.1	84.2	84.4	84.5	84.7	84.9	85.0	85.1	85.3	85.5	85.6	
Deaths input																										
In-migration from the UK																										
Male	1,903	1,768	1,814	1,944	1,930	1,936	1,894	1,982	1,933	1,938	1,899	1,983	1,941	1,951	1,916	1,966	1,971	1,982	1,947	1,969	1,965	1,968	1,970	1,985	1,983	
Female	2,061	1,909	1,964	2,068	2,017	2,106	2,047	2,048	2,004	2,091	2,046	2,096	2,019	2,052	2,078	2,092	2,057	2,070	2,086	2,080	2,083	2,100	2,099			
All	3,964	3,677	3,768	4,013	4,007	3,911	4,087	3,979	3,987	3,903	4,074	3,986	4,007	3,935	4,019	4,049	4,074	4,029	4,020	4,058	4,053	4,053	4,085	4,082		
SMiGr: male	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	
SMiGr: female	0.2	0.1	0.1	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.1	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	
Migrants input																										
Out-migration to the UK																										
Male	1,533	1,679	1,634	1,506	1,516	1,517	1,563	1,466	1,523	1,523	1,564	1,489	1,544	1,540	1,585	1,562	1,536	1,531	1,572	1,567	1,579	1,572	1,579	1,571	1,581	
Female	1,663	1,806	1,741	1,619	1,629	1,607	1,621	1,569	1,619	1,620	1,655	1,576	1,632	1,632	1,682	1,640	1,632	1,675	1,670	1,670	1,675	1,681	1,674	1,683		
All	3,197	3,483	3,375	3,125	3,145	3,124	3,209	3,025	3,141	3,143	3,219	3,065	3,176	3,172	3,267	3,199	3,176	3,163	3,247	3,237	3,260	3,247	3,261	3,246	3,264	
SMiGr: male	83.3	85.3	85.3	85.4	85.6	85.6	85.9	86.1	86.3	86.3	86.6	86.8	87.0	87.1	87.3	87.4	87.5	87.6	87.7	87.8	87.9	88.0	88.1	88.2	88.3	
SMiGr: female	95.7	103.7	101.0	93.8	94.2	93.0	94.9	89.5	91.9	91.6	93.2	88.3	90.6	89.9	91.9	89.8	88.9	88.1	90.0	89.4	89.7	89.0	89.0	88.2	88.3	
Migrants input																										
In-migration from Overseas																										
Male	82	73	69	69	66	65	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	
Female	63	56	54	53	51	50	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	
All	145	129	123	122	117	115	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	113	
SMiGr: male	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
SMiGr: female	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Migrants input																										
Out-migration to Overseas																										
Male	48	48	49	49	49	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	
Female	37	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	
All	85	86	87	87	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	88	
SMiGr: male	21.3	21.3	21.6	21.8	21.8	21.8	21.8	21.8	21.6	21.6	21.5	21.5	21.3	21.2	21.1	21.0	20.8	20.7	20.6	20.5	20.5	20.4	20.4	20.3	20.2	
SMiGr: female	21.6	21.7	22.0	22.3	22.3	22.4	22.5	22.5	22.4	22.3	22.2	22.2	22.0	21.9	21.8	21.7	21.6	21.4	21.3	21.2	21.2	21.1	21.1	21.0	21.0	
Migrants input																										
Migration - Net Flows																										
UK	+768	+193	+303	+911	+852	+890	+702	+1,062	+838	+844	+684	+1,009	+810	+835	+667	+819	+873	+911	+756	+732	+760	+801	+792	+840	+818	
Overseas	+60	+43	+30	+47	+35	+30	+27	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	+24	
Summary of population change																										
Natural chan	-276	-194	-213	-207	-200	-193	-195	-200	-200	-208	-219	-234	-247	-265	-279	-294	-311	-326	-343	-357	-371	-388	-400	-411	-420	
Net migration	+827	+236	+429	+646	+682	+697	+678	+1,086	+862	+868	+708	+1,033	+835	+860	+692	+844	+897	+935	+780	+816	+784	+825	+816	+864	+842	
Net change	+552	+43	+216	+439	+482	+504	+483	+886	+662	+660	+490	+801	+593	+525	+418	+550	+566	+609	+438	+469	+413	+437	+416	+453	+422	
Crude Birth f	8.45	8.48	8.47	8.53	8.56	8.64	8.70	8.77	8.76	8.76	8.72	8.72	8.69	8.68	8.64	8.62	8.61	8.62	8.61	8.61	8.62	8.62	8.64	8.66		
Crude Death	11.26	10.45	10.63	10.62	10.56	10.56	10.61	10.66	10.72	10.78	10.88	10.96	11.07	11.20	11.31	11.40	11.53	11.64	11.78	11.89	12.01	12.15	12.26	12.36	12.46	
Crude Net M	8.44	2.40	4.36	5.96	6.85	9.04	7.19	10.68	8.42	8.42	6.83	9.90	7.95	8.14	6.52	7.91	8.37	8.68	7.21	7.51	7.18	7.53	7.42	7.82	7.59	
Summary of Population estimates/forecasts																										
2014	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039
0-4	4,573	4,479	4,382	4,384	4,418	4,487	4,542	4,585																		

Population Estimates and F Staffordshire Moorlands October 2016

Components of Popula Scenario Ha: Experian Job Growth + PCU

Table with columns for 'Year beginning July 1st' from 2014-15 to 2038-39 and rows for Births (Male, Female, All, SMR, SMiGr), Deaths (Male, Female, All, SMR, SMiGr), In-migration from UK, Out-migration to UK, In-migration from Overseas, Out-migration to Overseas, Migration - Net Flows (UK, Overseas), Summary of population change (Natural chan, Net migration, etc.), Summary of Population estimates/forecasts (0-4, 5-10, etc.), Dependency ratios, mean age and sex ratio (0-15/16-65, etc.), Population impact of constraint (Number of cv), Labour Force (Number of L, Change in L), and User Defined (Number of U, Change in U).

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Population Estimates and F Staffordshire Moorlands October 2016

Components of Population Scenario 1: Combined Job Growth

Table with columns for Year beginning July 1st (2014-15 to 2038-39) and rows for Births, Deaths, Migration, and Net Flows. Includes sub-sections like 'In-migration from the UK' and 'Out-migration to Overseas'.

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Appendix 3 Data Tables

Table A.2 Historic and Projected Population growth for Staffordshire Moorlands District

	2008-based SNPP	2010-based SNPP	2011-based (interim) SNPP	2012-based SNPP	2014-based SNPP
2008	95,300				
2009	95,500				
2010	95,700	95,700			
2011	95,900	96,000	97,200		
2012	96,100	96,300	97,500	97,200	
2013	96,300	96,700	97,800	97,300	
2014	96,600	97,000	98,100	97,400	97,800
2015	96,900	97,400	98,500	97,500	97,800
2016	97,100	97,800	98,800	97,700	97,900
2017	97,400	98,200	99,200	97,800	98,000
2018	97,700	98,500	99,500	98,000	98,200
2019	98,100	99,000	99,900	98,200	98,300
2020	98,400	99,400	100,300	98,400	98,500
2021	98,700	99,800	100,600	98,600	98,700
2022	99,100	100,200		98,700	98,900
2023	99,400	100,600		98,900	99,100
2024	99,700	101,000		99,100	99,200
2025	99,900	101,400		99,200	99,400
2026	100,200	101,800		99,300	99,500
2027	100,500	102,100		99,400	99,600
2028	100,700	102,500		99,500	99,700
2029	100,900	102,800		99,600	99,800
2030	101,100	103,100		99,700	99,900
2031	101,300	103,400		99,800	100,000
2032	101,500	103,600		99,800	100,100
2033	101,700	103,900		99,900	100,200
2034		104,100		99,900	100,300
2035		104,400		99,900	100,300
2036				99,900	100,400
2037				100,000	100,400
2038					100,500
2039					100,500

Source: ONS 2008 / 2010 / 2012 / 2014-based SNPP

Table A.3 Net population change by age cohort in Staffordshire Moorlands District 2014-31

	2012-based SNPP	2014-based SNPP
0-4	-500	-400
5-9	-200	-200
10-14	100	100
15-19	-200	-300
20-24	-400	-300
25-29	-500	-300
30-34	-200	-100
35-39	300	300
40-44	-1,100	-1,000
45-49	-2,100	-2,100
50-54	-1,700	-1,800
55-59	-300	-300
60-64	1,000	900
65-69	100	200
70-74	800	900
75-79	1,300	1,400
80-84	2,600	2,500
85-89	1,800	1,600
90+	1,400	1,000
TOTAL	2,400	2,200

Source: ONS 2012 / 2014-based SNPP

Table A.4 Migration in Staffordshire Moorlands District 2005-2015

	Net Internal Migration	Net International Migration
2002	489	-24
2003	247	18
2004	129	-14
2005	478	-28
2006	553	54
2007	453	-1
2008	314	68
2009	209	-21
2010	144	-7
2011	31	60
2012	129	36
2013	432	-29
2014	511	35
2015	411	-10
10 Year Average (to 2015)	319	19
5 Year Average (to 2015)	303	18

Source: ONS Mid-Year Population Estimates

Table A.5 Projected Household Growth for Staffordshire Moorlands District

	2008-based SNHP	2011-based (interim) SNHP	2012-based SNHP	2014-based SNHP
2008	40,000	-	-	-
2009	-	-	-	-
2010	-	-	-	-
2011	-	41,804	-	-
2012	-	42,010	41,967	-
2013	42,000	42,218	42,109	-
2014	-	42,435	42,295	42,335
2015	-	42,655	42,485	42,464
2016	-	42,894	42,706	42,654
2017	-	43,109	42,886	42,816
2018	43,000	43,333	43,070	42,976
2019	-	43,554	43,253	43,148
2020	-	43,773	43,448	43,324
2021	-	44,007	43,651	43,508
2022	-	-	43,831	43,685
2023	44,000	-	44,007	43,848
2024	-	-	44,189	44,022
2025	-	-	44,364	44,191
2026	45,000	-	44,543	44,369
2027	-	-	44,715	44,544
2028	46,000	-	44,865	44,693
2029	-	-	45,007	44,835
2030	-	-	45,152	44,983
2031	-	-	45,277	45,114
2032	-	-	45,379	45,229
2033	47,000	-	45,474	45,331
2034	-	-	45,560	45,420
2035	-	-	45,640	45,504
2036	-	-	45,712	45,582
2037	-	-	45,771	45,645
2038	-	-	-	45,705
2039	-	-	-	45,755

Source: ONS 2008 / 2010 / 2012 / 2014-based SNHP

Table A.6 Change in Headship Rate by Age Cohort

	15-24	25-34	35-44	45-54	55-59	60-64	65-74	75-84	85+
2011	8.2%	39.0%	53.7%	55.5%	57.7%	59.0%	63.8%	76.5%	88.4%
2012	8.3%	38.6%	54.2%	55.7%	57.5%	58.7%	63.3%	76.1%	88.1%
2013	8.3%	38.3%	54.7%	56.0%	57.4%	58.3%	62.7%	75.6%	87.8%
2014	8.4%	37.9%	55.1%	56.3%	57.4%	58.1%	62.4%	75.3%	87.7%
2015	8.4%	37.5%	55.3%	56.6%	57.4%	57.9%	62.0%	75.2%	87.6%
2016	8.5%	37.1%	55.6%	56.8%	57.4%	57.7%	61.7%	75.0%	87.5%
2017	8.6%	36.8%	55.9%	57.1%	57.3%	57.4%	61.3%	74.7%	87.4%
2018	8.6%	36.4%	56.2%	57.3%	57.4%	57.2%	61.0%	74.5%	87.3%
2019	8.7%	36.1%	56.6%	57.7%	57.4%	57.0%	60.6%	74.2%	87.1%
2020	8.7%	35.7%	56.9%	58.0%	57.4%	56.8%	60.3%	74.0%	86.9%
2021	8.8%	35.4%	57.3%	58.4%	57.4%	56.6%	59.9%	73.8%	86.7%
2022	8.9%	35.1%	57.7%	58.7%	57.4%	56.3%	59.6%	73.4%	86.5%
2023	8.9%	34.7%	57.9%	59.0%	57.4%	56.1%	59.2%	73.2%	86.3%
2024	9.0%	34.4%	58.2%	59.4%	57.5%	56.0%	58.9%	73.1%	86.2%
2025	9.1%	34.1%	58.5%	59.7%	57.6%	55.8%	58.7%	72.9%	86.1%
2026	9.1%	33.8%	58.7%	60.0%	57.7%	55.8%	58.5%	72.9%	86.1%
2027	9.2%	33.4%	58.9%	60.3%	57.9%	55.8%	58.4%	73.0%	86.2%
2028	9.3%	33.0%	58.9%	60.5%	58.1%	55.8%	58.3%	73.1%	86.4%
2029	9.3%	32.7%	58.9%	60.7%	58.3%	55.8%	58.3%	73.2%	86.5%
2030	9.4%	32.3%	58.9%	60.9%	58.4%	55.8%	58.3%	73.3%	86.7%
2031	9.4%	31.9%	58.9%	61.1%	58.6%	55.8%	58.2%	73.4%	86.9%
2032	9.5%	31.6%	58.8%	61.2%	58.7%	55.8%	58.1%	73.5%	87.0%
2033	9.5%	31.2%	58.8%	61.4%	58.8%	55.8%	58.0%	73.5%	87.0%
2034	9.6%	30.9%	58.8%	61.5%	59.0%	55.7%	57.8%	73.5%	87.0%
2035	9.6%	30.6%	58.9%	61.7%	59.1%	55.6%	57.7%	73.5%	87.0%
2036	9.7%	30.3%	58.9%	62.0%	59.2%	55.6%	57.5%	73.5%	87.0%
2037	9.7%	30.0%	59.0%	62.2%	59.3%	55.5%	57.4%	73.5%	87.0%
2038	9.8%	29.7%	59.1%	62.4%	59.4%	55.5%	57.2%	73.5%	87.0%
2039	9.8%	29.4%	59.1%	62.5%	59.5%	55.4%	57.1%	73.5%	86.9%

Source: CLG 2014-based SNHP

Table A.7 Median House Prices for Staffordshire Moorlands

	Staffordshire Moorlands	Staffordshire	England
1998	£52,125	£57,350	£66,000
1999	£56,500	£60,000	£74,000
2000	£59,950	£66,000	£82,000
2001	£67,500	£74,950	£92,000
2002	£77,000	£87,000	£114,000
2003	£94,500	£109,000	£132,000
2004	£125,000	£128,000	£151,000
2005	£129,000	£135,000	£159,950
2006	£139,000	£145,000	£168,000
2007	£144,000	£150,000	£178,000
2008	£140,000	£148,000	£173,500
2009	£130,000	£144,000	£170,000
2010	£139,975	£149,995	£185,000
2011	£135,000	£142,500	£180,000
2012	£135,000	£145,000	£183,000
2013	£135,000	£148,000	£188,000
2014	£143,000	£155,000	£198,000
2015	£153,750	£162,000	£212,000

Source: CLG Live Table 586

Table A.8 Ratio of Lower Quartile House Price to Lower Quartile Earnings for Staffordshire Moorlands

	Staffordshire Moorlands	Staffordshire	England
1998	3.04	3.61	3.57
1999	3.31	3.63	3.68
2000	3.42	3.70	3.91
2001	3.41	3.96	4.08
2002	3.63	4.40	4.45
2003	4.30	5.12	5.23
2004	6.60	6.06	6.28
2005	6.14	6.74	6.82
2006	7.03	7.02	7.15
2007	7.76	7.20	7.25
2008	7.27	7.04	6.97
2009	5.66	6.15	6.28
2010	6.37	6.26	6.69
2011	6.17	6.35	6.57
2012	6.09	6.44	6.58
2013	5.91	~	6.66
2014	6.50	~	6.95
2015	7.26	~	7.02

Source: CLG Live Table 576



Nathaniel Lichfield
& Partners
Planning. Design. Economics.

Staffordshire Moorland ELR Update

**Staffordshire Moorlands District
Council**

February 2017

41306/06/MW/CRo/RHt

Nathaniel Lichfield & Partners
3rd Floor
One St James's Square
Manchester M2 6DN

nlplanning.com

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Registered Office:

14 Regent's Wharf

All Saints Street

London N1 9RL

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1.0 Introduction

1.1 Nathaniel Lichfield & Partners [NLP] has been commissioned by Staffordshire Moorlands District Council [SMDC] to prepare an update to the Employment Land Review [ELR] Update that NLP produced as a joint study for SMDC and High Peak Borough Council [HPBC] in July 2014.

1.2 The joint ELR update study formed part of the evidence base to inform High Peak's emerging Local Plan (since adopted) and Staffordshire Moorland's District Core Strategy Review. The update covered the period 2011 to 2031. It provided an update of employment land requirements for both High Peak and Staffordshire Moorlands separately, but did not include an assessment of employment sites as this work was completed by the respective local authorities.

1.3 The key outputs of the study were as follows:

- 1 An update of the economic factors driving the demand for employment land in the local authority areas, including the results of the 2013 Oxford Economics forecasts and also labour supply factors, including the relationship of jobs and economically active population;
- 2 A commentary on the nature of employment typologies in the long-term and its implications for floorspace and land requirements, including the requirements of specific sectors, use classes and types of B-Class and non B-Class employment uses;
- 3 Consideration of the significance of all employment including non B-Class uses on overall employment land requirements and the potential nonlinear relationship between (net) job growth and land/floorspace requirements;
- 4 Forecasting of the likely floorspace and land requirements for the local authority areas based on the above, to guide employment and land provision; and,
- 5 A commentary of the current state of comparative market demands on the districts and immediate vicinity for different types and locations of employment land provision.

1.4 High Peak adopted its Local Plan in April 2016. Staffordshire Moorlands District is working towards producing an updated Local Plan. The Planning Practice Guidance [PPG] requires Local Plans to be based on up-to-date evidence [§158]. Therefore SMDC has instructed NLP to update the 2014 joint ELR study to incorporate more recent data releases; to align with an updated SHMA; and also to reflect the changing economic context post-Brexit. The study recommendations relate to that part of the District that lies outwith the Peak District National Park, which is consistent with the 2014 joint ELR study. The study will cover the period 2014 – 2031/2033, with a base date of 2014 to synchronize with the SHMA start date (which utilises the 2014-based household and population projections).

- 1.5 At the time the 2014 joint ELR update was produced, the economy was in recovery, but now there is uncertainty caused by the EU referendum outcome in June 2016. This update will use post-Brexit projections that were released by Oxford Economics in October 2016 and also a new set of econometric projections produced by Experian in December 2016.
- 1.6 The Council has also commissioned a SHMA update which is currently being prepared, and the results of which will feed into the labour supply projections of this ELR update.

Policy Update

Emerging Staffordshire Moorlands Local Plan

- 1.7 The SM Core Strategy was adopted on the 26th March 2014. Staffordshire Moorlands District Council is seeking to submit its early review of the adopted Local Plan later this year and there is therefore a pressing need to ensure that the housing and employment land evidence upon which it will be based is as up-to-date and robust as possible which is the main purpose of NLP undertaking this update study. An update to the SHMA has also been commissioned and is currently being prepared.
- 1.8 The review will incorporate work underway on the Site Allocations Development Plan Document (DPD) in the form of a single comprehensive Local Plan for the plan period up to 2031. Land for future development to help deliver the objectives set out in the Council's adopted Core Strategy will be identified. Public consultation on site options and development boundaries was held between 6th July and 14th September 2015 with subsequent public consultation on the preferred site options and development boundaries taking place April 28th to 13th July 2016.
- 1.9 The joint SMDC and HPBC ELR study, produced in July 2014, underpins the employment land requirements of the High Peak Local Plan that was adopted in April 2016. In his report the Inspector made several references to the ELR study. The Inspector agreed with and supported the range of employment land requirements suggested in the study, and stated that these had been '*appropriately identified and justified*'.¹ He concluded that '*the overall land provision in the LP [Local Plan] has been justified*'.² The Inspector had no adverse comments on the approach and methodology used by NLP in the joint study; the same approach is applied in this update Study for Staffordshire Moorlands District.

¹ Paragraph 107 of the Planning Inspector's report on the examination into High Peak Local Plan (24 March 2016)

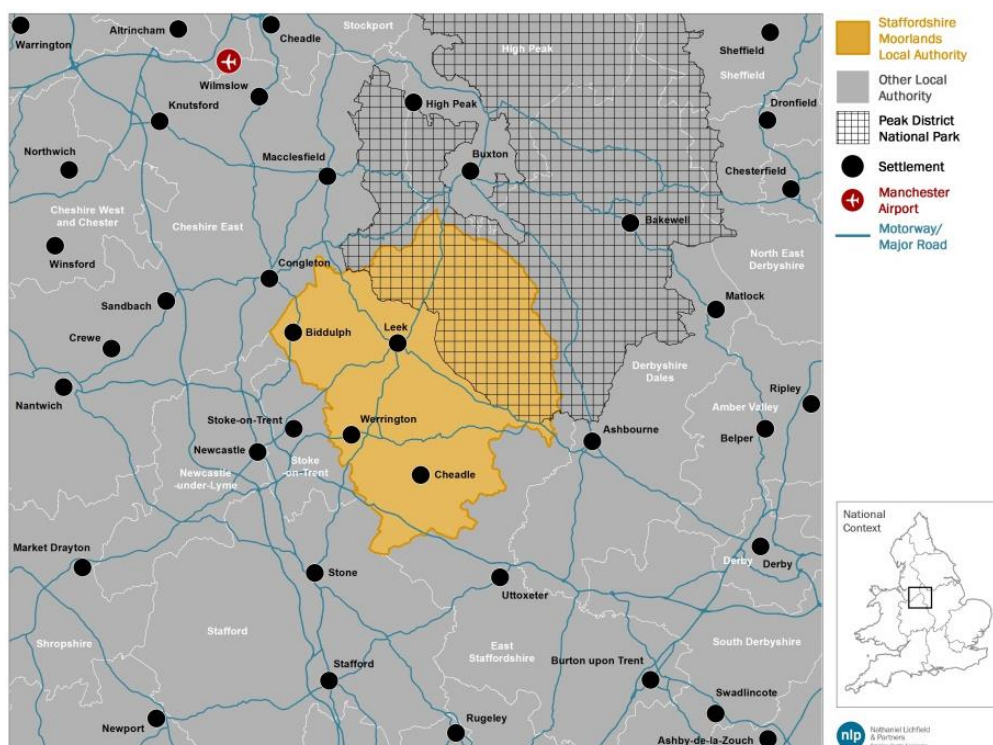
² Ibid, Paragraph 108

2.0 Economic Context

Introduction

2.1 This section provides an update to the economic context in Staffordshire Moorlands District. It summarises recent economic conditions and trends within Staffordshire Moorlands where there have been significant changes since the joint ELR update was produced in 2014.

Figure 2.1 Staffordshire Moorlands Sub-Regional Context



Source: NLP

2.2 Key main changes are summarised below:

- Funding** - Following the 2015 Spending Review, no future rounds of the Regional Growth Fund [RGF] are proposed. This was a national scheme that supported £1m+ projects through investing in capital infrastructure or research and development. RGF money is still available through RGF programmes however. These programmes are run by national or local organisations offering grants and/or loans to eligible businesses. Stoke on Trent and Staffordshire Jobs and Growth Fund will provide gap funding for existing companies that wish to expand or invest to create sustainable jobs, where this investment would otherwise not happen due to lack of available finance. Grant funds can be used for premises expansion, new premises, plant and machinery and infrastructure (i.e. capital expenditure) where this creates substantial new employment or safeguards jobs. The closing date to apply for

funding is February 2017. There are other funding streams available such as Staffordshire Business Funding that is available through the Staffordshire Business Innovation Centre and also the Staffordshire Business Loan Fund, the Staffordshire LEADER Programme and the Low Carbon Business Evolution Programme to name a few.

- JSA Claimants** - Unemployment in Staffordshire Moorlands was estimated at 884 JSA claimants in November 2013, (1.5% of the working age population). This was well below the West Midlands average of 3.6% and the national average at the time. More recent data from May 2016 estimates 340 JSA claimants (0.6%) of the work age population in Staffordshire Moorlands compared to 1.7% in the West Midlands and 1.3% for Great Britain. Staffordshire Moorlands therefore continues to have a much lower JSA claimant rate than the County and British averages.
- DWP out-of-work benefits** – DWP data for May 2013 indicated that 8.2% of Staffordshire Moorlands' working-age population were claiming key out-of-work benefits (comprising job seekers, incapacity benefits, lone parents and other on income related benefits). This was significantly below the West Midlands (12.3%) and British average (11.2%) at the time. The latest data for May 2016 shows a fall across all geographical areas: Staffordshire Moorlands (6.7%), West Midlands (9.7%) and Great Britain (8.7%).
- Business Start Ups** – The latest ONS Business Demography Enterprise Births, Deaths and Survivals data is available for 2014. In 2012 there were 255 business births in Staffordshire Moorlands, increasing to 380 in 2013 but declining slightly in 2014 (to 355). In 2012 there were 285 business deaths, which fell marginally to 265 in 2013 before rising again to 280 in 2014. The latest data therefore highlights an increase in business births from 2012 to 2014, whilst business deaths remain relatively stable over the same period.
- Economic Activity** – In 2012/13 Staffordshire Moorlands District had an estimated 47,800 (77.4%) economically active residents³. In 2015/16 this had increased to 50,200 economically active residents, which equates to an economic activity rate of 84.6%⁴. This is higher than the regional (75.2%) and national (77.9%) averages in 2015/16. The proportion of working age residents with no qualifications in Staffordshire Moorlands totalled 9.2% in 2015, which has fallen since 2011 (11.3%). The latest figure remains above the average for Great Britain (8.6%) but lower than the regional average (13.0%) in 2015⁵.
- Employment Sectors** - Figure 2.2 compares employment across key industrial sectors between 2012 and 2015. Manufacturing remains the main sector with 14.6% of jobs, although this represents a decline from the 16% recorded in 2012. The proportion of jobs in the Education

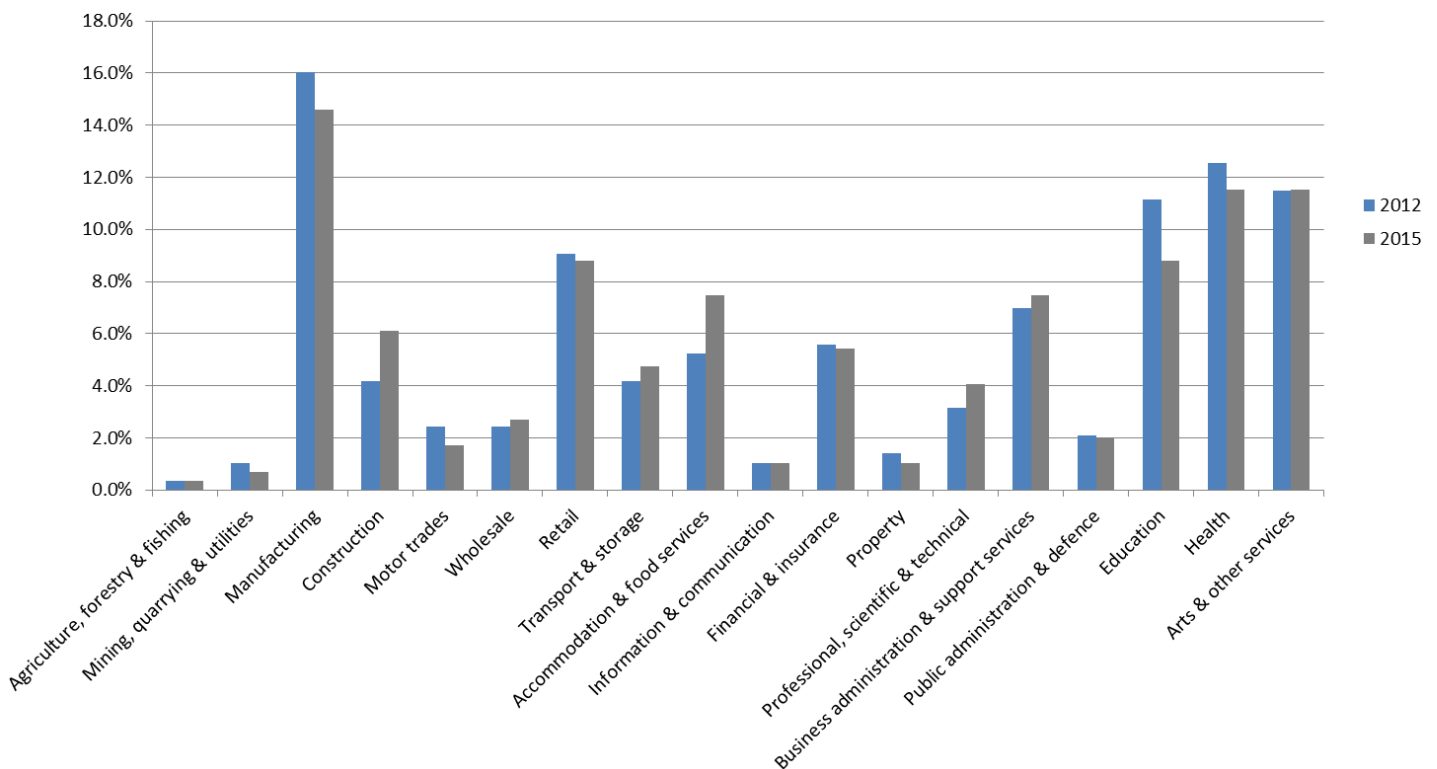
³ ONS Annual Population Survey

⁴ Ibid

⁵ Ibid

sector in the District has fallen from 11.1% in 2012 to 8.8% four years later. The purchase of Leek College by Derby University and its merging to form 'Buxton & Leek College' may account for some of the decline in the education sector as people are now officially employed by organisations outside the district or work jointly across different work-bases. There has been an increase in the absolute number (and also the proportion) of professional, scientific and technical jobs over that time period to compensate, rising from 900 jobs (3.1%) in 2012 to 1,200 (4.1%) in 2015. Whilst this is a relatively small percentage change, the absolute number of jobs has increased by approximately 300. This is still below the regional (6.6%) and national (8.8%) rates for this sector.

Figure 2.2 Employment Jobs by Industry (2012 and 2015)



Source: ONS Business Register and Employment Survey

- Employment Jobs** – Oxford Economics Data (October 2016) provides current and projected employment figures by sector. Table 2.1 compares the number of jobs based in each sector in 2014, 2031 and 2033. The sector providing the most FTE jobs in 2014 was manufacturing, although the sector is forecast to lose almost 1,000 jobs by 2033. In contrast, the construction industry is expected to increase by around 500 FTE jobs over the same time period. It should be noted that over the same time period the latest Experian projections indicate that the District will gain around 1,300 FTEs, with the main difference comprising the growth in B2 manufacturing jobs. This discrepancy is analysed in Section 4.0.

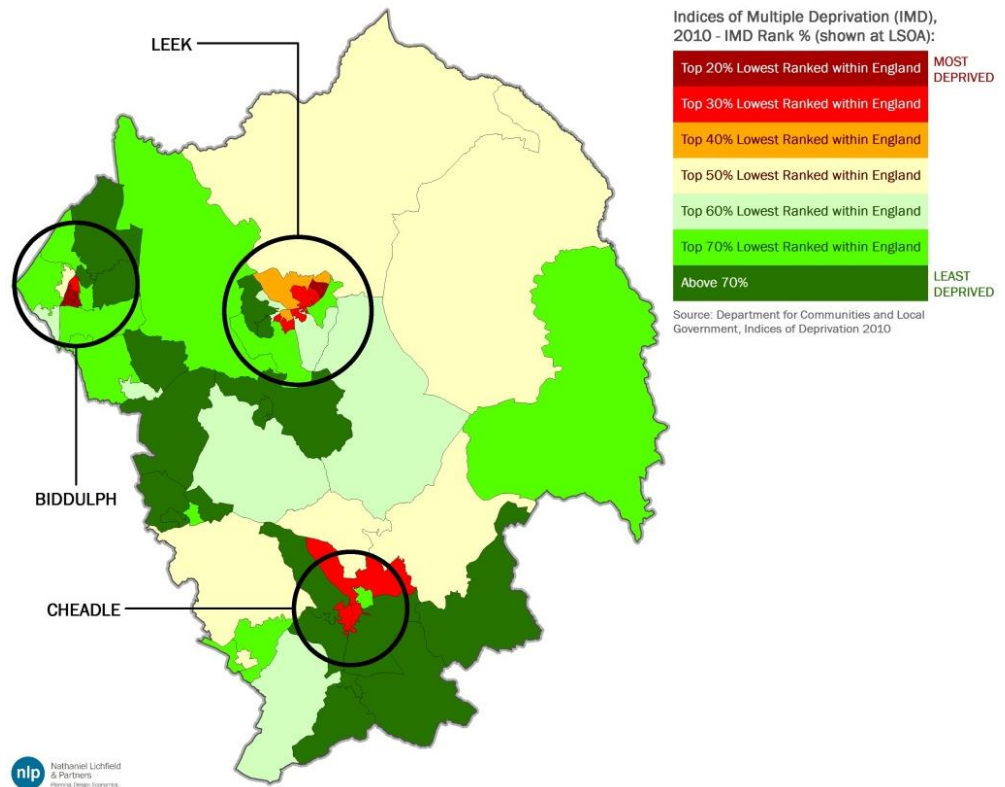
Table 2.1 Comparison of Employment (in thousands) 2011/2031/2033

Employment Sector	2014	2031	2033	Change (2014-2033)
Agriculture, forestry and fishing (A)	1.0	1.2	1.2	0.2
Mining and quarrying (B), Electricity, gas, steam and air conditioning supply (D) and Water supply; sewerage, waste management and remediation activities (E)	0.4	0.4	0.4	0.0
Manufacturing (C)	5.0	4.2	4.1	-0.9
Construction (F)	2.2	2.6	2.7	0.5
Wholesale and retail trade; repair of motor vehicles and motorcycles (G)	3.7	3.4	3.4	-0.3
Transportation and storage (H)	1.0	1.1	1.1	0.1
Accommodation and food service activities (I)	1.3	1.2	1.2	-0.1
Information and communication (J)	0.4	0.5	0.5	0.1
Financial and insurance activities (K)	1.7	1.5	1.5	-0.2
Real estate activities (L)	0.4	0.4	0.4	0.0
Professional, scientific and technical activities (M)	1.2	1.5	1.5	0.3
Administrative and support service activities (N)	2.2	2.7	2.7	0.5
Public administration and defence; compulsory social security (O)	0.6	0.5	0.4	-0.2
Education (P)	2.3	2.2	2.2	-0.1
Human health and social work activities (Q)	3.3	3.1	3.1	-0.2
Arts, entertainment and recreation (R)	4.2	4.4	4.4	0.2
Other service activities (S)	0.7	0.8	0.8	0.1
Total	31.4	31.7	31.6	0.2

Source: Oxford Economics (October 2016)

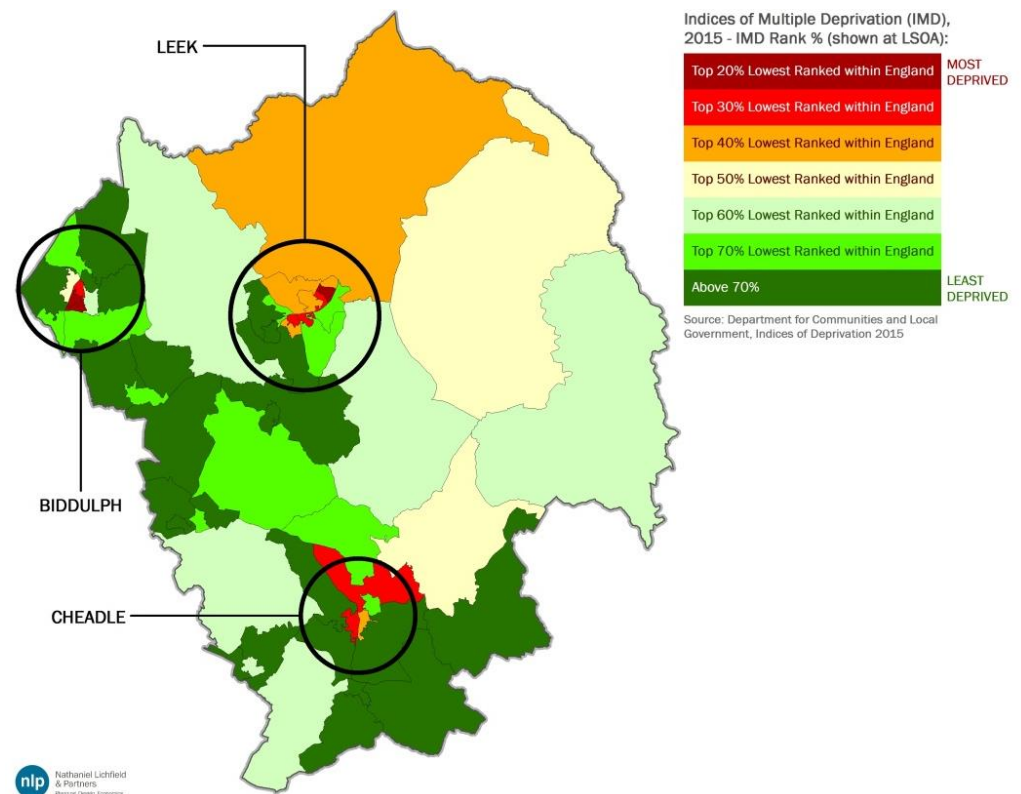
- Deprivation** – Figure 2.3 and Figure 2.4 illustrate levels of deprivation across the District, based on the Index of Multiple Deprivation [IMD] for 2010 and 2015. The figures illustrate that whilst there has been some variation across the District over the intervening five years, with several parts of the District particularly to the north of Leek) experiencing a slight downgrade, many other parts of the District around Cheadle and south of Leek in particular, have seen greater levels of affluence. This mirrors the District-wide picture; based on the IMD 2010 (rank of average rank), Staffordshire Moorlands District was rated the 185th most deprived out of 326 authorities (1 being the most deprived); however the latest IMD 2015 data ranks Staffordshire Moorland at 203rd demonstrating that in relative terms Staffordshire Moorlands has seen an improvement in levels of deprivation.

Figure 2.3 IMD 2010 Staffordshire Moorlands District



Source: CLG/NLP Analysis

Figure 2.4 IMD 2015 Staffordshire Moorlands District



Source: CLG/NLP Analysis

Functional Economic Area

- 2.3 This section provides a broad overview of Staffordshire Moorlands District and its likely relationship within a wider Functional Economic Market Area [FEMA]. The following provides an up-to-date analysis of the extent of the FEMA in accordance with the Practice Guidance and using the latest 2011 Census data on migration and commuting levels. The 2014 ELR concluded that Staffordshire Moorlands District would fall within the wider economic area of Stoke-on-Trent, within which some 76% of the District's economically active residents worked according to the 2011 Census.
- 2.4 The Practice Guidance⁶ provides advice on how a FEMA can be defined. It states that commercial property market geographies should be thought of in terms of market requirements for the location of premises and spatial factors used in analysing demand and supply. The Practice Guidance⁷ goes on to state that since patterns of economic activity vary from place to place, there is no standard approach to defining a FEMA. However FEMAs can be defined by taking account of factors including travel to work areas and housing market areas⁸.
- 2.5 More detailed guidance on how to define a FEMA is provided by CLG. This states that examining commuting flows can help to define the FEMA of an economy⁹. These commuting flows can be assessed using the latest travel-to-work flow data from the 2011 Census.
- 2.6 Analysis of Travel to Work Areas [TTWAs] across the country was carried out by ONS in 2015, based on 2011 commuting patterns (Figure 2.5). From the modelling work undertaken, ONS considered that Staffordshire Moorlands was entirely contained within a larger 'Stoke-on-Trent' TTWA that also takes in other local authorities including Stoke-on-Trent, Newcastle-Under-Lyme, and parts of East Staffordshire and Cheshire East.

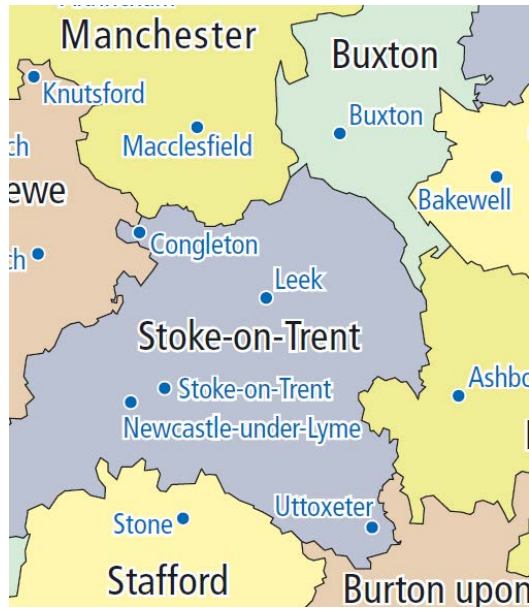
⁶ Practice Guidance Reference 2a-012-20140306

⁷ *Ibid*

⁸ *Ibid*

⁹ CLG (2010) Functional Economic Market Areas: An Economic Note

Figure 2.5 ONS Travel-to-work-area analysis based on 2011 Census commuting data

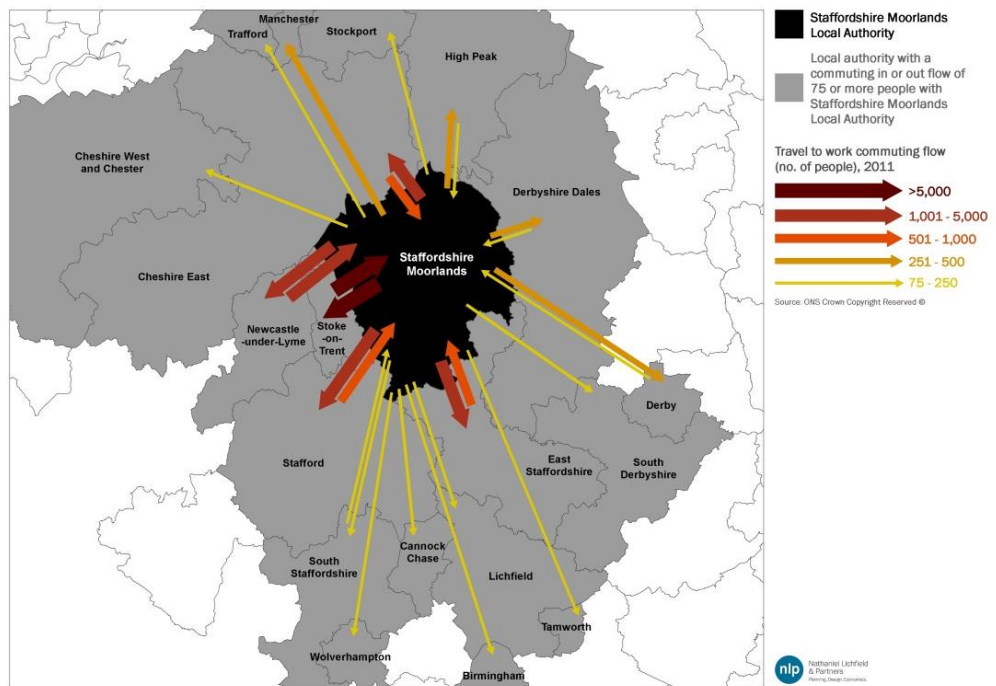


Source: ONS (2015)

2.7

At the time of the 2011 Census, Staffordshire Moorlands was recorded as having an inflow of 10,204 workers commuting into the District on a daily basis against 22,941¹⁰ out-commuters, giving a net total of 12,737 out-commuters. The District has high levels of out-commuting to Stoke-on-Trent, East Staffordshire and Newcastle-under-Lyme.

Figure 2.6 Staffordshire Moorlands District Commuting Patterns



Source: ONS Census 2011

¹⁰ This excludes those commuting out of the District to work overseas

- 2.8 This represents a change from the time of the previous Census, when 22,101 residents commuted out of the District daily, against 8,145 in-commuters, giving a net total of 13,956 out-commuters.
- 2.9 The ONS defines labour market areas as those areas where the bulk of the resident population also work within the same area. Defining labour market areas requires an analysis of commuting patterns to identify Travel to Work Areas [TTWAs] for local economies. A commonly accepted approach to defining TTWAs is that generally around 75% of an area's resident workforce work in the area (the first test) and at least 75% of the people who work in the area also live in the area (the second test). The area must also have a working population of at least 3,500. It is worth noting that to define a Housing Market Area [HMA], a figure of around 70% is generally seen as being the threshold for self-containment in terms of internal movement patterns.
- 2.10 Applying this methodology to the 2011 Census data, it is possible to determine whether Staffordshire Moorlands can be considered a self-contained FEMA. The results of commuting flows are presented in Table 2.2. The table indicates that Staffordshire Moorlands in isolation cannot be said to represent a TTWA and therefore it is unlikely to be a FEMA. It also demonstrates that the combined authorities of Staffordshire Moorlands, Newcastle-under-Lyme and Stoke-on-Trent have an employment market that is self-contained at levels well above those commonly accepted when defining a TTWA.

Table 2.2 Commuting data and FEMA tests

	Live and work in LA	Resident workforce population	Workplace population	Net commuters	FEMA Test #1	FEMA Test #2
Staffordshire Moorlands	47,942	35,248	24,991	-12,694	52.1%	70.9%
Staffordshire Moorlands and Stoke-on-Trent	156,480	150,054	114,382	-6,426	73.1%	76.2%
Staffordshire Moorlands, Newcastle-under-Lyme and Stoke-on-Trent	214,122	199,730	173,821	-14,392	81.2%	87.0%

Source: 2011 Census

- 2.11 The analysis shows that Staffordshire Moorlands District alone has very low commuting self-containment (52.1%) based on the FEMA Test #1. In contrast, the analysis demonstrates that the District forms part of the wider Stoke-on-Trent TTWA (including the administrative areas of Stoke-on-Trent, Newcastle-under-Lyme and Staffordshire Moorlands). The FEMA tests show that the three authority areas have self-containment levels of between 81% (Test 1) and 87% (Test 2).
- 2.12 Housing Market Areas [HMAs] are a further criterion that can be used to help identify a FEMA according to the Practice Guidance¹¹. The Staffordshire Moorlands SHMA¹² states that internal migration within Staffordshire

¹¹ §2a-012-20140306¹² Staffordshire Moorlands SHMA (June 2014)

Moorlands District accounts for 52% of all inward migration and 57% of all outward migration. In contrast, factoring in migration data to and from Stoke on Trent and Newcastle-under-Lyme accounts for 69% of all in migrations and 73% of all out migrations (including long distance moves)¹³. The SHMA considers that on the basis of the PPG definition Staffordshire Moorlands District could not be seen as a self-contained HMA. It concludes that the situation is more complex and parts of the District have much stronger relationships with the adjoining district of Stoke-on-Trent than with other settlements in Staffordshire Moorlands District.

- 2.13 In terms of the implications of this, the Framework is not as prescriptive regarding addressing business needs in full across the FEMA as it is regarding the need to meet housing needs across an HMA. Instead, paragraph 160 requires LPAs to have a *“clear understanding of business needs within the economic markets operating in and across their area”*. To achieve this, they should:
- *“work together with county and neighbouring authorities and with LEPs to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market; and*
 - *work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.”*
- 2.14 This nevertheless raises important considerations for the effective planning of employment space in Staffordshire Moorlands District. The duty to cooperate with neighbouring authorities is especially important given Staffordshire Moorland District’s economic relationship and commuting patterns with neighbouring authorities, namely Stoke-on-Trent and Newcastle-under-Lyme. The District will need to co-operate with neighbouring authorities over the plan period to ensure that the needs of businesses and commuting residents are being effectively met.
- 2.15 Pragmatically, it is also vital that SMDC considers the supply and demand for employment space within its own District boundaries. The Local Plan must ensure that there is sufficient local supply in Staffordshire Moorlands District for its businesses to expand and grow.
- 2.16 Although some of the local authorities have strong commuting and migratory relations with Staffordshire Moorlands District, as part of the consultation exercise undertaken in 2014, none of the LPAs have specifically requested that SMDC should take on some of their employment land shortfall, or vice versa. This position was established through stakeholder consultation in 2014 and whilst NLP has not contacted neighbouring authorities individually as part of this partial update, officers at SMDC have confirmed this is still the position.
- 2.17 In accordance with the Duty to Cooperate, it is recommended that SMDC continue to partake in close discussions with Stoke-on-Trent and Newcastle-

¹³ Ibid

Under-Lyme to ensure that their economic strategies and emerging development plan polices align.

Policy Update

Emerging Staffordshire Moorlands Local Plan

- 2.18 The Core Strategy was adopted on the 26th March 2014. Staffordshire Moorlands District Council is seeking to submit its early review of the adopted Local Plan in 2017 and there is therefore a pressing need to ensure that the housing and employment land evidence upon which it will be based is as up-to-date and robust as possible which is the main purpose of NLP undertaking this update study. An update to the SHMA has also been commissioned and is currently being finalised.
- 2.19 The review will incorporate work underway on the Site Allocations Development Plan Document (DPD) in the form of a single comprehensive Local Plan for the plan period up to 2031. Land for future development to help deliver the objectives set out in the Council's adopted Core Strategy will be identified. Public consultation on site options and development boundaries was held between 6th July and 14th September 2015 with subsequent public consultation on preferred site options and development boundaries taking place between April 28th and 13th July 2016.

3.0 **The Current Stock of Employment Floorspace**

Introduction

3.1 This section provides an update of the current stock of employment space in Staffordshire Moorlands, as well as recent trends in, and changes to, supply. It also provides detail of development planned for future and past losses of land.

3.2 The analysis contained within this section draws upon the following data sources:

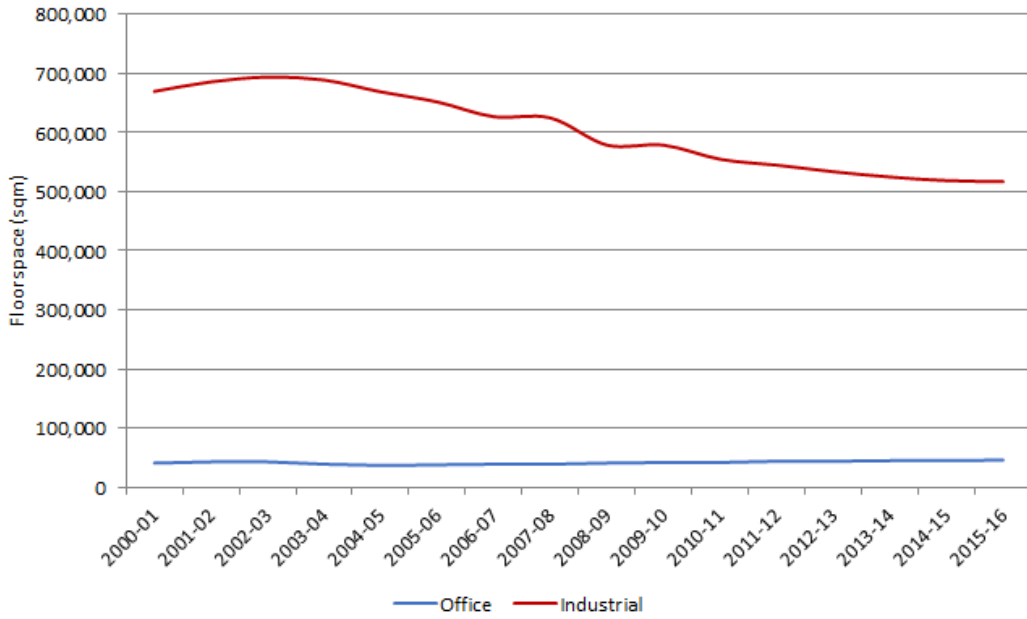
- Commercial floorspace data from the Valuation Office (VOA);
- Staffordshire Moorlands District Council's monitoring data on employment development; and
- Websites of agents active in the local area.

3.3 An assessment of employment sites has also been undertaken separately by the LPA to help inform the study.

Commercial Floorspace

3.4 The most up-to-date information from the VOA provides commercial/value floorspace dates to 2015/16. In 2015/16, Staffordshire Moorlands had over 560,000 sqm of industrial/office floorspace. As illustrated in Figure 3.1, the vast majority of this related to industrial/warehousing floorspace – 517,000 sqm, or 92% of the total. This bias was slightly more pronounced in 2000, with 94% of the total stock comprising industrial and warehousing floorspace. Over this period B2/B8 floorspace has declined by 23% (153,000 sqm), or 10,200 sqm per annum. In contrast, B1 office space has actually increased by 12% (5,000 sqm) over this period.

Figure 3.1 Stock of Floorspace in Staffordshire Moorlands District 2000-2016

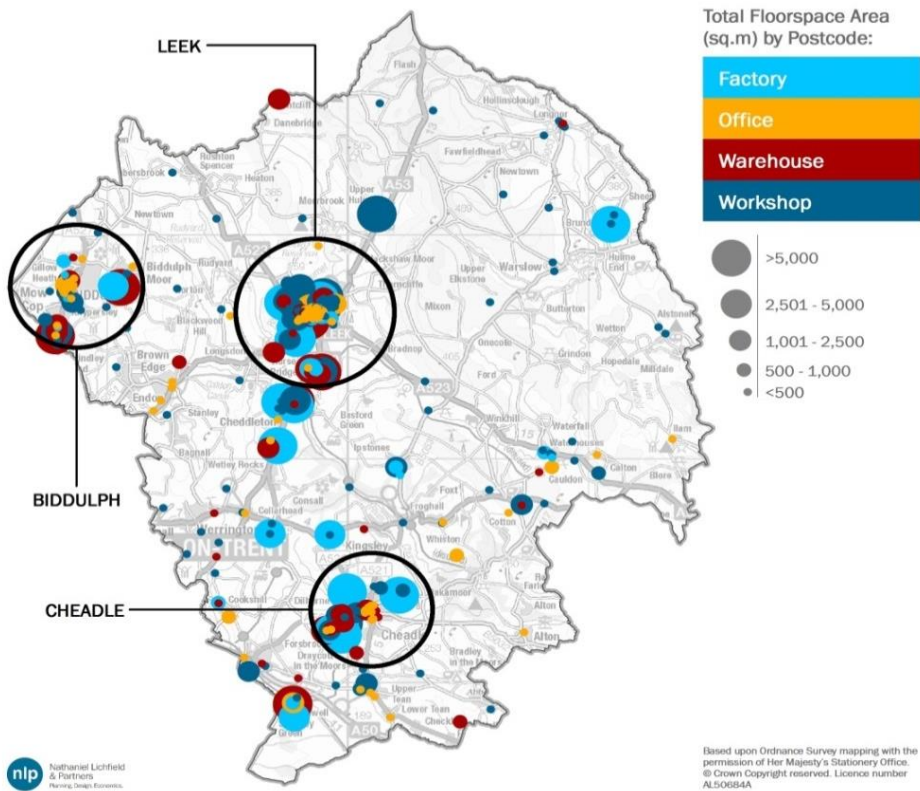


Source: VOA Floorspace Statistics/NLP Analysis
 Note: The term 'Industrial' as used by the VOA in this experimental data includes B1c, B2, B8 and some Sui Generis uses. From the data provided by VOA it is not possible to extract the Sui Generis uses from the overall floorspace figures.

3.5

Figure 3.2 illustrates the spatial distribution of employment space across Staffordshire Moorlands District. The figure shows the size of different types of employment space, based on records held by the Valuation Office Agency.

Figure 3.2 Spatial Distribution of Employment Floorspace

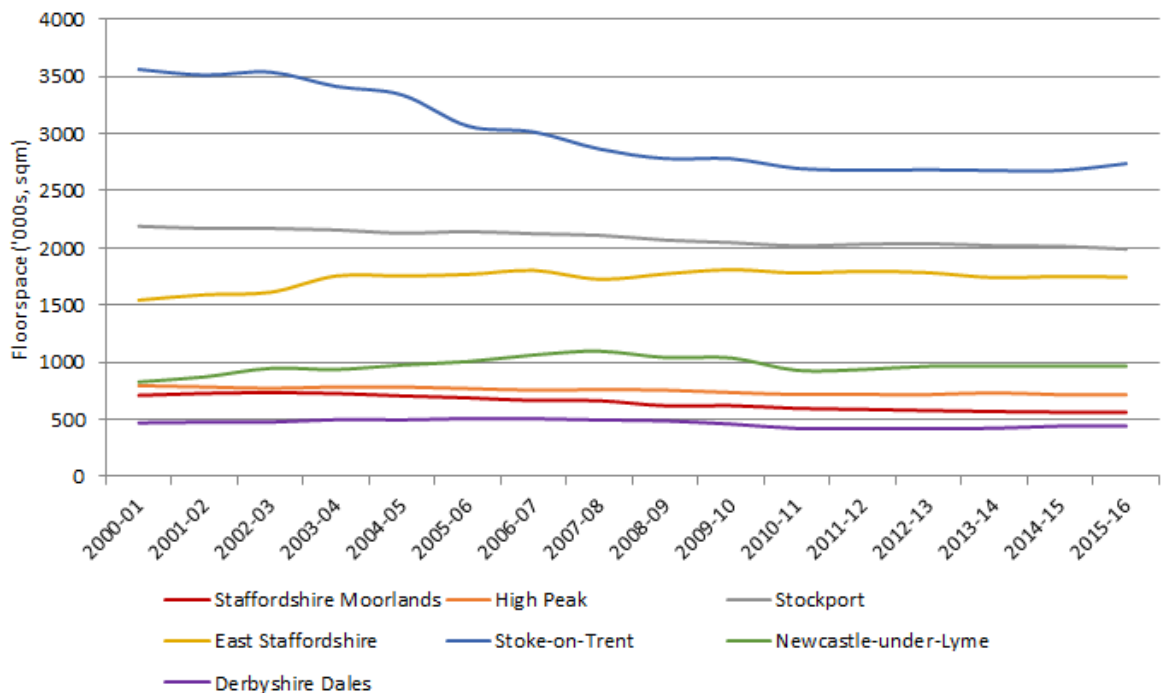


Source: VOA 2016 / NLP

3.6 The distribution of employment space reflects the scale of key settlement centres within the District: Leek has the largest cluster of employment floorspace followed by Cheadle and Biddulph. Figure 3.2 illustrates clearly that businesses are clustered in these settlements and close to the main transport corridors that serve the District. Other smaller pockets of employment floorspace, principally small workshops (<1,000 sqm), are spread along key A-roads such as the A52 which runs east to west and connects the District to Stoke-on-Trent.

3.7 A comparison with employment space levels in nearby districts is presented in Figure 3.3. This suggests that Staffordshire Moorlands District has a higher level of floorspace than the neighbouring rural authority of Derbyshire Dales, but with similar trends exhibited (i.e. rising during the early 2000s, followed by a continuous fall from around 2006 onwards). The surrounding urban areas such as Stockport and Stoke-on-Trent have much higher levels of floorspace, although Stoke in particular has experienced a very significant level of decline over this period.

Figure 3.3 Stock of Floorspace by Comparator Areas, 2000-2016



Source: VOA Business Floorspace Statistics / NLP Analysis

Vacancy Levels

3.8 Across Staffordshire Moorlands District based on an online survey of commercial estates agents¹⁴ there was around 7,840 sqm of industrial floorspace available and being actively marketed in October 2016, equivalent to 1.6% of the total B2/B8 industrial stock (492,085 sqm). This compares to c.6,400 sqm of available industrial floorspace being actively marketed in 2014.

¹⁴ Rightmove and Movehut were analysed in detail to identify vacant industrial and office floorspace. The findings provide a snapshot of vacancy levels from the time of the research undertaken in October 2016.

The latest figures are still lower than might be expected, which suggests that the variety and supply of premises in the District is limited and hence available properties are occupied quickly.

- 3.9 For offices, the available stock was around 1,330 sqm in 2014, equivalent to almost 3% of the total stock¹⁵. This was below the typical normal market level of 8-10%. The latest data suggests that there is around 7,200 sqm of available office stock, equivalent to 14% of the total stock (49,965 sqm), a significant increase. The increased proportion of available office stock can be partly attributed to the inclusion of Cross Street Mill which comprises a series of offices of varying sizes totalling approximately 5,350 sqm.

Development Rates

- 3.10 SMDC officers collate data on the development of employment land for Annual Monitoring purposes. Take-up of floorspace (i.e. completion rates) for employment development has been provided by SMDC offices from 2006 onwards.
- 3.11 As Table 3.1 illustrates, take-up of employment sites in Staffordshire Moorlands District over the period 2007/08 to 2014/15 totalled 10.06 ha, or 1.26 ha per annum.
- 3.12 Although much of the take up in recent years relates to just one year, 2011/12, this is not limited to one development and actually relates to a number of schemes that happened to be recorded in that year including:
- around 1.87 ha for a new Adams Food factory on existing Kerrygold premises;
 - 1.09 ha involved the completed components of a new John Pointons Energy Centre, a major scheme involving extensive new build;
 - 0.31ha related to new building expansion as Esterchem;
 - 0.083ha involved a large extension to Croda Chemicals; and,
 - various other mixed B1/B2/B8 completions under 300 sqm.

¹⁵ Ibid

Table 3.1 Gross Employment Completions in Staffordshire Moorlands District (ha)

Year	B1	B2	B8	Mixed B1, B2, B8	Total B-Class
2007/08	0.22	0	0	0.02	0.24
2008/09	0.64	0	0.21	0	0.85
2009/10	0.02	0.10	0.32	0.52	0.95
2010/11	1.29	0.34	0	0.05	1.67
2011/12	0.16	0.64	0	3.40	4.19
2012/13	0.23	0.04	0.17	1.50	1.95
2013/14	0.02	0.19	0.00	0.00	0.20
2014/15	0.01	0.00	0.00	0.00	0.01
TOTAL	2.59	1.31	0.70	5.49	10.06
Annual Average	0.32	0.16	0.09	0.69	1.26

Source: Staffordshire Moorlands District Council 2016

- 3.13 Forma 1 and 2 of the West Midlands Employment Land Survey were used for 2013/14 data. 'Existing Sites', defined as 'sites still available for development', are not included.
- 3.14 2014/15 uses data provided on 'positive commitments' and does not include the temporary change of use (SMD/2014/0416) in this figure.
- 3.15 The latest take up figures provided by the Council demonstrate there has been limited development in 2013/14 and 2014/15. No data is available for 2015/16 at the time of writing.

Losses of Employment Land

- 3.16 Information provided by SMDC indicates that losses of employment land in the period 2007/08 to 2014/15 have been as follows:

Table 3.2 Losses of Employment Land

Use Class	Losses 2007/08 – 2014/15 (ha)
B1a	0.08
B1b	0.00
B1c	0.24
B2	0.99
B8	0.14
Mixed B1/B2/B8	7.15
TOTAL	8.60

Source: SMDC

- 3.17 The rate of losses in Staffordshire Moorlands totals 8.60ha over that 8 year period at a rate of 1.08 ha per annum. Much of this is attributable to the redevelopment of the Churnet Works site at Macclesfield Road, Leek, for a

Sainsbury's foodstore, B1/B2/B8 industrial units and other retail units in 2012/13. In total, of the 9.514 ha site, 3 ha comprised undeveloped land, 1.45 ha was redeveloped for new employment units, and the remaining 5.06ha is to be redeveloped for A1 retail. Whilst this development is not complete, we understand from SMDC that no further development occurred on this site between 2013 and 2015 and in any case the full extent of losses has been accounted for in the year 2011/12. This has resulted in a large decline in losses for the most recent period.

Anticipated Future Losses

- 3.18 The Council consulted on the latest version of its SHLAA in 2015 as part of its site options and development boundary consultation between 6th July and 14th September 2015.
- 3.19 SMDC Officers confirmed that around 30 ha of employment land in Staffordshire Moorlands may be lost to residential and mixed use development over the period 2011 to 2031. It includes a mixture of allocated sites and existing employment sites and equates to a loss of approximately 1.5 ha per annum over the 20 year period.

Available Employment Land

- 3.20 Data collated by SMDC suggests that there was around 17.13ha of 'available' B-class employment land across Staffordshire Moorlands in July 2014¹⁶. It should be noted that this supply does not include the Regional Investment Site (RIS) at Blythe Bridge. The RIS site was identified in the Preferred Options Sites and Boundaries consultation (2016) as the Northern Gateway Opportunity Site to link it to the emerging Northern Gateway initiative. The site may have a role to play in supporting the project, which aims to maximize the regeneration benefits of HS2 investment in the vicinity of Crewe. The Northern Gateway Development Zone spans north Staffordshire and Cheshire. Although it is a commitment of 50 hectares, it does not count against the Core Strategy requirements, because it is considered to be a strategic provision for North Staffordshire rather than being specific to the Staffordshire Moorlands.

Emerging Supply of Employment Floorspace

- 3.21 An analysis of SMDC's development pipeline also helps us to understand the projected supply of employment space. Information has been provided by the Council detailing applications granted planning permission which have not yet been completed. In Staffordshire Moorlands, the site area of planning permissions for new industrial/commercial development is 0.73 ha that remain extant but have not yet be completed (as of the monitoring year 2014/15).

¹⁶ This figure was provided by SMDC and was considered accurate by the Council at the time of the Joint ELR Study prepared by NLP in July 2014

Summary

3.22

The key findings can be summarised as follows:

- Staffordshire Moorlands District has over 598,000 sqm of B-class floorspace, the vast majority of which relates to industrial floorspace (546,000 sqm), or 91% of the total.
- In Staffordshire Moorlands District, 7,844 sqm (2%) of industrial floorspace and 7,206 (14%) of office floorspace is currently being marketed. Since 2014 the amount of office floorspace being marketed has increased, which is attributable to a number of large units becoming available.
- Take-up of employment sites in Staffordshire Moorlands over the period 2006 to 2014 totalled 10.06 ha, or 1.26 ha per annum, although it should be noted that completions in 2013/14 and 2014/15 have been very low.
- An average of 1.08 ha gross of B class space has been lost annually in Staffordshire Moorlands District since 2007; this is a total of 8.60 ha. Losses have tailed off since the substantial losses associated with the Churnet Works development for a new Sainsbury's foodstore in 2012.

4.0

Future Requirements for B-Class Employment Space

Introduction

4.1

This section considers the future economic growth requirements in Staffordshire Moorlands District by drawing upon several methodologies that reflect the requirements of the Practice Guidance. These scenarios are used to inform the assessment of the District's future employment land needs for office and industrial (i.e. manufacturing and warehousing) for the period 2014 to 2031 and 2014 to 2033.

Methodology

4.2

The Housing and Economic Development Needs Assessment section of the Practice Guidance advises that *“local authorities should develop an idea of future needs based on a range of data which is current and robust.”*¹⁷ In particular, it recommends that Plan-makers consider a variety of forecasting techniques:

- 1 Sectoral employment forecasts and projections (labour demand);
- 2 Demographically-derived assessments of future employment land needs (labour supply);
- 3 Analysis based on the past take-up of employment land and property and/or future property market requirements; and,
- 4 Consultation with relevant organisations, studies of business trends and monitoring of business, employment and economic statistics.

4.3

Within this context, a number of potential future scenarios are considered within this section in order to provide a framework for assessing future B-class employment space requirements in Staffordshire Moorlands District over the 17-year period 2014 to 2031 and 19-year period 2014 to 2033. The quantitative forecasting techniques applied clearly align with items 1-3 outlined above:

- a Baseline employment forecasts (**labour demand**), using Oxford Economics' Local Market Quarterly Forecasts for October 2016; Experian's local area-based projections and a Combined jobs growth scenario;
- b Estimated growth in the local **labour supply** – and the jobs and employment space that this could be expected to support – having regard to analysis presented as part of the District's Strategic Housing Market Assessment [SHMA]; and

¹⁷ 2a-032-20140306

c **Consideration of past take-up of employment space based upon monitoring data provided by SMDC and how these might change in future.**

- 4.4 All of these approaches have their own individual strengths and limitations. In order to be robust, however, the District's economic growth potential (and the likely demand for employment space) needs to be assessed under a variety of future scenarios that reflect alternative growth conditions that could arise over the study period. In reconciling the various scenarios, consideration needs to be given to how appropriate each is to the particular circumstances and aspirations of SMDC.
- 4.5 The ultimate judgement regarding the level of employment need that SMDC should plan for is not, therefore, simply shaped by a consideration of quantitative analysis. Rather, a number of qualitative factors must also be taken into account (as discussed in other sections of this report). These factors, which have been identified through an analysis of economic and market conditions – as well as earlier consultation with economic stakeholders, commercial agents and local businesses – will influence the employment space requirements that need to be planned for and must be considered alongside the modelled scenarios.
- 4.6 It is important to note at the outset that the two forecasting houses appraised in this ELR, namely Oxford Economics [OE] and Experian, both produce credible and robust estimates of job growth at a local area level. However, there are methodological differences between them regarding how the various job projections are derived. This can mean that in certain circumstances and in certain spatial areas, one may produce a more realistic, or appropriate, level of job growth than another. A commentary is provided below of how each forecasting house calculates job growth at a local spatial area.

Growth Scenarios

A. Econometric Job Forecasting

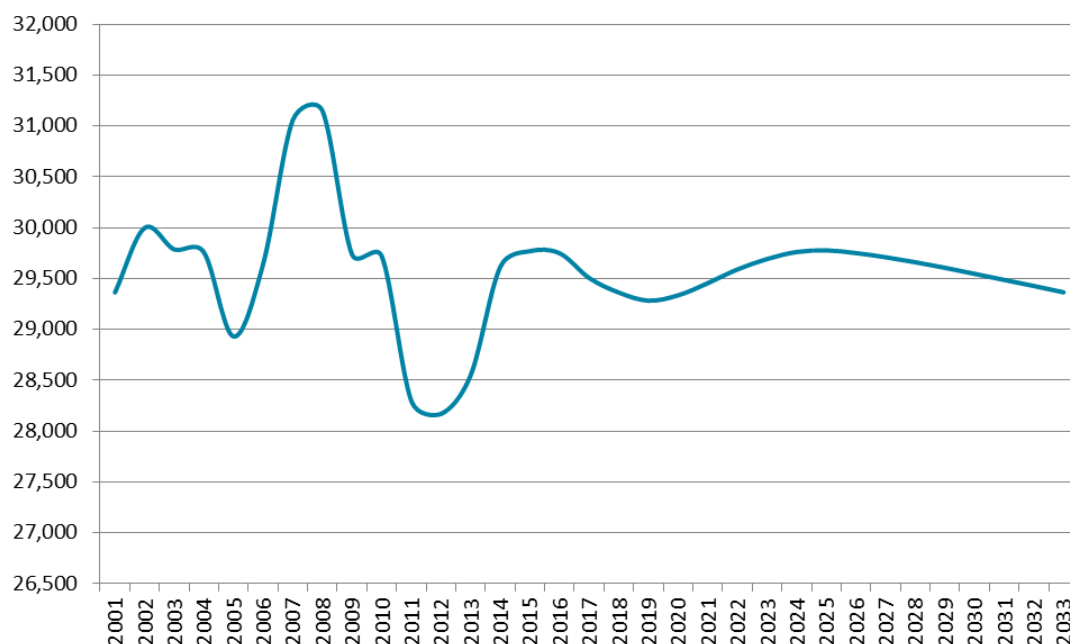
Scenario 1) Oxford Economics Staffordshire Moorlands Economic Forecasts (October 2016)

- 4.7 Oxford Economics [OE] job forecasts were commissioned by Staffordshire Moorlands District Council to underpin this analysis.
- 4.8 It should be emphasised that such forecasts tend to be most reliable at regional and national scales and consequently less so at the local economy level. Nevertheless, they provide a valuable input in respect of understanding future land needs by indicating the broad scale and direction of economic growth in different sectors.
- 4.9 Oxford Economics [OE] forecasts start with national forecasts of demand for labour set out in 19 individual sectors, then move to regional and local

forecasts in turn, constraining each of these to the larger geographical area figures.

- 4.10 Unlike Experian, OE produces its own forecasts of population, which are economically driven. The births and deaths figures are taken from the ONS population projections, but projected migration levels are generated by OE.
- 4.11 As with Experian local forecasts, OE adjusts the proportion of the working age population that is in employment, in order to reflect the level of demand for labour; OE frames this as a combined 'employment rate', rather than separate economic activity and unemployment rates. OE also adjusts migration, based on the view that fewer people would move into an area if the employment rate is falling too fast, i.e. employment prospects are weak.
- 4.12 As with the Experian model, commuting rates are fixed. Therefore, there are three variable elements in the OE model (migration, economic activity rates and unemployment rates), compared to just two in the Experian model (economic activity rates and unemployment rates). In contrast to the approach adopted by Experian, this recognises that migration (and hence, population levels) will change in response to employment growth.
- 4.13 OE's local forecasts are led and constrained by its macroeconomic forecasts and to a lesser extent by the ONS population projections. For further information on the OE methodology, see the OE Local Authority District Forecasting Model Guide in Appendix 2.
- 4.14 Oxford Economics' detailed Local Authority Forecasts take account of the existing economic structures of each Local Authority (broken down by economic sector) and the historical performance observed at the Local Authority level.
- 4.15 Before presenting the job growth outcomes from the scenarios it is worth highlighting, in broad terms, limitations in how these were generated:
- 1 They are predominantly trend-based estimates projecting historic growth patterns into the future;
 - 2 The forecasts do not take into account policy influences and unforeseen impacts of individual business decisions; and,
 - 3 It is important to recognise that there is not always a clear cut relationship between employment change and employment land needs. Additional employment space can be needed even if employment itself is falling, for example if a manufacturing firm requires more space to enable greater automation and achieve job reductions through productivity gains.
- 4.16 For Staffordshire Moorlands District, the October 2016 OE jobs-based employment projections suggest that, following a rapid increase between 2012 and 2014, Staffordshire Moorlands District is likely to experience a decline in employment to 2019, picking up again to 2025 before declining steadily to 2033 (see below).

Figure 4.1 Jobs based (FTE) Employment Change in Staffordshire Moorlands District (Historic and Projected) 2001-2033



Source: Oxford Economics / NLP Analysis

4.17

The OE forecasts project a FTE job growth in Staffordshire Moorlands District of just 288 (net) for the period 2014-2031 as can be seen in Table 4.1. The strongest growth (in absolute terms) is expected in Administrative and Support Service activities (+460 or +20.6%) and Construction (+401 or 17.9%). The greatest (proportionate) increases are anticipated in Arts, entertainment and recreation (+25.4%) and Professional, scientific and technical activities (+26.3%). It is important to note that each category comprises more specific sub-sectors, so for example, much of the job growth in Administrative and support service activities is not in the B-class uses (includes Travel agency, tour operator and security and investigation activities).

Table 4.1 Fastest Growing and Declining FTE Employment Sectors in Staffordshire Moorlands District, 2014-2031 and 2014-2033

OE Sector	Use Class	Employment Change (2011-2031)	% Change (2011-2031)	Employment Change (2011-2033)	% Change (2011-2033)
Professional Services	B Class	+302	26.3%	+315	27.4%
Recreation	Non B Class	+169	25.4%	+160	24.2%
Administrative & Supportive Services	Part B Class	+460	20.6%	+489	21.9%
Information and Communication	B Class	+77	20.2%	+79	20.7%
Agriculture	Non B Class	+225	22.5%	+199	19.9%
Manufacturing	B Class	-833	-16.6%	-952	-19.2%
Public Administration	Part B Class	-99	-18.0%	-106	-19.2%

Source: OE 2016 / NLP Analysis

4.18 Although job growth is projected to be in the order of 0.9% 2014-2031, GVA growth outstrips this, increasing by 25.7% over the same time period (illustrated in Table 4.2).

Table 4.2 Staffordshire Moorlands Oxford Economics Summary

	2011	2014	2021	2026	2031	2033	2014-2031	
							+/-	%
Workforce Jobs (thousands)	34.7	36.7	37.0	37.3	37.0	36.9	+338	0.9
Total FTE Employment (thousands)	29.4	31.4	31.8	32.0	31.7	31.6	+288	0.9
Staffordshire Moorlands GVA (£m 2013)	1,339.4	1,278.0	1,372.2	1,499.5	1,606.4	1,652.2	+328.4	25.7

Source: Oxford Economics October 2016

4.19 The overall employment change in Staffordshire Moorlands District resulting from these forecasts is shown in Table 4.2 and Table 4.3 along with expected employment growth in the main B-class sectors. This includes an allowance for jobs in other non B-class sectors that typically utilise industrial or office space, such as some construction uses, vehicle repair, courier services, road transport and cargo handling and some public administration activities. This is because a certain proportion of these jobs will occupy premises falling within the B-class sectors (see Appendix 1).

4.20 To translate the resultant job forecasts into estimates of potential employment space, it is necessary to allocate the level of employment change forecast for office, industrial, and wholesale / distribution uses as follows:

- The office floorspace requirement is related to job growth / decline in the financial and business service sectors¹⁸;
- The industrial floorspace requirement is related to job growth / decline in the manufacturing sectors¹⁹; and,
- The wholesale / distribution floorspace requirement is related to job growth / decline in the Industrial sectors of wholesale and land transport, storage and postal services.²⁰

4.21 These figures indicate a slight decrease in the level of net FTE job change (-320 jobs) in the B-use classes in Staffordshire Moorlands District over the period to 2031, with B1a/b sectors seeing a cumulative increase of +523 jobs, but neutralised by B8 seeing a cumulative decrease of -92 and large decline in B1c/B2 manufacturing (-751). This is within the context of overall job growth of 288 jobs projected for Staffordshire Moorlands District between 2014 and 2031 (i.e. non B-class sections are forecast to grow by over 600 jobs).

¹⁸ i.e. BRES Sectors 58-75, Office administration and support and 10% of Public Administration and Defence

¹⁹ Manufacturing sectors, plus car repair, some construction and waste and remediation activities

²⁰ Wholesaling less car repairs retail car sales, plus post/couriers and land transport

Table 4.3 Forecast FTE Change in Staffordshire Moorlands District (2014 – 2031/33)

	Staffordshire Moorlands FTE Jobs			Change
	2014	2031	2033	2014-2031
Offices (B1a/b)*	4,549	5,072	5,091	+523
Manufacturing (B1c/B2)**	6,469	5,718	5,594	-751
Distribution (B8)***	1,781	1,689	1,681	-92
Total B-class Jobs	12,799	12,479	12,366	-320
Other Non B-Class Jobs	18,628	19,236	19,199	+608
Jobs in All Sectors	31,427	31,715	31,565	+288

Source: Oxford Economics / NLP Analysis

** includes a proportion of public sector employment and administration & support services

** includes vehicle repair and some construction activities

*** includes elements of transport & communications sectors

4.22 In order to translate the resulting figures into employment land projections, employment densities (based upon the latest 2015 HCA²¹ guidance on employment densities), adjusted to translate FTEs into workforce jobs and plot ratios by use class, were then applied to the employment change.

4.23 It was assumed that:

- 1 One B1a/b general office FTE job requires 14 sqm of employment floorspace [Gross External Area, or GEA];
- 2 One B1c light industrial FTE job requires 60 sqm of employment floorspace [GEA];
- 3 One B2 industrial FTE job requires 38 sqm of employment floorspace [GEA];
- 4 A combined B1c/B2 factor of one FTE job per 49 sqm was obtained by taking an average of the aforementioned B1c/B2 GEA equivalents;
- 5 One warehousing/distribution FTE job requires 70 sq. m. of employment space [GEA]²².

4.24 The HCA Guidance takes account of recent trends in terms of the changing use of employment space, the main change being the more efficient utilisation of office space due to increased flexible working and hot-desking. This has resulted in a decrease in the amount of floorspace per office worker compared to previous guidance.

4.25 An adjustment has been made to reflect the fact that vacancy rates in Staffordshire Moorlands are currently around 14% for office floorspace and around 2% for industrial/warehousing floorspace²³. On the basis that a figure of 10% better reflects 'normal' market conditions, the model has assumed that there is a need for slightly less office floorspace, and more industrial

²¹ HCA (November 2015), Employment Densities Guide, 3rd Edition

²² Given that the majority of B8 warehousing has been low bay warehousing in recent years, the 'small' warehousing jobs ratio of 1 FTE job per 70 sqm has been used from the HCA guidance as agreed with Council Officers at the time of the Joint ELR Study in 2014. We have retained this ratio as we are not aware of anything that is likely to have significantly changes this assumption in the intervening period.

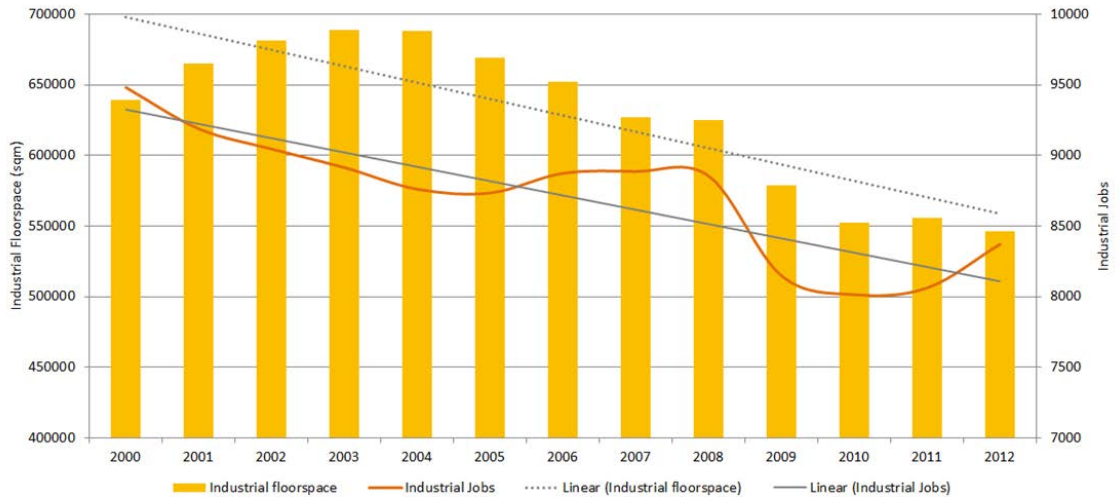
²³ On the basis of an assessment of commercial property websites in October 2016 set against the VOA Business Floorspace statistics.

floorspace, to help bring the market back to something approaching an equilibrium by 2031.

4.26 The relationship between job growth and floorspace is not, however, straightforward. As can be seen in Figure 4.2, whilst the number of industrial jobs in Staffordshire Moorlands declined between 2000 and 2012 (by -12%), the amount of industrial floorspace in occupation declined by -15%. However, this is due to an upsurge in jobs in the last couple of years of this period which has skewed the figures and the general trend over this period has been that jobs have fallen at a faster rate than floorspace. Furthermore, office floorspace has grown at a slower rate than FTE jobs: 111%, compared to 151% which implies an element of landless growth.

4.27 As such, where a reduction in industrial jobs is forecast, the associated negative floorspace was halved, to reflect the fact that not all of this employment space is likely to be lost.

Figure 4.2 Comparison of Historic Industrial FTE Jobs/Floorspace in Staffordshire Moorlands



Source: NLP Analysis/Oxford Economics/Experimental Business Floorspace Statistics 2000-2012 (VOA)

Note: 'linear' refers to a line of best fit of average change

4.28 The resultant floorspace and land estimates are provided in Table 4.4. They indicate a negative net floorspace requirement for B1a/b, B1c/B2 and B8 uses in Staffordshire Moorlands District of -16,112 sqm. This is despite strong B1a/b growth over the 17-year assessment period. In contrast, future B8 floorspace is estimated to be strongly negative, alongside a more modest negative requirement for B2. Applying a standard 40% plot ratio suggests that the net land requirements under this scenario are in the order of -4 ha to 2031 and -4.7 ha to 2033.

Table 4.4 OE FTE Job Growth based Net Employment Floorspace and Land Requirements 2014-2031 and 2014-2033

	Staffordshire Moorlands District Net Floorspace Requirement (sqm)		Staffordshire Moorlands District Net Land Requirement (Ha)	
	2014-2031	2014-2033	2014-2031	2014-2033
Offices (B1a/b)	5,514	5,813	1.38	1.45
Manufacturing (B1c/B2)	-18,408	-21,437	-4.60	-5.36
Distribution (B8)	-3,217	-3,504	-0.80	-0.88
Total	-16,112	-19,128	-4.03	-4.78

Source: Oxford Economics / NLP Analysis

Scenario 2): Experian Job Growth Projections

4.29 The Experian econometric forecasts begin with UK-wide economic variables to create a core macro-economic forecast, indicating the national demand for labour. Regional forecasts of employment change are constrained to conform to these UK-wide employment figures, and local forecasts are constrained to match the regional totals. These forecasts set out the expected levels of growth across 12 broad sectors and 38 categories.

4.30 For its local forecasts, Experian begins with ONS population projections along with its own employment forecasts. It then creates and adjusts its own economic activity and unemployment rates to align with both the population and employment figures. Appendix D to the Experian Data Guide (December 2016) states that “*the participation rate is an endogenous variable in all our models. It is not a fixed assumption.*” Hence, if demand for labour is high (i.e. there are a large number of new jobs), the economic activity rate is assumed to increase and/or unemployment to decrease.

4.31 Commuting rates are fixed for the local forecasts, although if there is deemed to be insufficient demand or supply for labour after the adjustment of economic activity and unemployment rates, the resulting commuting rate may be different. Therefore, Experian’s local forecasts are led and constrained by both the ONS population projections and its own macroeconomic jobs forecasts.

4.32 For further information on the Experian methodology, see the Experian UK Regional Planning Service Data Guide (December 2016) in Appendix 3.

4.33 The Experian forecasts project a FTE job growth in Staffordshire Moorlands District of 1,300 (net) for the period 2014-2031 as can be seen in Table 4.5.

The strongest growth (in absolute terms) is expected in the manufacture of Transport Equipment (+944 or +179%) and Machinery & Equipment (+732 or 50%), with the former also comprising the greatest (proportionate) increase. The largest reductions in employment are projected for the manufacture of Metal Products (-317, or -43%); Wholesale (-214 or -1%) and Agriculture, Forestry and Fishing (-213 or -18%).

Table 4.5 Fastest Growing and Declining FTE Employment Sectors in Staffordshire Moorlands District, 2014-2031 and 2014-2033

Experian Sector	Use Class	Employment Change (2011-2031)	% Change (2011-2031)	Employment Change (2011-2033)	% Change (2011-2033)
Transport Equipment (manufacture of)	B Class	+944	179%	+1,140	216%
Machinery & Equipment (manufacture of)	B Class	+732	50%	+818	56%
Recreation	Non B Class	+310	15%	+395	19%
Finance	B Class	+206	13%	+191	12%
Administration and Support Services	Part B Class	+205	10%	+187	9%
Chemicals (manufacture of)	B Class	-211	-50%	-213	-51%
Non-Metallic Products (manufacture of)	B Class	-211	-50%	-213	-51%
Public Administration & Defence	Part B Class	-212	-34%	-215	-34%
Agriculture, Forestry & Fishing	Non B Class	-213	-18%	-220	-19%
Wholesale	Part B Class	-214	-15%	-224	-15%
Metal Products (manufacture of)	B Class	-317	-43%	-320	-43%

Source: OE 2016 / NLP Analysis

- 4.34 The overall employment change in Staffordshire Moorlands District resulting from these forecasts is shown in Table 4.6 along with expected employment growth in the main B-class sectors. This includes an allowance for jobs in other non B-class sectors that typically utilise industrial or office space, such as some construction uses, vehicle repair, courier services, road transport and cargo handling and some public administration activities. As with the OE commentary above, this is because a certain proportion of these jobs will occupy premises falling within the B-class sectors. We have applied similar assumptions regarding the alignment of sectoral growth with office/industrial and wholesale floorspace requirements.
- 4.35 These figures indicate a healthy increase in the level of net FTE job change (+1,190 FTE jobs) in the B-use classes in Staffordshire Moorlands District over the period to 2031, with B1a/b sectors seeing a cumulative increase of +471 jobs, a slight decrease in B8 employment, and a strong increase in B1c/B2 manufacturing (+761) which is entirely due to the aforementioned growth in the manufacture of transport equipment and machinery & equipment. This is within the context of overall job growth of 1,300 FTE jobs projected for Staffordshire Moorlands District between 2014 and 2031 (i.e. non B-class sections are forecast to grow by 110 FTE jobs).

Table 4.6 Forecast FTE Change in Staffordshire Moorlands District (2014 – 2031/33)

	Staffordshire Moorlands FTE Jobs			Change
	2014	2031	2033	2014-2031
Offices (B1a/b)*	3,690	4,162	4,128	+471
Manufacturing (B1c/B2)**	5,394	6,155	6,417	+761
Distribution (B8)***	1,680	1,638	1,713	-42
Total B-class Jobs	10,764	11,954	12,258	+1,190
Other Non B-Class Jobs	15,036	15,146	15,042	+110
Jobs in All Sectors	25,800	27,100	27,300	+1,300

Source: Experian / NLP Analysis

** includes a proportion of public sector employment and administration & support services

** includes vehicle repair and some construction activities

*** includes elements of transport & communications sectors

4.36 In order to translate the resulting figures into employment land projections, employment densities (based upon the latest 2015 HCA²⁴ guidance on employment densities), adjusted to translate FTEs into workforce jobs and plot ratios by use class, were then applied to the employment change as per the approach applied to the OE projections set out in Scenario 1. We have also made similar allowances for vacancy rate adjustments and halved negative B8 floorspace.

4.37 The resultant floorspace and land estimates are provided in Table 4.7. They indicate a positive net floorspace requirement for B1a/b, B1c/B2 and B8 uses in Staffordshire Moorlands District of 68,574 sqm to 2031. This is due to strong B1a/b and B1c/B2 growth over the 17-year assessment period. In contrast, future B8 floorspace is slightly negative. Applying a standard 40% plot ratio suggests that the net land requirements under this scenario are in the order of +17 ha to 2031 and +22 ha to 2033.

Table 4.7 Experian FTE Job Growth based Net Employment Floorspace and Land Requirements 2014-2031 and 2014-2033

	Staffordshire Moorlands District Net Floorspace Requirement (sqm)		Staffordshire Moorlands District Net Land Requirement (Ha)	
	2014-2031	2014-2033	2014-2031	2014-2033
Offices (B1a/b)	4,657	6,015	1.16	1.50
Manufacturing (B1c/B2)	65,397	69,707	16.35	17.43
Distribution (B8)	-1,481	13,754	-0.37	3.44
Total	68,574	89,476	17.14	22.37

Source: Experian / NLP Analysis

Scenario 3: Combination of Job Growth Forecasts

4.38 As noted above, whilst both forecasting houses produce reliable and robust job growth projections, there can be some variance at a local area level due to the slightly different methodologies employed and increased data volatility at this spatial level. This section explores whether we could attach more or less

²⁴ HCA (November 2015), Employment Densities Guide, 3rd Edition

weight to either of these projections in the context of Staffordshire Moorlands District, and if not, whether it would be appropriate to combine the forecasts to generate a new scenario.

Sectoral Job Growth

4.39 Table 4.8 presents a comparison of the two econometric job projections. Although the three forecasting houses release data broken down across a number of sectors, these have been amalgamated by NLP into 12 broad SIC sectors to enable comparisons to be made. Figure 4.3 demonstrates the overall divergence between the two employment forecasts.

4.40 Whilst both projections indicate growth over the plan period, the magnitude varies considerably between the two projections. For instance, the OE projections suggest a growth of just 288 jobs over the projection period, whilst the Experian projections (starting from a lower base) project a level of growth 4.5-times higher, at 1,300.

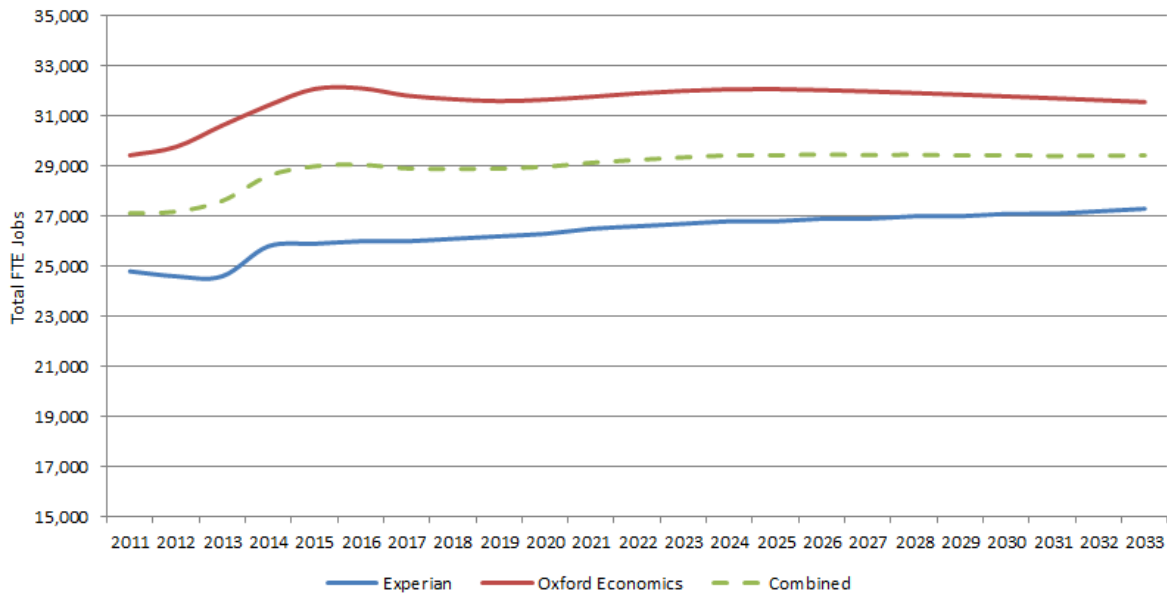
Table 4.8 Comparison of Econometric Models' Workforce Net Job Growth

Sectors	Staffordshire Moorlands District		
	Oxford Economics	Experian	Average
Agriculture, Forestry & Fishing	225	-213	6
Mining and Quarrying	3	0	2
Manufacturing	-833	829	-2
Utilities	-23	-1	-12
Construction	351	102	227
Wholesale and Retail	-292	-324	-308
Transport and Storage	114	103	108
Accommodation, Food Services & Recreation	-80	412	166
Information and Communication	77	0	39
Finance and Insurance	-101	310	105
Professional & Other Private Services	976	307	641
Public Services	-130	-225	-178
TOTAL	288	1,300	794

Source: Oxford Economics October 2016 / Experian December 2016 / NLP analysis

Note: cells highlighted in red are more than 300 jobs higher/lower than the average.

Figure 4.3 Staffordshire Moorlands Total FTE Job Growth by Scenario (2014-2031)



Source: Oxford Economics / Experian / NLP analysis

- 4.41 For the most part, the key sectors that are increasing / decreasing the most for Staffordshire Moorlands are similar; the issue is the scale of change. For instance, Construction, Transport & Storage, and Professional Services are sectors that are forecast to grow across both sets of projections. Conversely, Wholesale & Retail and Public Services are projected to decline by OE and Experian.
- 4.42 The most obvious discrepancy between the 2 projections relates to the Manufacturing sector. Whilst OE projects a net decline of 833 FTE jobs between 2014 and 2031, the Experian projections indicate a net growth of 829 FTE jobs. This is primarily due to the difference projected in just two sub-sectors, specifically the manufacture of Machinery & Equipment, and Transport Equipment. The OE projections suggest a decline of -427 FTE jobs for these two sectors, whilst the Experian projections suggest a growth of 1,676 FTE jobs net.
- 4.43 Historic Business Register and Employment Survey [BRES] data for the period 2009-2015 suggests that employment in Staffordshire Moorlands District has been static in the manufacture of machinery sector (at 1,250 jobs), whilst the number of people employed in the manufacture of transport equipment has declined from 530 to 380 over the same time period.
- 4.44 On the face of it therefore, this would suggest that the OE projections bear a closer resemblance to what has happened in these two sectors in recent years, whilst the Experian projections are indicating a step change in growth across both sectors.
- 4.45 This is not to say, however, that the Experian forecasts are necessarily unsound. As set out above, Experian constrains its local forecasts to match the regional totals, hence sectors where the West Midlands has a particular

competitive advantage and which are likely to grow strongly over the coming years, are also forecast to perform well in Staffordshire Moorlands.

- 4.46 The West Midlands region has a world-renowned automotive, aerospace and rail technologies cluster, as exemplified in the ambitions set out in the 'Midlands Engine' Prospectus²⁵:

“Our manufacturing output will continue to be driven by global companies like Alstom, Bombardier Jaguar Land Rover, JCB and Rolls-Royce. These companies also contribute strongly to the wider transport technology and engineering sectors, and their supply chains extend across the Midlands. This is a significant economic network. Our strong supply chain base will be central to the success of the Midlands Engine.”

- 4.47 Whilst the extent to which Staffordshire Moorlands District can benefit from this region-wide growth in advanced manufacturing in these highly specialised sectors is open to question, there are a number of companies located in the District that could be well placed to support these aspirations. This includes the likes of JCB (with two large factories producing Earthmovers and Compact Products to the north-east of Cheadle) and Belle Engineering (a manufacturer of light equipment, including mini-dumpers and snowploughs for the building and construction markets, based in Sheen).

- 4.48 Hence whilst the Experian projections for these sectors may appear very ambitious, it would be wrong to discount them entirely as they align with region-wide growth opportunities and are founded on the growth of existing long established, successful manufacturing companies based in the District.

- 4.49 Furthermore, changing the base date of the projections from 2014 to 2011 would have a significant impact on the level of job growth for the OE forecasts in particular. OE indicates that over the 20-year period 2011- 2031, FTE job growth would be in the order of 2,278, compared to 2,300 for Experian over the same time period – a very modest difference indeed.

Conclusion on suitability of the two projections

- 4.50 It is important to recognise that there are inevitably uncertainties and limitations associated with modelling assumptions under any of the future labour demand scenarios considered. In particular, depending upon the methodology applied, there may be data anomalies in the source data used to build the forecasts, which then have the potential to become accentuated over time.

- 4.51 Whilst Experian and OE provide overall methodologies setting out their broad assumptions in defining their local area based econometric models, they do not disclose the many detailed assumptions they make concerning the local and regional economy, along with the adjustments made to the raw data in order to calculate such forecasts. Because of this, it is difficult to make robust decisions concerning the comparative weight to attach to each forecast for Staffordshire Moorlands.

²⁵ HM Government (2016): *The Midlands Engine Prospectus*, page 6

- 4.52 From a review of the two datasets, there are no apparent coding errors in the data that would justify any amendments. Although the Experian projections project what may appear to be very ambitious growth in certain advanced manufacturing sectors when compared with the OE forecasts (and past trends), it would be difficult to justify excluding this sectoral growth altogether. This is due to the strong regional prospects for growth in these core LEP sectors and the existence of existing successful companies in Staffordshire Moorlands that specialise in the type of advanced manufacturing that is targeted for growth.
- 4.53 On balance, it is considered that there is merit in taking forward a combination of the two scenarios. It is stressed that taking an average level of growth for individual sectors across the two projections is problematic due to the different methodologies used, and should be treated with caution by SMDC.
- 4.54 With this caveat in mind, taking an average of the net land growth for the OE/Experian scenarios would suggest a requirement for +6.6 ha to 2031 and +8.8 ha to 2033. This is based on a net increase of 435 B-Class FTE jobs (794 FTEs in total) over the period 2014-2031.

Table 4.9 Combined Land Requirements 2014-2031 and 2014-2033

	Staffordshire Moorlands District Net Land Requirement (Ha)	
	2014-2031	2014-2033
Offices (B1a/b)	1.27	1.48
Manufacturing (B1c/B2)	5.88	6.04
Distribution (B8)	-0.59	1.28
Total	6.56	8.79

Source: OE / Experian / NLP Analysis

Scenario 4) Past Trends

- 4.55 The Planning Practice Guidance states:
- Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area.²⁶*
- 4.56 In line with Planning Practice Guidance and using OE 2016 data, past trends in FTE job growth over the periods 2014-2031 (2,609) and 2014-2033 (2,930) were considered. This FTE job growth was broken down by the key B-class use groupings as before (B1a/B1c&B2/B8) and job density ratios applied to each. The past trends scenario suggests growth in office FTE jobs (B1a) but declining FTE jobs in industrial (B1c/B2) and warehousing (B8) land use. Modelling these past trends suggests a need for +15,400 sqm or 3.87 ha to 2031 and +15,366 sqm or 3.84 ha to 2033.

²⁶ 2a-019-20140306

Table 4.10 Past Trends FTE Job Growth based Net Employment Floorspace and Land Requirements 2014-2031/33

	Staffordshire Moorlands District Net Floorspace Requirement (sqm)		Staffordshire Moorlands District Net Land Requirement (Ha)	
	2014-2031	2014-2033	2014-2031	2014-2033
Offices (B1a/b)	11,230	12,344	2.81	3.09
Manufacturing (B1c/B2)	-8,156	-10,020	-2.04	-2.50
Distribution (B8)	12,409	13,042	3.10	3.26
Total	15,482	15,366	3.87	3.84

Source: NLP Analysis

Scenario 5) Job Stabilisation

4.57

For this Scenario, it has been assumed that the District's overall job growth will stabilise over the coming years (i.e. zero job growth post 2014). An adjustment has been made to the B-Class job forecasts on the basis that the latest OE projections suggest a gradual shift away from employment based on traditional B-Class land. Hence to maintain an overall zero net job growth (and based on the trends outlined in Scenario 1), it has been assumed that B-Class job growth will reduce by 433 to 2031, and -545 to 2033, to reflect this shift. All other assumptions mirror those applied for scenarios 1 and 2, with the results set out in Table 4.11.

Table 4.11 Job Stabilisation FTE Job Growth 2014-2031/33

	Staffordshire Moorlands District Net Floorspace Requirement (sqm)		Staffordshire Moorlands District Net Land Requirement (Ha)	
	2014-2031	2014-2033	2014-2031	2014-2033
Offices (B1a/b)	4,804	5,100	1.20	1.28
Manufacturing (B1c/B2)	-19,681	-22,682	-4.92	-5.67
Distribution (B8)	-3,754	-4,038	-0.94	-1.01
Total	-18,632	-21,621	-4.66	-5.41

Source: NLP Analysis

Scenario 6) Past Take Up Rates

4.58

Long term completion rates employment floorspace reflect market demand and actual development patterns on the ground. For many situations, they can provide a reasonable basis for informing future land needs, particularly where land supply or demand has not been unduly constrained historically. However, the future demand picture may not necessarily reflect past trends and some adjustments may be needed.

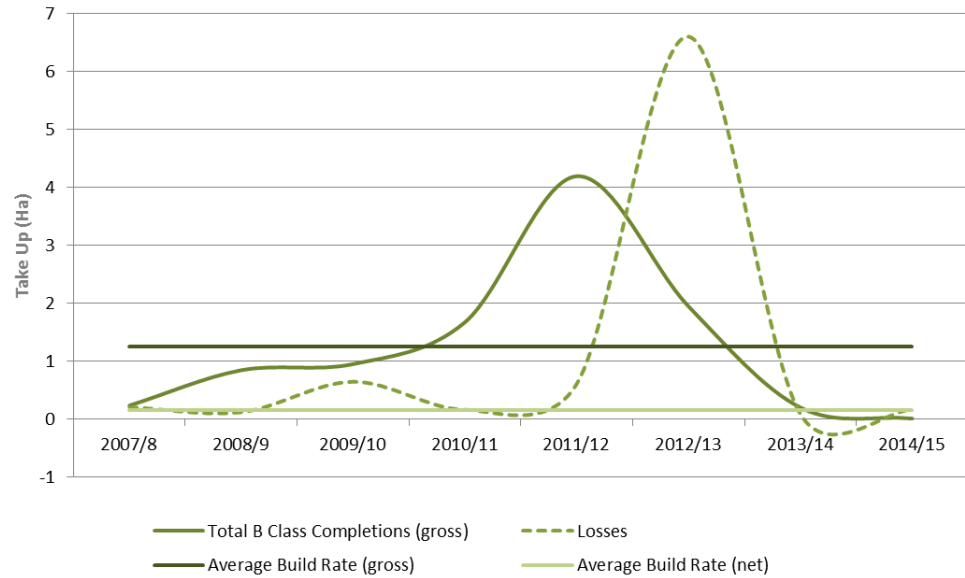
4.59

Data on past completions and losses by B-class sector was provided by SMDC. As Figure 4.4 illustrates, take-up of employment sites in Staffordshire Moorlands District over the period 2007/08 to 2014/15 totalled 10.06 ha, or 1.26 ha per annum.

4.60

Losses totalled 8.6 ha over the same time period (2007/08-2014/15), at a rate of 1.08 ha annually, meaning that more employment land was developed than was lost over the period, resulting in a 0.18 ha net increase in floorspace per annum.

Figure 4.4 Past Take Up of Employment Land in Staffordshire Moorlands



Source: SMDC

4.61

This scenario simply assumes that future development rates of employment space up to 2031 will be similar to those that have occurred in Staffordshire Moorlands District over previous years (the period for which take-up information is available for). However, it should be noted that the information provided by SMDC covers a relatively short period (8 years) which may not reflect longer term trends.

4.62

The calculation of the net employment land figure set out below is therefore considered a relatively pessimistic approach. However, it can be used in this instance due to the detailed information made available by the Council regarding take up and losses of individual sites which allows a direct net comparison to be made.

4.63

This approach produces a gross requirement in Staffordshire Moorlands District for around 1.26 ha per annum gross, or around 0.18 ha per annum net. The latter figure is equal to 3.06 ha over the 17-year period to 2031 or 3.42 ha over the 19-year period to 2033. These floorspace projections are higher than the OE econometric projections (Table 4.4).

Table 4.12 Employment Floorspace and Land Requirements for Staffordshire Moorlands based on Past Trends Continuing, 2014-2031 and 2014-2033

	Staffordshire Moorlands District Net Floorspace Requirement (sqm)		Staffordshire Moorlands District Net Land Requirement (Ha)	
	2014-2031	2014-2033	2014-2031	2014-2033
Offices (B1a/b)	5,363	5,994	1.34	1.50
Manufacturing (B1c/B2)	3,812	4,260	0.95	1.07
Distribution (B8)	3,065	3,425	0.77	0.86
Total	12,240	13,680	3.06	3.42

Source: NLP Analysis

- 4.64 This approach assumes that past trends of development would continue unchanged, which may not fully reflect changes in the economy as it returns to growth. It may also underestimate future demand if the supply was constrained in the past, for example because of few sites becoming available or infrastructure / funding factors.
- 4.65 On the other hand, future development rates for industrial space may be less than has been achieved historically as the sector rationalises and/or makes more efficient use of space.
- 4.66 Clearly the recession and prolonged economic downturn (and the continued uncertainty surrounding Brexit) have had a significant effect on the viability of development schemes and in this regard Staffordshire Moorlands is no different from the majority of other areas outside London and the Greater South East.
- 4.67 Nevertheless, clearly the OE modelling work demonstrates limited (and indeed negative for B2 and B8) prospects for growth for the B-class employment sectors. The practical physical constraints and relative inaccessibility of certain areas suggest that realistically, an upsurge in large developments in the authority area is unlikely for the foreseeable future.
- 4.68 In addition, all of the following suggest that take up rates may not significantly increase in the future:
- 1 The move towards a more Business Services-orientated economy with significantly higher employment densities;
 - 2 The future supply of land in the authority is particularly constrained by topographical and environmental constraints;
 - 3 The restructuring of the traditional manufacturing economy with the potential for 'recycling' of older sites;
 - 4 The Government's measures to facilitate the change of use from B1a office and B8 warehousing (and, from October 2017, B1c light industrial) to residential without the need for planning permission;
 - 5 The long term impacts of the economic downturn and uncertainty surrounding the implications of Brexit;

- 6 The significant reduction in public sector spending available to deliver difficult brownfield sites; and,
- 7 The need to consider alternative uses for existing B-class sites (i.e. for waste and recycling).

4.69 On balance, for Staffordshire Moorlands, it is suggested that the 0.18 ha net annual past take up rate represents a valid figure going forward.

Scenarios 7 & 8) Labour Supply

4.70 It is also important to take into account how many jobs, and hence how much employment space, would be necessary to broadly match forecast growth of the resident workforce in the District. In contrast to the other approaches, this approach focuses on the future supply of labour rather than the demand for labour. This scenario then projects the amount of new jobs needed to match the future working-age population, and how much employment space would be needed to accommodate these jobs.

4.71 At the time of writing, a Strategic Housing Market Assessment [SHMA] Update is being undertaken by NLP on behalf of Staffordshire Moorlands District Council. Using the PopGroup demographic modelling tool and its outputs, two main demographic scenarios have been identified for Staffordshire Moorlands District that result in a need for 170 dpa and 196 dpa.

4.72 To translate this job growth²⁷ into employment floorspace requirements, similar assumptions concerning vacancy rates and employment densities as per the econometric demand side forecasting work were applied to the job projections. The following two scenarios have been modelled:

Scenario 7) Labour Supply (170 dpa)

4.73 This scenario models the 2014-based SNPP and applies the headship rates within the 2014-based SNHP. Under this scenario, workforce jobs are projected to be 35,485 in 2031 (a decline of 1,637 since 2014) and 35,357 in 2033 (a fall of 1,764).

Scenario 8) Labour Supply (196 dpa)

4.74 Under this scenario the 2014 and 2015 mid-year population estimates were included as a population constraint in the requisite years. The population was then rebased going forward applying the fertility, mortality and migration rates from the 2014 SNPP. The workforce jobs are projected to decrease by 1,579 from 2014 to 2031 and by 1,704 from 2014 to 2033.

4.75 The results are presented in Table 4.13. Under these two scenarios, addressing the future employment requirements of local residents would require between –32,770 sqm and -33,234 sqm between 2014 and 2031, and

²⁷ The labour supply scenarios are based on workforce job growth unlike scenarios 1,2,3 which use FTE job growth, hence slightly different job densities have been applied as per the HCA Guidance.

between -37,312 sqm and -36,833 sqm of B-class employment space (net) between 2014 and 2033 in Staffordshire Moorlands District.

Table 4.13 Staffordshire Moorlands District B-Class Net Floorspace Required from Labour Supply Growth Scenarios, 2014-31 and 2014-33

Use	Staffordshire Moorlands District			
	Scenario 7) 170 dpa		Scenario 8) 196 dpa	
	2014-2031	2014-2033	2014-2031	2014-2033
Offices (B1a/b)	1,407	1,421	1,535	1,555
Industrial (B1c/B2)	-27,739	-31,318	-27,503	-31,077
Warehousing (B8)	-6,902	-7,416	-6,802	-7,311
Total	-33,234	-37,312	-32,770	-36,833

Source: NLP

Table 4.14 Staffordshire Moorlands District B-Class Land Required from Labour Supply Growth Scenarios, 2014-31 and 2014-33

Use	Staffordshire Moorlands District			
	Scenario 7) 170 dpa		Scenario 8) 196 dpa	
	2014-2031	2014-2033	2014-2031	2014-2033
Offices (B1a/b)	0.35	0.36	0.38	0.39
Industrial (B1c/B2)	-6.93	-7.83	-6.88	-7.77
Warehousing (B8)	-1.73	-1.85	-1.70	-1.83
Total	-8.31	-9.33	-8.19	-9.31

Source: NLP

Convert Net to Gross Floorspace Requirements

4.76 To convert the net requirement for employment space into a gross requirement (the amount of employment space or land to be allocated), an allowance is also typically made for some replacement of losses of existing employment space that may be developed for other, non B-Class uses in future. This is a widely accepted approach in planning for future employment land needs.

4.77 A judgement was therefore made on the suitability and degree of the allowance for future losses which it would be appropriate to apply here based on the consultants' understanding of supply-side deliverability factors in Staffordshire Moorlands District and current trends in the market. Not all losses need necessarily to be replaced as some will reflect restructuring in the local economy as less space may be needed in some sectors in future. However, some replacement is needed to refresh the quality of the stock and to avoid the employment land supply continually declining.

4.78 There is an argument that not all such losses of employment land should necessarily be replaced or reflected in an increased gross land requirement. This would be on the basis that the stock of employment land in Staffordshire Moorlands District contains some older sites less likely to meet future needs

and is of a scale that reflects past industrial patterns, rather than the amounts of land needed in future.

- 4.79 However, against this argument is the likelihood that other sites may also be lost by 2031, and these will represent losses to the overall land portfolio, reducing choice within the market. For instance, the District's Strategic Housing Land Availability Assessment [SHLAA] (dated 2015) provides an indication of how many sites presently used for employment purposes may be suitable for housing suitability over the period (to 2031). Based on the SHLAA, SMDC advised that around 30 ha of employment land in Staffordshire Moorlands may be lost to residential and mixed use development over the period 2011 to 2031 or 1.5 ha annually.
- 4.80 Extant planning permissions relating to the loss of B-Class employment land to alternative, usually higher value uses such as residential or retail can also lead to future losses. In Staffordshire Moorlands over the past 2 years, extant planning permissions account for around 1 ha of land that could be lost from the employment land portfolio if/when the planning permission is implemented in addition to the 0.26 ha that have already been lost during this time.
- 4.81 Whilst it is possible that not all of these identified developed and previously developed sites will be lost to residential purposes, it is worth considering given the recent introduction of Permitted Development Rights permitting streamlined 'office-to-residential' conversion, especially given that commercial agents have pointed this out as being an issue (alongside the suggestion that a considerable amount of the existing employment land stock in Staffordshire Moorlands District is no longer fit for purpose and needs replenishing with better quality units more suited to meeting modern operator requirements)²⁸.
- 4.82 Balancing these considerations, it is suggested that a replacement factor of 1.08 ha per annum for Staffordshire Moorlands provides a reasonable basis to go forward. It is accepted that the 1.5 ha loss replacement was factored into the previous ELR's analysis; however more recent data suggests that the level of losses has continued to tail off over the past 2 years and as such a slightly lower rate of replacement is considered appropriate in this instance.
- 4.83 This nevertheless indicates that our loss replacement figure may be on the conservative side and it should therefore be monitored by the authority over the next few years and adjusted as necessary to ensure that it is approximate to future losses.
- 4.84 An alternative approach to calculating gross land requirements with a margin of choice is to apply a rate of 'churn' equivalent to 1% of Staffordshire Moorlands District's existing stock per annum (see other local employment land studies e.g. Lichfield District, Nuneaton and Bedworth). For Staffordshire Moorlands, this could roughly equate to demand for around 1.35 ha per annum (based upon 1% of 540,817 sq. m. of existing floorspace in the District and multiplied

²⁸ Commercial Agents were engaged at the time of the Joint ELR Study in 2014 which is when these views were expressed.

by 40% plot ratio), a figure that is just slightly above the 1.08 ha allowance for losses identified above, which suggests the figure taken forward is reasonable.

Safety Margin

- 4.85 To estimate the overall requirement of employment space that should be planned for in allocating sites, and to allow some flexibility of provision, it is normal to add an allowance as a safety margin for factors such as delays in some sites coming forward for development. This margin is a contingency factor, providing a modest additional land buffer so that supply is not too tightly matched to estimated demand, and so that shortages of land do not arise if future demand turns out to be greater than the forecasts. Such flexibility is sensible given the uncertainties in the forecasting process and the scope for delays in developing employment space.²⁹
- 4.86 The South East England Planning Partnership Board (SEEPB)³⁰ guidance on employment land assessments recommends an allowance that is equivalent to the average time for a site to gain planning permission and be developed, typically about two years. For Staffordshire Moorlands District, on the basis of the gross take up analysis set out in the Past Take Up Scenario, the following safety margins were added for B-class uses:

Table 4.15 Staffordshire Moorlands Safety Margin Allowances

All B-Class Uses	Gross Average Annual Take-up (ha)	2-year Safety Margin Added 2014-2031
Staffordshire Moorlands	1.26	2.52

Source: NLP Analysis

- 4.87 The model steps are summarised in Figure 4.5. The same steps described above to convert the net employment projections from net to gross (with a 2 year margin of choice) have been applied to the net historic take up figures described above for consistency.

²⁹ This safety margin is separate from the consideration of vacancy rate which is dealt with in §7.20.

³⁰ SEEPB Economic and Employment Land Assessments Supplementary Guidance Consultation Document, 2009. Although the SEEPB no longer exists and the formal status of this guidance is not established, it is considered to be a source of good practice.

Figure 4.5 Staged Approach to Employment Land Requirements (2014-2031)



4.88 In summary, the demand-led range of indicative total gross land requirements to 2031, factoring in a 2-year margin of choice, results in the following demand projections for Staffordshire Moorlands:

- Econometric demand led projections: 16.3 – 38.1 ha
- Past Take Up: 24.0 ha
- Labour Supply Projections: 12.6 – 12.7 ha

4.89 An extension of the modelling period by two years to 2033, factoring in a 2-year margin of choice, increases the land requirement for each scenario as follows:

- Econometric demand led projections: 17.7 – 45.5 ha
- Past Take Up: 26.5 ha
- Labour Supply Projections: 13.8 – 13.9 ha

Table 4.16 Staffordshire Moorlands Gross Employment Land Comparisons 2014-31 and 2014-33

		B1a/b	B1c/B2	B8	TOTAL
1) OE Baseline	2014-2031 (net)	1.38	-4.60	-0.80	-4.03
	2014-2031 (gross)				14.37
	+ Flexibility factor				16.89
2) Past Trends	2014-2031 (net)	2.81	-2.04	3.10	3.87
	2014-2031 (gross)				22.26
	+ Flexibility factor				24.79
3) Experian	2014-2031 (net)	1.16	16.35	-0.37	17.14
	2014-2031 (gross)				35.53
	+ Flexibility factor				38.06
4) Combination Job Growth	2014-2031 (net)	1.27	5.88	-0.59	6.58
	2014-2031 (gross)				24.95
	+ Flexibility factor				27.47
5) Job Stabilisation	2014-2031 (net)	1.20	-4.92	-0.94	-4.66
	2014-2031 (gross)				13.74
	+ Flexibility factor				16.26
6) Past Take Up Rates	2014-2031 (net)	1.34	0.95	0.77	3.06
	2014-2031 (gross)				21.45
	+ Flexibility factor				23.98
7) Labour Supply (170 dpa)	2014-2031 (net)	0.35	-6.93	-1.73	-8.31
	2014-2031 (gross)				10.09
	+ Flexibility factor				12.61
8) Labour Supply (196 dpa)	2014-2031 (net)	0.38	-6.88	-1.70	-8.19
	2014-2031 (gross)				10.20
	+ Flexibility factor				12.73
2014-2033					
1) OE Baseline	2014-2033 (net)	1.45	-5.36	-0.88	-4.78
	2014-2033 (gross)				15.78
	+ Flexibility factor				18.30
2) Past Trends	2014-2033 (net)	3.09	-2.50	3.26	3.84
	2014-2033 (gross)				24.40
	+ Flexibility factor				26.92
3) Experian	2014-2033 (net)	1.50	17.43	3.44	22.37
	2014-2033 (gross)				42.93
	+ Flexibility factor				45.45
4) Combination Job Growth	2014-2033 (net)	1.48	6.04	1.28	8.79
	2014-2033 (gross)				29.35
	+ Flexibility factor				31.88

		B1a/b	B1c/B2	B8	TOTAL
5) Job Stabilisation	2014-2031 (net)	1.28	-5.67	-1.01	-5.41
	2014-2031 (gross)				15.15
	+ Flexibility factor				17.68
6) Past Take Up Rates	2014-2033 (net)	1.50	1.07	0.86	3.42
	2014-2033 (gross)				23.98
	+ Flexibility factor				26.50
7) Labour Supply (170 dpa)	2014-2033 (net)	0.36	-7.83	-1.85	-9.33
	2014-2033 (gross)				11.23
	+ Flexibility factor				13.75
8) Labour Supply (196 dpa)	2014-2033 (net)	0.39	-7.77	-1.83	-9.21
	2014-2033 (gross)				11.35
	+ Flexibility factor				13.87

Figure 4.6 Staffordshire Moorlands District Employment Land Projections (2014-2031)

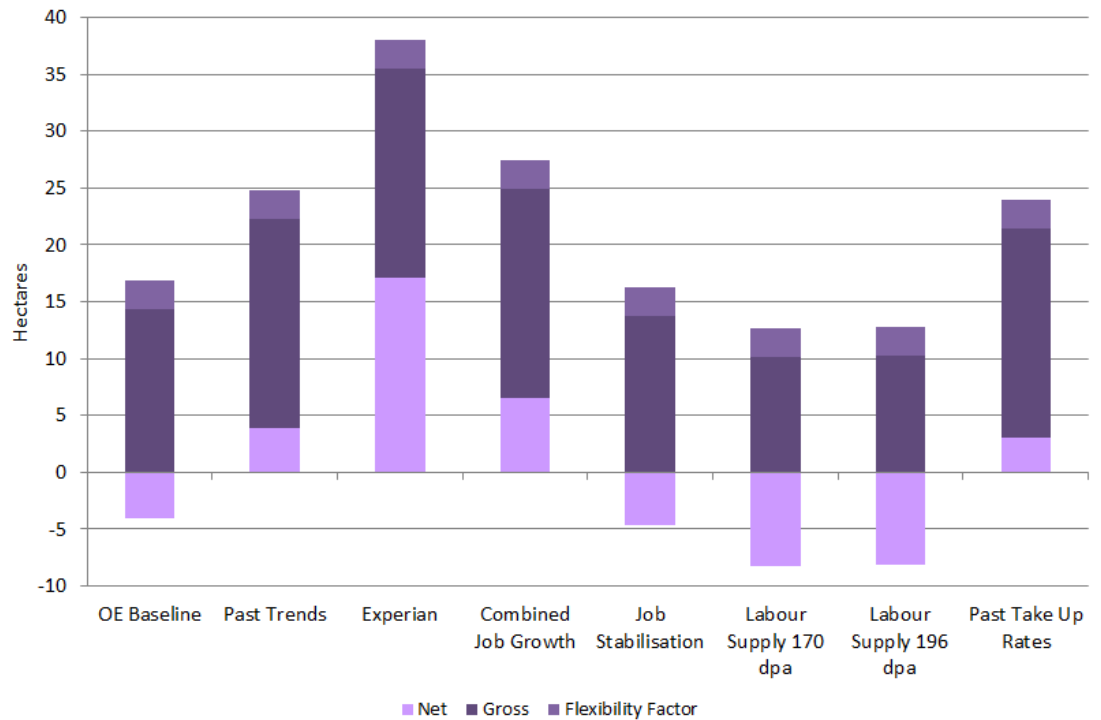
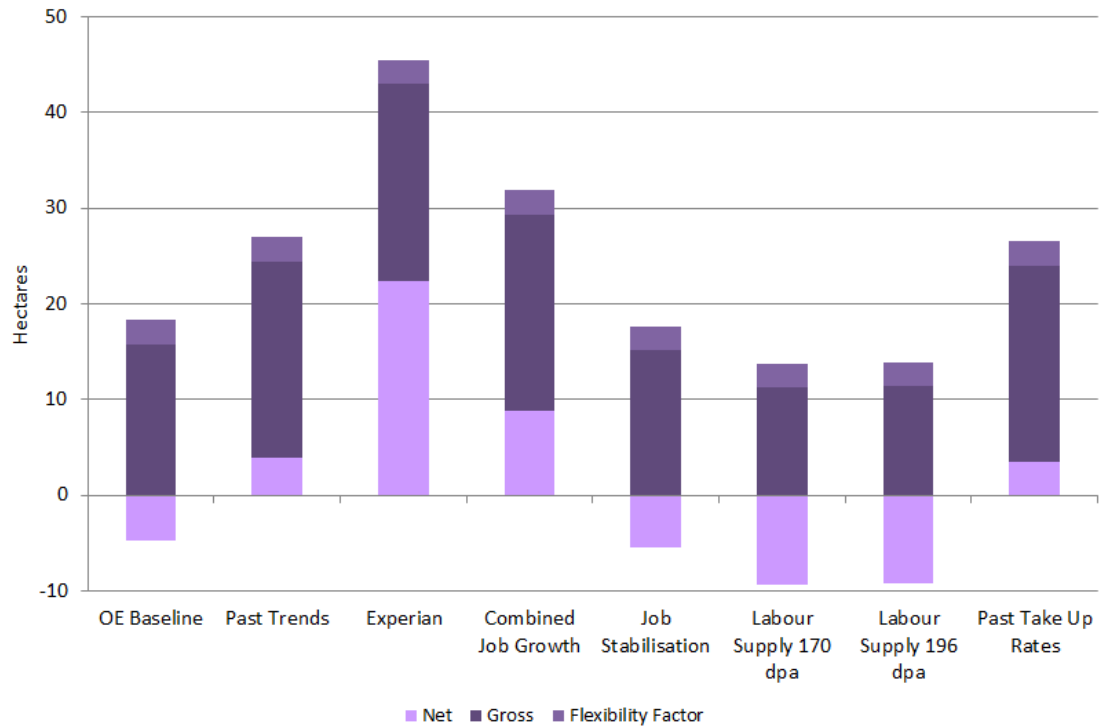


Figure 4.7 Staffordshire Moorlands District Employment Land Projections (2014-2033)



4.90 The labour supply projections for Staffordshire Moorlands District are illustrated alongside the aforementioned econometric and past take up projections in Figure 4.6 and Figure 4.7. The labour supply projections, at around 13 ha to 2031 (gross) are below the broader range based on the demand-led projections of 16 ha (Job Stabilisation) 17 ha (OE baseline), 24ha (based on past take up rates), 25 ha (Past Trends), 27 ha for the Combined Job Growth scenario and up to 38 ha for the Experian projections for the period 2014-2031.

Reality Check

4.91 Clearly the levels of future demand for B-use class land projected by the various projections differ. The projections are largely trend-based; in particular, the past take up has been (at least partly) recorded during an unprecedented recession in the commercial market nationally. It is likely that the actual performance of Staffordshire Moorlands District’s economy and commercial property market will lie somewhere between the econometric and past trends projections.

4.92 In order to provide a clearer steer as to what level of growth Staffordshire Moorlands District should be planning for, it is important to apply a series of reality checks.

Adjustments to Plot Ratios

4.93 The estimates of land requirements are clearly highly sensitive to the various assumptions used. The job / floorspace ratios and plot ratios adopted here

reflect those in the former ODPM guidance³¹. At present, it is assumed that the plot ratio³² of 40% is generally applied to out-of-centre office space, industrial space and warehousing.

- 4.94 If a lower level were applied to all types of employment land of, say, 30%, this would make a modest difference to the overall net requirement of office floorspace. However, given that the OE forecasts predict the strongest growth for SMDC to be in administrative and support service activities, and with the Framework's requirement for office space to be located in town centres rather than out of centre, this could point to plot densities increasing, rather than decreasing in future. On this basis, it is considered reasonable to assume that the majority of future development in the authority areas will be at plot ratios closer to 40% than 30%.

Adjustments to the Margin of Choice

- 4.95 A more significant assumption in terms of sensitivity is the 2-year safety margin added. A 2-year margin of choice may ordinarily be seen as being reasonable, particularly in the light of the on-going economic uncertainties and the need to provide market ready sites to prevent occupiers from moving beyond the authority areas when searching for appropriate sites. Hence an increased margin of choice would help to provide a balanced portfolio.
- 4.96 It should also be noted that the UK as a whole is likely to experience a period of economic recovery in the coming years which may result in increased demand for employment land beyond that projected by the various scenarios.
- 4.97 To consider the likely impact of increased demand a further sensitivity test was modelled that excluded the vacancy rate. This resulted in a modest reduction in the level of land required, of around 6%, which is within the margin for error for such work and suggests that the approach taken is robust.
- 4.98 In summary, it is recommended that the approach taken in defining a two-year margin of choice, incorporating an adjustment for vacancy, remains valid.

Conclusions

- 4.99 This report has appraised a range of employment land projections for Staffordshire Moorlands District using a variety of methodologies in accordance with Government Guidance.
- 4.100 It should be noted that the OE forecasts used in the production of this report cover the areas of the Peak District National Park which fall within Staffordshire Moorlands District. The employment land take-up and loss information covers the area of the local authority outside of the National Park. However, it is not considered that this anomaly has any discernible impact upon the findings

³¹ Employment Land Reviews Guidance Note, ODPM (2004)

³² A plot ratio is the total building square footage (building area) divided by the site size square meterage (area of the plot). Therefore, a plot ratio of 150% would indicate that the total floor area of a building is 1.5 times the gross area of the plot on which it is constructed. For practical purposes, this would equate to a 3 storey building with fifty percent plot coverage, the remaining plot area being occupied, for example, by access roads, parking and landscaping.

because the majority of industrial centres in Staffordshire Moorlands District are located outwith the National Park. In addition, the majority of jobs in the National Park are related to non B class uses such as tourism and leisure which do not have a direct impact upon the requirement and supply of B class employment land.

- 4.101 **It is also stressed that this report considers indigenous need for employment land in Staffordshire Moorland District and does not consider strategic employment land; the c.50 ha allocation at Blythe Bridge is still required to meet wider sub-regional requirements.**
- 4.102 It is important to identify an appropriate level of need that achieves a balance between market realism and economic and planning policy objectives. A range of qualitative and quantitative factors have been considered within this report that can help to inform a judgment on the appropriate level of need, with the key issues set out below³³:
- 1 Staffordshire Moorlands benefits from a relatively high value manufacturing base with linkages to sector expertise and clusters of businesses. There are a high number of small businesses and entrepreneurialism, combined with strong business survival rates. A highly skilled workforce, combined with the exceptional Peak District landscape and quality of life offer make the authority area an ideal location for knowledge and creative businesses. The visitor economy is a key sector and the local authority area provides a market for Peak District businesses and branded products. This may result in a requirement for B-class uses such as offices for tourism-related business and manufacturing premises for niche food products.
 - 2 There is a lack of good quality small to medium-sized industrial premises, which is suppressing demand. In particular, the limited level of development in recent years has restricted the availability of sites for local businesses to expand.
 - 3 Future realisable demand may be further restricted by the current poor and ageing existing stock, lack of public investment in infrastructure, poor access to many industrial estates/business parks, and weak inward investment offering relative to adjoining areas (notably Stoke on Trent).
 - 4 A high level of net out-commuting is also an issue in Staffordshire Moorlands where 12,737 (previously 13,956³⁴) more people commute out to work than commute in. There is significant level of net out-commuting to Stoke-on-Trent and Newcastle-under-Lyme. The three authorities are considered to constitute a FEMA based on methodology in the Planning Practice Guidance (See Section 2.0 of this report). Therefore SMDC will need to undertake discussions with the relevant neighbouring authorities (Stoke-on-Trent and Newcastle-Under-Lyme) to satisfy their obligation

³³ The key issues for Staffordshire Moorlands District were considered at the time of the joint SMDC and HP ELR Update in 2014, many of the issues remain unchanged.

³⁴ Based on data from the 2001 Census

under the duty to co-operate and confirm that each authority's needs can be met across the FEMA.

- 5 The job density ratio of 0.64³⁵ (an increase from 0.55 at the time of the 2014 Joint ELR Update) in Staffordshire Moorlands District is very low compared to the West Midlands average of 0.78. Rebalancing the land uses of Staffordshire Moorlands District to ensure that more, and better quality, jobs are provided could help to reverse this trend and 'claw-back' out-commuters, reducing net out-commuting rates (although this would need to be a choice made by the authority and supported by corporate decisions and policies in their economic strategy and emerging Local Plan).
- 6 Labour supply analyses for Staffordshire Moorlands based on the delivery of between 170 dpa and 196 dpa, indicates that the number of economically active residents is forecast to increase slightly over the coming years. On this basis, around 13 ha (gross) could be required up to 2031 and around 14 ha (gross) up to 2033.

- 4.103 Consequently, on the basis of these considerations, for Staffordshire Moorlands District, a range of between **13 ha and 27 ha** (gross) of employment land may be considered appropriate to 2031 and **14 ha and 32 ha** (gross) to 2033. This is approximate to Labour Supply scenario at the lower end and a combination of projection at the top end, including past trends and past take up rates.
- 4.104 We have noted earlier that caution should be applied before taking forward the Combined Job Growth scenario; hence if SMDC were to allocate this level of employment land it would need to monitor the situation closely to ensure that the scale of job growth associated with this is realistic. The 27ha upper end of the range is only slightly higher than the level that would be suggested by the past take up of land, however, which would lend weight to the supposition that it is not unreasonable.
- 4.105 The Joint ELR Update produced in 2014 concluded a range of between 25 ha and 45ha (gross) of employment land may be considered appropriate to 2031 for Staffordshire Moorlands District. This was approximate to the Labour Supply Scenarios at the lower end, and the OE Baseline/Policy On projections at the top end.
- 4.106 The ranges are different particularly at the top end due to a number of changes since the previous modelling work:
- The latest OE (October 2016) projected job growth for Staffordshire Moorlands District is +288 compared with +3,009 based on an earlier (pre Brexit) model.
 - The modelling period has been shortened by 3 years (2014-2031) and 1 year (2014 – 2033).

³⁵ A Jobs Density Ratio of 0.5 means that there are 0.5 jobs within the local authority for every resident of working age. The data source is ONS, 2014

- Take up and losses have declined very significantly over the past couple of years.

- 4.107 The updated range would synchronize with Staffordshire Moorlands District's housing needs identified in the emerging SHMA; meet previously identified needs to revitalise current poor quality stock; help address the imbalance of the portfolio in terms of the size of properties available; meet continued demand for B2 floorspace (particularly from indigenous companies) and the emerging digital and creative, and knowledge economy business service sectors, whilst factoring in the continued economic uncertainty and the practicalities of the physical constraints of the authority area which would preclude a step-change in delivery.
- 4.108 If Staffordshire Moorlands District seeks to accommodate new developments of large-scale warehousing schemes (which has not been the case in the past), then this could necessitate higher levels of provision well above the current portfolio such as the strategic site at Blythe Bridge.
- 4.109 Furthermore, it is recognised that the labour supply projections which link to the Objectively Assessed Housing Need are at the lower end of this range. Whilst it has been acknowledged that there is not a direct causal link between housing and employment land requirements, there is nevertheless a need to ensure that the two dovetail together to avoid any unsustainable outcomes.
- 4.110 As such, if Staffordshire Moorlands District was to consider going for the top end of the employment land range, it would need to be mindful of the housing implications by either considering a higher level of housing delivery, or reviewing other policy interventions to minimise any adverse labour force and economic implications. This could include the need to 'claw back' out-commuters and planning for a mix of housing which encourages the retention of residents of an economically active age or encourages younger economically active people to move into Staffordshire Moorlands District.
- 4.111 It is recognised that this may be difficult to achieve and would therefore require a strong policy intervention by the Local Authority, set out in its Local Plan. This could include an aspiration to increase the job density in Staffordshire Moorlands District to, 0.78 (up from 0.64 currently to equal the West Midlands average), followed up by suitable policy measures such as the provision of better quality employment opportunities, and monitored on a regular basis by the Council to test whether the aspirations and policy measures remain appropriate.
- 4.112 In terms of how the 13 – 27 ha range for Staffordshire Moorlands could be split between the B1a/ B1b, B1c/B2 and B8 uses, it is not possible to directly translate the net split in Table 4.16 into gross requirements, as the data is not sufficiently robust to enable a precise breakdown of land lost/margin of choice by use type. However, There are a number of conflicting considerations:
- 1 Between 2007/08 and 2014/15, past take up has totalled 2.59 ha / 56% (B1 Use), 1.31 ha / 29% (B2 Use), 0.70 ha / 15% (B8 Use) plus a further 5.49 ha for Mixed B-uses.

- 2 The latest OE (October 2016) FTE job growth forecasts project growth in office based sectors such as IT, Professional Services and Administrative & Supportive Services, and the most significant levels of decline in Manufacturing and Public Administration.
- 3 The OE growth forecasts project that B1a floorspace will increase from 14.5% in 2014 to 16% in 2031; B1c/B2 is anticipated to decline from 20.6% in 2014 to 18.0% in 2031; and B8 from 5.7% to 5.3% over the same period.
- 4 The OE growth forecasts indicate stronger growth in B1a/b office floorspace requirements; a more modest decline in B8 land requirements; and a greater decline in demand for B2 industrial.
- 5 Alternatively, the Experian projections indicate much stronger growth in B1c/B2 manufacturing, of 761 net jobs to 2031;
- 6 Based on the current 'stock' of floorspace in Staffordshire Moorlands District, there is a considerable supply of industrial (B2/B8) units, comprising 92% of all floorspace in the District, compared to 9% for B1a/b office³⁶.
- 7 Vacancy levels are high for office space, at around 14% of the total stock across the District. In contrast, vacancy rates for industrial units are much lower, at around 2%, representing supply shortage when considered against demand.
- 8 Based on the current land use of B-class sites identified as having the potential for redevelopment for non-employment uses in future through the SHLAA, the majority relate to industrial sites.

4.113 On the basis of the (often conflicting) factors summarised above, it is considered that an indicative split of around 50% for B1a/B1b office and the remaining 50% for B1c/B2/B8 industrial/warehousing land could be appropriate. This is broadly proportionate to past take up, reflecting the key growth sectors in the OE (October 2016) projections, albeit set within a context of an oversupply of office stock presently in the District.

4.114 This seeks to balance the replacement of some existing industrial stock with aspirations for heightened demand in this sector going forward; the higher growth in B1a/b office requirements, the decline of the industrial sector reported by OE and the growth projected by Experian, and the slight negative demand of B8 warehousing (albeit recognising that this 'land hungry' sector requires a disproportionate amount of land relative to employment generated).

³⁶ VOA statistics (2016)

Advice for Staffordshire Moorlands District

This report does not seek to make a planning or policy judgement; this is a matter for SMDC when taking account of the information before them. The report therefore represents a first stage for further consideration of all relevant factors through the Local Plan process.

On this basis, the recommended employment land requirement range for SMDC is as follows:

13 ha – 27 ha 2014-2031.

14 ha – 32 ha 2014 -2033

The selection of the final figure will depend upon the preferred level of employment growth for Staffordshire Moorlands District and its alignment with housing needs. The identification of the number of new jobs that are to be sought will be based upon the identification of policy aspirations relating to the promotion of key sectors in accordance with the economic and spatial vision for the area.

5.0 Conclusion

- 5.1 This section draws together the key messages from the previous sections and considers potential policy choices for the delivery of employment space in Staffordshire Moorlands District.
- 5.2 The ELR was undertaken to provide SMDC with an updated evidence base to inform the preparation of its emerging Local Plan. Since the original 2014 Joint ELR was undertaken there have been a number of changes to the economy. Unemployment claimant levels in Staffordshire Moorlands have improved, reducing to 0.6% of the working age population. The economically active population has increased to 84.6% from its previous base of 77.4%. There has also been an increase in business start-up rates. Despite these recent improvements to the economy, Staffordshire Moorlands is forecast to have relatively flat employment growth up to 2031.
- 5.3 Staffordshire Moorlands has a very low self-containment rate (based on the commuting patterns of the resident workforce), and cannot be considered to constitute a self-contained FEMA as a consequence. Analysis of commuting patterns in Section 2.0 suggests that it is instead part of the wider Stoke-on-Trent TTWA. This means that SMDC must continue to cooperate with its neighbouring authorities to ensure that the needs of businesses and its residents are being met. This may be through a formal arrangement agreeing employment land supply. Particular emphasis should be placed on its relationships with Stoke-on-Trent and Newcastle-under-Lyme. Pragmatically, it is also vital that SMDC considers the supply and demand for employment space within its own District boundaries. SMDC's emerging Local Plan must ensure there is sufficient local supply of employment land within the District for its businesses to expand and grow.

Recommended Requirement

- 5.4 This report has considered a range of demand and labour supply-led employment land scenarios for Staffordshire Moorlands. This has been undertaken in line with the Practice Guidance. The range of B-Class employment land required in SMDC ranges from 13 ha to 27 ha (gross) up to 2031, and between 14 ha and 32 ha (gross) up to 2033. This is approximate to Labour Supply scenario at the lower end and Combined Job Growth, Past Take Up / Past Trend projections at the top end. This range excludes the Blythe Bridge strategic site which addresses wider sub-regional needs.
- 5.5 The ranges are lower than the estimates provided in the previous ELR. This is due (in part) to a shorter modelling period, aligned with weaker levels of take up and losses in recent years, whilst the latest OE projected job growth data is also more pessimistic than before.
- 5.6 Furthermore, it is recognised that the labour supply projections which link to the Objectively Assessed Housing Need are at the lower end of this range.

Whilst it is acknowledged that there is not a direct causal link between housing and employment land requirements, there is nevertheless a need to ensure that the two dovetail together to avoid any unsustainable outcomes.

- 5.7 As such, if SMDC was to consider going for the top end of the employment land range, it would need to be mindful of the housing implications by either considering a higher level of housing delivery, or reviewing other policy interventions to minimise any adverse labour force and economic implications. This could include the need to 'claw back' out-commuters and planning for a mix of housing which encourages the retention of residents of an economically active age or encourages younger economically active people to move into the District.
- 5.8 It is recognised that this may be difficult to achieve and would therefore require a strong policy intervention by the Local Authority, set out in its Local Plan. This could include an aspiration to increase the job density in Staffordshire Moorlands District to meet the West Midlands average of 0.78.
- 5.9 The requirement for B-Class employment space is recommended to have an indicative split of 50% for B1a/B1b office, 50% for B1c/B2/B8 industrial and warehousing land could be appropriate. This is roughly proportionate to past take up and reflects projected changes to employment, high office vacancy rates as well as qualitative factors such as the need to replace existing industrial stock.

Policy Implications

- 5.10 To meet the future requirements for office and industrial space in Staffordshire Moorlands, it will be necessary for the Council to make choices about which employment sites to protect or allocate for employment development or which to bring forward as mixed-use schemes either in part or whole. These judgements need to consider:
- 1 the local benefits of B class employment sectors and the need to sustain a diversified and resilient economy that is able to capitalise on economic growth opportunities as they arise;
 - 2 the economic and market outcomes that would arise if particular sectors become displaced from the economy, or are otherwise constrained from expanding in the District;
 - 3 the need to promote growth in high value employment roles/jobs that require a skilled worked force in Staffordshire Moorlands, that meet the aspirations of resident workers and supports the relatively productive nature of the economy; and
 - 4 the requirement to set targets for delivery of new B class employment space particularly on strategic sites to provide clarity and certainty for developers, which will require a practical assessment of what the market can deliver at any point in time.

- 5.11 For mixed-use allocations, masterplans and delivery strategies should be developed to help ensure that the indicative quantum of employment floorspace/land suggested is delivered in practice over the plan period. Without this additional clarity, these sites could present a higher risk in terms of their ability to meet business needs in Staffordshire Moorlands.
- 5.12 It is recommended that the Council should evidence how its portfolio of allocations and other development opportunities will support delivery of new space over the short, medium and long-term (structured broadly in five year periods). This accords with the approach set out in the former SEEPB guidance on employment land assessments which encouraged local authorities to demonstrate a five-year rolling supply of employment land.
- 5.13 Where any gaps are identified, the Council will want to consider options for how this can be addressed (potentially in the form of new allocations). It is helpful for sites to be assessed on a consistent basis in order to determine at broadly what point in the Plan period they may become available, and how important any individual site is for meeting either office or industrial needs within any rolling five-year period. It will also be important in establishing any potential mismatch between identified allocations and those areas of the District that attract the strongest levels of market demand. The different needs between rural and urban areas should also be considered. For example, rural areas are likely to generate a requirement for smaller and more flexible employment space than larger settlements like Leek.
- 5.14 In determining the likely timing and availability of land, this delivery trajectory should have regard to:
- 1 the planning status of sites (extant planning permission, allocation etc);
 - 2 development constraints/costs and known requirements for infrastructure (more detailed assessment work may be required);
 - 3 current developer/landowner aspirations; and
 - 4 market delivery and viability factors.
- 5.15 The assessment provides the opportunity to identify and map out the Local Plan's 'when', 'whom' and 'how' employment space delivery actions for each site. In turn, it will also offer a basis to continually assess the potential role of a site in meeting employment land and other Local Plan objectives (and, inter alia, the policy benefits that would accrue if earlier delivery of the site was encouraged). The trajectory should be linked to the annual monitoring process and periodically updated to ensure the rolling supply of employment land during the new Local Plan period.
- 5.16 The Blythe Bridge site has a strategic importance beyond the District boundary and across the sub-region, and is designated as a Regional Investment Site. This site should therefore be considered separate from the requirement range. This approach would ensure that the District's needs are being met whilst inward investment opportunities can be protected and promoted.

Appendix 1 Definition of B Class Sectors

The method used for re-categorising the employment forecasts by sector into B-Class uses is summarised below.

Apportionment of B Class Sectors to Land Uses

Sector	Proportion of Jobs by Use Class		
	B1 office	B2 industrial	B8 warehousing
Agriculture, Forestry & Fishing	Non B-Class		
Extraction & Mining	Non B-Class		
Food, Drink & Tobacco	0%	100%	0%
Textiles & Clothing	0%	100%	0%
Wood & Paper	0%	100%	0%
Printing and Recorded Media	0%	100%	0%
Fuel Refining	0%	100%	0%
Chemicals	0%	100%	0%
Pharmaceuticals	0%	100%	0%
Non-Metallic Products	0%	100%	0%
Metal Products	0%	100%	0%
Computer & Electronic Products	0%	100%	0%
Machinery & Equipment	0%	100%	0%
Transport Equipment	0%	100%	0%
Other Manufacturing	0%	100%	0%
Utilities		88%	
Construction of Buildings	Non B-Class		
Civil Engineering	Non B-Class		
Specialised Construction Activities	0%	48.7%	0%
Wholesale	0%	31.5%	59.9%
Retail	Non B-Class		
Accommodation & Food Services	Non B-Class		
Land Transport, Storage & Post	0%	0%	84.1%
Air & Water Transport	Non B-Class		
Recreation	Non B-Class		
Media Activities	100%	0%	0%
Telecoms	100%	0%	0%
Computing & Information Services	100%	0%	0%
Finance	100%	0%	0%
Insurance & Pensions	100%	0%	0%
Real Estate	100%	0%	0%
Professional Services	100%	0%	0%
Administrative & Supportive Services	39.1%	0%	0%
Other Private Services	Non B-Class		
Public Administration & Defence	10%	0%	0%
Education	Non B-Class		
Health	Non B-Class		
Residential Care & Social Work	Non B-Class		

Source: OE 2016 / NLP analysis

Appendix 2 Oxford Economics Local Authority District Forecasting Model (2015)

Appendix 3 Experian Data Guide: UK Regional Planning Service (December 2016)



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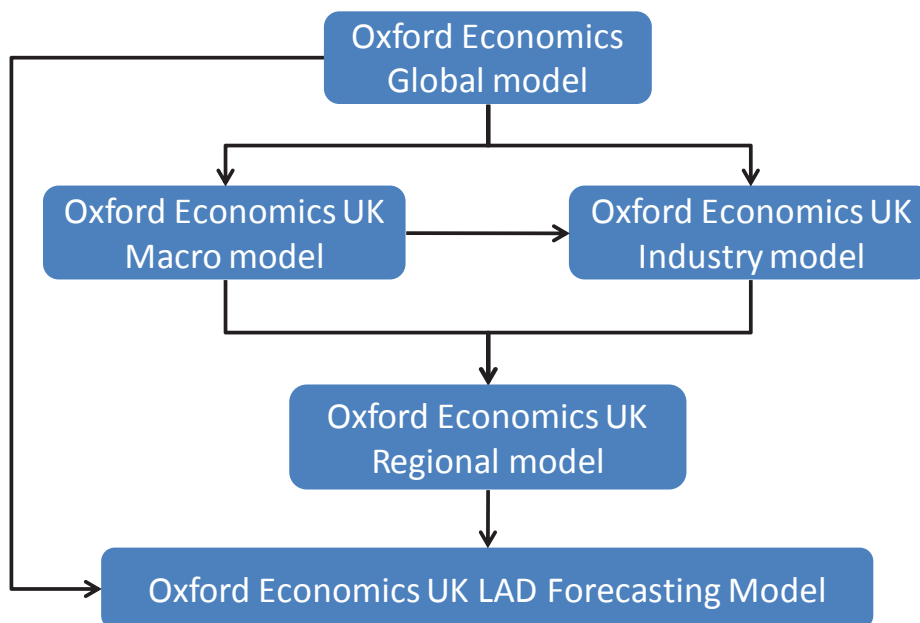
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Local Authority District Forecasting Model

Oxford Economics Local Authority District Forecasting Model sits within the Oxford suite of forecasting models. This structure ensures that global and national factors (such as developments in the Eurozone and UK Government fiscal policy) have an appropriate impact on the forecasts at a local authority level. This empirical framework (or set of 'controls') is critical in ensuring that the forecasts are much more than just an extrapolation of historical trends. Rather, the trends in our global, national and sectoral forecasts have an impact on the local area forecasts. In the current economic climate this means most, if not all, local areas will face challenges in the short-term, irrespective of how they have performed over the past 15 years.

Figure 1.1: Hierarchical structure of Oxford Economics' suite of models

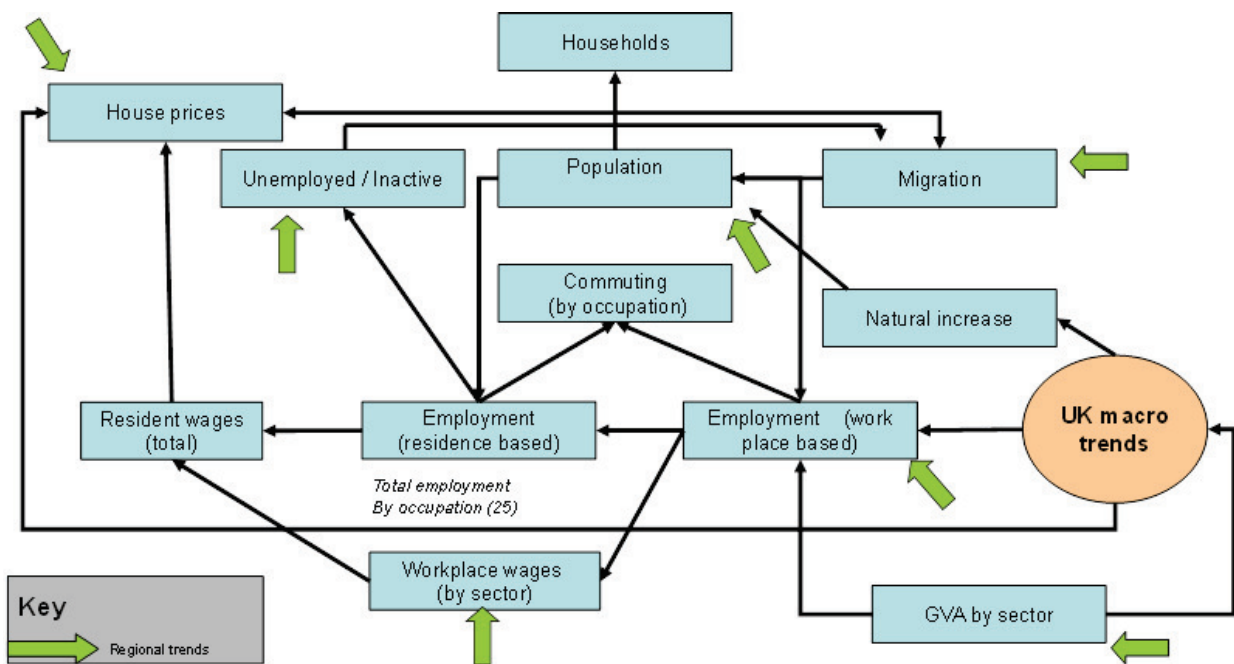


Our local forecasting model depends essentially upon three factors:

- National/regional outlooks – all the forecasting models we operate are fully consistent with the broader global and national forecasts which are updated on a monthly basis.
- Historical trends in an area (which implicitly factor in supply side factors impinging on demand), augmented where appropriate by local knowledge and understanding of patterns of economic development built up over decades of expertise, and
- Fundamental economic relationships which interlink the various elements of the outlook.

The main internal relationships between variables are summarised in Figure 1.2. Each variable is related to others within the models. Key variables are also related to variables in the other Oxford Economics models.

Figure 1.2: Main Relationships

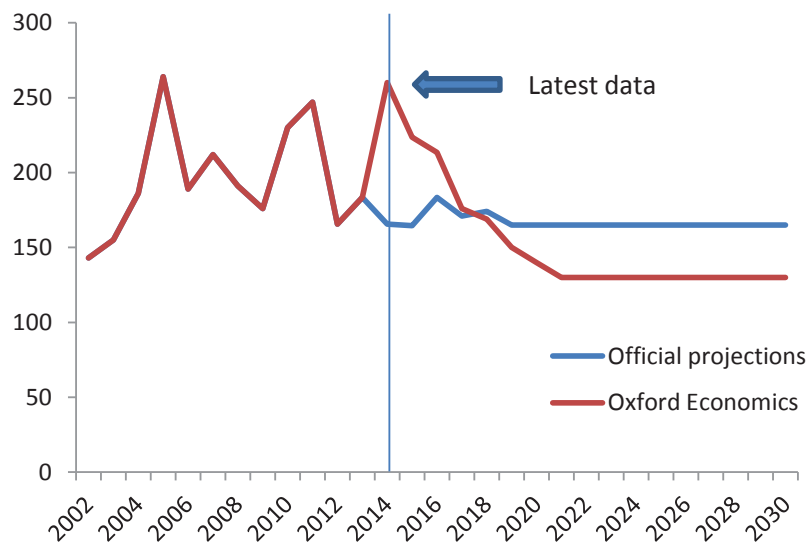


The forecasts are produced within a fully-integrated system, which makes assumptions about migration, commuting and activity rates when producing employment and population forecasts.

Data and assumptions

Population

Oxford Economics produce their own forecasts of population which are economically driven and thus differ from the official population projections. Official births and deaths projections from the 2012-based population projections are used but we have our own view on UK migration. The chart below sets out the Oxford migration forecast for the UK compared with the 2012-based population projection. Oxford Economics expect UK net migration to average 130,000 per annum compared to 165,000 in the official projections. The latest data suggests that UK net migration has increased to over 260,000 in 2014 which is already considerably above the official projections (166,000)



Oxford Economics population forecasts are derived from an economically driven model whereas official projections are trend based and do not consider how demand in the economy (and the likely impact on employment rates) affects migration.

At the local level, migration is linked to the employment rate forecast. If the employment rate within an area is falling too fast, migration reacts as the model assumes that people would not be attracted into this area to live, given that the employment prospects are weak. This ensures that the relationship between the labour market outlook and the demographic forecast is sensible. This series is scaled to be consistent with the migration forecast for the region from the UK Regional Model.

The total population forecast is then constructed using the forecast of migration and the natural increase assumptions. Natural increase for local areas is forecast based upon recent trends in both the historical data and the official projections.

Working age population

Working age population data is also collected from the Mid-Year estimates (MYE) for each area up to 2013. It is defined at all people aged 16 to 64.

The share of working age to total population is forecast using both trends in the official projections and trends in the London forecast from our UK Regional Model. This is applied to the total population forecast and scaled to be consistent with the working age population for London.

Employees in employment

There are two key sources for the employee jobs data – ONS Workforce Jobs (WFJ) and the Business Register and Employment Survey (BRES):

- The WFJ series is reported on a quarterly basis, providing estimates of employee jobs by sector (based on the 2007 Standard Industrial Classification – SIC 2007) for the UK and its constituent government office regions, over the period 1981 Q3 to 2014 Q3.
- The BRES is an employment survey which has replaced the Annual Business Inquiry (ABI). Similar to WFJ, BRES data is based upon SIC 2007, but it is only published for the years 2008-13. Prior to this, ABI and Annual Employment Survey (AES) data is available for employee jobs data, however this is based on an older industrial classification (SIC 2003). Data is available at local authority level and more detailed sector definitions. It is worth noting that the BRES is first and foremost a survey and is therefore subject to volatility, particularly when the level of detail becomes more refined. The survey is collected in September of each year and not seasonally adjusted.

There are a number of steps in constructing regional employee jobs, due to changes in sectoral classifications across the various sources, and restrictions on data availability over particular periods of time. Initially, we take employee jobs data for each sector directly from the BRES over the years 2009-13, which reflects recent methodological changes to the BRES in accounting for working proprietors. This relates to September figures and is based upon SIC 2007 sectors. In 2008, levels of employee jobs are constructed by extrapolating back the trend in the old BRES. Data from the ABI and AES is used to construct the data back to 1991.

This constructed local dataset is then scaled to be consistent with the UK employee jobs series from WFJ, by applying an adjustment factor to all sectors which converts the data to annual average values (seasonally adjusted). This is measured on a workplace basis.

The starting point in producing employment forecasts is the determination of workplace-based employees in employment in each of broad 19 SIC2007 based sectors consistent with the London and UK outlooks. At local authority level some of the sectors are driven predominantly by population estimates, others by total employment in the area and the remainder relative to the regional performance (largely exporting sectors). All sectors are also influenced by past trends in the local area. Taken in totality, employment is cross referenced with a number of variables (including population, relative performance across similar areas, historical cyclical performance and known policy) for checking and validation purposes. Where necessary, manual adjustments are made to the projected trends to reflect this validation process. The

methods of sectoral projection are as follows, each of which are forecast based upon recent trends:

- Agriculture - share of the London
- Mining and quarrying - share of the London
- Manufacturing - share of the London
- Electricity, gas, & steam - share of the London
- Water supply; sewerage, waste management - share of the London
- Construction - location quotient based upon total employment
- Wholesale and retail trade - location quotient based upon consumer spending
- Transportation and storage - location quotient based upon consumer spending
- Accommodation and food service activities - location quotient based upon consumer spending
- Information and communication - share of the London
- Financial and insurance activities - share of the London
- Real estate activities - location quotient based upon total employment
- Professional, scientific and technical activities - location quotient based upon total employment
- Administrative and support service activities - location quotient based upon total employment
- Public administration and defence - location quotient based upon population
- Education - location quotient based upon population
- Human health and social work activities - location quotient based upon population
- Arts, entertainment and recreation - location quotient based upon consumer spending
- Other service activities - location quotient based upon consumer spending

Self-employment

Self-employment data for the London is taken from Workforce jobs (19 sector detail). The data is broken down into detailed sectors using both employee trends and the UK data for self-employment by 2 digit SIC2007 sector. Data for the local authorities is Census based (and scaled to the London self-employed jobs estimates) and is broken down using the employees in employment sectoral structure. The sectors are forecast using the growth in the sectoral employees in employment data and the estimates are scaled to the regional estimate of self-employment by sector.

Total employment (jobs)

Total employment includes employees in employment, the self-employed and Her Majesty's Forces. This is measured on a workplace basis. No specific forecasting for this measure is required - it is calculated from the forecasted elements discussed above.

Note that this estimate is a jobs and not people measure (i.e. one person can have more than one job and would be counted more than once in this indicator).

Full time and part time employment

Local Authority shares of part-time employees from BRES/ABI/AES (which are trend forecasts linked to the London forecasts) are applied to the workplace employee estimates described above. Full-time employees are simply the total of employees minus the part-time employees. No sectoral detail is available for these indicators.

Total employment (people)

People based employment is calculated in a similar way to full-time equivalents except an adjustment factor is then applied to ensure consistency with the Census results. This is measured on a workplace basis. No specific forecasting for this measure is required; it is calculated from the forecasted elements discussed above. One person can have more than one job, but working people would only be counted once in this indicator.

Occupations (people)

Occupations are forecast regionally using an occupation by industry occupation matrix (25 occupations, 19 industries). The coefficients within the matrix are projected based upon national trends in a similar matrix. This means the regional occupational structure is predominantly dictated by changes in industrial structure though the model is capable of making regional specific adjustments. Locally, occupations are forecast using the regional matrix and the local industrial structure. For workplace based occupations the total people based employment (see above) is used as the 'control total'. Using this method without adjustment would produce an 'expected occupation structure' given regional characteristics. In other words, the number of managers in a given area would depend only upon trends in the regional occupational industry matrix and the local areas industrial structure. Comparison of this forecast method with the census reveals it to be a reasonable but not an entirely accurate forecast method. As such an adjustment factor is applied to ensure that the proportions of occupations match those reported in the Census. The adjustment factor is kept constant over the forecast though can be changed to simulate changes in occupation structure above and beyond that which industrial structure would predict.

Unemployment

Claimant count unemployment data is taken from ONS, via NOMIS. Annual average values are calculated from the monthly data. The latest data available is November 2014.

Unemployment (claimant count) is projected based on regional trends and a measure of overall labour market tightness (relative employment rate) in the local area. It is not at present directly affected by migration though they do impact indirectly through the employment rate (which has working age population as its denominator).

Unemployment rate is defined as claimant count unemployment as a percentage of the working age population. No specific forecasting of this measure is required.

Resident employment

This is a measure of the number of people living in an area who are in work. Resident employment data is taken from the Annual Population Survey. The latest year of available data is 2013. Given that this data is survey based and tends to be very volatile, data is 'smoothed' by taking a 3 year average.

Residence employment is based on a commuting matrix taken from the 2011 Census. This matrix tells us where employed residents of an area work. Using this information each available job (see workplace employment people based above) is allocated to a resident of a given authority. This method assumes the proportions of commuting do not change over time.

Employment rate is defined as residence employment as a percentage of the population aged 16 plus. No specific forecasting of this measure is required.

Net commuting

Net commuting is the sum of people based employment less resident employment. No specific forecasting for this measure is required - it is calculated from the forecasted elements discussed above.

Labour force

Labour force is the sum of resident employment and unemployment. No specific forecasting for this measure is required - it is calculated from the forecasted elements discussed above.

Gross Value Added

GVA forecasts are available for detailed sectors for the London region from our UK Regional Model. For areas within the region, data on total GVA is available at NUTS 3 level. This includes counties and former Metropolitan counties. Our forecasts at local authority level are obtained firstly by calculating an 'expected' GVA in each area. This is calculated by multiplying the London region's GVA per employee in each sector by workplace employment in each sector within each local authority area. An adjustment factor based upon relative earnings is also applied as areas with higher wages should produce higher levels of GVA. Expected GVA is then scaled to add the GVA at NUTS 3 level and the London sectoral forecasts from the UK Regional Model.

Workplace based wages

London data on average wages by sector is available from the Annual Survey of Hours and Earnings (ASHE), the latest year of data is 2014. At the level of individual local authorities estimates of total wages on a workplace basis and a residence basis are also available from the NES and now ASHE.

The growth in UK wages by sector is applied to the local area sectoral wage series (constructed using ASHE totals for authorities and regional industry totals) to give an estimate of wages within each sector. An adjustment factor is applied to reflect the relative occupation structure of each area. Hence areas where higher paying occupations are growing faster than the regional average will have higher wages. These wages estimates are then scaled to be consistent with regional wage totals.

Residence based wages

Residence based wages are constructed within the model by adjusting the workplace based wages for local areas. An adjustment factor, which is based upon ASHE workplace based and residence based data, is applied to ensure consistency with the published data. This factor is held constant but can be adjusted for scenario purposes.

Appraisal of alternative housing target options

8 Appraisal of alternative housing target options

- 8.1** The matrices below set out the likely significant effects on sustainability of the alternative options considered by the Council for a housing requirement. The assessments are based on the methodology proposed and consulted on in the SA Scoping Report and use the SA Framework also developed through consultation as part of the SA Scoping stage.
- 8.2** As part of the SA appraisal of options, consideration has been given to effects on sustainability over time (in the short, medium and long term) along with any cumulative impacts of implementing each option and possible mitigation measures where appropriate.
- 8.3** In comparing options with one another, consideration has also been given to the geographical scale of effect, whether any identified effects would be permanent or temporary, reversible or irreversible and the assumptions made, or justification for the assessment recorded.
- 8.4** Definitions of significance are provided in Section 3 Appraisal Methodology.

Scoring of options

Score	
++	The requirement will have a very positive impact on the sustainability objective
+	The requirement will have a slightly positive impact on the sustainability objective
0	The requirement will have a negligible or neutral impact on the sustainability objective. A recorded neutral effect does not necessarily mean that there will be no effect at the project level, but shows that at this strategic level there are no identifiable effects.
-	The requirement will have a slightly negative impact on the sustainability objective
--	The requirement will have a very negative impact on the sustainability objective
i	The outcome could be dependent on implementation, or more detail is required to make an assessment
?	The impact of an issue cannot be predicted at this stage

Table 8.1 Scoring of options

8.5 Different components within an option may generate varying impacts. This is indicated by "/".

Key to Table

- ST: Short term = 0 - 5 years
- MT: Medium term = 5 - 10 years
- LT: Long term = over 10 years

February 2017 Alternatives appraisal
Housing Requirement Option 1

SA Objective		Option 1: 235 new homes each year				Justification; cumulative effects / mitigation measures	
		Decision making criteria		Time-frame			Nature of effect; Comments
		ST	MT	LT			
SOCIAL							
<p>1- To improve community cohesion and the quality of where people work and live.</p> <p>2- To improve community cohesion and the quality of where people work and live.</p>	●	Will it make a positive contribution towards community cohesion?	?	?	?	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are more dependent on design and location of new development than on the overall housing requirement. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new housing development.</p>	
	●	Will it improve neighbourhood quality?					<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. There is a balance between loss of countryside as a result of development and provision of new, accessible open space as part of new developments. This requirement may offer the least opportunity for associated benefits such as new or enhanced community facilities to be delivered as a result of new development.</p>
	●	Will it ensure that there is adequate open space and support Green Infrastructure?					
	●	Will it minimise light and noise pollution?					
	●	Will it ensure that occupiers of buildings and spaces have					

Option 1: 235 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	sufficient natural light and appropriate levels of privacy?					
2. To advance equality of opportunity between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation? Will it help to minimise the distance people need to travel to access education, employment, shopping and other 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver the least housing growth of the four options considered and thus the least opportunity to improve accessibility to key services and facilities. Despite this, lower levels of housing growth will enable a focus of growth on small urban extensions and small sites within the existing settlement boundary which is likely to help minimise the distance people need to travel.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs, services and facilities. Mitigation measures: Local Plan policies to ensure that new developments are brought forward in sustainable locations.</p>

Option 1: 235 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
3. To improve health and reduce health inequalities.	<ul style="list-style-type: none"> key services and facilities. Will it improve health or access to health facilities? Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 	?/-	?/-	?/--	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver the least housing growth of the four options considered and thus the least opportunity to improve health infrastructure, including opportunities for walking and cycling. In the long term there could be a deterioration in health through lack of investment in health-care, leisure and physical recreational facilities. There is a balance between loss of countryside as a result of development and provision of improved opportunities to access the countryside as part of new developments.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Investment in new infrastructure keeps pace with growth. More housing growth offers more opportunities to invest in new health-care facilities, including new or improved opportunities for walking and cycling. Mitigation measures: Local Plan policies to ensure that new developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks, including increased opportunities for access to the countryside.</p>

Option 1: 235 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the implementation of relevant Local Plan policies.	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Good design will help minimise opportunities for crime and reduce the fear of crime.</p> <p>Mitigation measures: Local Plan policies to ensure that new developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p>
5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social /extra care housing.	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	+	+	+	<p>This option represents the lower end of the recommended OAN range⁽¹⁾ and by meeting the full demographically-assessed need for housing in the District will have a direct, long-term, positive effect on this SA objective. The requirement is expected to enable the delivery of a range of housing types and tenures, making a contribution to meeting community needs. However the impact of this option on the SA objective is less significant than under all other options. This option is likely to make the least contribution</p>	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Household projections suggest a considerable growth in the number of older people. The SHMA⁽²⁾ identified a critical affordable housing need. Objectively assessed housing need for the District is between 235dpa and 330dpa. This option will meet the objectively assessed housing need of the plan area but fails fully to address affordable housing need, or offer maximum opportunity for investment in meeting the</p>

Option 1: 235 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
					to addressing the needs of an ageing population or ensuring that problems of affordability can be satisfactorily addressed, risking adverse outcomes for older people and those who still need to access the housing market.	housing needs of older people. Mitigation measures: Wider initiatives of the Council should be supported to help deliver additional affordable homes.
To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	?/+	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this requirement could have a positive effect on minimising the impact of new development on existing traffic congestion and could offer support for the use of sustainable forms of transport through delivering most new development close to town and village centres. The option could support priorities and provisions identified in the SMDC integrated transport strategy ⁽³⁾, including the proposed Local Transport Packages for Leek, Cheadle and Biddulph.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Lower levels of growth are likely to generate fewer new car journeys, resulting in less impact on existing congestion. Lower levels of growth will maximise the proportion of new development delivered close to existing centres, facilitating use of sustainable forms of transport. Higher levels of growth will allow most investment in support for sustainable transport. Mitigation measures: Local Plan policies to ensure that developments are brought forward in sustainable locations; support safe walking and cycling and improve access to the natural environment.</p>

Option 1: 235 new homes each year					Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame			
		ST	MT	LT	
ENVIRONMENTAL					
7. To minimise contributions to climate change and consider climate change adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 	-	-	-	<p>There is some uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of developments and the implementation of Local Plan policies. However this option is likely to result in the smallest overall increase in carbon emissions from the energy consumption and emissions arising from construction and use of new development and associated car journeys.</p>
	<ul style="list-style-type: none"> Will it minimise emissions of 	?	?	?/-	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the</p>
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of 	?	?	?/-	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Even if individual properties are built to high environmental performance standards and delivered in sustainable locations, the total increase in number of dwellings and car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Identified</p>

Option 1: 235 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 				<p>location of development and the implementation of Local Plan policies. However as this option represents the lowest level of growth, it is likely to give rise to the lowest level of new emissions of airborne pollutants associated with additional car journeys. In the long-term there is some potential for development to be delivered within 500m of an identified area of poor air quality.</p>	<p>areas of poor air quality include the Cellarhead junction (between the A52 and A520); Ball Haye Street, Leek (a primary link road from Leek A53 to the A523 Macclesfield and Buxton Road) and Broad Street, Leek (a primary link road from Stoke on Trent)⁽⁴⁾. The total increase in number of dwellings and car journeys is likely to increase emission of airborne pollutants. There is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments include appropriate landscaping to aid removal of air pollutants.</p>
9. To reduce flood risk, protect and enhance water sources.	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However the SFRA⁽⁵⁾ confirms that there are few locations</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Development - at whatever overall scale - will be permitted only where schemes meet development plan requirements for management of flood risk. Mitigation measures:</p>

Option 1: 235 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water Framework Directive? Will it encourage water efficiency and demand management? 				<p>in which development would significantly increase fluvial flood risk elsewhere, due to the majority of potentially suitable sites for development being located within Flood Zone 1, with only a few sites partially within Flood Zone 2 or 3. This option requires the least peripheral development proposed on agricultural (greenfield) land on the outskirts of settlements, and thus poses the lowest risk of all options to increase surface water flood risk within towns or villages and further downstream as a result of increased surface water runoff and reduced infiltration.</p>	<p>Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>
10. To identify, conserve and enhance biodiversity resources and to test the plan's	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature 	?	?/+	?/++	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as it proposes the lowest level of growth, this option is</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature</p>

Option 1: 235 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>policies and proposals on European Sites and SSSIs</p>	<ul style="list-style-type: none"> conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure? 				<p>likely to provide most overall, long-term protection for biodiversity and natural networks. There will however be the lowest level of new investment and associated opportunities to deliver biodiversity enhancement or the extension of GI networks as part of schemes. Given it will lead to the lowest recreational and other urbanising pressures on the closest European sites, of all options considered, this option is also likely to afford most protection for the integrity of European sites. However the HRA of the Local Plan will ensure that Local Plan policies and allocations will not result in adverse effects on European designated sites.</p>	<p>conservation importance, but the higher the level of growth, the greater the need to allocate sites in the countryside, on the periphery of settlements, including potentially requiring Green Belt release and potentially sites within the zone of influence of European designated sites. Mitigation measures: Local Plan policies to ensure conservation and enhancement of biodiversity and that any development proposal is not permitted to have an adverse effect on the integrity of a European site.</p>
<p>11. To safeguard the best and most versatile agricultural land; improve soil and land</p>	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? 	?	?/+	?/++	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for the best and most</p>

Option 1: 235 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
resources; and protect and enhance geological resources.	<ul style="list-style-type: none"> Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 				<p>policies. However as it proposes the lowest level of growth, this option is likely to provide most overall, long-term protection for the best and most versatile agricultural land.</p> <p>measures: Local Plan policies to ensure protection and enhancement of geologically important sites.</p>	<p>versatile agricultural land and geological resources, but the higher the level of growth, the greater the need to allocate agricultural (greenfield) sites. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites.</p>
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.</p>
13. To protect and enhance the character of towns / villages	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of 	?	?/+	?/++	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide</p>

Option 1: 235 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
and other heritage and archaeological assets along with their settings.	<p>cultural and historic heritage assets (designated and undesignated assets) along with their settings?</p> <ul style="list-style-type: none"> Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place? 				<p>implementation of Local Plan policies. However with the lowest level of growth proposed, of all options considered, this option is most likely to result in protection of cultural and historic heritage assets (designated and undesignated) along with their settings.</p>	<p>protection for heritage and archaeological assets along with their settings. However the higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of altering the character of settlements and resulting in deterioration of cultural and historic heritage assets (designated and undesignated assets) or their settings that could not be reasonably mitigated.</p> <p>Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.</p>
14. To protect and enhance the character and appearance of the landscape including historic	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? 	?	?/+	?/++	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. The Landscape and Settlement Character Assessment Study⁽⁶⁾ offers guidance to help</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. However the higher the level of growth, the greater the number of site</p>

Option 1: 235 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
landscape and other natural assets and resources.	<ul style="list-style-type: none"> Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 				<p>ensure new development required in the District takes place in locations that are compatible with the unique quality of the Staffordshire Moorlands landscape and in sympathy with the setting of a particular settlement. The HEA⁽⁷⁾ identified that (within each of the study areas) historic character had been retained and that beyond the present extent of the built areas, a dispersed settlement pattern was still predominant. With the lowest level of growth proposed, of all options considered, this option is the most likely to result in the protection of the character and appearance of the landscapes, including historic landscapes, and other natural assets and resources.</p>	<p>allocations that will be made, increasing the risk of resulting in an adverse effect on the character of landscapes, including historic landscapes, that could not be reasonably mitigated. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.</p>
15. To encourage further development of	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: The higher the level of growth, the greater the</p>

Option 1: 235 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
sustainable tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> economy and local distinctiveness? Does it help support tourism and the visitor economy? 				<p>implementation of Local Plan policies. With the lowest level of growth proposed, of all options considered, this option is the least likely to result in a long-term, adverse impact on local distinctiveness, potentially leading to an associated long-term positive impact on tourism and the visitor economy. However, this is balanced by the option also providing the least opportunity for investment in culture and tourism that could result in long-term negative effects on the local economy.</p>	<p>number of site allocations that will be made, increasing the risk of congestion and an adverse effect on the character and appearance of landscapes, towns and villages that together may detract from the further development of local distinctiveness and could result in long-term negative impacts on tourism and the visitor economy. Counter to this, higher levels of growth provide the most opportunities for investment that may support tourism and the visitor economy. Mitigation measures: Local Plan policies to support tourism and the visitor economy.</p>
ECONOMIC						
16. To safeguard the vitality and viability of the District's towns and villages, and create and	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	+	+	+	<p>Under this option, the population of the district is projected to increase by 2,567 from 2014 to 2031. The population growth predicted arises from high levels of net in-migration which counteracts a significant</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Residents of new developments will support their local retail, leisure and service provision. Mitigation measures:</p>

Option 1: 235 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>sustain a vibrant rural economy</p> <p>100 To strengthen, modernise and diversify the District economy, and promote sustainable economic growth</p>	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 	-	--	--	<p>decrease in population expected from natural change resulting in an excess of deaths over births. The increase in spending in the local economy this is likely to generate should result in benefits to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services. Although since this option provides for the lowest level of growth, the benefits would be lowest of all options considered.</p>	<p>Local Plan policies to support town and village centres.</p>
					<p>This option is likely to lead to a decline in the labour force of 2,141 (2014-2031) and job losses of 1,579 over the same period. This is likely to result in a significant negative effect on business, the local economy and local employment through a lack of encouragement for investment in business and infrastructure.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: A local labour supply will help to deliver economic growth across the plan area. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>

Option 1: 235 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
18. To encourage and support a high and stable level of employment	<ul style="list-style-type: none"> Will it meet the employment needs of local people? Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 	-	--	--	<p>It is projected that the number of people aged over 65 in the District will increase by 39% by 2031. The oldest age groups (75-84 and 85+) would see the most substantial increases of 69% and 134% respectively⁽⁸⁾. Under this option, the ageing profile of the population is likely to contribute to a declining labour force and job losses which could undermine economic stability in the long term. The option is likely to have a negative effect on the local economy and local employment.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Whilst there is not a direct causal relationship between job growth and housing needs, the two are nevertheless fundamentally related. Ensuring a sufficient supply of homes within easy access of employment is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
<p>Summary of significant effects:</p> <p>This option proposes the delivery of 235 new dwellings per year (2014-2031). It will have a direct, long-term positive effect on the SA objective to ensure provision of homes to meet local needs since it represents the lower end of the recommended objectively assessed housing need range. However being the lower end of the range, the option makes the least contribution of all options considered to addressing affordable housing need and the needs of an ageing population. Predicted population growth of around 2,500 is likely to increase spending in the local economy resulting in positive benefits for the District's towns and villages including helping to safeguard local shops and services. However since this option provides for the lowest level of growth, these benefits would be lowest of all options considered. This option is likely to lead to a decline in the labour force of 2,141 and the loss of 1,579 jobs (2014 - 2031). This is likely to undermine economic stability in the long term and lead to a significant negative effect on business, the local economy and local employment through a lack of encouragement for investment in business and infrastructure. As the lowest growth option, requiring the lowest number of site allocations, by comparison with other options considered, this alternative is likely to result in minor positive effects on SA objectives relating to the protection of biodiversity;</p>						

Option 1: 235 new homes each year					
SA Objective	Decision making criteria	Time-frame		Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT		
					<p>the character of towns, villages and heritage assets and their settings; and landscape character and natural assets. The lower level of growth is also likely to minimise the negative effects on objectives relating to climate change contributions and air quality that are associated with energy consumption and emissions arising from construction and use of new dwellings and associated car journeys. The lower level of growth is also likely to help enable a focus of new development on small urban extensions and small sites within existing settlement boundaries resulting in minor positive effects on minimising the distance people need to travel to access key services and facilities and increasing the opportunities for use of sustainable forms of transport. However since this option proposes the lowest level of growth, it is also likely to result in the lowest level of investment in community facilities, including Green Infrastructure and other measures that help to reduce health inequalities, leading to minor negative effects on the SA objective relating to supporting health improvements.</p>

Table 8.2 Assessment Table for Feb 2017 Option 1: 235 new homes each year

1. Staffordshire Moorlands SHMA Update: December 2016 Revision; Nathaniel Lichfield & Partners; February 2017
2. Strategic Housing Market Assessment and Housing Needs Study; Nathaniel Lichfield & Partners; June 2014
3. Staffordshire Moorlands District Integrated Transport Strategy 2013-2031; Staffordshire County Council; November 2013
4. 2014 Air Quality Progress Report for Staffordshire Moorlands District Council in fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; November 2014
5. Staffordshire Moorlands Level 1 Strategic Flood Risk Assessment (SFRA) Update; AECOM Infrastructure and Environment UK Ltd; October 2015
6. Landscape and Settlement Character Assessment Study; Wardell Armstrong; 2008
7. Historic Environment Character Assessment: Staffordshire Moorlands; Staffordshire County Council; August 2010
8. Staffordshire Moorlands 2012-based SNHP Update; Nathaniel Lichfield & Partners; January 2016

February 2017 Housing Requirement Option 2

SA Objective	February 2017 Option 2: 260 new homes each year			Justification; cumulative effects / mitigation measures	
	Decision making criteria	Time-frame	Nature of effect; Comments		
SOCIAL					
1. To improve community cohesion and the quality of where people work and live.	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and 	<p>ST</p> <p>MT</p> <p>LT</p>	<p>?</p> <p>?</p> <p>?</p>	<p>?</p>	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. There is a balance between loss of countryside as a result of development and provision of new, accessible open space as part of new developments. This requirement may offer fewer opportunities than options 3 and 4 for achieving associated benefits of investment, such as new or enhanced community facilities, but there would be more opportunities than under option 1.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are more dependent on design and location of new development than on the overall housing requirement. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new housing development.</p>

February 2017 Option 2: 260 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
2. To advance equality of opportunity between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<p>appropriate levels of privacy?</p> <ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation? Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver more growth than under option 1, but less growth than proposed under options 3 or 4 and thus some opportunity to improve accessibility to key services and facilities. Lower levels of housing growth may enable a focus of growth on small urban extensions and small sites within the existing settlement boundary which is likely to help minimise the distance people need to travel.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs, services and facilities. Mitigation measures: Local Plan policies to ensure that new developments are brought forward in sustainable locations.</p>

SA Objective		February 2017 Option 2: 260 new homes each year				Justification; cumulative effects / mitigation measures
		Decision making criteria		Time-frame		
		ST	MT	LT		
3. To improve health and reduce health inequalities.	<ul style="list-style-type: none"> Will it improve health or access to health facilities? Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 	?	?/-	?/-	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver more growth than under option 1, but less growth than proposed under options 3 or 4 and thus some opportunity to improve health infrastructure, including opportunities for walking and cycling. In the long term there could be a deterioration in health through lack of investment in health-care, leisure and physical recreational facilities. There is a balance between loss of countryside as a result of development and provision of improved opportunities to access the countryside as part of new developments.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Investment in new infrastructure keeps pace with growth. More housing growth offers more opportunities to invest in new health-care facilities, including new or improved opportunities for walking and cycling. Mitigation measures: Local Plan policies to ensure that new developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks, including increased opportunities for access to the countryside.</p>
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the implementation of relevant Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce</p>

February 2017 Option 2: 260 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social /extra care housing.	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	+	+	++	<p>This option represents the job stabilisation scenario⁽¹⁾ and is mid-way within the full objectively assessed needs range. By meeting the full assessed need for housing in the District, this option will have a direct, long-term, positive effect on the SA objective. The requirement is expected to enable the delivery of a range of housing types and tenures, making a contribution to meeting community needs. While the impact of this option on the SA objective is greater than that under option 1, it is less significant than under options 3 and 4. Whilst this option is likely to contribute to addressing the needs of an ageing population and ensuring that problems of affordability can be addressed, there is a greater risk of</p>	<p>the fear of crime. Mitigation measures: Local Plan policies to ensure that new developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Household projections suggest a considerable growth in the number of older people. The SHMA⁽²⁾ identified a critical affordable housing need. Objectively assessed housing need for the District is between 235dpa and 330dpa. This option will meet the objectively assessed housing need of the plan area but fails fully to address affordable housing need, or offer maximum opportunity for investment in meeting the housing needs of older people. Mitigation measures: Wider initiatives of the Council should be supported to</p>

SA Objective		February 2017 Option 2: 260 new homes each year				Justification; cumulative effects / mitigation measures	
		Decision making criteria		Time-frame			Nature of effect; Comments
		ST	MT	LT			
6. To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.		<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	?/+	?/+	?/++	<p>adverse outcomes for older people and those who still need to access the housing market than under options 3 and 4.</p> <p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement could have a long-term positive effect on minimising the impact of new development on existing traffic congestion and could offer support for the use of sustainable forms of transport through delivering new development close to town and village centres. The option could support priorities and provisions identified in the SMDC integrated transport strategy ⁽³⁾, including the proposed Local Transport Packages for Leek, Cheadle and Biddulph.</p>	<p>help deliver additional affordable homes.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Lower levels of growth are likely to generate fewer new car journeys, resulting in less impact on existing congestion. Lower levels of growth will maximise the proportion of new development delivered close to existing centres, facilitating use of sustainable forms of transport. Higher levels of growth will allow most investment in support for sustainable transport. Mitigation measures: Local Plan policies to ensure that developments are brought forward in sustainable locations; support safe walking and cycling and improve access to the natural environment.</p>

February 2017 Option 2: 260 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
ENVIRONMENTAL						
7. To minimise contributions to climate change and consider climate change adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 	-	-	- -	<p>There is some uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of developments and the implementation of Local Plan policies. However since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to result in a lower overall increase in carbon emissions from the energy consumption and emissions arising from construction and use of new development and associated car journeys. In the long-term there is likely to be a more significant negative impact than under option 1 since this proposes lower growth.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Even if high environmental performance standards and delivered in sustainable locations, the total increase in number of dwellings and car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.</p>
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of 	?	?/-	?/-	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Identified</p>

SA Objective		February 2017 Option 2: 260 new homes each year				Justification; cumulative effects / mitigation measures	
		Decision making criteria		Time-frame			Nature of effect; Comments
		ST	MT	LT			
		<ul style="list-style-type: none"> airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 				<p>location of development and the implementation of Local Plan policies. However since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to give rise to lower levels of new emissions of airborne pollutants associated with additional car journeys. In the medium and long-term there is likely to be a more significant negative impact than under option 1 and some potential for development to be delivered within 500m of an identified area of poor air quality.</p>	<p>areas of poor air quality include the Cellarhead junction (between the A52 and A520); Ball Haye Street, Leek (a primary link road from Leek A53 to the A523 Macclesfield and Buxton Road) and Broad Street, Leek (a primary link road from Stoke on Trent)⁽⁴⁾. The total increase in number of dwellings and car journeys is likely to increase emission of airborne pollutants, there is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments include appropriate landscaping to aid removal of air pollutants.</p>
<ul style="list-style-type: none"> 9. To reduce flood risk, protect and enhance water sources. 		<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However the SFRA⁽⁵⁾ confirms that there are few locations in which</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Development - at whatever overall scale - will be permitted only where schemes meet development plan requirements for management of flood risk.</p>	

February 2017 Option 2: 260 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water Framework Directive? Will it encourage water efficiency and demand management? 				<p>development would significantly increase fluvial flood risk elsewhere, due to the majority of potentially suitable sites for development being located within Flood Zone 1, with only a few sites partially within Flood Zone 2 or 3. Since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to result in less peripheral development proposed on agricultural (greenfield) land on the outskirts of settlements, and thus result in less risk of surface water flood risk within towns or villages and further downstream as a result of increased surface water runoff and reduced infiltration. Although in the long-term there is likely to be a more significant negative impact than under option 1.</p>	<p>Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>
10. To identify, conserve and enhance biodiversity resources and	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and 	?	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for</p>

SA Objective		February 2017 Option 2: 260 new homes each year			Justification; cumulative effects / mitigation measures	
		Decision making criteria	Time-frame			Nature of effect; Comments
		ST	MT	LT		
to test the plan's policies and proposals on European Sites and SSSIs		<ul style="list-style-type: none"> nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure? 			However, since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to provide overall, long-term protection for biodiversity and natural networks. However in comparison with options 3 and 4, there is likely to be a lower level of new investment and associated opportunities to deliver biodiversity enhancement or the extension of GI networks as part of schemes. Given that in comparison with options 3 and 4, this requirement is likely to lead to lower recreational and other urbanising pressures on the closest European sites, the option is also likely to afford long-term protection for the integrity of European sites. Whilst positive impacts are not as significant as under option 1, the HRA of the Local Plan will ensure that Local Plan policies and allocations will not result in adverse effects on European designated sites.	sites of ecological and nature conservation importance, but the higher the level of growth, the greater the need to allocate sites in the countryside, on the periphery of settlements, including sites potentially requiring Green Belt release or within the zone of influence of European designated sites. Mitigation measures: Local Plan policies to ensure conservation and enhancement of biodiversity and that any development proposal is not permitted to have an adverse effect on the integrity of a European site.

February 2017 Option 2: 260 new homes each year					Justification; cumulative effects / mitigation measures	
SA Objective	Decision making criteria	Time-frame				Nature of effect; Comments
		ST	MT	LT		
11. To safeguard the best and most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 	?	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to provide overall, long-term protection for the best and most versatile agricultural land. However positive impacts are not as significant as under option 1.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for the best and most versatile agricultural land and geological resources, but the higher the level of growth, the greater the need to allocate agricultural (greenfield) sites. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites.</p>
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible. Mitigation</p>

February 2017 Option 2: 260 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> existing buildings? Will it increase the use of building materials from sustainable sources? 					<p>measures: Local Plan policies to support waste minimisation.</p>
<p>10 To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.</p>	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and undesignated assets) along with their settings? Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local 	?	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to result in protection of cultural and historic heritage assets (designated and undesignated) along with their settings. Positive impacts are not as significant as under option 1.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings. However the higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of altering the character of settlements and resulting in deterioration of cultural and historic heritage assets (designated and undesignated assets) or their settings that could not be reasonably mitigated. Mitigation measures: Local Plan policies to support protection and</p>

February 2017 Option 2: 260 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	distinctiveness and sense of place?					enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.
14. To protect and enhance the character and appearance of the landscape including historic landscape and other natural assets and resources.	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 	?	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. The Landscape and Settlement Character Assessment Study⁽⁶⁾ offers guidance to help ensure new development required in the District takes place in locations that are compatible with the unique quality of the Staffordshire Moorlands landscape and in sympathy with the setting of a particular settlement. The HEA⁽⁷⁾ identified that (within each of the study areas) historic character had been retained and that beyond the present extent of the built areas, a dispersed settlement pattern was still predominant. Since it proposes a lower level of growth than under</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. However the higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of resulting in an adverse effect on the character of landscapes, including historic landscapes, that could not be reasonably mitigated. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.</p>	

SA Objective		February 2017 Option 2: 260 new homes each year				Justification; cumulative effects / mitigation measures	
		Decision making criteria	Time-frame				Nature of effect; Comments
		ST	MT	LT			
<p>To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.</p>		<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and local distinctiveness? Does it help support tourism and the visitor economy? 	?	?	?	<p>options 3 and 4, in comparison with other alternatives considered, this requirement is likely to result in the protection of the character and appearance of the landscape, including historic landscapes, and other natural assets and resources. Positive impacts are not as significant as under option 1.</p> <p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is less likely to result in a long-term, adverse impact on local distinctiveness, and this may lead to a long-term positive impact on tourism and the visitor economy. The significance is less than under option 1. The positive impacts are balanced by the requirement also providing less</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: The higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of congestion and an adverse effect on the character and appearance of landscapes, towns and villages that together may detract from the further development of local distinctiveness and could result in long-term negative impacts on tourism and the visitor economy. Counter to this, higher levels of growth provide the most opportunities for investment that</p>

February 2017 Option 2: 260 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
					opportunity than under options 3 and 4 for investment in culture and tourism and this may result in long-term negative effects on the local economy.	may support tourism and the visitor economy. Mitigation measures: Local Plan policies to support tourism and the visitor economy.
ECONOMIC						
16. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	+	+	++	<p>This option assumes that the number of jobs in the District remains at its 2014 level over the plan period and since there is an ageing population, there would be a need for growth in the labour force, in-migration and ultimately housing of 259dpa to 2031. Creating a labour force large enough to support job stabilisation would result in a population increase of 6,339 (2014-31). The increase in spending in the local economy this is likely to generate should result in benefits to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services. Although since this option proposes a lower level of growth than under</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Residents of new developments will support their local retail, leisure and service provision. Mitigation measures: Local Plan policies to support town and village centres.</p>

SA Objective		February 2017 Option 2: 260 new homes each year				Justification; cumulative effects / mitigation measures
		Decision making criteria		Time-frame		
		ST	MT	LT		
					options 3 and 4, in comparison with other alternatives considered, this requirement is likely to result in less significant benefits. Benefits would be more significant than under option 1.	
<p>17. To strengthen, modernise and diversify the District economy, and promote sustainable economic growth</p>		<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 	+	+	+	<p>This option represents the level at which the District's economy would stabilise, ie there would be zero job growth 2014 - 2031. This is likely to result in a minor positive effect on business, the local economy and local employment.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Helping to stem the decline of working age residents in the District would achieve a more balanced population structure and reduce potential future economic difficulties and the demands of services associated with an ageing population and a more limited supply of labour. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
<p>18. To encourage and support a high</p>		<ul style="list-style-type: none"> Will it increase economic activity levels? 	0	0	+	<p>Whilst this option is to maintain the 2014 level of jobs in the District over</p> <p>Geographical scale: Local Plan area; Effects: Permanent;</p>

February 2017 Option 2: 260 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
and stable level of employment	<ul style="list-style-type: none"> Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 				the plan period, a fall in the labour force of 127 is predicted. This is likely to lead to a long term minor positive impact on the local economy and local employment.	<p>Assumptions made: Whilst there is not a direct causal relationship between job growth and housing needs, the two are nevertheless fundamentally related. Ensuring a sufficient supply of homes within easy access of employment is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
<p>Summary of significant effects:</p> <p>The option proposes the delivery of 260 new dwellings per year. Since it is within the recommended, full objectively assessed housing need range, the housing requirement would have a direct, long-term positive effect on the SA objective to ensure provision of homes to meet local needs. This positive effect is likely to be more significant than under option 1. However being closer to the lower end of the range than options 3 and 4, the option makes less of a contribution than options 3 and 4 to addressing affordable housing need and the needs of an ageing population. Predicted population growth of around 6,300 is likely to increase spending in the local economy resulting in positive benefits for the District's towns and villages, including help to safeguard local shops and services. Under this option, these benefits are likely to be more significant than under option 1 and less significant than under options 3 and 4. This option is expected to maintain the 2014 level of jobs in the district over the plan period. This is likely to result in a long term minor positive impact on business, the local economy and local employment. This compares favourably with the impacts on this objective likely under option 1, where significant negative impacts on SA objectives for supporting employment and economic growth are likely since housing delivery below 260dpa would potentially result in a reduction in jobs. However the positive impacts on economic growth under this option are less significant than those likely to result under options 3 and 4. Option 2 requires the second lowest number of site allocations of the four options considered, and consequently this</p>						

SA Objective	February 2017 Option 2: 260 new homes each year			Justification; cumulative effects / mitigation measures	
	Decision making criteria	Time-frame			Nature of effect; Comments
		ST	MT		
	<p>alternative is likely to result in comparatively more positive effects on SA objectives relating to the protection of biodiversity; the character of towns, villages and heritage assets and their settings; and landscape character and natural assets than options 3 and 4. Positive effects on these objectives are slightly less under this option than under option 1. The lower level of growth under option 2 compared with options 3 and 4 is also likely to minimise the negative effects on objectives relating to climate change contributions and air quality that are associated with energy consumption and emissions arising from construction and use of new dwellings and associated car journeys. The lower level of growth is also likely more likely under option 2 than options 3 and 4 to enable a focus of new development on small urban extensions and small sites within existing settlement boundaries resulting in minor positive effects on minimising the distance people need to travel to access key services and facilities and increasing the opportunities for use of sustainable forms of transport. Benefits under option 2 in this regard are not likely to be as great as under option 1. However since option 2 proposes the second lowest level of growth of the four options considered, it is likely to result in a lower level of investment than under options 3 and 4 in community facilities, including Green Infrastructure and other measures that help to reduce health inequalities, leading to possible minor negative effects on the SA objective relating to supporting health improvements. These negative effects are not likely to be as significant as under option 1.</p>				

Table 8.3 Assessment Table for Option 2: 260 new homes each year

1. Staffordshire Moorlands SHMA Update: December 2016 Revision; Nathaniel Lichfield & Partners; February 2017
2. Strategic Housing Market Assessment and Housing Needs Study; Nathaniel Lichfield & Partners; June 2014
3. Staffordshire Moorlands District Integrated Transport Strategy 2013-2031; Staffordshire County Council; November 2013
4. 2014 Air Quality Progress Report for Staffordshire Moorlands District Council in fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; November 2014
5. Staffordshire Moorlands Level 1 Strategic Flood Risk Assessment (SFRA) Update; AECOM Infrastructure and Environment UK Ltd; October 2015
6. Landscape and Settlement Character Assessment Study; Wardell Armstrong; 2008
7. Historic Environment Character Assessment: Staffordshire Moorlands; Staffordshire County Council; August 2010

February 2017 Housing requirement Option 3

SA Objective	February 2017 Option 3: 330 new homes each year				Justification; cumulative effects / mitigation measures	
	Decision making criteria	Time-frame				Nature of effect; Comments
		ST	MT	LT		
SOCIAL						
<p>1. To improve community cohesion and the quality of where people work and live.</p> <ul style="list-style-type: none"> ● Will it make a positive contribution towards community cohesion? ● Will it improve neighbourhood quality? ● Will it ensure that there is adequate open space and support Green Infrastructure? ● Will it minimise light and noise pollution? ● Will it ensure that occupiers of buildings and spaces have sufficient natural light and 	?	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. There is a balance between loss of countryside as a result of development and provision of new, accessible open space as part of new developments. This requirement may offer more opportunities than options 1 and 2 for achieving associated benefits of investment, such as new or enhanced community facilities, but there would be less opportunities than under option 4.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are more dependent on design and location of new development than on the overall housing requirement. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new housing development.</p>	

February 2017 Option 3: 330 new homes each year					
SA Objective	Decision making criteria	Time-frame			Justification; cumulative effects / mitigation measures
		ST	MT	LT	
2. To advance equality of opportunity between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<p>appropriate levels of privacy?</p> <ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation? Will it help to minimise the distance people need to travel to access education, employment, shopping and other key 	?	?/+	?/+	<p>Nature of effect; Comments</p> <p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver more growth than under options 1 and 2 (but less growth than proposed under option 4) and consequently there is opportunity to improve accessibility to key services and facilities through delivering more investment into the rural areas. However under this option it is less likely than under options 1 and 2 that the focus of growth could be delivered as small urban extensions and small sites within existing settlement boundaries and this may increase the distance that some people would need to travel in order to access key services and facilities.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs, services and facilities. Mitigation measures: Local Plan policies to ensure that new developments are brought forward in sustainable locations.</p>

SA Objective	February 2017 Option 3: 330 new homes each year					Justification; cumulative effects / mitigation measures
	Decision making criteria	Time-frame			Nature of effect; Comments	
		ST	MT	LT		
<p>3. To improve health and reduce health inequalities.</p> <ul style="list-style-type: none"> Will it improve health or access to health facilities? Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 	services and facilities.	?	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver more growth than under options 1 and 2 (but less growth than proposed under option 4) and consequently there is opportunity to improve health infrastructure, including opportunities for walking and cycling. In the long term there could be an indirectly positive effect on health through enabling investment in health-care, leisure and physical recreational facilities. There is a balance between loss of countryside as a result of development and provision of improved opportunities to access the countryside as part of new developments.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Investment in new infrastructure keeps pace with growth. More housing growth offers more opportunities to invest in new health-care facilities, including new or improved opportunities for walking and cycling. Mitigation measures: Local Plan policies to ensure that new developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks, including increased opportunities for access to the countryside.</p>

February 2017 Option 3: 330 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the implementation of relevant Local Plan policies.	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce the fear of crime.</p> <p>Mitigation measures: Local Plan policies to ensure that new developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p>
5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social /extra care housing.	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	+	++	++	This option represents the level of housing growth necessary to provide a sufficiently large labour force to support the average level of job growth projected by two forecasting houses: Oxford Economics and Experian ⁽¹⁾ . This option represents the upper end of the objectively assessed housing need range. By meeting the full assessed need for housing in the District, this option will have a direct, medium and long-term, positive effect on the SA objective. The requirement is expected to enable the delivery of a range of	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Household projections suggest a considerable growth in the number of older people. The SHMA⁽²⁾ identified a critical affordable housing need. Objectively assessed housing need for the District is between 235dpa and 330dpa. This option will meet the objectively assessed housing need of the plan area and address both affordable</p>

February 2017 Option 3: 330 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
600 To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and 	?	?	?/-	<p>housing types and tenures, making a significant contribution to meeting community needs. While the impact of this option on the SA objective is greater than that under options 1 and 2, it is less significant than under option 4. As the upper end of the OAN range, this option is likely to make a significant contribution to addressing the needs of an ageing population and ensuring that problems of affordability can be addressed.</p> <p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered, this requirement could have a long-term negative effect on minimising the impact of new development on existing traffic congestion. Due to the extent of sites that are likely to be allocated under this option, it is less likely than under options</p>	<p>housing need and the housing needs of older people. Mitigation measures: Wider initiatives of the Council should be supported to help deliver additional affordable homes.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Lower levels of growth are likely to generate fewer new car journeys, resulting in less impact on existing congestion. Lower levels of growth will maximise the proportion of new development delivered close to existing centres, facilitating use of sustainable forms of transport. Higher levels of growth will allow most investment in support for</p>

February 2017 Option 3: 330 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	support Green Infrastructure?				1 and 2 that a high proportion of new development can be delivered close to town and village centres, possibly resulting in a lower use of sustainable forms of transport. The option is likely to support priorities and provisions identified in the SMDC integrated transport strategy ⁽³⁾ , including the proposed Local Transport Packages for Leek, Cheadle and Biddulph.	sustainable transport. Mitigation measures: Local Plan policies to ensure that developments are brought forward in sustainable locations; support safe walking and cycling and improve access to the natural environment.
ENVIRONMENTAL						
7. To minimise contributions to climate change and consider climate change adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in 	-	--	--	There is some uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of developments and the implementation of Local Plan policies. However since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered, this requirement is likely to result in a higher overall increase in carbon emissions from the energy consumption and emissions arising from construction and use of new	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Even if individual properties are built to high environmental performance standards and delivered in sustainable locations, the total increase in number of dwellings and car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental</p>

February 2017 Option 3: 330 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport?				development and associated car journeys. Impacts are likely to be less significant than under option 4.	design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 	?	?/-	?/--	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered, this requirement is likely to give rise to higher levels of new emissions of airborne pollutants associated with additional car journeys. In the medium and long-term there is likely to be a more significant negative impact than under options 1 and 2 and some potential for development to be delivered within 500m of an identified area of poor air quality. Impacts are</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Identified areas of poor air quality include the Cellarhead junction (between the A52 and A520); Ball Haye Street, Leek (a primary link road from Leek A53 to the A523 Macclesfield and Buxton Road) and Broad Street, Leek (a primary link road from Stoke on Trent)⁽⁴⁾. The total increase in number of dwellings and car journeys is likely to increase emission of airborne pollutants, there is a risk that air quality may deteriorate in areas of existing low quality.</p>

February 2017 Option 3: 330 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
					likely to be less significant than under option 4.	Mitigation measures: Local Plan policies to ensure that developments include appropriate landscaping to aid removal of air pollutants.
<p>To reduce flood risk, protect and enhance water resources.</p>	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However the SFRA⁽⁶⁾ confirms that there are few locations in which development would significantly increase fluvial flood risk elsewhere, due to the majority of potentially suitable sites for development being located within Flood Zone 1, with only a few sites partially within Flood Zone 2 or 3. Since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered, this requirement is likely to result in more peripheral development proposed on agricultural (greenfield) land on the outskirts of settlements, and thus result in more risk of surface water flood risk</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Development - at whatever overall scale - will be permitted only where schemes meet development plan requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>

February 2017 Option 3: 330 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Framework Directive? Will it encourage water efficiency and demand management? 				<p>within towns or villages and further downstream as a result of increased surface water runoff and reduced infiltration. Although in the long-term there is likely to be a less significant impact than under option 4.</p>	
10. To identify, conserve and enhance biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure? 	?	?/-	?/-	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. Since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered (with the exception of the highest growth option 4) this requirement is less likely to provide long-term protection for biodiversity and natural networks. However in comparison with options 1 and 2, there is likely to be a higher level of new investment and associated opportunities to deliver biodiversity enhancement or the extension of GI networks as part of schemes (but less opportunity than under option 4). Given that in comparison with options 1 and</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance, but the higher the level of growth, the greater the need to allocate sites in the countryside, on the periphery of settlements, including sites potentially requiring Green Belt release or within the zone of influence of European designated sites. Mitigation measures: Local Plan policies to ensure conservation and enhancement of biodiversity and that any development proposal is not</p>

SA Objective		February 2017 Option 3: 330 new homes each year					Justification; cumulative effects / mitigation measures
		Decision making criteria	Time-frame			Nature of effect; Comments	
		ST	MT	LT			
<p>11. To safeguard the best and most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.</p>		<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? 	?	?	?/-	<p>2, this requirement is likely to lead to increased recreational and other urbanising pressures on the closest European sites, the option is also less likely to afford long-term protection for the integrity of European sites. Whilst such negative impacts are not as significant as under option 4, the HRA of the Local Plan will ensure that Local Plan policies and allocations will not result in adverse effects on European designated sites.</p> <p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered (with the exception of the highest growth option 4) this requirement is less likely to provide overall, long-term protection for the best and most versatile</p>	<p>permitted to have an adverse effect on the integrity of a European site.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for the best and most versatile agricultural land and geological resources, but the higher the level of growth, the greater the need to allocate agricultural (greenfield) sites. Mitigation measures: Local Plan policies to ensure protection</p>

February 2017 Option 3: 330 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 				agricultural land. However negative impacts are not as significant as under option 4.	and enhancement of geologically important sites.
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.</p>
13. To protect and enhance the character of towns / villages and other	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and 	?	?	?/-	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Policies in the Local Plan will provide protection for heritage and</p>

February 2017 Option 3: 330 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
heritage and archaeological assets along with their settings.	<p>historic heritage assets (designated and undesignated assets) along with their settings?</p> <ul style="list-style-type: none"> Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place? 				proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered (with the exception of the highest growth option 4) this requirement is likely to result in less protection of cultural and historic heritage assets (designated and undesignated assets) or their settings that could not be reasonably mitigated. Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.	archaeological assets along with their settings. However the higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of altering the character of settlements and resulting in deterioration of cultural and historic heritage assets (designated and undesignated assets) or their settings that could not be reasonably mitigated. Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.
14. To protect and enhance the character and appearance of the landscape including	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? 	?	?	?/-	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. The Landscape and Settlement Character Assessment	Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. However the

February 2017 Option 3: 330 new homes each year					
SA Objective	Decision making criteria	Time-frame			Justification; cumulative effects / mitigation measures
		ST	MT	LT	
historic landscape and other natural assets and resources.	<ul style="list-style-type: none"> Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 				<p>higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of resulting in an adverse effect on the character of landscapes, including historic landscapes, that could not be reasonably mitigated.</p> <p>Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.</p>
15. To encourage	<ul style="list-style-type: none"> Will it support the development of a 	?	?	?	<p>Study⁽⁶⁾ offers guidance to help ensure new development required in the District takes place in locations that are compatible with the unique quality of the Staffordshire Moorlands landscape and in sympathy with the setting of a particular settlement. The HEA⁽⁷⁾ identified that (within each of the study areas) historic character had been retained and that beyond the present extent of the built areas, a dispersed settlement pattern was still predominant. Since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered (with the exception of the highest growth option 4) this requirement is less likely to result in the protection of the character and appearance of the landscape, including historic landscapes, and other natural assets and resources. Negative impacts are not as significant as under option 4.</p> <p>There is uncertainty as to the nature of the effect and level of significance as</p>

February 2017 Option 3: 330 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>further development of sustainable tourism, cultural heritage and local distinctiveness.</p>	<p>vibrant cultural economy and local distinctiveness?</p> <ul style="list-style-type: none"> Does it help support tourism and the visitor economy? 				<p>this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered (with the exception of the highest growth option 4) this requirement is more likely to result in a long-term, adverse impact on local distinctiveness, and this may lead to a long-term negative impact on tourism and the visitor economy. The significance is less than under option 4. The negative impacts are balanced by the requirement also providing more opportunity than under options 1 and 2 for investment in culture and tourism and this may result in medium term positive effects on the local economy.</p>	<p>Assumptions made: The higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of congestion and an adverse effect on the character and appearance of landscapes, towns and villages that together may detract from the further development of local distinctiveness and could result in long-term negative impacts on tourism and the visitor economy. Counter to this, higher levels of growth provide the most opportunities for investment that may support tourism and the visitor economy. Mitigation measures: Local Plan policies to support tourism and the visitor economy.</p>
ECONOMIC						
16. To safeguard the vitality and	<ul style="list-style-type: none"> Will it safeguard shops and 	+	++	++	<p>This option combines the job growth projected by Oxford Economics and Experian and incorporates partial catch</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Residents</p>

February 2017 Option 3: 330 new homes each year					
SA Objective	Decision making criteria	Time-frame		Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT		
viability of the District's towns and villages, and create and sustain a vibrant rural economy	services in existing centres? <ul style="list-style-type: none"> Will it safeguard and improve the retail, leisure and service provision? 				of new developments will support their local retail, leisure and service provision. Mitigation measures: Local Plan policies to support town and village centres.

SA Objective		February 2017 Option 3: 330 new homes each year					Justification; cumulative effects / mitigation measures
		Decision making criteria		Time-frame		Nature of effect; Comments	
		ST	MT	LT			
17. To strengthen, modernise and diversify the District economy, and provide sustainable economic growth	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 	+	+	++	This option is based on modelled job growth of an additional 870 jobs (794 FTEs) in the District 2014-2031 (51 annually). Although this seems modest, it is set within the context of a decline in jobs forecast under the 2014-based SNPP baseline. Job growth (while modest) is likely to result in long-term positive effects on business, the local economy and local employment.		<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Helping to reverse the decline of working age residents in the District would achieve a more balanced population structure and reduce potential future economic difficulties and the demand of services associated with an ageing population and a more limited supply of labour.</p> <p>Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
	<ul style="list-style-type: none"> Will it meet the needs of local people? Will it increase economic activity levels? Will it improve physical 	+	+	++	This option represents the level of housing growth necessary to provide a sufficiently large labour force to support an average of the Oxford Economics and Experian job growth forecasts for the District 2014-2031; a labour force increase of 981. This is likely to allow for the economic potential of the district to be realised and result in medium and long term positive impacts on the local economy and local employment.		<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Whilst there is not a direct causal relationship between job growth and housing needs, the two are nevertheless fundamentally related. Ensuring a sufficient supply of homes within easy access of employment is a central element</p>
18. To encourage and support a high and stable level of employment	<ul style="list-style-type: none"> Will it meet the needs of local people? Will it increase economic activity levels? Will it improve physical 	+	+	++	This option represents the level of housing growth necessary to provide a sufficiently large labour force to support an average of the Oxford Economics and Experian job growth forecasts for the District 2014-2031; a labour force increase of 981. This is likely to allow for the economic potential of the district to be realised and result in medium and long term positive impacts on the local economy and local employment.		<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Whilst there is not a direct causal relationship between job growth and housing needs, the two are nevertheless fundamentally related. Ensuring a sufficient supply of homes within easy access of employment is a central element</p>

February 2017 Option 3: 330 new homes each year					
SA Objective	Decision making criteria	Time-frame		Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT		
	accessibility to jobs? Will it support higher income levels for local residents?				of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.
<p>Summary of significant effects:</p> <p>This option proposes the delivery of 330 new dwellings per year. Since it is the upper end of the recommended objectively assessed housing need range, the housing requirement would have a direct, long-term positive effect on the SA objective to ensure provision of homes to meet local needs. This positive effect is likely to be more significant than under options 1 and 2. As the upper end of the range, the option is likely to make a significant contribution to addressing affordable housing need and the needs of an ageing population. Predicted population growth on around 8,500 is likely to increase spending in the local economy resulting in positive benefits for the District's towns and villages, including help to safeguard local shops and services. Under this option, these benefits are likely to be more significant than under options 1 and 2, but less significant than under option 4. This option is based on expected job growth of 870 and a labour force increase of 981 in the district 2014-2031. This is likely to allow for the economic potential of the district to be realised and lead to medium and long term positive impacts on the local economy and local employment. Option 3 requires the second highest number of site allocations of the four options considered, and consequently this alternative is likely to result in comparatively more negative effects on SA objectives relating to the protection of biodiversity; the character of towns, villages and heritage assets and their settings; and landscape character and natural assets than options 1 and 2. Negative effects on these objectives are slightly less under this option than under option 4. The higher level of growth under option 3 compared with options 1 and 2 is also likely to result in negative effects on objectives relating to climate change contributions and air quality that are associated with energy consumption and emissions arising from construction and use of new dwellings and associated car journeys. Due to the extent of sites that are likely to be allocated under this option, it is less likely than under options 1 and 2 that a high proportion of new development can be delivered close to town and village centres, resulting in negative effects on minimising the distance people need to travel to access key services and facilities and reducing the opportunities for use of sustainable forms of transport. Negative effects under option 3 in this regard are not likely to be as great as under option 4. However since option 3 proposes the second highest level of growth</p>					

SA Objective	February 2017 Option 3: 330 new homes each year				Justification; cumulative effects / mitigation measures
	Decision making criteria	Time-frame		Nature of effect; Comments	
		ST	MT		
	of the four options considered, it is likely to result in a higher level of investment than under options 1 and 2 in community facilities, including Green Infrastructure and other measures that help to reduce health inequalities, leading to possible minor positive effects on the SA objective relating to supporting health improvements. These positive effects are not likely to be as significant as under option 4.				

Table 8.4 Assessment Table for Option 3: 330 new homes each year

1. Staffordshire Moorlands SHMA December 2016 Update; Nathaniel Lichfield & Partners; February 2017
2. Strategic Housing Market Assessment and Housing Needs Study; Nathaniel Lichfield & Partners; June 2014
3. Staffordshire Moorlands District Integrated Transport Strategy 2013-2031; Staffordshire County Council; November 2013
4. 2014 Air Quality Progress Report for Staffordshire Moorlands District Council in fulfillment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; November 2014
5. Staffordshire Moorlands Level 1 Strategic Flood Risk Assessment (SFRA) Update; AECOM Infrastructure and Environment UK Ltd; October 2015
6. Landscape and Settlement Character Assessment Study; Wardell Armstrong; 2008
7. Historic Environment Character Assessment: Staffordshire Moorlands; Staffordshire County Council; August 2010

February 2017 Housing requirement Option 4

SA Objective		Option 4: 450 new homes each year				Justification; cumulative effects / mitigation measures
		Decision making criteria		Time-frame		
		ST	MT	LT		
SOCIAL						
1. To improve community cohesion and the quality of where people work and live.	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and 	?	?	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. There is a balance between loss of countryside as a result of development and provision of new, accessible open space as part of new developments. This requirement is likely to offer the most opportunity for associated benefits such as new or enhanced community facilities to be delivered as a result of new development.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are more dependent on design and location of new development than on the overall housing requirement. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new housing development.</p>

Option 4: 450 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
2. To advance equality of opportunity between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<p>appropriate levels of privacy?</p> <ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation? Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 	?	?	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver the highest level of housing growth of the four options considered and thus the greatest opportunity to improve accessibility to key services and facilities through delivering more investment into the rural areas. However, this level of new housing development is not likely to enable growth to be focused on small urban extensions and small sites within the existing settlement boundaries, which may result in increasing the distance people need to travel.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs, services and facilities. Mitigation measures: Local Plan policies to ensure that new developments are brought forward in sustainable locations.</p>

Option 4: 450 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
3. To improve health and reduce health inequalities.	<ul style="list-style-type: none"> Will it improve health or access to health facilities? Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 	?	?	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver the highest level of housing growth of the four options considered and thus present the most opportunities to improve health infrastructure, including opportunities for walking and cycling. In the long term there could be an improvement in health through increased investment in health-care, leisure and physical recreational facilities. There is a balance between loss of countryside as a result of development and provision of improved opportunities to access the countryside as part of new developments.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Investment in new infrastructure keeps pace with growth. More housing growth offers more opportunities to invest in new health-care facilities, including new or improved opportunities for walking and cycling. Mitigation measures: Local Plan policies to ensure that new developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks, including increased opportunities for access to the countryside.</p>

Option 4: 450 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the implementation of relevant Local Plan policies.	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce the fear of crime. Mitigation measures: Local Plan policies to ensure that new developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p>
5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social /extra care housing.	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	++	++	++	This option exceeds the upper end of the recommended OAN range ⁽¹⁾ and by meeting the full, objectively assessed need for housing in the District, it will have a direct, long-term, positive effect on this SA objective. The requirement is expected to enable the delivery of a range of housing types and tenures, making a significant contribution to meeting community needs. The impact of this option on the SA objective is more significant than under all other options. This option is likely to make the most contribution to addressing	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Household projections suggest a considerable growth in the number of older people. The SHMA⁽²⁾ identified a critical affordable housing need. Objectively assessed housing need for the District is between 235dpa and 300dpa. This option will meet the objectively assessed housing need of the plan area and will go further than any other option considered towards addressing affordable housing need and</p>

Option 4: 450 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
6. To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	?/-	?/--	?/--	<p>the needs of an ageing population and ensuring that problems of affordability can be satisfactorily addressed, improving outcomes for older people and those who still need to access the housing market.</p> <p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this requirement is likely to have a negative effect on minimising the impact of new development on existing traffic congestion. Due to the number of site allocations that would be required, it is likely that some new development would be delivered remote from town and village centres, making the use of sustainable forms of transport less likely. The option could support priorities and provisions identified in the SMDC integrated transport strategy ⁽³⁾, including the proposed</p>	<p>offering opportunities for investment in meeting the housing needs of older people. Mitigation measures: Wider initiatives of the Council should be supported to help deliver additional affordable homes.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Lower levels of growth are likely to generate fewer new car journeys, resulting in less impact on existing congestion. Lower levels of growth will maximise the proportion of new development delivered close to existing centres, facilitating use of sustainable forms of transport. Higher levels of growth will allow most investment in support for walking and cycling initiatives. Mitigation measures: Local Plan policies to ensure that developments are brought forward in sustainable locations; support safe walking and cycling and</p>

Option 4: 450 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
					Local Transport Packages for Leek, Cheddle and Biddulph.	improve access to the natural environment.
ENVIRONMENTAL						
7. To minimise contributions to climate change and consider climate change adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 	--	--	--	<p>There is some uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of developments and the implementation of Local Plan policies. However this option is likely to result in the greatest overall increase in carbon emissions from the energy consumption and emissions arising from construction and use of new development and associated car journeys.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Even if individual properties are built to high environmental performance standards and delivered in sustainable locations, the total increase in number of dwellings and car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.</p>
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of 	?	?/-	--	There is uncertainty as to the nature of the effect and level of significance	<p>Geographical scale: Local Plan area; Effects: Permanent;</p>

Option 4: 450 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 				<p>as this will be dependent on the location of development and the implementation of Local Plan policies. However as this option represents the highest level of housing growth, it is likely to give rise to the highest level of new emissions of airborne pollutants associated with additional car journeys. In the medium-term there is potential for development to be delivered within 500m of an identified area of poor air quality.</p>	<p>Assumptions made: Identified areas of poor air quality include the Cellarhead junction (between the A52 and A520); Ball Haye Street, Leek (a primary link road from Leek A53 to the A523 Macclesfield and Buxton Road) and Broad Street, Leek (a primary link road from Stoke on Trent)⁽⁴⁾. The total increase in number of dwellings and car journeys is likely to increase emission of airborne pollutants. There is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments include appropriate landscaping to aid removal of air pollutants.</p>
9. To reduce flood risk, protect and enhance water sources.	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However the SFRA⁽⁵⁾</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Development - at whatever overall scale - will be permitted only where schemes meet development plan</p>

Option 4: 450 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water Framework Directive? Will it encourage water efficiency and demand management? 				<p>confirms that there are few locations in which development would significantly increase fluvial flood risk elsewhere, due to the majority of potentially suitable sites for development being located within Flood Zone 1, with only a few sites partially within Flood Zone 2 or 3. This option requires the most peripheral development proposed on agricultural (greenfield) land on the outskirts of settlements, and thus poses the greatest risk of all options to increase surface water flood risk within towns or villages and further downstream as a result of increased surface water runoff and reduced infiltration.</p>	<p>requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>
10. To identify, conserve and enhance biodiversity	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites 	?/-	?/--	?/--	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide</p>

Option 4: 450 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
resources and to test the plan's policies and proposals on European Sites and SSSIs	<ul style="list-style-type: none"> of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure? 				implementation of Local Plan policies. However as it proposes the highest level of housing growth, of all options considered, this option is likely to provide least overall, long-term protection for biodiversity and natural networks. There will however be the greatest level of new investment and associated opportunities to deliver biodiversity enhancement or the extension of GI networks as part of schemes. Given it will lead to the highest recreational and other urbanising pressures on the closest European sites, of all options considered, this option is also likely to afford least protection for the integrity of European sites. However the HRA of the Local Plan will ensure that Local Plan policies and allocations will not result in adverse effects on European designated sites.	protection for biodiversity and for sites of ecological and nature conservation importance, but the higher the level of growth, the greater the need to allocate sites in the countryside, on the periphery of settlements, including potentially requiring Green Belt release and potentially sites within the zone of influence of European designated sites. Mitigation measures: Local Plan policies to ensure conservation and enhancement of biodiversity and that any development proposal is not permitted to have an adverse effect on the integrity of a European site.
11. To safeguard the best and most versatile agricultural land?	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? 	?/-	?/--	?/--	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the	Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in

Option 4: 450 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
agricultural land; improve soil and land resources; and protect and enhance geological resources.	<ul style="list-style-type: none"> Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 				location of development and the implementation of Local Plan policies. However as it proposes the highest level of housing growth of all options considered, this option is likely to provide least overall, long-term protection for the best and most versatile agricultural land.	the Local Plan will provide protection for the best and most versatile agricultural land and geological resources, but the higher the level of growth, the greater the need to allocate agricultural (greenfield) sites. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites.
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.	Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.

Option 4: 450 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
13. To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and undesignated assets) along with their settings? Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place? 	?/-	?/--	?/--	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However with the highest level of housing growth proposed, of all options considered, this option is least likely to result in protection of cultural and historic heritage assets (designated and undesignated) along with their settings.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings. However the higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of altering the character of settlements and resulting in deterioration of cultural and historic heritage assets (designated and undesignated assets) or their settings that could not be reasonably mitigated. Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.</p>
14. To protect and enhance the character	<ul style="list-style-type: none"> Will it protect and enhance the character of the 	?/-	?/--	?/--	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in</p>

Option 4: 450 new homes each year				Justification; cumulative effects / mitigation measures	
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments
		ST	MT	LT	
and appearance of the landscape including historic landscape and other natural assets and resources.	<ul style="list-style-type: none"> landscape and maintain and strengthen local distinctiveness? Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 				<p>the Local Plan will provide protection for landscape character and natural assets. However the higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of resulting in an adverse effect on the character of landscapes, including historic landscapes, that could not be reasonably mitigated. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.</p>
					<p>location of development and the implementation of Local Plan policies. The Landscape and Settlement Character Assessment Study⁽⁶⁾ offers guidance to help ensure new development required in the District takes place in locations that are compatible with the unique quality of the Staffordshire Moorlands landscape and in sympathy with the setting of a particular settlement. The HEA⁽⁷⁾ identified that (within each of the study areas) historic character had been retained and that beyond the present extent of the built areas, a dispersed settlement pattern was still predominant. With the highest level of housing growth proposed, of all options considered, this option is the least likely to result in the protection of the character and appearance of the landscape, including historic landscapes, and other natural assets and resources.</p>

Option 4: 450 new homes each year					Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame			
		ST	MT	LT	
15. To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and local distinctiveness? Does it help support tourism and the visitor economy? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. With the highest level of housing growth proposed, of all options considered, this option is the most likely to result in a long-term, adverse impact on local distinctiveness, potentially leading to an associated long-term negative impact on tourism and the visitor economy. However, this is balanced by the option also providing the most opportunity for investment in culture and tourism that could result in long-term positive effects on the local economy.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: The higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of congestion and an adverse effect on the character and appearance of landscapes, towns and villages that together may detract from the further development of local distinctiveness and could result in long-term negative impacts on tourism and the visitor economy. Counter to this, higher levels of growth provide the most opportunities for investment that may support tourism and the visitor economy. Mitigation measures: Local Plan policies to support tourism and the visitor economy.</p>
ECONOMIC					
16. To safeguard the vitality and	<ul style="list-style-type: none"> Will it safeguard shops and 	++	++	++	<p>This option uses the scenario based on past trends job growth but incorporating partial catch up</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Residents of</p>

Option 4: 450 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
viability of the District's towns and villages, and create and sustain a vibrant rural economy	<ul style="list-style-type: none"> services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 				<p>headship rates. Modelling the level of housing needed were historic job growth trends set to continue over the plan period indicates there would need to be an increase in the population of 13,697 in the district 2014-31. The increase in spending in the local economy this is likely to generate should result in significant benefits to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services. However these benefits should be treated with caution since the SHMA December 2016 update notes that the population growth would primarily be achieved by very significant levels of net inward migration counteracting natural change and this is likely to require a step change in migration above the level that may be achievable in the district.</p>	<p>new developments will support their local retail, leisure and service provision. To achieve the 450dpa that would be required based on a continuation of past job growth rates would require a 6-fold increase in net population growth compared to the 2014-based SNPP and would require more than 10,000 additional migrants from elsewhere across the UK/abroad to move into the district. Mitigation measures: Local Plan policies to support town and village centres.</p>
17. To strengthen, modernise and	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment 	++	++	++	<p>This projection estimates that there could be an increase in the labour force of 3,746 2014-31 (220pa). This</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: A local</p>

Option 4: 450 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
diversify the District economy, and promote sustainable economic growth	<ul style="list-style-type: none"> land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 				is likely to result in a significant positive effect on business, the local economy and local employment. However these benefits should be treated with caution since SHMA December 2016 update notes that the population growth would primarily be achieved by very significant levels of net inward migration counteracting natural change and this is likely to require a step change in migration above the level that may be achievable in the district.	labour supply will help to deliver economic growth across the plan area. Mitigation measures: Local Plan policies to support sustainable economic growth.
10 To encourage and support a high and stable level of employment	<ul style="list-style-type: none"> Will it meet the employment needs of local people? Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income 	++	++	++	<p>The past trends scenario provides employment growth in the district of 3,038 jobs 2014-31 (179pa). The option is likely to have a significant positive effect on the local economy and local employment. However these benefits should be treated with caution since the SHMA December 2016 update notes that the population growth required to underpin this job growth would primarily be achieved by inward migration as opposed to</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Whilst there is not a direct causal relationship between job growth and housing needs, the two are nevertheless fundamentally related. Ensuring a sufficient supply of homes within easy access of employment is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to</p>

Option 4: 450 new homes each year					
SA Objective	Decision making criteria	Time-frame			Justification; cumulative effects / mitigation measures
		ST	MT	LT	
	levels for local residents?				support sustainable economic growth.
					natural change. To achieve the 450dpa that would be required based on a continuation of past job growth rates would require a 6-fold increase in net population growth compared to the 2014-based SNPP and would require more than 10,000 additional migrants from elsewhere across the UK/abroad to move into the district.

Summary of significant effects:

This option proposes the delivery of 450 new dwellings per year. It will have a direct and significant positive effect on the SA objective to ensure provision of homes to meet local needs since it exceeds the upper end of the recommended objectively assessed housing need range. This option should make the greatest contribution of all options considered to addressing affordable housing need and the needs of an ageing population. Predicted population growth of around 13,700 is likely to increase spending in the local economy resulting in positive benefits for the District's towns and villages, including helping to safeguard local shops and services. The past trends scenario provides employment growth in the district of 3,038 jobs 2014-31 (179pa) and an increase in the labour force of 3,746 2014-31 (220pa). As a result, the option is likely to have a significant positive effect on the local economy and local employment. However these predicted positive effects should be treated with caution, since the SHMA December 2016 update notes that the population growth required to underpin this job growth would primarily be achieved by inward migration as opposed to natural change. To achieve the 450dpa that would be required based on a continuation of past job growth rates would require a 6-fold increase in net population growth compared to the 2014-based SNPP and would require more than 10,000 additional migrants from elsewhere across the UK/abroad to move into the district. This is considered to be at odds with what may be reasonably expected to occur in the district. As the highest growth option, requiring the highest number of site allocations, by comparison with other options considered, this alternative is likely to result in significant negative effects on SA objectives relating to the protection of biodiversity; the character of towns, villages and heritage assets and their settings; and landscape character and natural assets. The high level of housing growth is also likely to result in negative effects on objectives relating to climate change contributions and air quality

SA Objective	Option 4: 450 new homes each year				Justification; cumulative effects / mitigation measures
	Decision making criteria	Time-frame		Nature of effect; Comments	
		ST	MT		
	<p>that are associated with energy consumption and emissions arising from construction and use of new dwellings and associated car journeys. This level of new housing development is not likely to enable growth to be focused on small urban extensions and small sites within the existing settlement boundaries, which may result in increasing the distance people need to travel to access key services and facilities and makes the use of sustainable forms of transport less likely. However since this option proposes the highest level of growth, it is likely to result in the highest level of investment in community facilities, including Green Infrastructure and other measures that may help to reduce health inequalities, leading to positive effects on the SA objective relating to supporting health improvements.</p>				

Table 8.5 Assessment Table for Option 4: 450 new homes each year

1. Staffordshire Moorlands SHMA: December 2016 Revision; Nathaniel Lichfield & Partners; February 2017
2. Strategic Housing Market Assessment and Housing Needs Study; Nathaniel Lichfield & Partners; June 2014
3. Staffordshire Moorlands District Integrated Transport Strategy 2013-2031; Staffordshire County Council; November 2013
4. 2014 Air Quality Progress Report for Staffordshire Moorlands District Council in fulfillment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; November 2014
5. Staffordshire Moorlands Level 1 Strategic Flood Risk Assessment (SFRA) Update; AECOM Infrastructure and Environment UK Ltd; October 2015
6. Landscape and Settlement Character Assessment Study; Wardell Armstrong; 2008
7. Historic Environment Character Assessment: Staffordshire Moorlands; Staffordshire County Council; August 2010

January 2016 Alternatives appraisal

January 2016 Housing Requirement Option 1

SA Objective	January 2016 Option 1: 250 new homes each year				Justification; cumulative effects / mitigation measures
	Decision making criteria	Time-frame		Nature of effect; Comments	
		ST	MT		
	SOCIAL				

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>1. To improve community cohesion and the quality of where people work and live.</p>	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and appropriate levels of privacy? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. There is a balance between loss of countryside as a result of development and provision of new, accessible open space as part of new developments. This requirement may offer the least opportunity for associated benefits such as new or enhanced community facilities to be delivered as a result of new development.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are more dependent on design and location of new development than on the overall housing requirement. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new housing development.</p>

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
2. To advance equality of opportunity between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation? Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver the least housing growth of the four options considered and thus the least opportunity to improve accessibility to key services and facilities. Despite this, lower levels of housing growth will enable a focus of growth on small urban extensions and small sites within the existing settlement boundary which is likely to help minimise the distance people need to travel.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs, services and facilities. Mitigation measures: Local Plan policies to ensure that new developments are brought forward in sustainable locations.</p>
3. To improve health and	<ul style="list-style-type: none"> Will it improve health or access to health facilities? 	?/-	?/-	?/--	<p>There is uncertainty as to the nature of the effect and level of significance</p>	<p>Geographical scale: Local Plan area; Effects: Permanent;</p>

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>reduce health inequalities.</p> <p style="text-align: center;">Page 322</p>	<ul style="list-style-type: none"> Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 				<p>as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver the least housing growth of the four options considered and thus the least opportunity to improve health infrastructure, including opportunities for walking and cycling. In the long term there could be a deterioration in health through lack of investment in health-care, leisure and physical recreational facilities. There is a balance between loss of countryside as a result of development and provision of improved opportunities to access the countryside as part of new developments.</p>	<p>Assumptions made: Investment in new infrastructure keeps pace with growth. More housing growth offers more opportunities to invest in new health-care facilities, including new or improved opportunities for walking and cycling. Mitigation measures: Local Plan policies to ensure that new developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks, including increased opportunities for access to the countryside.</p>
<p>4. To minimise opportunities for crime and reduce the fear of crime.</p>	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the implementation of relevant Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce the fear of crime. Mitigation measures: Local Plan policies to ensure that new</p>

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social /extra care housing.	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	+	+	+	<p>This option represents the lower end of the recommended OAN range⁽¹⁾ and by meeting the full demographically-assessed need for housing in the District will have a direct, long-term, positive effect on this SA objective. The requirement is expected to enable the delivery of a range of housing types and tenures, making a contribution to meeting community needs. However the impact of this option on the SA objective is less significant than under all other options. This option is likely to make the least contribution to addressing the needs of an ageing population or ensuring that problems of affordability can be satisfactorily addressed, risking adverse outcomes for older people and those who still need to access the housing market.</p>	<p>developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Household projections suggest a considerable growth in the number of older people. The SHIMA⁽²⁾ identified a critical affordable housing need. Objectively assessed housing need for the District is between 250dpa and 440dpa. This option will meet the objectively assessed housing need of the plan area but fails fully to address affordable housing need, or offer maximum opportunity for investment in meeting the housing needs of older people. Mitigation measures: Wider initiatives of the Council should be supported to help deliver additional affordable homes.</p>

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
6. To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	?/+	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this requirement could have a positive effect on minimising the impact of new development on existing traffic congestion and could offer support for the use of sustainable forms of transport through delivering most new development close to town and village centres. The option could support priorities and provisions identified in the SMDC integrated transport strategy ⁽³⁾, including the proposed Local Transport Packages for Leek, Cheadle and Biddulph.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Lower levels of growth are likely to generate fewer new car journeys, resulting in less impact on existing congestion. Lower levels of growth will maximise the proportion of new development delivered close to existing centres, facilitating use of sustainable forms of transport. Higher levels of growth will allow most investment in support for sustainable transport. Mitigation measures: Local Plan policies to ensure that developments are brought forward in sustainable locations; support safe walking and cycling and improve access to the natural environment.</p>
ENVIRONMENTAL						
7. To minimise contributions to climate change	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? 	-	-	-	<p>There is some uncertainty as to the nature of the effect and level of</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Even if individual properties are built to</p>

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
and consider climate change adaptation.	<ul style="list-style-type: none"> Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 				<p>significance as this will be dependent on the location of developments and the implementation of Local Plan policies. However this option is likely to result in the smallest overall increase in carbon emissions from the energy consumption and emissions arising from construction and use of new development and associated car journeys.</p>	<p>high environmental performance standards and delivered in sustainable locations, the total increase in number of dwellings and car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.</p>
85 to improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 	?	?	?/-	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as this option represents the lowest level of growth, it is likely to give rise to the lowest level of new emissions of airborne pollutants associated with additional car journeys. In the long-term there is some potential for development to</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Identified areas of poor air quality include the Cellarhead junction (between the A52 and A520); Ball Haye Street, Leek (a primary link road from Leek A53 to the A523 Macclesfield and Buxton Road) and Broad Street, Leek (a primary link road from Stoke on Trent)⁽⁴⁾. The total</p>

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
					be delivered within 500m of an identified area of poor air quality.	increase in number of dwellings and car journeys is likely to increase emission of airborne pollutants. There is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments include appropriate landscaping to aid removal of air pollutants.
9. To reduce flood risk, protect and enhance water sources.	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However the SFRA⁽⁶⁾ confirms that there are few locations in which development would significantly increase fluvial flood risk elsewhere, due to the majority of potentially suitable sites for development being located within Flood Zone 1, with only a few sites partially within Flood Zone 2 or 3. This option requires the least peripheral development proposed on</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Development - at whatever overall scale - will be permitted only where schemes meet development plan requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> of water resources and help contribute to the objectives of the Water Framework Directive? Will it encourage water efficiency and demand management? 				<p>agricultural (greenfield) land on the outskirts of settlements, and thus poses the lowest risk of all options to increase surface water flood risk within towns or villages and further downstream as a result of increased surface water runoff and reduced infiltration.</p>	
<p>10 To identify, conserve and enhance biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs</p>	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and 	?	?/+	?/++	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as it proposes the lowest level of growth, this option is likely to provide most overall, long-term protection for biodiversity and natural networks. There will however be the lowest level of new investment and associated opportunities to deliver biodiversity enhancement or the extension of GI networks as part of schemes. Given it will lead to the lowest recreational</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance, but the higher the level of growth, the greater the need to allocate sites in the countryside, on the periphery of settlements, including potentially requiring Green Belt release and potentially sites within the zone of influence of European designated sites. Mitigation measures: Local Plan policies to ensure</p>

January 2016 Option 1: 250 new homes each year					
SA Objective	Decision making criteria	Time-frame		Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT		
	green infrastructure?				conservation and enhancement of biodiversity and that any development proposal is not permitted to have an adverse effect on the integrity of a European site.
12 To safeguard the best and most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and 	?	?/+	?/++	<p>and other urbanising pressures on the closest European sites, of all options considered, this option is also likely to afford most protection for the integrity of European sites. However the HRA of the Local Plan will ensure that Local Plan policies and allocations will not result in adverse effects on European designated sites.</p> <p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as it proposes the lowest level of growth, this option is likely to provide most overall, long-term protection for the best and most versatile agricultural land.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for the best and most versatile agricultural land and geological resources, but the higher the level of growth, the greater the need to allocate agricultural (greenfield) sites. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites.</p>

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> geomorphological features? Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.</p>
13. To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and undesignated assets) along with their settings? Will it protect and reinforce the character and 	?	?/+	?/++	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However with the lowest level of growth proposed, of all options considered, this option is most likely to result in protection of cultural and historic heritage assets (designated and undesignated) along with their settings.	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings. However the higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of altering the character of settlements and resulting in deterioration of cultural and historic heritage assets</p>

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place?					(designated and undesignated assets) or their settings that could not be reasonably mitigated. Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.
140 To protect and enhance the character and appearance of the landscape including historic landscape and other natural assets and resources.	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment 	?	?/+	?/++	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. The Landscape and Settlement Character Assessment Study⁽⁶⁾ offers guidance to help ensure new development required in the District takes place in locations that are compatible with the unique quality of the Staffordshire Moorlands landscape and in sympathy with the setting of a particular settlement. The HEA⁽⁷⁾ identified that (within each of the study areas) historic character</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. However the higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of resulting in an adverse effect on the character of landscapes, including historic landscapes, that could not be reasonably mitigated. Mitigation measures: Local Plan policies to support protection and enhancement of the character and</p>	

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	identified in the NCA profiles?				had been retained and that beyond the present extent of the built areas, a dispersed settlement pattern was still predominant. With the lowest level of growth proposed, of all options considered, this option is the most likely to result in the protection of the character and appearance of the landscape, including historic landscapes, and other natural assets and resources.	appearance of the landscape including historic landscape and other natural assets and resources.
10 To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and local distinctiveness? Does it help support tourism and the visitor economy? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. With the lowest level of growth proposed, of all options considered, this option is the least likely to result in a long-term, adverse impact on local distinctiveness, potentially leading to an associated long-term positive impact on tourism and the visitor economy. However, this is balanced by the option also providing the least opportunity for investment	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: The higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of congestion and an adverse effect on the character and appearance of landscapes, towns and villages that together may detract from the further development of local distinctiveness and could result in long-term negative impacts on tourism and the visitor economy. Counter to this, higher levels of</p>

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
					in culture and tourism that could result in long-term negative effects on the local economy.	growth provide the most opportunities for investment that may support tourism and the visitor economy. Mitigation measures: Local Plan policies to support tourism and the visitor economy.
ECONOMIC						
16. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	+	+	+	Under this option, the population of the district is projected to increase by 2,882 to 2031. The population growth predicted arises from high levels of in-migration counteracted by natural change resulting from an excess of deaths over births. The increase in spending in the local economy this is likely to generate should result in benefits to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services. Although since this option provides for the lowest level of growth, the benefits would be lowest of all options considered.	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Residents of new developments will support their local retail, leisure and service provision. Mitigation measures: Local Plan policies to support town and village centres.</p>

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
17. To strengthen, modernise and diversify the District economy, and promote sustainable economic growth	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 	-	--	--	<p>This option is likely to lead to the loss of 2,075 jobs over the plan period. This is likely to result in a significant negative effect on business, the local economy and local employment through a lack of encouragement for investment in business and infrastructure.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: A local labour supply will help to deliver economic growth across the plan area. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
18. To encourage and support a high and stable level of employment	<ul style="list-style-type: none"> Will it meet the employment needs of local people? Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income 	-	--	--	<p>It is projected that the number of people aged over 65 in the District will increase by 39% by 2031. The oldest age groups (75-84 and 85+) would see the most substantial increases of 69% and 134% respectively⁽⁸⁾. Under this option, the ageing profile of the population is likely to result in a reduction in the labour force, with the working age population expected to decline by</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Whilst there is not a direct causal relationship between job growth and housing needs, the two are nevertheless fundamentally related. Ensuring a sufficient supply of homes within easy access of employment is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to</p>

January 2016 Option 1: 250 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	levels for local residents?				4,058 by 2031. Taking into account overall economic activity rates of individual age groups, this option indicates that the labour force would decline by 2,075 over the plan period. The option is likely to have a negative effect on the local economy and local employment.	support sustainable economic growth.

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Summary of significant effects:

This option proposes the delivery of 250 new dwellings per year. It will have a direct, long-term positive effect on the SA objective to ensure provision of homes to meet local needs since it represents the lower end of the recommended objectively assessed housing need range. However being the lower end of the range, the option makes the least contribution of all options considered to addressing affordable housing need and the needs of an ageing population. Predicted population growth of around 2,800 is likely to increase spending in the local economy resulting in positive benefits for the District's towns and villages including helping to safeguard local shops and services. However since this option provides for the lowest level of growth, these benefits would be lowest of all options considered. This option is likely to lead to the loss of 2,075 jobs over the plan period. This is likely to result in a significant negative effect on business, the local economy and local employment through a lack of encouragement for investment in business and infrastructure. As the lowest growth option, requiring the lowest number of site allocations, by comparison with other options considered, this alternative is likely to result in minor positive effects on SA objectives relating to the protection of biodiversity; the character of towns, villages and heritage assets and their settings; and landscape character and natural assets. The low level of growth is also likely to minimise the negative effects on objectives relating to climate change contributions and air quality that are associated with energy consumption and emissions arising from construction and use of new dwellings and associated car journeys. The low level of growth is also likely to help enable a focus of new development on small urban extensions and small sites within existing settlement boundaries resulting in minor positive effects on minimising the distance people need to travel to access key services

SA Objective	January 2016 Option 1: 250 new homes each year				Justification; cumulative effects / mitigation measures	
	Decision making criteria	Time-frame				Nature of effect; Comments
		ST	MT	LT		
					and facilities and increasing the opportunities for use of sustainable forms of transport. However since this option proposes the lowest level of growth, it is also likely to result in the lowest level of investment in community facilities, including Green Infrastructure and other measures that help to reduce health inequalities, leading to minor negative effects on the SA objective relating to supporting health improvements.	

Table 8.6 Assessment Table for Option 1: 250 new homes each year

1. Staffordshire Moorlands 2012-based SNHP Update: January 2016 Revision; Nathaniel Lichfield & Partners; January 2016
2. Strategic Housing Market Assessment and Housing Needs Study; Nathaniel Lichfield & Partners; June 2014
3. Staffordshire Moorlands District Integrated Transport Strategy 2013-2031; Staffordshire County Council; November 2013
4. 2014 Air Quality Progress Report for Staffordshire Moorlands District Council in fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; November 2014
5. Staffordshire Moorlands Level 1 Strategic Flood Risk Assessment (SFRA) Update; AECOM Infrastructure and Environment UK Ltd; October 2015
6. Landscape and Settlement Character Assessment Study; Wardell Armstrong; 2008
7. Historic Environment Character Assessment: Staffordshire Moorlands; Staffordshire County Council; August 2010
8. Staffordshire Moorlands 2012-based SNHP Update; Nathaniel Lichfield & Partners; January 2016

January 2016 Housing Requirement Option 2

SA Objective	January 2016 Option 2: 320 new homes each year				Justification; cumulative effects / mitigation measures	
	Decision making criteria	Time-frame				Nature of effect; Comments
		ST	MT	LT		
SOCIAL						
1. To improve community cohesion and the quality of life where people work and live.	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. There is a balance between loss of countryside as a result of development and provision of new, accessible open space as part of new developments. This requirement may offer fewer opportunities than options 3 and 4 for achieving associated benefits of investment, such as new or enhanced community facilities, but there would be more opportunities than under option 1.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are more dependent on design and location of new development than on the overall housing requirement. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new housing development.</p>

January 2016 Option 2: 320 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
2. To advance equality of opportunity between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<p>appropriate levels of privacy?</p> <ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation? Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver more growth than under option 1, but less growth than proposed under options 3 or 4 and thus some opportunity to improve accessibility to key services and facilities. Lower levels of housing growth may enable a focus of growth on small urban extensions and small sites within the existing settlement boundary which is likely to help minimise the distance people need to travel.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs, services and facilities. Mitigation measures: Local Plan policies to ensure that new developments are brought forward in sustainable locations.</p>

January 2016 Option 2: 320 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
3. To improve health and reduce health inequalities.	<ul style="list-style-type: none"> Will it improve health or access to health facilities? Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 	?	?/-	?/-	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver more growth than under option 1, but less growth than proposed under options 3 or 4 and thus some opportunity to improve health infrastructure, including opportunities for walking and cycling. In the long term there could be a deterioration in health through lack of investment in health-care, leisure and physical recreational facilities. There is a balance between loss of countryside as a result of development and provision of improved opportunities to access the countryside as part of new developments.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Investment in new infrastructure keeps pace with growth. More housing growth offers more opportunities to invest in new health-care facilities, including new or improved opportunities for walking and cycling. Mitigation measures: Local Plan policies to ensure that new developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks, including increased opportunities for access to the countryside.</p>
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the implementation of relevant Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce</p>

January 2016 Option 2: 320 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social /extra care housing.	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	+	+	++	<p>This option represents the job stabilisation / past trends job growth scenario⁽¹⁾. It is also broadly aligned with the requirement identified in the adopted Core Strategy (300dpa). By meeting the full assessed need for housing in the District, this option will have a direct, long-term, positive effect on the SA objective. The requirement is expected to enable the delivery of a range of housing types and tenures, making a contribution to meeting community needs. While the impact of this option on the SA objective is greater than that under option 1, it is less significant than under options 3 and 4. Whilst this option is likely to contribute to addressing the needs of an ageing population and ensuring that problems</p>	<p>the fear of crime. Mitigation measures: Local Plan policies to ensure that new developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Household projections suggest a considerable growth in the number of older people. The SHMA⁽²⁾ identified a critical affordable housing need. Objectively assessed housing need for the District is between 250dpa and 440dpa. This option will meet the objectively assessed housing need of the plan area but fails fully to address affordable housing need, or offer maximum opportunity for investment in meeting the housing needs of older people. Mitigation measures: Wider initiatives of the Council should be supported to</p>

January 2016 Option 2: 320 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
6. To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	?/+	?/+	?/++	<p>of affordability can be addressed, there is a greater risk of adverse outcomes for older people and those who still need to access the housing market than under options 3 and 4.</p> <p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement could have a long-term positive effect on minimising the impact of new development on existing traffic congestion and could offer support for the use of sustainable forms of transport through delivering new development close to town and village centres. The option could support priorities and provisions identified in the SMDC integrated transport strategy ⁽³⁾, including the</p>	<p>help deliver additional affordable homes.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Lower levels of growth are likely to generate fewer new car journeys, resulting in less impact on existing congestion. Lower levels of growth will maximise the proportion of new development delivered close to existing centres, facilitating use of sustainable forms of transport. Higher levels of growth will allow most investment in support for sustainable transport. Mitigation measures: Local Plan policies to ensure that developments are brought forward in sustainable locations; support safe walking and cycling and improve access to the natural environment.</p>

January 2016 Option 2: 320 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
					proposed Local Transport Packages for Leek, Cheadle and Biddulph.	
ENVIRONMENTAL						
7. To minimise contributions to climate change and consider climate change adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 	-	-	--	<p>There is some uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of developments and the implementation of Local Plan policies. However since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to result in a lower overall increase in carbon emissions from the energy consumption and emissions arising from construction and use of new development and associated car journeys. In the long-term there is likely to be a more significant negative impact than under option 1 since this proposes lower growth.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Even if individual properties are built to high environmental performance standards and delivered in sustainable locations, the total increase in number of dwellings and car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.</p>

SA Objective		January 2016 Option 2: 320 new homes each year					Justification; cumulative effects / mitigation measures	
		Decision making criteria		Time-frame				Nature of effect; Comments
		ST	MT	LT				
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 	?	?/-	?/-	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to give rise to lower levels of new emissions of airborne pollutants associated with additional car journeys. In the medium and long-term there is likely to be a more significant negative impact than under option 1 and some potential for development to be delivered within 500m of an identified area of poor air quality.</p>			<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Identified areas of poor air quality include the Cellarhead junction (between the A52 and A520); Ball Haye Street, Leek (a primary link road from Leek A53 to the A523 Macclesfield and Buxton Road) and Broad Street, Leek (a primary link road from Stoke on Trent)⁽⁴⁾. The total increase in number of dwellings and car journeys is likely to increase emission of airborne pollutants, there is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments include appropriate landscaping to aid removal of air pollutants.</p>
9. To reduce flood risk, protect and enhance water sources.	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.</p>			<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Development - at whatever overall scale - will be permitted only</p>

SA Objective	January 2016 Option 2: 320 new homes each year				Justification; cumulative effects / mitigation measures	
	Decision making criteria	Time-frame				Nature of effect; Comments
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water Framework Directive? Will it encourage water efficiency and demand management? 				<p>However the SFRA⁽⁶⁾ confirms that there are few locations in which development would significantly increase fluvial flood risk elsewhere, due to the majority of potentially suitable sites for development being located within Flood Zone 1, with only a few sites partially within Flood Zone 2 or 3. Since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to result in less peripheral development proposed on agricultural (greenfield) land on the outskirts of settlements, and thus result in less risk of surface water flood risk within towns or villages and further downstream as a result of increased surface water runoff and reduced infiltration. Although in the long-term there is likely to be a more significant negative impact than under option 1.</p>	<p>where schemes meet development plan requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>
10. To identify, conserve and enhance	<ul style="list-style-type: none"> Will it protect and promote effective management of 	?	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in</p>	

January 2016 Option 2: 320 new homes each year					
SA Objective	Decision making criteria	Time-frame		Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT		
biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs Page 344	the district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure?			location of development and the implementation of Local Plan policies. However, since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to provide overall, long-term protection for biodiversity and natural networks. However in comparison with options 3 and 4, there is likely to be a lower level of new investment and associated opportunities to deliver biodiversity enhancement or the extension of GI networks as part of schemes. Given that in comparison with options 3 and 4, this requirement is likely to lead to lower recreational and other urbanising pressures on the closest European sites, the option is also likely to afford long-term protection for the integrity of European sites. Whilst positive impacts are not as significant as under option 1, the HRA of the Local Plan will ensure that Local Plan	the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance, but the higher the level of growth, the greater the need to allocate sites in the countryside, on the periphery of settlements, including sites potentially requiring Green Belt release or within the zone of influence of European designated sites. Mitigation measures: Local Plan policies to ensure conservation and enhancement of biodiversity and that any development proposal is not permitted to have an adverse effect on the integrity of a European site.

January 2016 Option 2: 320 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
11. To safeguard the best and most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 	?	?/+	?/+	<p>policies and allocations will not result in adverse effects on European designated sites.</p> <p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to provide overall, long-term protection for the best and most versatile agricultural land. However positive impacts are not as significant as under option 1.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for the best and most versatile agricultural land and geological resources, but the higher the level of growth, the greater the need to allocate agricultural (greenfield) sites. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites.</p>
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will encourage the</p>

January 2016 Option 2: 320 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 				location of development and the implementation of Local Plan policies.	re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.
16 To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and undesignated assets) along with their settings? Will it protect and reinforce the character and appearance of the district's towns and villages and 	?	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to result in protection of cultural and historic heritage assets (designated and undesignated) along with their settings. Positive impacts are not as significant as under option 1.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings. However the higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of altering the character of settlements and resulting in deterioration of cultural and historic heritage assets (designated and undesignated assets) or their settings that could not be reasonably mitigated.</p>

January 2016 Option 2: 320 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	maintain and strengthen local distinctiveness and sense of place?					Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.
14. To protect and enhance the character and appearance of the landscape including historic landscape and other natural assets and resources.	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 	?	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. The Landscape and Settlement Character Assessment Study⁽⁶⁾ offers guidance to help ensure new development required in the District takes place in locations that are compatible with the unique quality of the Staffordshire Moorlands landscape and in sympathy with the setting of a particular settlement. The HEA⁽⁷⁾ identified that (within each of the study areas) historic character had been retained and that beyond the present extent of the built areas, a dispersed</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. However the higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of resulting in an adverse effect on the character of landscapes, including historic landscapes, that could not be reasonably mitigated. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and</p>	

January 2016 Option 2: 320 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
					settlement pattern was still predominant. Since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to result in the protection of the character and appearance of the landscape, including historic landscapes, and other natural assets and resources. Positive impacts are not as significant as under option 1.	other natural assets and resources.
15. To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and local distinctiveness? Does it help support tourism and the visitor economy? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is less likely to result in a long-term, adverse impact on local distinctiveness, and this may lead to a long-term positive impact on tourism and the visitor economy. The	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: The higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of congestion and an adverse effect on the character and appearance of landscapes, towns and villages that together may detract from the further development of local distinctiveness and could result in long-term negative impacts on tourism and the visitor economy.</p>

January 2016 Option 2: 320 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
					significance is less than under option 1. The positive impacts are balanced by the requirement also providing less opportunity than under options 3 and 4 for investment in culture and tourism and this may result in long-term negative effects on the local economy.	Counter to this, higher levels of growth provide the most opportunities for investment that may support tourism and the visitor economy. Mitigation measures: Local Plan policies to support tourism and the visitor economy.
ECONOMIC						
10 To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	+	+	++	This option assumes that the number of jobs in the District remains at its current (2012) level over the plan period and since there is an ageing population, there would be a need for growth in the labour force, in-migration and ultimately housing. Creating a labour force large enough to support jobs would result in a population increase of 7,901. The increase in spending in the local economy this is likely to generate should result in benefits to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services.	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Residents of new developments will support their local retail, leisure and service provision. Mitigation measures: Local Plan policies to support town and village centres.</p>

SA Objective		January 2016 Option 2: 320 new homes each year				Justification; cumulative effects / mitigation measures
		Decision making criteria		Time-frame		
		ST	MT	LT		
					Although since this option proposes a lower level of growth than under options 3 and 4, in comparison with other alternatives considered, this requirement is likely to result in less significant benefits. Benefits would be more significant than under option 1.	
17. To strengthen, modernise and diversify the District economy, and promote sustainable economic growth		<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 	+	+	+	<p>This option is likely to lead to zero additional jobs (or a marginal increase from the 10% uplift for affordable housing) and is expected to help stem the decline of working age residents in the District. This is likely to result in a minor positive effect on business, the local economy and local employment.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Helping to stem the decline of working age residents in the District would achieve a more balanced population structure and reduce potential future economic difficulties and the demands of services associated with an ageing population and a more limited supply of labour. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
18. To encourage and		<ul style="list-style-type: none"> Will it meet the employment 	0	0	+	<p>This option is expected to maintain the current number of jobs in the</p> <p>Geographical scale: Local Plan area; Effects: Permanent;</p>

January 2016 Option 2: 320 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
support a high and stable level of employment	<ul style="list-style-type: none"> needs of local people? Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 				District. This is likely to result in a long term minor positive impact on the local economy and local employment.	<p>Assumptions made: Whilst there is not a direct causal relationship between job growth and housing needs, the two are nevertheless fundamentally related. Ensuring a sufficient supply of homes within easy access of employment is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
<p>Summary of significant effects:</p> <p>This option proposes the delivery of 320 new dwellings per year. Since it is within the recommended objectively assessed housing need range, the housing requirement would have a direct, long-term positive effect on the SA objective to ensure provision of homes to meet local needs. This positive effect is likely to be more significant than under option 1. However being closer to the lower end of the range than options 3 and 4, the option makes less of a contribution than options 3 and 4 to addressing affordable housing need and the needs of an ageing population. Predicted population growth of around 7,900 is likely to increase spending in the local economy resulting in positive benefits for the District's towns and villages, including help to safeguard local shops and services. Under this option, these benefits are likely to be more significant than under option 1 and less significant than under options 3 and 4. This option is expected to maintain the current number of jobs in the district over the plan period. This is likely to result in a long term minor positive impact on business, the local economy and local employment. This compares favourably with the impacts on this objective likely under option 1, where significant negative impacts on SA objectives for supporting employment and economic growth are likely. However the positive impacts on economic growth under this option are less significant than those likely to result under options 3 and 4. Option 2 requires the second lowest number of site allocations</p>						

SA Objective	January 2016 Option 2: 320 new homes each year			Justification; cumulative effects / mitigation measures	
	Decision making criteria	Time-frame			Nature of effect; Comments
		ST	MT		
				<p>of the four options considered, and consequently this alternative is likely to result in comparatively more positive effects on SA objectives relating to the protection of biodiversity; the character of towns, villages and heritage assets and their settings; and landscape character and natural assets than options 3 and 4. Positive effects on these objectives are slightly less under this option than under option 1. The lower level of growth under option 2 compared with options 3 and 4 is also likely to minimise the negative effects on objectives relating to climate change contributions and air quality that are associated with energy consumption and emissions arising from construction and use of new dwellings and associated car journeys. The lower level of growth is also likely more likely under option 2 than options 3 and 4 to enable a focus of new development on small urban extensions and small sites within existing settlement boundaries resulting in minor positive effects on minimising the distance people need to travel to access key services and facilities and increasing the opportunities for use of sustainable forms of transport. Benefits under option 2 in this regard are not likely to be as great as under option 1. However since option 2 proposes the second lowest level of growth of the four options considered, it is likely to result in a lower level of investment than under options 3 and 4 in community facilities, including Green Infrastructure and other measures that help to reduce health inequalities, leading to possible minor negative effects on the SA objective relating to supporting health improvements. These negative effects are not likely to be as significant as under option 1.</p>	

Table 8.7 Assessment Table for Option 2: 320 new homes each year

1. Staffordshire Moorlands 2012-based SNHP Update: January 2016 Revision; Nathaniel Lichfield & Partners; January 2016
2. Strategic Housing Market Assessment and Housing Needs Study; Nathaniel Lichfield & Partners; June 2014
3. Staffordshire Moorlands District Integrated Transport Strategy 2013-2031; Staffordshire County Council; November 2013
4. 2014 Air Quality Progress Report for Staffordshire Moorlands District Council In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; November 2014
5. Staffordshire Moorlands Level 1 Strategic Flood Risk Assessment (SFRA) Update; AECOM Infrastructure and Environment UK Ltd; October 2015
6. Landscape and Settlement Character Assessment Study; Wardell Armstrong; 2008
7. Historic Environment Character Assessment: Staffordshire Moorlands; Staffordshire County Council; August 2010

January 2016 Housing Requirement Option 3

SA Objective		January 2016 Option 3: 440 new homes each year				Justification; cumulative effects / mitigation measures
		Decision making criteria		Time-frame		
		ST	MT	LT		
SOCIAL						
1. To improve community cohesion and the quality of where people work and live.	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and 	?	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. There is a balance between loss of countryside as a result of development and provision of new, accessible open space as part of new developments. This requirement may offer more opportunities than options 1 and 2 for achieving associated benefits of investment, such as new or enhanced community facilities, but there would be less opportunities than under option 4.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are more dependent on design and location of new development than on the overall housing requirement. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new housing development.</p>

January 2016 Option 3: 440 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
2. To advance equality of opportunity between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<p>appropriate levels of privacy?</p> <ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation? Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 	?	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver more growth than under options 1 and 2 (but less growth than proposed under option 4) and consequently there is opportunity to improve accessibility to key services and facilities through delivering more investment into the rural areas. However under this option it is less likely than under options 1 and 2 that the focus of growth could be delivered as small urban extensions and small sites within existing settlement boundaries and this may increase the distance that some people would need to travel in order to access key services and facilities.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs, services and facilities. Mitigation measures: Local Plan policies to ensure that new developments are brought forward in sustainable locations.</p>

January 2016 Option 3: 440 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
3. To improve health and reduce health inequalities.	<ul style="list-style-type: none"> Will it improve health or access to health facilities? Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 	?	?/+	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver more growth than under options 1 and 2 (but less growth than proposed under option 4) and consequently there is opportunity to improve health infrastructure, including opportunities for walking and cycling. In the long term there could be an indirectly positive effect on health through enabling investment in health-care, leisure and physical recreational facilities. There is a balance between loss of countryside as a result of development and provision of improved opportunities to access the countryside as part of new developments.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Investment in new infrastructure keeps pace with growth. More housing growth offers more opportunities to invest in new health-care facilities, including new or improved opportunities for walking and cycling. Mitigation measures: Local Plan policies to ensure that new developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks, including increased opportunities for access to the countryside.</p>
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the implementation of relevant Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce</p>

January 2016 Option 3: 440 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>50 To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social /extra care housing.</p>	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	+	++	++	<p>This option represents the Oxford Economics Job Growth scenario⁽¹⁾. This option represents to upper end of the objectively assessed housing need range. By meeting the full assessed need for housing in the District, this option will have a direct, medium and long-term, positive effect on the SA objective. The requirement is expected to enable the delivery of a range of housing types and tenures, making a significant contribution to meeting community needs. While the impact of this option on the SA objective is greater than that under options 1 and 2, it is less significant than under option 4. As the upper end of the OAN range, this option is likely to make a significant contribution to addressing the needs of an ageing population and ensuring that</p>	<p>the fear of crime. Mitigation measures: Local Plan policies to ensure that new developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Household projections suggest a considerable growth in the number of older people. The SHMA⁽²⁾ identified a critical affordable housing need. Objectively assessed housing need for the District is between 250dpa and 440dpa. This option will meet the objectively assessed housing need of the plan area and address both affordable housing need and the housing needs of older people. Mitigation measures: Wider initiatives of the Council should be supported to help deliver additional affordable homes.</p>

January 2016 Option 3: 440 new homes each year					
SA Objective	Decision making criteria	Time-frame			Justification; cumulative effects / mitigation measures
		ST	MT	LT	
6. To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	?	?	?/-	<p>problems of affordability can be addressed.</p> <p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered, this requirement could have a long-term negative effect on minimising the impact of new development on existing traffic congestion. Due to the extent of sites that are likely to be allocated under this option, it is less likely than under options 1 and 2 that a high proportion of new development can be delivered close to town and village centres, possibly resulting in a lower use of sustainable forms of transport. The option is likely to support priorities and provisions identified in the SMDC integrated transport strategy ⁽³⁾, including the proposed Local Transport</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Lower levels of growth are likely to generate fewer new car journeys, resulting in less impact on existing congestion. Lower levels of growth will maximise the proportion of new development delivered close to existing centres, facilitating use of sustainable forms of transport. Higher levels of growth will allow most investment in support for sustainable transport. Mitigation measures: Local Plan policies to ensure that developments are brought forward in sustainable locations; support safe walking and cycling and improve access to the natural environment.</p>

January 2016 Option 3: 440 new homes each year					
SA Objective	Decision making criteria	Time-frame		Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT		
				Packages for Leek, Cheadle and Biddulph.	
ENVIRONMENTAL					
7. To minimise contributions to climate change and consider climate change adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 	-	--	--	<p>There is some uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of developments and the implementation of Local Plan policies. However since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered, this requirement is likely to result in a higher overall increase in carbon emissions from the energy consumption and emissions arising from construction and use of new development and associated car journeys. Impacts are likely to be less significant than under option 4.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Even if individual properties are built to high environmental performance standards and delivered in sustainable locations, the total increase in number of dwellings and car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.</p>

January 2016 Option 3: 440 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 	?	?/-	?/--	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered, this requirement is likely to give rise to higher levels of new emissions of airborne pollutants associated with additional car journeys. In the medium and long-term there is likely to be a more significant negative impact than under options 1 and 2 and some potential for development to be delivered within 500m of an identified area of poor air quality. Impacts are likely to be less significant than under option 4.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Identified areas of poor air quality include the Cellarhead junction (between the A52 and A520); Ball Haye Street, Leek (a primary link road from Leek A53 to the A523 Macclesfield and Buxton Road) and Broad Street, Leek (a primary link road from Stoke on Trent)⁽⁴⁾. The total increase in number of dwellings and car journeys is likely to increase emission of airborne pollutants, there is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments include appropriate landscaping to aid removal of air pollutants.</p>
9. To reduce flood risk, protect and enhance water sources.	<ul style="list-style-type: none"> Is new development directed towards 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Development - at whatever overall scale - will be permitted only</p>

SA Objective		January 2016 Option 3: 440 new homes each year				Justification; cumulative effects / mitigation measures	
		Decision making criteria	Time-frame		Nature of effect; Comments		
		ST	MT	LT			
		<ul style="list-style-type: none"> • areas of least flood risk? Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water Framework Directive? • Will it encourage water efficiency and demand management? 				<p>of Local Plan policies. However the SFRA⁽⁶⁾ confirms that there are few locations in which development would significantly increase fluvial flood risk elsewhere, due to the majority of potentially suitable sites for development being located within Flood Zone 1, with only a few sites partially within Flood Zone 2 or 3. Since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered, this requirement is likely to result in more peripheral development proposed on agricultural (greenfield) land on the outskirts of settlements, and thus result in more risk of surface water flood risk within towns or villages and further downstream as a result of increased surface water runoff and reduced infiltration. Although in the long-term there is likely to be a less significant impact than under option 4.</p>	<p>where schemes meet development plan requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>

January 2016 Option 3: 440 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
10. To identify, conserve and enhance biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure? 	?	?/-	?/-	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. Since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered (with the exception of the highest growth option 4) this requirement is less likely to provide long-term protection for biodiversity and natural networks. However in comparison with options 1 and 2, there is likely to be a higher level of new investment and associated opportunities to deliver biodiversity enhancement or the extension of GI networks as part of schemes (but less opportunity than under option 4). Given that in comparison with options 1 and 2, this requirement is likely to lead to increased recreational and other urbanising pressures on the closest European sites, the option is also less likely to afford long-term protection for the integrity of European sites. Whilst such negative impacts are not as</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance, but the higher the level of growth, the greater the need to allocate sites in the countryside, on the periphery of settlements, including sites potentially requiring Green Belt release or within the zone of influence of European designated sites. Mitigation measures: Local Plan policies to ensure conservation and enhancement of biodiversity and that any development proposal is not permitted to have an adverse effect on the integrity of a European site.</p>

January 2016 Option 3: 440 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>11 To safeguard the best and most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.</p>	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 	?	?	?/-	<p>significant as under option 4, the HRA of the Local Plan will ensure that Local Plan policies and allocations will not result in adverse effects on European designated sites.</p> <p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered (with the exception of the highest growth option 4) this requirement is less likely to provide overall, long-term protection for the best and most versatile agricultural land. However negative impacts are not as significant as under option 4.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for the best and most versatile agricultural land and geological resources, but the higher the level of growth, the greater the need to allocate agricultural (greenfield) sites. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites.</p>

January 2016 Option 3: 440 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.</p>
13. To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and undesignated assets) along with their settings? Will it protect and reinforce the character and 	?	?	?/-	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered (with the exception of the highest growth option 4) this requirement is likely to result in less protection of cultural and historic heritage assets (designated and undesignated) along with their settings.	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings. However the higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of altering the character of settlements and resulting in deterioration of cultural and historic heritage assets</p>

SA Objective		January 2016 Option 3: 440 new homes each year				Justification; cumulative effects / mitigation measures
		Decision making criteria	Time-frame			
		ST	MT	LT		
	appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place?					Negative impacts are not as significant as under option 4. Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.
19? To protect and enhance the character and appearance of the landscape including historic landscape and other natural assets and resources.	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment 	?	?	?/-		<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. The Landscape and Settlement Character Assessment Study⁽⁶⁾ offers guidance to help ensure new development required in the District takes place in locations that are compatible with the unique quality of the Staffordshire Moorlands landscape and in sympathy with the setting of a particular settlement. The HEA⁽⁷⁾ identified that (within each of the study areas) historic character had been retained and that beyond the present</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. However the higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of resulting in an adverse effect on the character of landscapes, including historic landscapes, that could not be reasonably mitigated. Mitigation measures: Local Plan policies to support protection and enhancement of the character and</p>

January 2016 Option 3: 440 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	identified in the NCA profiles?				extent of the built areas, a dispersed settlement pattern was still predominant. Since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered (with the exception of the highest growth option 4) this requirement is less likely to result in the protection of the character and appearance of the landscape, including historic landscapes, and other natural assets and resources. Negative impacts are not as significant as under option 4.	appearance of the landscape including historic landscape and other natural assets and resources.
15 To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and local distinctiveness? Does it help support tourism and the visitor economy? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However since it proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered (with the exception of the highest growth option 4) this requirement is more likely to result in a long-term, adverse impact on local	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: The higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of congestion and an adverse effect on the character and appearance of landscapes, towns and villages that together may detract from the further development of local distinctiveness and could result in</p>

January 2016 Option 3: 440 new homes each year					
SA Objective	Decision making criteria	Time-frame		Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT		
				distinctiveness, and this may lead to a long-term negative impact on tourism and the visitor economy. The significance is less than under option 4. The negative impacts are balanced by the requirement also providing more opportunity than under options 1 and 2 for investment in culture and tourism and this may result in medium term positive effects on the local economy.	long-term negative impacts on tourism and the visitor economy. Counter to this, higher levels of growth provide the most opportunities for investment that may support tourism and the visitor economy. Mitigation measures: Local Plan policies to support tourism and the visitor economy.
ECONOMIC					
16. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	+	++	++	<p>This option uses Oxford Economics projections of future employment growth in the district. It represents the "unconstrained" potential of the area based on its existing business base, mix of sectors and inherent economic qualities. To support the increase in jobs projected by the model, the total population would need to grow by 13,393 over the plan period. The increase in spending in the local economy this would generate is likely to result in benefits to the vitality and viability of the District's towns and</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Residents of new developments will support their local retail, leisure and service provision. Mitigation measures: Local Plan policies to support town and village centres.</p>

January 2016 Option 3: 440 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
10. To strengthen, improve and diversify the District economy, and promote sustainable economic growth	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of 	+	+	++	<p>villages, contributing to the safeguarding and improvement of shops and services. Since this option proposes a higher level of growth than under options 1 and 2, in comparison with other alternatives considered (with the exception of the highest growth option 4) this requirement is likely to result in significant benefits for the economies of existing centres. Benefits however are likely to be less significant than under option 4.</p> <p>This option is based on modelled job growth of an additional 2,250 jobs over the plan period. This is likely to result in long-term positive effects on business, the local economy and local employment.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Helping to reverse the decline of working age residents in the District would achieve a more balanced population structure and reduce potential future economic difficulties and the demand of services associated with an ageing population and a more limited supply of labour. Mitigation measures: Local Plan</p>

January 2016 Option 3: 440 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
18. To encourage and support a high and stable level of employment	<ul style="list-style-type: none"> existing businesses? Will it meet the employment needs of local people? Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 	+	+	++	<p>This option is expected to deliver sufficient labour force levels to support the Oxford Economics job growth projections, a labour force increase of 1,549. This is likely to allow for the economic potential of the district to be realised and result in medium and long term positive impacts on the local economy and local employment.</p>	<p>policies to support sustainable economic growth.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Whilst there is not a direct causal relationship between job growth and housing needs, the two are nevertheless fundamentally related. Ensuring a sufficient supply of homes within easy access of employment is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
<p>Summary of significant effects:</p> <p>This option proposes the delivery of 440 new dwellings per year. Since it is the upper end of the recommended objectively assessed housing need range, the housing requirement would have a direct, long-term positive effect on the SA objective to ensure provision of homes to meet local needs. This positive effect is likely to be more significant than under options 1 and 2. As the upper end of the range, the option is likely to make a significant contribution to addressing affordable housing need and the needs of an ageing population. Predicted population growth of around 13,400 is likely to increase spending in the local economy resulting in positive benefits for the District's towns and villages, including help to safeguard local shops and services. Under this option, these benefits are likely to be more significant than under options 1 and 2,</p>						

SA Objective	January 2016 Option 3: 440 new homes each year				Justification; cumulative effects / mitigation measures
	Decision making criteria	Time-frame		Nature of effect; Comments	
		ST	MT		
					<p>but less significant than under option 4. This option is based on expected job growth of 2,250 in the district over the plan period. This is likely to allow for the economic potential of the district to be realised and result in medium and long term positive impacts on the local economy and local employment. Option 3 requires the second highest number of site allocations of the four options considered, and consequently this alternative is likely to result in comparatively more negative effects on SA objectives relating to the protection of biodiversity; the character of towns, villages and heritage assets and their settings; and landscape character and natural assets than options 1 and 2. Negative effects on these objectives are slightly less under this option than under option 4. The higher level of growth under option 3 compared with options 1 and 2 is also likely to result in negative effects on objectives relating to climate change contributions and air quality that are associated with energy consumption and emissions arising from construction and use of new dwellings and associated car journeys. Due to the extent of sites that are likely to be allocated under this option, it is less likely than under options 1 and 2 that a high proportion of new development can be delivered close to town and village centres, resulting in negative effects on minimising the distance people need to travel to access key services and facilities and reducing the opportunities for use of sustainable forms of transport. Negative effects under option 3 in this regard are not likely to be as great as under option 4. However since option 3 proposes the second highest level of growth of the four options considered, it is likely to result in a higher level of investment than under options 1 and 2 in community facilities, including Green Infrastructure and other measures that help to reduce health inequalities, leading to possible minor positive effects on the SA objective relating to supporting health improvements. These positive effects are not likely to be as significant as under option 4.</p>

Table 8.8 Assessment Table for Option 3: 440 new homes each year

1. Staffordshire Moorlands 2012-based SNHP Update: January 2016 Revision; Nathaniel Lichfield & Partners; January 2016
2. Strategic Housing Market Assessment and Housing Needs Study; Nathaniel Lichfield & Partners; June 2014
3. Staffordshire Moorlands District Integrated Transport Strategy 2013-2031; Staffordshire County Council; November 2013
4. 2014 Air Quality Progress Report for Staffordshire Moorlands District Council In fulfillment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; November 2014
5. Staffordshire Moorlands Level 1 Strategic Flood Risk Assessment (SFRA) Update; AECOM Infrastructure and Environment UK Ltd; October 2015
6. Landscape and Settlement Character Assessment Study; Wardell Armstrong; 2008
7. Historic Environment Character Assessment: Staffordshire Moorlands; Staffordshire County Council; August 2010

January 2016 Housing requirement option 4

SA Objective		January 2016 Option 4: 520 new homes each year				Justification; cumulative effects / mitigation measures	
		Decision making criteria		Time-frame			Nature of effect; Comments
		ST	MT	LT			
SOCIAL							
<p>1. To improve community cohesion and the quality of life where people work and live.</p>		<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and 	?	?	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. There is a balance between loss of countryside as a result of development and provision of new, accessible open space as part of new developments. This requirement is likely to offer the most opportunity for associated benefits such as new or enhanced community facilities to be delivered as a result of new development.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are more dependent on design and location of new development than on the overall housing requirement. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new housing development.</p>

January 2016 Option 4: 520 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
2. To advance equality of opportunity between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<p>appropriate levels of privacy?</p> <ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation? Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver the highest level of housing growth of the four options considered and thus the greatest opportunity to improve accessibility to key services and facilities through delivering more investment into the rural areas. However, this level of new housing development is not likely to enable growth to be focused on small urban extensions and small sites within the existing settlement boundaries, which may result in increasing the distance people need to travel.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs, services and facilities. Mitigation measures: Local Plan policies to ensure that new developments are brought forward in sustainable locations.</p>

January 2016 Option 4: 520 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
3. To improve health and reduce health inequalities.	<ul style="list-style-type: none"> Will it improve health or access to health facilities? Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 	?	?	?/+	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option will deliver the highest level of housing growth of the four options considered and thus present the most opportunities to improve health infrastructure, including opportunities for walking and cycling. In the long term there could be an improvement in health through increased investment in health-care, leisure and physical recreational facilities. There is a balance between loss of countryside as a result of development and provision of improved opportunities to access the countryside as part of new developments.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Investment in new infrastructure keeps pace with growth. More housing growth offers more opportunities to invest in new health-care facilities, including new or improved opportunities for walking and cycling. Mitigation measures: Local Plan policies to ensure that new developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks, including increased opportunities for access to the countryside.</p>
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the implementation of relevant Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce</p>

January 2016 Option 4: 520 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social / extra care housing.	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	++	++	++	<p>This option exceeds the upper end of the recommended OAN range⁽¹⁾ and by meeting the full, objectively assessed need for housing in the District, it will have a direct, long-term, positive effect on this SA objective. The requirement is expected to enable the delivery of a range of housing types and tenures, making a significant contribution to meeting community needs. The impact of this option on the SA objective is more significant than under all other options. This option is likely to make the most contribution to addressing the needs of an ageing population and ensuring that problems of affordability can be satisfactorily addressed, improving outcomes for older people</p>	<p>the fear of crime. Mitigation measures: Local Plan policies to ensure that new developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Household projections suggest a considerable growth in the number of older people. The SHMA⁽²⁾ identified a critical affordable housing need. Objectively assessed housing need for the District is between 250dpa and 440dpa. This option will meet the objectively assessed housing need of the plan area and will go further than any other option considered towards addressing affordable housing need and offering opportunities for investment in meeting the housing needs of older people. Mitigation measures: Wider initiatives of the Council should be supported to</p>

January 2016 Option 4: 520 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
6. To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	?/-	?/--	?/--	<p>and those who still need to access the housing market.</p> <p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this requirement is likely to have a negative effect on minimising the impact of new development on existing traffic congestion. Due to the number of site allocations that would be required, it is likely that some new development would be delivered remote from town and village centres, making the use of sustainable forms of transport less likely. The option could support priorities and provisions identified in the SMDC integrated transport strategy ⁽³⁾, including the proposed Local Transport Packages for Leek, Cheadle and Biddulph.</p>	<p>help deliver additional affordable homes.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Lower levels of growth are likely to generate fewer new car journeys, resulting in less impact on existing congestion. Lower levels of growth will maximise the proportion of new development delivered close to existing centres, facilitating use of sustainable forms of transport. Higher levels of growth will allow most investment in support for walking and cycling initiatives. Mitigation measures: Local Plan policies to ensure that developments are brought forward in sustainable locations; support safe walking and cycling and improve access to the natural environment.</p>
ENVIRONMENTAL						

January 2016 Option 4: 520 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
7. To minimise contributions to climate change and consider climate change adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 	--	--	--	<p>There is some uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of developments and the implementation of Local Plan policies. However this option is likely to result in the greatest overall increase in carbon emissions from the energy consumption and emissions arising from construction and use of new development and associated car journeys.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Even if individual properties are built to high environmental performance standards and delivered in sustainable locations, the total increase in number of dwellings and car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.</p>
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of airborne pollutants? Will it maximise the removal of air 	?	?/-	--	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as this option represents the highest level of housing growth, it is</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Identified areas of poor air quality include the Cellarhead junction (between the A52 and A520); Ball Haye Street, Leek (a primary link road</p>

January 2016 Option 4: 520 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	pollutants (e.g. by trees)?				likely to give rise to the highest level of new emissions of airborne pollutants associated with additional car journeys. In the medium-term there is potential for development to be delivered within 500m of an identified area of poor air quality.	from Leek A53 to the A523 Macclesfield and Buxton Road) and Broad Street, Leek (a primary link road from Stoke on Trent) ⁽⁴⁾ . The total increase in number of dwellings and car journeys is likely to increase emission of airborne pollutants. There is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments include appropriate landscaping to aid removal of air pollutants.
9. To reduce flood risk, protect and enhance water sources.	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However the SFRA ⁽⁵⁾ confirms that there are few locations in which development would significantly increase fluvial flood risk elsewhere, due to the majority of potentially suitable sites for development being	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Development - at whatever overall scale - will be permitted only where schemes meet development plan requirements for management of flood risk.</p> <p>Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk</p>

January 2016 Option 4: 520 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> SuDS into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water Framework Directive? Will it encourage water efficiency and demand management? 				located within Flood Zone 1, with only a few sites partially within Flood Zone 2 or 3. This option requires the most peripheral development proposed on agricultural (greenfield) land on the outskirts of settlements, and thus poses the greatest risk of all options to increase surface water flood risk within towns or villages and further downstream as a result of increased surface water runoff and reduced infiltration.	and incorporate SuDS wherever possible.
10. To identify, conserve and enhance biodiversity resources and to test the plan's policies and proposals on European	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature conservation importance? Will it help contribute to 	?/-	?/--	?/--	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as it proposes the highest level of housing growth, of all options considered, this option is likely to provide least overall, long-term	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance, but the higher the level of growth, the greater the need to allocate sites</p>

SA Objective		January 2016 Option 4: 520 new homes each year				Justification; cumulative effects / mitigation measures	
		Decision making criteria		Time-frame			Nature of effect; Comments
		ST	MT	LT			
Sites and SSSIs	<p>Staffordshire Biodiversity Action Plan objectives?</p> <ul style="list-style-type: none"> Will it help deliver networks of biodiversity and green infrastructure? 					<p>protection for biodiversity and natural networks. There will however be the greatest level of new investment and associated opportunities to deliver biodiversity enhancement or the extension of GI networks as part of schemes. Given it will lead to the highest recreational and other urbanising pressures on the closest European sites, of all options considered, this option is also likely to afford least protection for the integrity of European sites. However the HRA of the Local Plan will ensure that Local Plan policies and allocations will not result in adverse effects on European designated sites.</p>	<p>in the countryside, on the periphery of settlements, including potentially requiring Green Belt release and potentially sites within the zone of influence of European designated sites. Mitigation measures: Local Plan policies to ensure conservation and enhancement of biodiversity and that any development proposal is not permitted to have an adverse effect on the integrity of a European site.</p>
11. To safeguard the best and most versatile agricultural land; improve soil and land resources; and	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? 	?/-	?/--	?/--		<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as it proposes the highest level of housing growth of all options considered, this option is likely to</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for the best and most versatile agricultural land and geological resources, but the higher the level of growth, the</p>

January 2016 Option 4: 520 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
protect and enhance geological resources.	<ul style="list-style-type: none"> Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 				provide least overall, long-term protection for the best and most versatile agricultural land.	greater the need to allocate agricultural (greenfield) sites. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites.
To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.	Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.
13. To protect and enhance the character of towns / villages	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of 	?/-	?/--	?/--	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the	Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide

January 2016 Option 4: 520 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
and other heritage and archaeological assets along with their settings.	<p>cultural and historic heritage assets (designated and undesignated assets) along with their settings?</p> <ul style="list-style-type: none"> Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place? 				<p>implementation of Local Plan policies. However with the highest level of housing growth proposed, of all options considered, this option is least likely to result in protection of cultural and historic heritage assets (designated and undesignated) along with their settings.</p>	<p>protection for heritage and archaeological assets along with their settings. However the higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of altering the character of settlements and resulting in deterioration of cultural and historic heritage assets (designated and undesignated assets) or their settings that could not be reasonably mitigated.</p> <p>Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.</p>
14. To protect and enhance the character and appearance of the landscape including	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? 	?/-	?/--	?/--	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. The Landscape and Settlement</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. However the</p>

January 2016 Option 4: 520 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>historic landscape and other natural assets and resources.</p>	<ul style="list-style-type: none"> Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 				<p>Character Assessment Study⁽⁶⁾ offers guidance to help ensure new development required in the District takes place in locations that are compatible with the unique quality of the Staffordshire Moorlands landscape and in sympathy with the setting of a particular settlement. The HEA⁽⁷⁾ identified that (within each of the study areas) historic character had been retained and that beyond the present extent of the built areas, a dispersed settlement pattern was still predominant. With the highest level of housing growth proposed, of all options considered, this option is the least likely to result in the protection of the character and appearance of the landscape, including historic landscapes, and other natural assets and resources.</p>	<p>higher the level of growth, the greater the number of site allocations that will be made, increasing the risk of resulting in an adverse effect on the character of landscapes, including historic landscapes, that could not be reasonably mitigated. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.</p>
<p>15. To encourage further development of</p>	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: The higher the level of growth, the greater the</p>

January 2016 Option 4: 520 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
sustainable tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> local distinctiveness? Does it help support tourism and the visitor economy? 				<p>implementation of Local Plan policies. With the highest level of housing growth proposed, of all options considered, this option is the most likely to result in a long-term, adverse impact on local distinctiveness, potentially leading to an associated long-term negative impact on tourism and the visitor economy. However, this is balanced by the option also providing the most opportunity for investment in culture and tourism that could result in long-term positive effects on the local economy.</p>	<p>number of site allocations that will be made, increasing the risk of congestion and an adverse effect on the character and appearance of landscapes, towns and villages that together may detract from the further development of local distinctiveness and could result in long-term negative impacts on tourism and the visitor economy. Counter to this, higher levels of growth provide the most opportunities for investment that may support tourism and the visitor economy. Mitigation measures: Local Plan policies to support tourism and the visitor economy.</p>
ECONOMIC						
16. To safeguard the vitality and viability of the District's towns and villages,	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the 	++	++	++	<p>This option uses the scenario based on job creation figures set out in the Council's ELR⁽⁸⁾. To underpin a level of job growth based on projecting increasing growth in targeted industrial</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Residents of new developments will support their local retail, leisure and</p>

January 2016 Option 4: 520 new homes each year						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
and create and sustain a vibrant rural economy	retail, leisure and service provision?				sectors in line with regional averages there would need to be an increase in the population of 17,202 in the district over the plan period. The increase in spending in the local economy this is likely to generate should result in significant benefits to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services. However these benefits should be treated with caution since the 2012-based SNHP update notes that the population growth would primarily be achieved by inward migration as opposed to natural change and this would require a step change in migration above the level that is likely to be achievable in the district.	service provision. Mitigation measures: Local Plan policies to support town and village centres.
17. To strengthen, modernise and diversify the District	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in 	++	++	++	This option is based on an objective forecast of how the district could perform in economic terms based on the nature of its economy and current expectations of future national and	Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: A local labour supply will help to deliver economic growth across the plan

SA Objective		January 2016 Option 4: 520 new homes each year				Justification; cumulative effects / mitigation measures	
		Decision making criteria		Time-frame			Nature of effect; Comments
		ST	MT	LT			
economy, and promote sustainable economic growth		<ul style="list-style-type: none"> sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 				regional economic performance. This projection estimates that there could be a total (net additional) job growth of around 3,878 over the plan period. This is likely to result in a significant positive effect on business, the local economy and local employment. However these benefits should be treated with caution since the 2012-based SNHP update notes that the population growth required to underpin this job growth would primarily be achieved by inward migration as opposed to natural change and this would require a step change in migration above the level that is likely to be achievable in the district.	area. Mitigation measures: Local Plan policies to support sustainable economic growth.
18. To encourage and support a high and stable level of employment		<ul style="list-style-type: none"> Will it meet the employment needs of local people? Will it increase economic activity levels? 	++	++	++	This option is based on a scenario factoring in increased economic growth in the key sectors in line with the regional average and provides unconstrained employment growth in the district of 3,878 jobs over the course of the plan period. The option is likely to have a significant positive	Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Whilst there is not a direct causal relationship between job growth and housing needs, the two are nevertheless fundamentally related. Ensuring a sufficient supply of homes within

January 2016 Option 4: 520 new homes each year					
SA Objective	Decision making criteria	Time-frame		Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT		
	<ul style="list-style-type: none"> Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 			<p>effect on the local economy and local employment. However these benefits should be treated with caution since the 2012-based SNHP update notes that the population growth required to underpin this job growth would primarily be achieved by inward migration as opposed to natural change. Net migration would need to increase from +7,373 to +20,645 - over 13,000 net additional in migrants to achieve the required population level (all other assumptions remaining constant). This is considered to be at odds with what may be reasonably expected to occur in the district.</p>	<p>easy access of employment is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
<p>Summary of significant effects:</p> <p>This option proposes the delivery of 520 new dwellings per year. It will have a direct and significant positive effect on the SA objective to ensure provision of homes to meet local needs since it exceeds the upper end of the recommended objectively assessed housing need range. This option should make the greatest contribution of all options considered to addressing affordable housing need and the needs of an ageing population. Predicted population growth of around 17,000 is likely to increase spending in the local economy resulting in positive benefits for the District's towns and villages, including helping to safeguard local shops and services. This option is based on an objective forecast of how the district could perform in economic terms based on the nature of its economy and current expectations of future national and regional economic performance and provides unconstrained employment growth in the district of 3,878 jobs over the plan period. As a result, the option is likely to have a significant positive effect on the local economy and local employment. However these predicted positive</p>					

SA Objective	January 2016 Option 4: 520 new homes each year			Justification; cumulative effects / mitigation measures	
	Decision making criteria	Time-frame			Nature of effect; Comments
		ST	MT		
				<p>effects should be treated with caution, since the 2012-based SNHP update notes that the population growth required to underpin this job growth would primarily be achieved by inward migration as opposed to natural change. Net migration would need to increase from +7,373 to +20,645 - over 13,000 net additional in migrants to achieve the required population level (all other assumptions remaining constant). This is considered to be at odds with what may be reasonably expected to occur in the district. As the highest growth option, requiring the highest number of site allocations, by comparison with other options considered, this alternative is likely to result in significant negative effects on SA objectives relating to the protection of biodiversity; the character of towns, villages and heritage assets and their settings; and landscape character and natural assets. The high level of housing growth is also likely to result in negative effects on objectives relating to climate change contributions and air quality that are associated with energy consumption and emissions arising from construction and use of new dwellings and associated car journeys. This level of new housing development is not likely to enable growth to be focused on small urban extensions and small sites within the existing settlement boundaries, which may result in increasing the distance people need to travel to access key services and facilities and makes the use of sustainable forms of transport less likely. However since this option proposes the highest level of growth, it is likely to result in the highest level of investment in community facilities, including Green Infrastructure and other measures that may help to reduce health inequalities, leading to positive effects on the SA objective relating to supporting health improvements.</p>	

Table 8.9 Assessment Table for Option 4: 520 new homes each year

1. Staffordshire Moorlands 2012-based SNHP Update: January 2016 Revision; Nathaniel Lichfield & Partners; January 2016
2. Strategic Housing Market Assessment and Housing Needs Study; Nathaniel Lichfield & Partners; June 2014
3. Staffordshire Moorlands District Integrated Transport Strategy 2013-2031; Staffordshire County Council; November 2013
4. 2014 Air Quality Progress Report for Staffordshire Moorlands District Council In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; November 2014
5. Staffordshire Moorlands Level 1 Strategic Flood Risk Assessment (SFRA) Update; AECOM Infrastructure and Environment UK Ltd; October 2015
6. Landscape and Settlement Character Assessment Study; Wardell Armstrong; 2008
7. Historic Environment Character Assessment: Staffordshire Moorlands; Staffordshire County Council; August 2010
8. Employment Land Requirement Study; Nathaniel Lichfield & Partners; July 2014 and Updated Labour Supply Modelling; September 2014

Appraisal of alternative options for an employment land requirement

9 Appraisal of alternative options for an employment land requirement

February 2017 Option 1: 13 hectares

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
SOCIAL						
<p>To improve community cohesion and the quality of where people work and live.</p>	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and appropriate levels of privacy? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of employment land allocations and the implementation of Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are more dependent on design and location of new development than on the overall employment land requirement. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new employment development.</p>

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
2. To advance equality of opportunity between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation? Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of employment land allocations and the implementation of Local Plan policies. This option represents the lower end of the range and as such may provide less opportunities than under all other options to allocate employment space across the district and thus help to minimise the distance people may need to travel to access jobs.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs. Mitigation measures: Local Plan policies to ensure that new employment developments are brought forward in sustainable locations.</p>
		?	?	?		
3. To improve health and reduce	<ul style="list-style-type: none"> Will it improve health or access to health facilities? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance</p>	<p>Geographical scale: Local Plan area; Effects:</p>

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
health inequalities.	<ul style="list-style-type: none"> Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 				<p>as this will be dependent on the location of employment land allocations and the implementation of Local Plan policies. However this option represents the lower end of the range and as such may provide less opportunities than under all other options to allocate employment space across the district and thus deliver associated opportunities to increase take up of sustainable transport choices and support improvements to healthy travel networks.</p>	<p>Permanent; Assumptions made: The more hectares of employment land allocated, the more opportunities are provided for increasing healthy travel networks. Mitigation measures: Local Plan policies to ensure that new employment developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks.</p>
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the implementation of relevant Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce the fear of crime. Mitigation</p>

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social /extra care housing.</p>	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	-	-	-	<p>In contrast to the other scenarios, this approach (labour supply) focuses on the future supply of labour rather than the demand for labour. The scenario projects the amount of new jobs needed to match the future working-age population and how much employment space would be needed to accommodate these jobs. The demographic scenarios identified in the emerging SHMA result in a need for 170dpa and 196dpa. Overall the labour supply scenario is considered likely to lead to negative effects on this SA objective.</p>	<p>measures: Local Plan policies to ensure that new employment developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Whilst there may not be a direct causal link between housing and employment land requirements, there is nevertheless a need to ensure that the two dovetail together to avoid any unsustainable outcomes. Mitigation measures: The Local Plan may need to set out a strong policy intervention to ensure</p>

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>6 To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.</p>	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	<p>?/-</p>	<p>?/-</p>	<p>?/--</p>	<p>that the housing implications of the preferred employment land requirement are addressed.</p>	
<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. The district has high levels of out commuting to Stoke-on-Trent, East Staffordshire and Newcastle-under-Lyme. This option represents the lower end of the range and as such may provide less opportunities than under all other options to ensure that there is sufficient local supply of employment land in the district for its businesses to expand and grow.</p>					<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Reducing out commuting will help to reduce the number of journeys made by car overall. Mitigation measures: Local Plan policies to ensure that employment developments are brought forward in sustainable locations and support safe walking and cycling.</p>	
ENVIRONMENTAL						

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>7. To minimise contributions to climate change and consider climate change adaptation.</p> <p style="text-align: right;">Page 393</p>	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 	-	-	-	<p>There is some uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of developments and the implementation of Local Plan policies. However this option is likely to lead to the lowest overall increase in carbon emissions from the energy consumption and emissions arising from construction and use of new development and associated car journeys.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Even if employment developments are built to high environmental performance standards and delivered in sustainable locations, the total increase in employment opportunity and related car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of</p>

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 	?	?/-	?/-	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as this option represents the lowest end of the employment land requirement range, it is likely to lead to the lowest level of new emissions of airborne pollutants associated with additional car journeys. In the long-term there is potential for development to be delivered within 500m of an identified area of poor air quality.</p>	<p>sustainable forms of transport.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Identified areas of poor air quality include the Cellarhead junction (between the A52 and A520); Ball Haye Street, Leek (a primary link road from Leek A53 to the A523 Macclesfield and Buxton Road) and Broad Street, Leek (a primary link road from Stoke on Trent)⁽¹⁾. The allocation of new employment land and car journeys from increased local employment opportunities is likely to increase emission of airborne pollutants. There</p>

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>To reduce flood risk, protect and enhance water resources.</p>	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality of water resources and help 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However the SFRA⁽²⁾ confirms that there are few locations in which development would significantly increase fluvial flood risk elsewhere, due to the majority of potentially suitable sites for development being located within Flood Zone 1, with only a few sites partially within Flood Zone 2 or 3. This option requires the least</p>	<p>is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments include appropriate landscaping to aid removal of air pollutants.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Development will be permitted only where schemes meet development plan requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and</p>

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<p>contribute to the objectives of the Water Framework Directive?</p> <ul style="list-style-type: none"> Will it encourage water efficiency and demand management? 				<p>allocation of employment land, and thus poses the lowest risk of all options to increase surface water flood risk within towns or villages and further downstream as a result of increased surface water runoff and reduced infiltration.</p>	<p>incorporate SuDS wherever possible.</p>
<p>16 To identify, conserve and enhance biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs</p>	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance. Mitigation measures: Local Plan policies to ensure conservation and enhancement of biodiversity and that any development proposal is not permitted to have an adverse effect on the</p>

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
11. To safeguard the best and most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as it proposes the lowest allocation of new employment land of all options considered, this option is likely to lead to most overall, long-term protection for geological resources.</p>	<p>integrity of a European site.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for geological resources including the best and most versatile agricultural land. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites.</p>
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made:</p>

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 				implementation of Local Plan policies.	<p>Policies in the Local Plan will encourage the re-use of existing buildings wherever possible.</p> <p>Mitigation measures: Local Plan policies to support waste minimisation.</p>
10 To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and undesignated assets) along with their settings? Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as it proposes the lowest allocation of new employment land of all options considered, this option is likely to lead to most overall, long-term protection for the character of settlements along with heritage assets and their settings.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings.</p> <p>Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.</p>

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
14. To protect and enhance the character and appearance of the landscape including historic landscape and other natural assets and resources.	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. The Landscape and Settlement Character Assessment Study⁽³⁾ offers guidance to help ensure new development required in the District takes place in locations that are compatible with the unique quality of the Staffordshire Moorlands landscape and in sympathy with the setting of a particular settlement.</p> <p>The HEA⁽⁴⁾ identified that (within each of the study areas) historic character had been retained and that beyond the present extent of the built areas, a dispersed settlement pattern was still predominant. However as it proposes the lowest allocation of new employment land of all options considered, this option is likely to lead to most overall, long-term protection for landscape character and other natural assets.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.</p>

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
15. To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and local distinctiveness? Does it help support tourism and the visitor economy? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as it proposes the lowest allocation of new employment land of all options considered, this option is likely to lead to least overall, long-term support for sustainable tourism.	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: A thriving district with a robust cultural and visitor economy will require sufficient supply of local employment land.</p> <p>Mitigation measures: Local Plan policies to support tourism and the visitor economy.</p>
ECONOMIC						
16. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	+	+	+	Ensuring a sufficient supply of employment land is likely to enable local businesses to expand and a positive contribution being made to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services. However as it proposes the lowest allocation of new employment land	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Employees of expanding and incoming businesses will support their local retail, leisure and service provision. Mitigation measures: Local Plan</p>

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
17. To strengthen, modernise and diversify the District economy, and promote sustainable economic growth	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 	+	+	++	<p>of all options considered, this option is likely to lead to least overall, long-term support for the vitality and viability of the district's towns and villages.</p> <p>This option would help to meet previously identified needs to revitalise current poor quality stock; help address the imbalance of the portfolio in terms of the size of properties available and meet continued demand for B2 floorspace (particularly from indigenous companies). However as it proposes the lowest allocation of new employment land of all options considered, this option is likely to lead to least overall, long-term support for strengthening, modernising and diversifying the district economy.</p>	<p>policies to support town and village centres.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: A local supply of employment land will help to deliver economic growth across the plan area. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
18. To encourage and support a high and stable	<ul style="list-style-type: none"> Will it meet the employment needs of local people? 	+	+	-	<p>The labour supply scenario forecasts workforce jobs to be 35,485 in 2031</p>	<p>Geographical scale: Local Plan area; Effects:</p>

Option 1: 13 hectares to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
level of employment	<ul style="list-style-type: none"> Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 				<p>(a decline of 1,637 since 2014). As it proposes the lowest allocation of new employment land of all options considered, this option is likely to lead to least overall, long-term support for encouraging a high and stable level of employment.</p>	<p>Permanent; Assumptions made: Ensuring a sufficient supply of employment land is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
<p>Summary of significant effects:</p> <p>This option is based on labour supply projections and proposes the delivery of 13ha of employment land to 2031 (gross). This option represents the lower end of the range and as such may provide less opportunities than under all other options to ensure that there is sufficient local supply of employment land in the district for its businesses to expand and grow. However it is still likely to lead to a positive effect on the local economy and local employment through helping to meet previously identified needs to revitalise current poor quality stock; help address the imbalance of the portfolio in terms of the size of properties available and meet continued demand for B2 floorspace (particularly from indigenous companies). However as it proposes the lowest allocation of new employment land of all options considered, this option is likely to lead to least overall, long-term support for strengthening, modernising and diversifying the district economy. The labour supply scenario forecasts workforce jobs to be 35,485 in 2031 (a decline of 1,637 since 2014), of all options considered, this option is likely to lead to least overall, long-term support for encouraging a high and stable level of employment. Ensuring a sufficient supply of employment land is likely to enable local businesses to expand and make a positive contribution to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services. However this option makes the least positive contribution to this of all options considered. The option is considered likely to lead to negative effects on meeting housing need since the scenario projects the amount of new jobs needed to match the future working-age population and how much employment space would be needed to accommodate these</p>						

Option 1: 13 hectares to 2031 (gross)					
SA Objective	Decision making criteria	Time-frame			Justification; cumulative effects / mitigation measures
		ST	MT	LT	
<p>jobs. The demographic scenarios identified in the emerging SHMA result in a need for 170dpa and 196dpa and housing supply at this level is not considered sufficient to meet objectively assessed need. Further negative effects are likely to result on objectives relating to climate change contributions and air quality that are associated with energy consumption and emissions arising from construction and use of new employment space and associated car journeys. Since the option represents the lowest allocation of new employment land there is less opportunity to deliver employment close to where people live, potentially increasing the distance people need to travel to access key services and facilities and making the use of sustainable forms of transport less likely. In addition, this option offers least opportunity to address the high levels of out commuting from the district, leading to negative effects predicted for the objective to reduce the number of journeys made by car. Uncertain effects are recorded on a number of SA objectives including those relating to community cohesion, the protection of biodiversity; the character of towns, villages and heritage assets and their settings; and landscape character and natural assets as the effect will be dependent on the location of employment land allocations and the implementation of Local Plan policies.</p>					

Table 9.1 Assessment Table for Option 1: 13 hectares

1. 2014 Air Quality Progress Report for Staffordshire Moorlands District Council in fulfillment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; November 2014
2. Staffordshire Moorlands Level 1 Strategic Flood Risk Assessment (SFRA) Update; AECOM Infrastructure and Environment UK Ltd; October 2015
3. Landscape and Settlement Character Assessment Study; Wardell Armstrong; 2008
4. Historic Environment Character Assessment: Staffordshire Moorlands; Staffordshire County Council; August 2010

Option 2: 16 hectares

Option 2: 16 hectares 2014 - 2031 (gross)					
SA Objective	Decision making criteria	Time-frame			Justification; cumulative effects / mitigation measures
		ST	MT	LT	
SOCIAL					

Option 2: 16 hectares 2014 - 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
1. To improve community cohesion and the quality of where people work and live.	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and appropriate levels of privacy? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of employment land allocations and the implementation of Local Plan policies.	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Community cohesion and local environmental quality are more dependent on design and location of new development than on the overall employment land requirement. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new employment development.</p>
2. To advance equality of opportunity	<ul style="list-style-type: none"> Will it remove or minimise any disadvantages 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Equality</p>

Option 2: 16 hectares 2014 - 2031 (gross)					Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame			
		ST	MT	LT	
between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<p>suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation?</p> <ul style="list-style-type: none"> Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 				<p>dependent on the location of employment land allocations and the implementation of Local Plan policies. This option is lower-mid range and as such may provide more opportunity than option 1, but less opportunity than under options 3 and 4 to allocate employment space across the district and thus help to minimise the distance people may need to travel to access jobs.</p> <p>Mitigation measures: Local Plan policies to ensure that new employment developments are brought forward in sustainable locations.</p>
3. To improve health and reduce health inequalities.	<ul style="list-style-type: none"> Will it improve health or access to health facilities? Will it promote healthy lifestyles? 	?	?	?	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: The more hectares of employment land allocated, the more opportunities are provided for</p>

Option 2: 16 hectares 2014 - 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 				<p>policies. However this option is lower-mid range and as such may provide more opportunity than option 1, but less opportunity than under options 3 and 4 to allocate employment space across the district and thus deliver associated opportunities to increase take up of sustainable transport choices and support improvements to healthy travel networks.</p>	<p>increasing healthy travel networks. Mitigation measures: Local Plan policies to ensure that new employment developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks.</p>
	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the implementation of relevant Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce the fear of crime. Mitigation measures: Local Plan policies to ensure that new employment developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p>

Option 2: 16 hectares 2014 - 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social /extra care housing.	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	+	+	++	<p>This option is based on demand-led projections. For this scenario it has been assumed that the district's overall job growth will stabilise over the coming years (ie zero job growth post 2014). To ensure labour supply to meet the job stabilisation forecasts, higher levels of housing delivery will be required. Overall the demand-led projections are considered likely to lead to positive effects on this SA objective, particularly in the long term.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Whilst there may not be a direct causal link between housing and employment land requirements, there is nevertheless a need to ensure that the two dovetail together to avoid any unsustainable outcomes. Mitigation measures: The Local Plan may need to set out a strong policy intervention to ensure that the housing implications of the preferred employment land requirement are addressed.</p>
6. To strengthen links between rural areas and towns by sustainable forms of transport and	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? 	?/+	?/+	?/++	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. The district has high</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Reducing out commuting will help to reduce the number of journeys made by car overall. Mitigation measures: Local Plan policies</p>

Option 2: 16 hectares 2014 - 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
reduce the number of journeys made by car. Page 408	<ul style="list-style-type: none"> Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 				levels of out commuting to Stoke-on-Trent, East Staffordshire and Newcastle-under-Lyme. This option is lower-mid range and as such may provide more opportunity than option 1, but less opportunity than under options 3 and 4 to ensure that there is sufficient local supply of employment land in the district for its businesses to expand and grow.	to ensure that employment developments are brought forward in sustainable locations and support safe walking and cycling.
ENVIRONMENTAL						
7. To minimise contributions to climate change and consider climate change adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce 	-	-	--	There is some uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of developments and the implementation of Local Plan policies. However this option is lower-mid range and as such is likely to lead to more impacts than option 1, but less than under options 3 and 4, in terms of overall increase in carbon emissions from the energy consumption and	Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Even if employment developments are built to high environmental performance standards and delivered in sustainable locations, the total increase in employment opportunity and related car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation

Option 2: 16 hectares 2014 - 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	the need for car use and / or encourage sustainable forms of transport?				emissions arising from construction and use of new development and associated car journeys.	measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 	?	?/-	?/-	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as this option is lower-mid the employment land requirement range, it is likely to lead to more impacts than option 1, but fewer impacts than under options 3 and 4 in relation to new emissions of airborne pollutants associated with additional car journeys. In the long-term there is potential for development to be delivered within 500m of an identified area of poor air quality.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Identified areas of poor air quality include the Cellarhead junction (between the A52 and A520); Ball Haye Street, Leek (a primary link road from Leek A53 to the A523 Macclesfield and Buxton Road) and Broad Street, Leek (a primary link road from Stoke on Trent)⁽¹⁾. The allocation of new employment land and car journeys from increased local employment opportunities is likely to increase emission of airborne pollutants. There is a risk that air quality</p>

Option 2: 16 hectares 2014 - 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>To reduce flood risk, protect and enhance water sources.</p>	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However the SFRA⁽²⁾ confirms that there are few locations in which development would significantly increase fluvial flood risk elsewhere, due to the majority of potentially suitable sites for development being located within Flood Zone 1, with only a few sites partially within Flood Zone 2 or 3. This options is lower-mid range, and thus poses more risk than option 1, but less</p>	<p>may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments include appropriate landscaping to aid removal of air pollutants.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Development will be permitted only where schemes meet development plan requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>

Option 2: 16 hectares 2014 - 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Framework Directive? Will it encourage water efficiency and demand management? 				risk than under options 3 and 4 to increase surface water flood risk within towns or villages and further downstream as a result of increased surface water runoff and reduced infiltration.	
10. To identify, conserve and enhance biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance.</p> <p>Mitigation measures: Local Plan policies to ensure conservation and enhancement of biodiversity and that any development proposal is not permitted to have an adverse effect on the integrity of a European site.</p>
11. To safeguard the best and	<ul style="list-style-type: none"> Will it safeguard the best and most 	?	?	?	There is uncertainty as to the nature of the effect and level of	<p>Geographical scale: Local Plan area; Effects: Permanent;</p>

Option 2: 16 hectares 2014 - 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.</p> <p>Page 412</p>	<ul style="list-style-type: none"> versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 				<p>significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as this option is lower-mid range, it is likely to lead to less opportunity than option 1, but more opportunity than under options 3 and 4, to offer long-term protection for geological resources.</p>	<p>Assumptions made: Policies in the Local Plan will provide protection for geological resources including the best and most versatile agricultural land. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites.</p>
<p>12. To minimise the use of non-renewable resources.</p>	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.</p>

Option 2: 16 hectares 2014 - 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
13. To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and undesignated assets) along with their settings? Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as this option is lower-mid range, it is likely to lead to less opportunity than option 1, but more opportunity than under options 3 and 4, to offer long-term protection for the character of settlements along with heritage assets and their settings.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings. Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.</p>
14. To protect and enhance the character and appearance of	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide</p>

Option 2: 16 hectares 2014 - 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>the landscape including historic landscape and other natural assets and resources.</p>	<ul style="list-style-type: none"> maintain and strengthen local distinctiveness? Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 				<p>development and the implementation of Local Plan policies. The Landscape and Settlement Character Assessment Study⁽³⁾ offers guidance to help ensure new development required in the District takes place in locations that are compatible with the unique quality of the Staffordshire Moorlands landscape and in sympathy with the setting of a particular settlement. The HEA⁽⁴⁾ identified that (within each of the study areas) historic character had been retained and that beyond the present extent of the built areas, a dispersed settlement pattern was still predominant. However as this option is lower-mid range, it is likely to lead to less opportunity than option 1, but more opportunity than under options 3 and 4, to offer long-term protection for landscape character and other natural assets.</p>	<p>protection for landscape character and natural assets. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.</p>

Option 2: 16 hectares 2014 - 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
15. To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and local distinctiveness? Does it help support tourism and the visitor economy? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as this option is lower-mid range, it is likely to lead to more opportunity than option 1, but less opportunity than under options 3 and 4, to offer long-term support for sustainable tourism.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: A thriving district with a robust cultural and visitor economy will require sufficient supply of local employment land. Mitigation measures: Local Plan policies to support tourism and the visitor economy.</p>
ECONOMIC						
16. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	+	+	++	<p>Ensuring a sufficient supply of employment land is likely to enable local businesses to expand and a positive contribution being made to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services. However as this option is lower-mid range, it is likely to lead to more opportunity than</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Employees of expanding and incoming businesses will support their local retail, leisure and service provision. Mitigation measures: Local Plan policies to support town and village centres.</p>

Option 2: 16 hectares 2014 - 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
17. To strengthen, modernise and diversify the District economy, and promote sustainable economic growth	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 	+	+	++	option 1, but less opportunity than under options 3 and 4, to offer long-term support for the vitality and viability of the district's towns and villages. This option would help to meet previously identified needs to revitalise current poor quality stock; help address the imbalance of the portfolio in terms of the size of properties available and meet continued demand for B2 floorspace (particularly from indigenous companies). However as this option is lower-mid range, it is likely to lead to more opportunity than option 1, but less opportunity than under options 3 and 4, to offer long-term support for strengthening, modernising and diversifying the district economy.	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: A local supply of employment land will help to deliver economic growth across the plan area. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
18. To encourage and support a high	<ul style="list-style-type: none"> Will it meet the employment needs of local people? 	+	+	+	For this scenario it has been assumed that the district's overall job growth will stabilise over the coming years, ie zero job growth	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Ensuring a sufficient supply of</p>

Option 2: 16 hectares 2014 - 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
and stable level of employment	<ul style="list-style-type: none"> Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 				<p>post 2014. To maintain an overall zero job growth it is assumed that B-class job growth will reduce by 433 to 2031. This option is lower-mid range and is likely to lead to more opportunity than option 1, but less opportunity than under options 3 and 4, to offer long-term support for encouraging a high and stable level of employment.</p>	<p>employment land is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
<p>Summary of significant effects:</p> <p>This option is based on a demand-led projection and proposes the delivery of 16ha of employment land 2014 to 2031 (gross). This job specialisation scenario provides a lower-mid range employment land requirement option and as such may provide more opportunity than option 1, but less opportunity than under options 3 and 4 to ensure that there is sufficient local supply of employment land in the district for its businesses to expand and grow. However the option is likely to lead to a positive effect on the local economy and local employment through helping to meet previously identified needs to revitalise current poor quality stock; help address the imbalance of the portfolio in terms of the size of properties available and meet continued demand for B2 floorspace (particularly from indigenous companies). As lower-mid-range, this option is likely to lead to more opportunity than under option 1, but less opportunity than under options 3 and 4, to offer long-term support for strengthening, modernising and diversifying the district economy. The scenario assumes that the district's overall job growth will stabilise over the coming years, ie zero job growth post 2014 and the option is likely to lead to more opportunity than option 1, but less opportunity than under options 3 and 4, to offer long-term support for encouraging a high and stable level of employment. Ensuring a sufficient supply of employment land is likely to enable local businesses to expand and make a positive contribution to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services. The option makes a more positive contribution to this than option 1, but less of a positive contribution than is likely under options 3 and 4. The option is considered likely to lead to positive</p>						

Option 2: 16 hectares 2014 - 2031 (gross)					
SA Objective	Decision making criteria	Time-frame		Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT LT		
<p>effects on meeting housing need since to ensure labour supply meets the job stabilisation forecast, higher levels of housing delivery will be required and this is likely to lead to meeting objectively assessed need. Negative effects are likely to result for objectives relating to climate change contributions and air quality that are associated with energy consumption and emissions arising from construction and use of new employment space and associated car journeys. Since the option is lower-mid range, there is more opportunity to deliver employment close to where people live than under option 1 but less opportunity than under options 3 and 4, influencing the distance people need to travel to access key services and facilities and impacting on the likelihood of people being enabled to use sustainable forms of transport. In addition, the option offers some opportunity to address the high levels of out commuting from the district, leading to less significant negative effects than under option 1, but more negative impacts than under options 3 and 4 predicted for the objective to reduce the number of journeys made by car. Uncertain effects are recorded on a number of SA objectives including those relating to community cohesion, the protection of biodiversity; the character of towns, villages and heritage assets and their settings; and landscape character and natural assets as the effect will be dependent on the location of employment land allocations and the implementation of Local Plan policies.</p>					

Table 9.2 Assessment Table for Option 2: 16 hectares

1. 2014 Air Quality Progress Report for Staffordshire Moorlands District Council in fulfillment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; November 2014
2. Staffordshire Moorlands Level 1 Strategic Flood Risk Assessment (SFRA) Update; AECOM Infrastructure and Environment UK Ltd; October 2015
3. Landscape and Settlement Character Assessment Study; Wardell Armstrong; 2008
4. Historic Environment Character Assessment: Staffordshire Moorlands; Staffordshire County Council; August 2010

Option 3: 25 hectares

Option 3: 25 hectares 2014 to 2031 (gross)					
SA Objective	Decision making criteria	Time-frame		Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT LT		
SOCIAL					

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
1. To improve community cohesion and the quality of where people work and live.	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and appropriate levels of privacy? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of employment land allocations and the implementation of Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are more dependent on design and location of new development than on the overall employment land requirement. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new employment development.</p>

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
2. To advance equality of opportunity between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation? Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of employment land allocations and the implementation of Local Plan policies. This option is upper-mid range and as such may provide more opportunity than under options 1 and 2 but less opportunity than option 4 to allocate employment space across the district and thus help to minimise the distance people may need to travel to access jobs.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs. Mitigation measures: Local Plan policies to ensure that new employment developments are brought forward in sustainable locations.</p>
3. To improve health and	<ul style="list-style-type: none"> Will it improve health or access to health facilities? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of</p>	<p>Geographical scale: Local Plan area; Effects: Permanent;</p>

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
reduce health inequalities.	<ul style="list-style-type: none"> Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 				significance as this will be dependent on the location of employment land allocations and the implementation of Local Plan policies. However this option is upper-mid range and as such may provide more opportunity than under options 1 and 2 but less opportunity than option 4 to allocate employment space across the district and thus deliver associated opportunities to increase take up of sustainable transport choices and support improvements to healthy travel networks.	<p>Assumptions made: The more hectares of employment land allocated, the more opportunities are provided for increasing healthy travel networks. Mitigation measures: Local Plan policies to ensure that new employment developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks.</p>
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the implementation of relevant Local Plan policies.	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce the fear of crime. Mitigation measures: Local Plan policies to ensure that new employment developments are well</p>

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social/extra care housing.	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	+	++	++	<p>This option is based on demand-led projections. Past trends in FTE job growth over the period 2014-2031 were considered (2,609) in addition to past take up rates of employment sites in the district, reflecting market demand. To ensure labour supply is sufficient to support the net land requirement produced by this approach (around 3ha - 3.9ha to 2031) high levels of housing delivery will be required. Overall the scenario is considered likely to lead to positive effects on this SA objective.</p>	<p>designed, creating safe places and reducing opportunities for anti-social behaviour.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Whilst there may not be a direct causal link between housing and employment land requirements, there is nevertheless a need to ensure that the two dovetail together to avoid any unsustainable outcomes. Mitigation measures: The Local Plan may need to set out a strong policy intervention to ensure that the housing implications of the preferred employment land requirement are addressed.</p>
6. To strengthen links between rural areas and towns by	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? 	?/+	?/+	?/++	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Reducing out commuting will help to</p>

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 				development and the implementation of Local Plan policies. The district has high levels of out commuting to Stoke-on-Trent, East Staffordshire and Newcastle-under-Lyme. This option is upper-mid range and as such may provide more opportunity than under options 1 and 2 but less opportunity than option 4 to ensure that there is sufficient local supply of employment land in the district for its businesses to expand and grow.	reduce the number of journeys made by car overall. Mitigation measures: Local Plan policies to ensure that employment developments are brought forward in sustainable locations and support safe walking and cycling.
ENVIRONMENTAL						
7. To minimise contributions to climate change and consider climate change adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? 	-	-	--	There is some uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of developments and the implementation of Local Plan policies. However this option is	Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Even if employment developments are built to high environmental performance standards and delivered in sustainable

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 				<p>upper-mid range and as such may lead to higher impacts than under options 1 and 2 but less impact than option 4 in relation to overall increases in carbon emissions from the energy consumption and emissions arising from construction and use of new development and associated car journeys.</p>	<p>locations, the total increase in employment opportunity and related car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.</p>
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 	?	?/-	?/--	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option is upper-mid range and as such may lead to higher impacts than under options 1 and 2 but less impact than option 4 in relation to the level of new emissions of airborne</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Identified areas of poor air quality include the Cellarhead junction (between the A52 and A520); Ball Haye Street, Leek (a primary link road from Leek A53 to the A523 Macclesfield and Buxton Road) and Broad Street, Leek (a primary link road from Stoke on Trent)⁽¹⁾.</p>

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
25 To reduce flood risk, protect and enhance water sources.	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as 	?	?	?	pollutants associated with additional car journeys. In the long-term there is potential for development to be delivered within 500m of an identified area of poor air quality.	The allocation of new employment land and car journeys from increased local employment opportunities is likely to increase emission of airborne pollutants. There is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments include appropriate landscaping to aid removal of air pollutants.
		?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However the SFRA ⁽²⁾ confirms that there are few locations in which development would significantly increase fluvial	Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Development will be permitted only where schemes meet development plan requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> SuDS into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water Framework Directive? Will it encourage water efficiency and demand management? 				<p>flood risk elsewhere, due to the majority of potentially suitable sites for development being located within Flood Zone 1, with only a few sites partially within Flood Zone 2 or 3. However this option is upper-mid range and as such may lead to higher impacts than under options 1 and 2 but less impact than option 4 in relation to any increase in surface water flood risk within towns or villages and further downstream as a result of increased surface water runoff and reduced infiltration.</p>	<p>and incorporate SuDS wherever possible.</p>
10. To identify, conserve and enhance biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance. Mitigation measures: Local Plan policies to ensure conservation and enhancement of biodiversity</p>

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<p>Biodiversity Action Plan objectives?</p> <ul style="list-style-type: none"> Will it help deliver networks of biodiversity and green infrastructure? 					and that any development proposal is not permitted to have an adverse effect on the integrity of a European site.
11. To safeguard the best and most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option is upper-mid range and as such may lead to higher impacts than under options 1 and 2 but less impact than option 4 in relation to overall, long-term protection for geological resources.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for geological resources including the best and most versatile agricultural land. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites.</p>

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.</p>
13. To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and undesignated assets) along with their settings? Will it protect and reinforce the character and appearance of the district's towns and villages and 	?	?	?	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option is upper-mid range and as such may lead to higher impacts than under options 1 and 2 but less impact than option 4 in relation to overall, long-term protection for the character of settlements along with heritage assets and their settings.	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings. Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.</p>

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
14. To protect and enhance the character and appearance of the landscape including historic landscape and other natural assets and resources.	<p>maintain and strengthen local distinctiveness and sense of place?</p> <ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. The Landscape and Settlement Character Assessment Study⁽³⁾ offers guidance to help ensure new development required in the District takes place in locations that are compatible with the unique quality of the Staffordshire Moorlands landscape and in sympathy with the setting of a particular settlement. The HEA⁽⁴⁾ identified that (within each of the study areas) historic character had been retained and that beyond the present extent of the built areas, a dispersed</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.</p>

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
160 To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and local distinctiveness? Does it help support tourism and the visitor economy? 	?	?	?	settlement pattern was still predominant. However this option is upper-mid range and as such may lead to higher impacts than under options 1 and 2 but less impact than option 4 in relation to overall, long-term protection for landscape character and other natural assets.	
					There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However this option is upper-mid range and as such may lead to higher impacts than under options 1 and 2 but less impact than option 4 in relation to overall, long-term support for sustainable tourism.	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: A thriving district with a robust cultural and visitor economy will require sufficient supply of local employment land. Mitigation measures: Local Plan policies to support tourism and the visitor economy.</p>
ECONOMIC						

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
16. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	+	++	++	Ensuring a sufficient supply of employment land is likely to enable local businesses to expand and a positive contribution being made to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services. This option is upper-mid range and as such may lead to higher impacts than under options 1 and 2 but less impact than option 4 in relation to overall, long-term support for the vitality and viability of the district's towns and villages.	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Employees of expanding and incoming businesses will support their local retail, leisure and service provision.</p> <p>Mitigation measures: Local Plan policies to support town and village centres.</p>
17. To strengthen, modernise and diversify the District economy, and promote sustainable economic growth	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of 	+	++	++	This option would help to meet previously identified needs to revitalise current poor quality stock; help address the imbalance of the portfolio in terms of the size of properties available and meet continued demand for B2 floorspace (particularly from indigenous companies). However this option is upper-mid range and as such may lead to higher	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: A local supply of employment land will help to deliver economic growth across the plan area.</p> <p>Mitigation measures: Local Plan policies to support sustainable economic growth.</p>

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	existing businesses?				impacts than under options 1 and 2 but less impact than option 4 in relation to overall, long-term support for strengthening, modernising and diversifying the district economy.	
<p>18 To encourage and support a high and stable level of employment</p> <p>19 To support a high and stable level of employment</p>	<ul style="list-style-type: none"> Will it meet the employment needs of local people? Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 	+	+	++	<p>The past trends job growth scenario suggests growth in office FTE jobs (B1a) but declining FTE jobs in industrial (B1c/B2) and warehousing (B8) land use. Consideration of past take up rates suggests limited prospects for growth in the B-class employment sectors. The practical physical constraints and relative inaccessibility of certain areas and the current lack of viability of employment developments schemes suggests that realistically an upsurge in large developments in the district is unlikely for the foreseeable future. However this option is upper-mid range and as such may lead to higher impacts than under options 1 and 2 but</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Ensuring a sufficient supply of employment land is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>

Option 3: 25 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
					less impact than option 4 in relation to overall, long-term support for encouraging a high and stable level of employment.	
<p>Summary of significant effects:</p> <p>This option is based on demand-led projections informed by past take up rates and past trends, proposing the delivery of 25ha of employment land to 2031 (gross). This option is upper-mid range and as such may provide more opportunities than under options 1 and 2, but less opportunity than option 4 to ensure that there is sufficient local supply of employment land in the district for its businesses to expand and grow. This option is likely to lead to a significantly positive effect on the local economy and local employment through helping to meet previously identified needs to revitalise current poor quality stock; help address the imbalance of the portfolio in terms of the size of properties available and meet continued demand for B2 floorspace (particularly from indigenous companies). As this option is upper-mid range it may provide more opportunities than under options 1 and 2, but less opportunity than option 4 to lead to overall, long-term support for strengthening, modernising and diversifying the district economy. The past trends job growth scenario suggests growth in office FTE jobs (B1a) but declining FTE jobs in industrial (B1c/B2) and warehousing (B8) land use. Consideration of past take up rates suggests limited prospects for growth in the B-class employment sectors. The practical physical constraints and relative inaccessibility of certain areas and the current lack of viability of employment development schemes suggests that realistically an upsurge in large developments in the district is unlikely for the foreseeable future. However as this option is upper-mid range it may provide more opportunities than under options 1 and 2, but less opportunity than option 4 to lead to long-term support for encouraging a high and stable level of employment. Ensuring a sufficient supply of employment land is likely to enable local businesses to expand and make a positive contribution to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services. This option makes a more positive contribution to this than options 1 and 2, but less of a contribution than option 4. The option is also considered likely to lead to positive effects on meeting housing need. Past trends in FTE job growth over the period 2014-2031 were considered (2,609) in addition to past take up rates of employment sites in the district, reflecting market demand. To ensure labour supply is sufficient to support the net land requirement produced by this approach (around 3ha - 3.9ha to 2031) high levels of housing delivery will be required, likely to be considered sufficient to meet objectively assessed need. Since the option is upper-mid range, there is most opportunity to deliver employment close to where people live than under options 1</p>						

Option 3: 25 hectares 2014 to 2031 (gross)					
SA Objective	Decision making criteria	Time-frame		Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT LT		
<p>and 2, potentially reducing the distance people need to travel to access key services and facilities and making the use of sustainable forms of transport more likely, however the option offers less of a positive contribution to this than option 4. In addition, this option offers more opportunity than options 1 and 2 to address the high levels of out-commuting from the district, leading to positive effects predicted for the objective to reduce the number of journeys made by car; although the significance is less than under option 4. However negative effects are likely to result on objectives relating to climate change contributions and air quality that are associated with energy consumption and emissions arising from construction and use of new employment space and associated car journeys, these effects are likely to be greater than under options 1 and 2, but less significant than under option 4. Uncertain effects are recorded on a number of SA objectives including those relating to community cohesion, the protection of biodiversity; the character of towns, villages and heritage assets and their settings; and landscape character and natural assets as the effect will be dependent on the location of employment land allocations and the implementation of Local Plan policies.</p>					

Table 9.3 Assessment Table for Option 3: 25 hectares

1. 2014 Air Quality Progress Report for Staffordshire Moorlands District Council In fulfillment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; November 2014
2. Staffordshire Moorlands Level 1 Strategic Flood Risk Assessment (SFRA) Update; AECOM Infrastructure and Environment UK Ltd; October 2015
3. Landscape and Settlement Character Assessment Study; Wardell Armstrong; 2008
4. Historic Environment Character Assessment: Staffordshire Moorlands; Staffordshire County Council; August 2010

Option 4: 27 hectares

Option 4: 27 hectares 2014 to 2031 (gross)					
SA Objective	Decision making criteria	Time-frame		Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT LT		
SOCIAL					

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
1. To improve community cohesion and the quality of where people work and live.	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and appropriate levels of privacy? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of employment land allocations and the implementation of Local Plan policies.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are more dependent on design and location of new development than on the overall employment land requirement. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new employment development.</p>	
2. To advance equality of opportunity between all	<ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of employment land</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made:</p>	

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
persons and eliminate social exclusion by improving access to jobs, services and facilities.	<p>due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation?</p> <ul style="list-style-type: none"> Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 				<p>allocations and the implementation of Local Plan policies. This option represents the upper end of the range and as such may provide more opportunities than under all other options to allocate employment space across the district and thus help to minimise the distance people may need to travel to access jobs.</p>	<p>Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs. Mitigation measures: Local Plan policies to ensure that new employment developments are brought forward in sustainable locations.</p>
3. To improve health and reduce health inequalities.	<ul style="list-style-type: none"> Will it improve health or access to health facilities? Will it promote healthy lifestyles? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of employment land allocations and the implementation of Local Plan policies. However this</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: The more hectares of employment land</p>

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 				<p>option represents the upper end of the range and as such may provide more opportunities than under all other options to allocate employment space across the district and thus deliver associated opportunities to increase take up of sustainable transport choices and support improvements to healthy travel networks.</p> <p>allocated, the more opportunities are provided for increasing healthy travel networks. Mitigation measures: Local Plan policies to ensure that new employment developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks.</p>	
4.7 To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the implementation of relevant Local Plan policies.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce the fear of crime. Mitigation measures: Local Plan policies to ensure that new employment developments are well</p>	

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social /extra care housing.	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	++	++	++	<p>This option is based on demand-led projections combining Oxford Economics and Experian job growth projections. To ensure labour supply is sufficient to support the net land requirement produced by this approach (around 6.5ha 2014 to 2031) significant levels of housing delivery will be required. Overall the scenario is considered likely to lead to positive effects on this SA objective.</p>	<p>designed, creating safe places and reducing opportunities for anti-social behaviour.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Whilst there may not be a direct causal link between housing and employment land requirements, there is nevertheless a need to ensure that the two dovetail together to avoid any unsustainable outcomes. Mitigation measures: The Local Plan may need to set out a strong policy intervention to ensure that the housing implications of the preferred employment</p>

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
6. To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	?/+	?/++	?/++	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. The district has high levels of out commuting to Stoke-on-Trent, East Staffordshire and Newcastle-under-Lyme. This option represents the upper end of the range and as such may provide more opportunities than under all other options to ensure that there is sufficient local supply of employment land in the district for its businesses to expand and grow.</p>	<p>land requirement are addressed.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Reducing out commuting will help to reduce the number of journeys made by car overall. Mitigation measures: Local Plan policies to ensure that employment developments are brought forward in sustainable locations and support safe walking and cycling.</p>
ENVIRONMENTAL						
7. To minimise contributions to climate change	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? 	-	--	--	<p>There is some uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of developments and the implementation of Local Plan</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Even if employment</p>

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>and consider climate change adaptation.</p> <p style="text-align: center;">Page 440</p>	<ul style="list-style-type: none"> ● Will it increase energy efficiency? ● Will it increase the use of renewable energy? ● Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 				<p>policies. However this option is likely to lead to the highest overall increase in carbon emissions from the energy consumption and emissions arising from construction and use of new development and associated car journeys.</p>	<p>developments are built to high environmental performance standards and delivered in sustainable locations, the total increase in employment opportunity and related car journeys is likely to increase energy use and associated greenhouse gas emissions.</p> <p>Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.</p>

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 	?	?/--	?/--	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as this option represents the upper end of the employment land requirement range, it is likely to lead to the highest level of new emissions of airborne pollutants associated with additional car journeys. In the long-term there is potential for development to be delivered within 500m of an identified area of poor air quality.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Identified areas of poor air quality include the Cellarhead junction (between the A52 and A520); Ball Haye Street, Leek (a primary link road from Leek A53 to the A523 Macclesfield and Buxton Road) and Broad Street, Leek (a primary link road from Stoke on Trent)⁽¹⁾. The allocation of new employment land and car journeys from increased local employment opportunities is likely to increase emission of airborne pollutants. There is a risk that air quality may deteriorate in areas of existing low quality.</p>

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
<p>To reduce flood risk, protect and enhance water sources.</p>	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However the SFRA⁽²⁾ confirms that there are few locations in which development would significantly increase fluvial flood risk elsewhere, due to the majority of potentially suitable sites for development being located within Flood Zone 1, with only a few sites partially within Flood Zone 2 or 3. This option requires the greatest allocation of employment land, and thus poses the highest risk of all options to increase surface water</p>	<p>Mitigation measures: Local Plan policies to ensure that developments include appropriate landscaping to aid removal of air pollutants.</p> <p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Development will be permitted only where schemes meet development plan requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<p>Framework Directive?</p> <ul style="list-style-type: none"> Will it encourage water efficiency and demand management? 				flood risk within towns or villages and further downstream as a result of increased surface water runoff and reduced infiltration.	
10. To identify, conserve and enhance biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.</p> <p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance.</p> <p>Mitigation measures: Local Plan policies to ensure conservation and enhancement of biodiversity and that any development proposal is not permitted to have an adverse effect on the integrity of a European site.</p>	

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
11. To safeguard the best and most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as it proposes the greatest allocation of new employment land of all options considered, this option is likely to lead to least overall, long-term protection for geological resources.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for geological resources including the best and most versatile agricultural land. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites.</p>
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible.</p>

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	sustainable sources?					Mitigation measures: Local Plan policies to support waste minimisation.
13. To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and undesignated assets) along with their settings? Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as it proposes the greatest allocation of new employment land of all options considered, this option is likely to lead to least overall, long-term protection for the character of settlements along with heritage assets and their settings.</p> <p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings.</p> <p>Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.</p>	
14. To protect and enhance the	<ul style="list-style-type: none"> Will it protect and enhance the 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance</p> <p>Geographical scale: Local Plan area; Effects:</p>	

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
character and appearance of the landscape including historic landscape and other natural assets and resources.	character of the landscape and maintain and strengthen local distinctiveness? <ul style="list-style-type: none"> Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 				as this will be dependent on the location of development and the implementation of Local Plan policies. The Landscape and Settlement Character Assessment Study ⁽³⁾ offers guidance to help ensure new development required in the District takes place in locations that are compatible with the unique quality of the Staffordshire Moorlands landscape and in sympathy with the setting of a particular settlement. The HEA ⁽⁴⁾ identified that (within each of the study areas) historic character had been retained and that beyond the present extent of the built areas, a dispersed settlement pattern was still predominant. However as it proposes the greatest allocation of new employment land of all options considered, this option is likely to lead to least overall, long-term protection for landscape character and other natural assets.	Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
15. To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and local distinctiveness? Does it help support tourism and the visitor economy? 	?	?	?	<p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and the implementation of Local Plan policies. However as it proposes the greatest allocation of new employment land of all options considered, this option is likely to lead to most overall, long-term support for sustainable tourism.</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: A thriving district with a robust cultural and visitor economy will require sufficient supply of local employment land. Mitigation measures: Local Plan policies to support tourism and the visitor economy.</p>
ECONOMIC						
16. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	+	++	++	<p>Ensuring a sufficient supply of employment land is likely to enable local businesses to expand and a positive contribution being made to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services. As it proposes the greatest allocation of new employment land of all</p>	<p>Geographical scale: Local Plan area; Effects: Permanent; Assumptions made: Employees of expanding and incoming businesses will support their local retail, leisure and service provision. Mitigation measures: Local Plan</p>

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
17. To strengthen, modernise and diversify the District economy, and promote sustainable economic growth	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 	++	++	++	options considered, this option is likely to lead to most overall, long-term support for the vitality and viability of the district's towns and villages.	policies to support town and village centres.
18. To encourage and support a high and stable	<ul style="list-style-type: none"> Will it meet the employment needs of local people? 	++	++	++	This option would help to meet previously identified needs to revitalise current poor quality stock; help address the imbalance of the portfolio in terms of the size of properties available and meet continued demand for B2 floorspace (particularly from indigenous companies). However as it proposes the greatest allocation of new employment land of all options considered, this option is likely to lead to most overall, long-term support for strengthening, modernising and diversifying the district economy.	<p>Geographical scale: Local Plan area; Effects: Permanent;</p> <p>Assumptions made: A local supply of employment land will help to deliver economic growth across the plan area. Mitigation measures: Local Plan policies to support sustainable economic growth.</p> <p>Geographical scale: Local Plan area; Effects:</p>

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
level of employment	<ul style="list-style-type: none"> Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 				<p>and Experian job growth forecasts. Whilst both projections indicate growth over the plan period, the projected scales vary considerably. OE suggest a net growth of +228 jobs 2014 - 2031 whilst Experian projections forecast +1,300 over the same period. A key difference between them relates to the projections for manufacture of machinery and equipment and of transport equipment with OE projections suggesting a decline of -427 FTE jobs for these two sectors and Experian projections suggesting a growth of 1,676 FTE jobs net. Given the presence of successful companies in the district specialising in these advanced manufacturing sectors, the NLP report considers there is merit in taking forward a combination of the two job growth scenarios providing a net increase of 435 B-Class FTE jobs 2014-2031 (794 FTEs in total). The report notes that allocation of this level of</p>	<p>Permanent; Assumptions made: Ensuring a sufficient supply of employment land is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
					employment land would require policy intervention and close monitoring to ensure that the associated scale of job growth is realistic. However as it proposes the greatest allocation of new employment land of all options considered, this option has the potential to lead to most overall, long-term support for encouraging a high and stable level of employment.	

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Summary of significant effects:

This option is based on demand-led projections informed by Oxford Economics and Experian job growth forecasts, proposing the delivery of 27ha of employment land to 2031 (gross). This option represents the upper end of the range and as such may provide more opportunities than under all other options to ensure that there is sufficient local supply of employment land in the district for its businesses to expand and grow. This option is likely to lead to a significantly positive effect on the local economy and local employment through helping to meet previously identified needs to revitalise current poor quality stock; help address the imbalance of the portfolio in terms of the size of properties available and meet continued demand for B2 floorspace (particularly from indigenous companies). The scenario represents a combination of Oxford Economics (OE) and Experian job growth forecasts. Whilst both projections indicate growth over the plan period, the magnitude of this varies considerably. OE suggest a net growth of +228 jobs 2014 - 2031 whilst Experian projections forecast +1,300 over the same period. A key difference between them relates to the projections for manufacture of machinery and equipment and of transport equipment with OE projections suggesting a decline of -427 FTE jobs for these two sectors and Experian projections suggesting a growth of 1,676 FTE jobs net. Given the presence of successful companies in the district specialising in these advanced manufacturing sectors, the NLP report considers there is merit in taking forward a combination of the two job growth scenarios providing a net increase of 435 B-Class FTE jobs 2014-2031 (794 FTEs in total). The report notes that allocation of this level of employment land would require policy intervention via the emerging Local

Option 4: 27 hectares 2014 to 2031 (gross)						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
		<p>Plan and close monitoring to ensure that the associated scale of job growth is realistic. However as it proposes the greatest allocation of new employment land of all options considered, this option has the greatest potential to lead to overall, long-term support for strengthening, modernising and diversifying the district economy and encouraging a high and stable level of employment. Ensuring a sufficient supply of employment land is likely to enable local businesses to expand and make a positive contribution to the vitality and viability of the District's towns and villages, contributing to the safeguarding and improvement of shops and services. This option makes the most positive contribution to this of all options considered. The option is also considered likely to lead to positive effects on meeting housing need. To ensure labour supply is sufficient to support the net land requirement produced by this approach (around 6.5ha 2014 to 2031) significant levels of housing delivery will be required, likely to be considered sufficient to meet objectively assessed need. Since the option represents the greatest allocation of new employment land there is most opportunity to deliver employment close to where people live, potentially reducing the distance people need to travel to access key services and facilities and making the use of sustainable forms of transport more likely. In addition, this option offers most opportunity to address the high levels of out-commuting from the district, leading to positive effects predicted for the objective to reduce the number of journeys made by car. However negative effects are likely to result on objectives relating to climate change contributions and air quality that are associated with energy consumption and emissions arising from construction and use of new employment space and associated car journeys. Uncertain effects are recorded on a number of SA objectives including those relating to community cohesion, the protection of biodiversity; the character of towns, villages and heritage assets and their settings; and landscape character and natural assets as the effect will be dependent on the location of employment land allocations and the implementation of Local Plan policies.</p>				

Table 9.4

1. 2014 Air Quality Progress Report for Staffordshire Moorlands District Council In fulfillment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; November 2014
2. Staffordshire Moorlands Level 1 Strategic Flood Risk Assessment (SFRA) Update; AECOM Infrastructure and Environment UK Ltd; October 2015
3. Landscape and Settlement Character Assessment Study; Wardell Armstrong; 2008
4. Historic Environment Character Assessment: Staffordshire Moorlands; Staffordshire County Council; August 2010

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Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO16	Mr Robert Moseley				Object	Building 420 per year within Staffordshire Moorlands and maintaining the green belt, and declaring yourself sustainable-is by definition is not sustainable and will lead to further Greenbelt erosion. 420 homes per year is growth. Alternatives; how many homes are empty? How many are rental and empty? How many homes do the people of Biddulph, not nationally to they need?
PO42	Mr P Rushton				Object	The housing requirement considered during the Whitehead examination in 2013 was, I believe, based on a 2011 census which has since been shown erroneous by a later prediction revealing a requirement of only 2500 homes. There is now no evidence to support the Government and SMDC determination to concrete over the green belt and to destroy the characters of Staffs Moorlands villages.
PO62	Ms Wendy Birks				General comment	Given the changing climate (increasingly intense precipitation) and , pressure to build on floodplains, slopes etc. I believe that all proposed developments, for both residential and employment, should be designed to reduce the rapid runoff off rainfall (in the current jargon "slow the flow") in order that existing properties and the new builds should be protected from the threat of flooding. For example sustainable urban drainage systems and green roofs. I would also like to see opportunities for wildlife to benefit from any developments, therefore stipulations to incude features such as cavities for birds, bats and bees incorporated into buildings and wildlife gardens surrounding them could be included in planning permissions. Likewise all opportunities to install renewable energy generating equipment such as solar panels, hydrothermal heating etc. should be specified by planners.
PO149	Miss Carly Chilton				Object	Having just spent a beautiful weekend in the Staffordshire Moorlands I am outraged at the development plan to urbanise this area of outstanding beauty. We regularly take a ramble through the land designated for development - BD063a we are outraged at this, this particular stretch of land is greenbelt area and as such should be fiercely guarded. We are strong conservationists and abjectly object to the development of greenbelt. The overall impact on wildlife and the landscape would be unforgiveable. Please do not build on one of our favourite country rambles.

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO242	Mr Robert Stockley				Object	I believe that decisions are being made without adequate consultation with the population of Staffs Moorlands. The planners are identifying sites from maps, without even bothering to visit the locations for future development. The councillors had to try long and hard to even get the planners out of there offices in Leek, and when they did visit, they were not aware of the potential for the Victoria Colliery site. Newcastle BC have met with Biddulph Councillors, and have agreed that a joint site at the Victoria location in Brown Lees would be beneficial to both councils. Therefore, why haven't the planners included this site in the Local Plan?
PO282	Mrs Sandra Walley				Object	I object to the proposals of building new houses on Green Belt Land. Particularly when the Chancellor George Osborne MP stated in question time at the House of Commons 25th May 2016 "we will not be using Green Belt to build houses when other better options are available". There are several Brown Field sites within the Biddulph boundaries that have been highlighted to the planning committee, who have ignored the sites and are continuing with their Green Belt proposals. I find this totally unacceptable.
PO802	Mr Timothy Sproston					Whilst I am not convinced that the housing need is there, I appreciate that we have an ageing population and that that waiting lists for social housing are too long. I would see this proposal to build new houses as an opportunity to upgrade the current housing stock, tidy areas of brown field which are an eyesore in the town and improve the infrastructure of Biddulph where required. It does not make sense to lose Green belt land and miss the opportunity to make the positive changes outlined above.
PO625	Ms Alison Conybeare				General comment	I accept that to comply with National Government policy, a certain number of houses are required. I understood these to be mainly aimed at existing urban sites. Therefore, how come 30% are to be placed in rural locations? Is this figure not too high?
PO615	MRS ELLEN FAULKNER				Object	Yes it's too great. I don't think these houses are needed in Biddulph.
PO401	Mr David John Allen				Support	Looks fine to me. However, would propose that we try to reinstate dilapidated housing stock

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO552	MRS ANGELA Turner				Object	They are not in any way linked to the available land available in each locality. Having a presumption that land can be taken out of the Green Belt to fulfil what is a generalised figure of 20% or 30% is a poor method of setting targets and already shows an unbalanced appraisal in favour of economic development without any due regard to other issues. These targets should have firstly been set based on available land within the urban boundary or classed as brownfield. SMDC will not be fulfilling the aim of 'Sustainable Development' according to its' true definition by simply taking land out of the greenbelt, moving it into the town boundary and allocating it as a housing site.
PO601	DR William Callender				General comment	We need to provide affordable housing to support employment in the area and provide a demand for local amenities. Given its rural nature it would be better to disperse this development by allowing greater freedom for the conversion of existing buildings or addition of single homes adjacent to others rather than seeking to develop single large sites with many houses.
PO4498	Mr Gez Willard	Willardwillard Ltd			General comment	The council has decided to plan for a middling level of housing growth. This is a complicated area of planning policy and the site owner [represented by agent] in this case wishes to reserve the right to object to it as the plan evolves and should they consider the figures unsound. [Refer to attached letter document and response form].
PO3928	Mr Phil Bamford	Gladman Developments			Object	This submission provides Gladman Development's written representations on the Staffordshire Moorlands Preferred Option Sites and Boundaries Consultation. These representations concern the following matters. Duty to Cooperate Sustainability Appraisal Objectively Assessed Housing Need Development Requirements and Distribution Green Belt Review Preferred Option Sites and Boundaries - Leek. [Refer to 2 submitted attachments].
PO3931	Mr Mike O Brien	WYG			Object	This representation has been prepared by WYG planning & Environment on behalf of Key Plant Automation Limited to support the allocation of land at Bode Business Park, Ball Haye Green, Leek for residential development. The owner of the site is to re-locate the Key Plant Automation business to an alternative location and is considering alternative uses for the present site. This representation aims to demonstrate that further consideration should be given to the allocation of the site for residential use. The attached Representations Report reviews the SMDC housing requirement, including historic delivery, as well as the assumptions that have resulted in the adjusted Objectively Assessed Need (OAN) and consequently the increased housing requirement to be achieved over the plan period. It also includes an analysis of the spatial distribution of housing across the district in the context of Leek specifically, and an assessment of SMDC's short term housing requirements within the next five years. The report also focuses on the Bode Business Park site with a review of its suitability for housing, as well as demonstrating that it is no longer a viable employment site. A number of changes to the Local Plan are therefore proposed in relation to: increasing District and Leek housing requirements consequently to allocate more Leek housing sites (including LE243) revisiting residential density expectations; and revisiting the proposed allocations in light of Policy SS5a of the Core Strategy which states that priority will be given to previously developed sites within the urban area.

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PO1620	Mr John Steele				Object	<p>The whole procedure is flawed on the following grounds: a) SMDC allege that the whole procedure is based on a Central Govt. build requirement, although our MP Karen Bradley and the Ministry state that local people must be the deciders of any plan. Since we have already been consulted it seems completely at odds with Govt. policy that our previous responses have largely been ignored. This is particularly true of the considered responses of the Parish Councils who are Statutory Consultees. b) The figure of 6080 additional homes needed by 2031, albeit discounted to 4158 by completions and commitments since 2011, is without sound foundation, because -the net immigration figures must be based on the Staffordshire Moorlands playing its part in housing the net immigration of the potential millions of people either coming from the less favoured parts of the EU or those persons gaining entry, legally or illegally to the EU from the middle east and elsewhere. There is nowhere else all these people could come from but the lack of transparency hides the fact that no provision has been made in terms of the additional expenditures required to settle such people in our environment. -the model used to calculate Labour Supply and it's effect on population used by Nathaniel Lichfield and Partners is outdated and fails to take into account the need for the retirement age to evolve in line with increasing life expectancy and generally fitter and active older people. It also fails to account for the trends of working from home and outsourcing to home workers. So the link between labour requirements and population is wrong. In conclusion it seems that this whole plan is being driven the wrong way round. SMDC appear to have decided that the £1000 bounty per home built and the eventual Council Tax revenue as the real objective, so that all the studies are worked to achieve the figures required. Indeed, looking at the Council's future budget propositions the books won't balance without these incomes. If SMDC wish to enter into a serious consultation with residents they should start from the more realistic requirement based on the 2015 Dept. for Communities and Local Government prediction which indicate the need for ONLY 2573 new homes in the Moorlands. Once we have some honesty in the figures the housing allocation exercise would become a genuine and serious consultation meriting a cooperative response.</p>

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO2736 PO2748 PO2744 PO2683 PO2678 PO2655 PO2663 PO2724 PO2651 PO2715 PO2616 PO2638 PO2603 PO2607 PO2618 PO2719 PO2710 PO2674 PO2642 PO2765 PO2898 PO2879 PO2851 PO2761 PO2976 PO2810 PO2940 PO2935 PO2986 PO2971 PO2793 PO2815 PO2770 PO2778 PO2991 PO2830 PO2840 PO2647 PO2667 PO2611	Mr R Snow Mrs V Weston Mr J Weston Mr A Hide Mrs D Hide Mr R Owen-Jones Mr C Alcock Mr Albert Allen Mrs Lara Austin Mrs Karen Cartlidge Mr Alan Eaton Mrs Carole Edwards Mr Michael Feather Mrs Angela Feather Mr Damien Flynn Mr Andrew Gibson Mrs Karen Green Mr G Owen-Jones Mr And Mrs T & J Prince Mrs J Weston Mr Alan Moss Mrs Margaret Moss Mr M Tunnicliffe Mr Andrew Weston Mr Jason Baggley A Brattley Mr Barry Fraser Mrs C Fraser Mr Ronald Fryer M Glover Miss A Gregory Mrs Vera James Mrs H Keeling Mr Stefan Lilleker Mr Ian Menzies Lingard Mrs B Massey Mrs Christine Pickin Mr And Mrs T & J Prince Miss Lynne Sanders Mrs Ena Wetwood				Object	The council's assessment (the 2012-based sub national household projections update – Jan 2016 revision) concluded the 250 dwellings per annum was the minimum required. However, despite 1000s of objections in the last consultation the council have not reduced the housing numbers. One of SMDC most valuable assets is its beautiful countryside, and the use of Greenfields. I object overall housing numbers for SM and the use of Greenfields of town and boundaries.

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO2659 PO2630 PO2634 PO2728 PO2732 PO2687 PO2691 PO2624 PO2753 PO3015 PO3020 PO3050 PO3045 PO2950 PO2774 PO3101 PO2870 PO3025 PO2757 PO2981 PO2803 PO2960 PO2911 PO2965 PO2996 PO3001 PO2955 PO2845 PO3040 PO3055 PO3247 PO3138 PO3237 PO3153 PO3096 PO3091 PO3133 PO3168 PO3128 PO3163 PO3158 PO3173	Mr A Emery Mrs R Green Mr Clive Green Mr John Elks Mrs Mavis Elks Mr Philip Simcock Ms M Kennaway Mrs J Whitefield Mr D Weston Mrs J Foster Councillor Helen Lingard Mrs Eva Moulton Mr Kenneth George Moulton D Pittman Mrs K Rogers Mrs J Seddon Mrs D Tunnicliffe Mr D Waring Mr Oliver Weston Mrs Susan Wiseman Mrs F Worsley Mrs P Griffiths Mr Raymond James Mr John Shipley Mr Michael Sposito Elvira Sposito Mr Ronald Griffiths Mrs Hazel Simcock Mrs Susan Clare Mr A Shenton Mr C Smith Mr N Watson Mrs M Snow Mrs J Titterton Mrs C Goodwin Mrs B Barks Mr A Ainsworth Mr D Ainsworth Mr G Clewlow Mr D Dunn Mrs P Dunn Mr D Ratcliffe	Cheadle Town Council			Object	The council's assessment (the 2012-based sub national household projections update – Jan 2016 revision) concluded the 250 dwellings per annum was the minimum required. However, despite 1000s of objections in the last consultation the council have not reduced the housing numbers. One of SMDC most valuable assets is its beautiful countryside, and the use of Greenfields. I object overall housing numbers for SM and the use of Greenfields of town and boundaries.

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PO3221	Mr D Ratcliffe				Object	The council's assessment (the 2012-based sub national household projections update – Jan 2016 revision) concluded the 250 dwellings per annum was the minimum required. However, despite 1000s of objections in the last consultation the council have not reduced the housing numbers. One of SMDC most valuable assets is its beautiful countryside, and the use of Greenfields. I object overall housing numbers for SM and the use of Greenfields of town and boundaries.
PO3214	Mr R Ball					
PO3086	Mr A Hewitt					
PO3209	Mr J Hewitt					
PO3204	Miss K Pickford-Avery					
PO3199	Mrs P Routledge					
PO3194	Mrs A Rogers					
PO3076	Mr W Wordsworth					
PO3071	Mr J Lawler					
PO3299	Mrs J Birks					
PO3304	Mr M Birks					
PO3389	Helen Abbey					
PO3543	Mrs Michelle Plant					
PO3532	Mr Lee Plant					
PO3584	Ms Gina Boston					
PO3253	K W Alcock					
PO3608	Mrs Patricia Allum					
PO3571	Mr Lee Austin					
PO3428	Mr Craig Beardmore					
PO3585	Mr Matthew Boston					
PO3455	Mrs Susan Brindley					
PO3454	Mr Darryl Brindley					
PO3429	Mrs Christine Broad					
PO3413	Mr Basil Brunt					
PO3324	Mr Peter Brunt					
PO3316	Mrs Hazel Brunt					
PO3380	Mr Stanley Byatt					
PO3280	Mr S Hassell					
PO3117	Miss P Millward					
PO3189	Miss S Ford					
PO3242	Mr R Lees					
PO3143	Mr And Mrs J Greenwood					
PO3035	Mr & Mrs L & D Stevenson					
PO3030	Mrs Angela Jones					
PO3106	Mr D Gould					
PO2699	Mr Eric Cartlidge					
PO3148	Mrs J Davies					
PO3381	Mrs Vera Byatt					
PO3325	Mrs Jill Callear					
PO3463	Mrs Joyce Campbell					
PO3396	Miss L Chadwick					
PO3421	Mrs M Clewes					

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ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO3364 PO3258 PO3356 PO3365 PO3341 PO3373 PO3317 PO3412 PO3404 PO3340 PO3269 PO3263 PO3397 PO3405 PO3291 PO3184 PO3066 PO3178 PO3061 PO3231 PO3112 PO3123 PO3226 PO3275 PO4773	Mr Harvey Cope Mr Roger Davis Mr D Fernihough Mr Tommy Frost Mr Colin Hayes Mrs F R Hayward Mrs Mary Jones Mrs Brenda Mills Mr David Tavernor Mr S Waring Mrs J.F. Eaton Mr A.R. Eaton Mr Saul Cutler Mrs Sara Tavernor Mr David Renshaw Mrs P Wordsworth Mr C Foster Mr P Hollywood Mrs A Hollywood Mr N Hewitt Mr I Millward Mr B Clare Mr P Heath Mr and Mrs A Brown Mr A Copcutt				Object	The council's assessment (the 2012-based sub national household projections update – Jan 2016 revision) concluded the 250 dwellings per annum was the minimum required. However, despite 1000s of objections in the last consultation the council have not reduced the housing numbers. One of SMDC most valuable assets is its beautiful countryside, and the use of Greenfields. I object overall housing numbers for SM and the use of Greenfields of town and boundaries.

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ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO3285	Mrs C Moseley				Object	The council's assessment (the 2012-based sub national household projections update – Jan 2016 revision) concluded the 250 dwellings per annum was the minimum required. However, despite 1000s of objections in the last consultation the council have not reduced the housing numbers. One of SMDC most valuable assets is its beautiful countryside, and the use of Greenfields. I object overall housing numbers for SM and the use of Greenfields of town and boundaries.
PO3290	Mrs B Heesman					
PO3420	Mr A Massey					
PO3667	K W Alcock					
PO3632	Mr Neville Brooks					
PO3625	Mrs Pauline Brooks					
PO3462	Mr Duncan Campbell					
PO3601	Mr K Davall					
PO3438	Mr George Davall					
PO3439	Mrs Isabel Davall					
PO3507	Mr Robert Dennis					
PO3500	Mrs Sylvia Dennis					
PO3580	Mrs Karen Drummond					
PO3592	Mr Alistair Drummond					
PO3531	Mr J Edwards					
PO3488	Mr Malcolm Elvidge					
PO3515	Mrs Anne Fox					
PO3633	Mrs Heather Frame					
PO3487	Mr Frank Harding					
PO3447	Mrs Pamela Johnson					
PO3446	Mr Roger Johnson					
PO3478	Mr & Mrs D Keates					
PO3609	Mrs H Keeling					
PO3562	Mr K Mannion					
PO3617	Mr Darren Potts					
PO3675	Mrs Giovanna Potts					
PO3547	Mr & Mrs J & C Smith					
PO3616	Mr David Thomas					
PO3524	Maria Turley					
PO3570	Mrs Jennifer Vasselin					
PO3563	Miss Rachel Vasselin					
PO3593	Mr Kenneth Weston					
PO3496	Mrs Avril Woodward					
PO3495	Mr David Woodward					
PO3508	Millicent Stevenson					
PO3348	Mr Christopher Jones					
PO3471	Mr D Hancock					
PO3470	Mrs J M Hancock					
PO3516	Master J Kennaway					
PO3357	Mr David Kennaway					
PO3372	Mrs M E Nicholls					
PO3308	Mr M Burton					
PO3333	Ms Allison Keates					

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ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO3264 PO3523 PO3554 PO3555 PO3309 PO3349 PO3653 PO3640 PO3855 PO3660 PO3676 PO3683 PO3684 PO3691 PO3697 PO3704 PO3705 PO3711 PO3715 PO3718 PO3726 PO3727 PO3734 PO3735 PO3742 PO3743 PO3750 PO3751 PO3758 PO3759 PO3766 PO3767 PO3774 PO3775 PO3782 PO3783 PO3790 PO3791 PO3798 PO3799 PO3806 PO3807 PO3815 PO3816	Mr Alan Keates Mr Henry James Gibson Mr John W Bossons Mrs R H Bossons Mr A Gough Mrs J Hewitt Mr K Whitefield Mr David Renshaw Mr Philip Silk Mr and Mrs V M Elks Mr G Hodgkinson Mrs K Smith Mr I Crawford Mrs J Crawford Mr JA Hayes Mr M Shirley Mr and Mrs M Nadova Mr P Cope Mrs J Cope Mr W Elks Mr D Richards Mr M Nad Ms T Janete Miss T Boulton Mrs J Sagers Mr C Loving Mr T Loving Mrs J Richardson Mrs C Hopkinson Mr and Mrs S Abbey Mrs P Richards Mr B Johnson Miss K Beardmore Mrs J Richards Mr R Broad Miss E Clough Mr P Clough Mr G Barks Mr A Wilson Mr P Titterton Miss K Wilson Miss R Oulsnam Miss R Allen Miss J Seddon				Object	The council's assessment (the 2012-based sub national household projections update – Jan 2016 revision) concluded the 250 dwellings per annum was the minimum required. However, despite 1000s of objections in the last consultation the council have not reduced the housing numbers. One of SMDC most valuable assets is its beautiful countryside, and the use of Greenfields. I object overall housing numbers for SM and the use of Greenfields of town and boundaries.

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PO3823 PO3824 PO3646 PO3831 PO3832 PO3839 PO3840 PO3847 PO3848 PO4793 PO4799 PO4814 PO4798 PO4779 PO4813 PO7467 PO7454 PO7461	Mr A Fox Miss T Millward Mr K Pickin Mr A Millward Mr R Turley Mrs D Harrison Mr A Wright Mr D Tomkinson Mrs J Tomkinson Mr Richard Gallagher Jean Horsley Mrs Gillian Smith Mr Keeling Mr and Mrs R & J Lovatt Mrs R Johnson Mr Jack Dempsey Mr C Machin Ms Linda Powell PO7461				Object	The council's assessment (the 2012-based sub national household projections update – Jan 2016 revision) concluded the 250 dwellings per annum was the minimum required. However, despite 1000s of objections in the last consultation the council have not reduced the housing numbers. One of SMDC most valuable assets is its beautiful countryside, and the use of Greenfields. I object overall housing numbers for SM and the use of Greenfields of town and boundaries.
PO4823	Ms Mary Walchester				Support	no comment made
PO7074	MRS PENNY PLANT				Object	I object to the overall housing numbers for Staffordshire Moorlands.
PO7070	Mr Alex Plant				Object	I object to the overall housing numbers for Staffordshire Moorlands.
PO7078	M Ellicock				Object	I object to the housing numbers that have been allocated for Cheadle and Staffordshire Moorlands in general. Particularly the greenfield spaces that fall within the area that has been defined as a Cheadle town boundary. These are the areas that most need the greenfield spaces to prevent oversized blocks of housing and maintain the open and green character enjoyed and used by so many of the existing residents daily.
PO6878	Unknown	Stoddards Ltd	Mr G Willard		Object	The council has decided to plan for a middling level of housing growth. This is a complicated area of planning policy and the site owner in this case wishes to reserve the right to object to it as the plan evolves and should they consider the figures unsound.

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PO6932	Mr M Bullock		Mr Ben Weatherley	Knights LLP	Object	<p>The latest consultation seeks views on the proposed annual housing requirement, which is proposed to be increased from 300 dwellings per annum to 320 dwellings per annum on the basis of updated OAN figures. In response to the proposed increase in the annual housing requirement from 300 dwellings per annum in the adopted Core Strategy, to 320 dwellings as part of the review being carried out as part of the Preferred Options Consultation, our client supports the proposed increase in the annual housing requirement, as this increase is considered to be justified by the latest evidence of housing need contained in the updated Strategic Housing Market Assessment. With regard to the proposed distribution of housing across the district, we would support a greater proportion of housing being allocated to Cheadle mindful that - as set out in summary within these representations and in more detail in our earlier representations to the SHLAA and Site Options Consultation - we consider that part of our client's land at Park Lane, Cheadle (site ref: CH165) is a suitable additional housing allocation. As well as asserting the suitability of our client's site itself for housing development, we consider Cheadle has the infrastructure and facilities to accommodate additional housing/growth (with our client's site being in close proximity to the town centre) and that it would have knock-on benefits from provision of additional housing to that currently proposed. Such benefits would include local economic benefits through additional spending in the town centre and at other local facilities and ultimately additional support for the future sustainability and growth of local services.</p>
PO6811	(unknown)		Mr G Willard		Object	<p>The council has decided to plan for a middling level of housing growth. This is a complicated area of planning policy and the site owner in this case wishes to reserve the right to object to it as the plan evolves and should they consider the figures unsound.</p>

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ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO6897	unknown	Mosaic Estates	Mr Cameron Austin-Fell	RPS Planning & Development	Object	<p>Thank you for the opportunity to respond to the above consultation. This response is made by RPS Planning and Development (RPS) on behalf of our clients Mosaic Estates (Mosaic), who is promoting land to the north of Cheadle. The principal focus of the Preferred Site Allocations (PSA) document is the proposal of land allocations to meet the requirements set in the 2014 Core Strategy. In addition to this, the PSA also addresses issues relating to housing need which is addressed as part of this response.</p> <p>Housing Need The housing requirement for the District was established in the 2014 Core Strategy, identifying a provision for 6,000 dwellings between 2006 and 2026. In his report on the 2014 Core Strategy, the Core Strategy Inspector indicated that an early review of the Core Strategy would be required, on the basis that the housing requirement for the Core Strategy was based on older evidence of need, derived from the West Midlands Regional Spatial Strategy (WMRSS). It is recognised that this 'policy on' document does not constitute an Objectively Assessed Need for housing (OAN) as required by the NPPF and NPPG. The NPPG advises that OAN should be based on the most up to date evidence of housing and population need. The Council's January 2016 SHMA update is based on forecasts from the Sub-National Population and Household Projections (SNPP/SNHP), updated biennially, however rely on the 2012 projections. The 2014 SNPP were published in late May 2016 and the complimentary 2014 SNHP is expected on 12 July 2016. It is somewhat unfortunate that the Council has gone out to consultation soon after the publication of new evidence, however by the time that the PSA is ready for submission, there can be no doubt that the implications of the 2014 SNHP will be the most up-to-date evidence. On this basis, it is strongly recommended that the Council revises its evidence of housing need once the 2014 SNHP is published, which can be offered for consultation prior to submission. As the evidence underpinning the OAN needs to be revised, it is not proposed to offer an in-depth critique of the SHMA, however Mosaic do offer the following observations: The Council has opted for an OAN of 320 dwellings per annum (dpa), between 2012 and 2031. This figure is somewhat of a mid-point of the dwelling range 250-440dpa proposed by the 2016 SHMA update. The figure of 320dpa has not adequately accounted for the uplifts required to the demographic projections as a result of forecast employment growth and does not represent OAN. Figure 5.1 of the Council's 2016 SHMA Update includes 5 employment led models of future dwelling need, indicating a range between 319 and 520. The proposed 320 dwellings is only marginally higher than the lowest employment projection in the SHMA (Scenario H) of 319 dwellings. The lowest figure of 319 dwellings is forecast on the assumption that jobs remain static (based on 2012 figures) across the plan period, adjusting only for the changing demographic structure arising from the increases in the ageing population. This is not considered to be a realistic expectation of future growth, which does not account for economic forecasts utilised in other scenarios. As there is currently little certainty of approach, a more appropriate mechanism would be to consider a mid-point between the 5 economic scenarios presented in the SHMA. This would favour a position of 420dpa, as a midpoint between 319 and 520dpa, as a more robust estimation of need. In RPS' view, failure to do this may ultimately result in the plan being found unsound, a situation which is everyone's interest to avoid. In summary, Mosaic welcomes the progress made on the Site Allocations document to date, following on from the 2014 Core Strategy. In RPS' experience, the process of quantifying OAN can be timely and often the subject of intensive scrutiny as part of the Examination process. To avoid unnecessary delays, it is advised that a refresh of the 2016 SHMA Update is undertaken after 12 July 2016 when the latest household projections are available. This will ensure that the Council's strategy for housing growth is grounded in the most up to date evidence. Additionally, the Council should be mindful of the employment projections and ensure that the preferred approach taken is justified and positively prepared.</p>

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PO6903	unknown	Mosaic Estates	Mr Cameron Austin-Fell	RPS Planning & Development	General comment	<p>Mosaic supports the Council’s strategy for distribution to Cheadle, which recognises the sustainability of the town and represents a principal location for future development. Table 3.2 of the Council’s PSA indicates that the Council has not performed well against housing requirements to date, noting that there have been only 82 completions to date in Cheadle, along with 205 commitments in the system. This is broadly reflective of the current land supply in the District, as indicated in the Council’s latest Housing Delivery Schedule, framed against the position at 31 March 2016 (published October 2015). The position in the latest Housing Delivery Schedule indicates a significant shortfall of housing, capable of meeting only 1.84 years of the housing requirement and far short of the necessary 5 years specified in the NPPF. There is clearly a need to bring sites forward which can deliver. The Council is rightly progressing with the Site Allocations document as a means of addressing this shortfall, however the Council should remain flexible in the allocations proposed, particularly where they are capable of delivering additional sustainable growth. It is therefore considered that preferred allocations proposed by the Council should be drafted as ‘minimum’ growth figures for each site. This will enable the plan to respond flexibly to local housing need and assist in delivering the Council’s shortfall.</p>

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PO9039	Gallagher Developments Ltd	Gallagher Developments Limited			Object	<p>(Mark Rose, Define - Agent) We welcome the recent review of the housing need evidence base, and clearly that should be kept up-to-date throughout the plan making process. We also note the proposed increase in the annual housing requirements, but are concerned that the District Council are not seeking to meet the full objectively assessed need (OAN) in accordance with the NPPF to support the expected level of economic growth, and critically to ensure that the high level of affordable housing need identified in the Borough is addressed. A central tenet of the NPPF is the provision of sufficient housing to meet the needs of present and future generations and, in doing so, to widen the choice of housing (paragraphs 7 and 9). To achieve that it requires (paragraph 14) “ local planning authorities should positively seek opportunities to meet the development needs of their area ”, that “ Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change ”, and set out a “ clear strategy for allocating sufficient land ” (paragraph 17). Delivery is underpinned by paragraph 47, which seeks to significantly boost the supply of housing requiring local planning authorities to “ use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area ” [my emphasis]. The Strategic Housing Market Assessment (SHMA) Update concludes (para. 5.40) that there is a housing OAN range of between 250 dpa and 440 dpa. It continues (para 5.43) to state that “ This OAN range provides a realistic level of housing delivery which will support economic growth and address potentially worsening housing market signals, whilst meeting the full demographically assessed need for housing in the District .” But notably it earlier states (para. 5.33) that: “ there is a clear need to uplift the figures to take account of the significant affordable housing need in Staffordshire Moorlands ”; and (para 5.36) that “ the previous SHMA (2014) identified a need for 707 affordable housing dwellings annually over the next five years. This must be taken into consideration by the Local Authority when deriving the most appropriate housing requirement for its Local Plan .” Furthermore at paragraph 5.38 point 8 it states “ To ensure that there is no disconnect between the housing OAN and the Council’s economic scenarios, in order to justify a figure below 438 dpa, SMDC would need to demonstrate how it would mitigate or avoid the adverse housing, economic and other outcomes that a lower growth approach could give rise to .” It later continues (para. 5.44) “ It would also need to evidence how the adverse impact of meeting housing need would ‘significantly and demonstrably outweigh the benefits’ [the Framework, §14] as well as make provision, through the duty-to-cooperate, for those needs to be met in full elsewhere within the wider HMA .” The consequences of not planning to meet the identified need would be dire. The Housing Strategy for England “Laying the Foundations” states in paragraph 1 that a “thriving, active but stable housing market that offers choice, flexibility and affordable housing is critical to our economic and social wellbeing.” It continues to highlight (paragraph 5) that “we have not built enough homes for more that a generation and the credit crunch has simply compounded this challenge”, and (paragraph 8) that “without urgent action to build new homes, children will grow up without the same opportunities to live near their families, young people will struggle to get a place to call their own and older people will not have the choice and support they need.” Furthermore, paragraph 9 states: “Housing is crucial for our social mobility, health and wellbeing – with quality and choice having an impact on social mobility and wellbeing from an early age, and our homes accounting for about half of all household wealth. Social housing should provide support for those who need it, when they need it, and should help vulnerable people to live independently. And opportunities for wealth must be open to all, with housing choices helping rather than hindering people’s ability to build assets and find employment.” On the basis of the evidence presented as part of this consultation it is apparent that the District Council has not justified how it would mitigate or avoid the adverse socio-economic impacts of their preferred lower growth approach, how the adverse impact of meeting housing need would ‘significantly and demonstrably outweigh the benefits’, or how those needs would be met elsewhere in the Housing Market Area. Consequently, my clients contend that the Local Plan Review should progress on the basis of seeking to deliver the full OAN of 440 dwellings per annum and 8,800 dwellings in total. We note the residual housing requirement of 885 dwellings for Biddulph identified in Table 3.2 of the consultation paper. However, in light of the District’s development strategy that focuses on the Market Towns including Biddulph, and the above comments in relation to the full OAN, that residual requirement can only be considered an absolute minimum figure for the town.</p>

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ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO9043	Mr and Mrs Siddorn				General comment	(Agent - G Willard) The council have decided to plan for a middling level of housing growth. This is a complicated area of planning policy and the site owner in this case wishes to reserve the right to object to it as the plan evolves and should they consider the figures unsound.
PO9056	Mrs Joyce Tagell				Object	(Agent - Hourigan Connolly) Summary of comments - full version attached Covering letter and report promoting BD083 on behalf of Mr & Mrs Tagell. objecting to the Council's OAHN of 320 dwellings pa and supporting a figure of at least 440 dwellings pa accordingly objecting to the Council's published residual housing requirement for the rural areas as it should be increased to reflect 440 pa figure (at 28% of District total) criticising the Council's 5 year housing supply figure/housing delivery backlog and argues it is actually lower than published, through alternative calculation methodologies objecting to Council assumptions used in factoring in allowance for annual infill, when calculating how much land needs to be formally allocated in rural areas, and arguing this will result in failure to meet (rural) housing needs. accordingly, client's land (BD083) should be included as an additional site.
PO9079	Mr Greg Powell	Cheadle Unite			Object	The high level of housing provision to secure net migration into the area is not a sustainable model. In 2031 the population base will have increased, some of which will form an ageing population. What for 2031 - 2046 an net migration of 10,000? A sustainable approach counts for increased assisted living, longer working life and doesn't rely on drawing migrants from other areas. It is not possible to control who those migrants are, e.g. are they working age? The model doesn't account for these factors.

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO9061	Mr Greg Powell	Cheadle Unite			Object	<p>Summary of representation (see attached response). The local community should decide the level of housing that they require. SMDC have clear evidence in several previous consultations and petitions submitted that the local community are against the excessive housing levels proposed. SMDC have failed to reduce the allocation to Cheadle which does not reflect the 5500+ responses that SMDC received in 2015 and does not take into account road traffic congestion, long term sustainability, the environment, damage to agriculture and access to doctors and dentists etc. The 2012 ONS population projections project a much reduced levelling off of the population across the Moorlands. These figures came out after the 6000+ housing targets were set. It indicates a much lower housing requirement of 2573 compared with the 6000+ figure. SMDC have not seized on these figures to justify a reduction in our housing provision and have failed to disseminate this information. SMDC effectively justifies retention of high levels of housing using an Oxford Economics Model supplied as part of the 'additional work' that SMDC have commissioned, produced by Nathaniel Lichfield and Partners. It draws the assertion that due to an ageing population to see a net gain of 85 jobs through to 2031 it is necessary to secure a net migration of 7,697 people into the area. This document has never been disseminated to or shared with residents or action groups as part of the consultation and been produced as evidence to justify retention of high housing figures. The officer response has been that Councils have to abide by over-riding National Policy, effectively making a mockery of any local opinion.</p>

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO9068	Mr Greg Powell	Cheadle Unite			Object	Summary only (please see attached response) Failure to co-operate and promote an effective strategy for the region. Cheadle Unite have for over 6 years been asking SMDC to work closely with our Local City 'Stoke-on-Trent' (S-o-T) on the regeneration of brownfield sites and where affordable housing can be built for our younger generation. SMDC can play a key role by collaborating and setting an overall housing figure with S-o-T and the Potteries that reduces our allocation. S-o-T have acknowledged that development opportunities outside the regeneration areas draws developers away and creates uncertainty. Cheadle residents have made it clear that the allocation should be reduced and provision for this can be made under a duty to co-operate. SMDC continues to evade grasping this issue as is stated 'Stoke-on-Trent City Council is in the early stages of preparing a joint Local Plan with Newcastle-under-Lyme Borough Council. At this stage, the evidence to support the plan, including the capacity to meet housing needs has yet to be established'.
PO9624	Mr R Lloyd				Object	(Summary of comments - full version attached) Government housing allocations are excessive and unrealistic due to lack of modern infrastructure to support new development.
PO9264	Mr Lee Dawkin	Renew Land	Mr Ben Weatherley	Knights LLP	Support	The latest consultation seeks views on the proposed annual housing requirement, which is proposed to be increased from 300 dwellings per annum to 320 dwellings per annum on the basis of updated OAN figures. In response to the proposed increase in the annual housing requirement from 300 dwellings per annum in the adopted Core Strategy, to 320 dwellings as part of the review being carried out as part of the Preferred Options Consultation, our client supports the proposed increase in the annual housing requirement, as this increase is considered to be justified by the latest evidence of housing need contained in the updated Strategic Housing Market Assessment. The district-wide and Biddulph-specific housing and other development requirements, including those established in the Core Strategy, have necessitated a review of settlement and Green Belt boundaries, and such a strategy for releasing sites from the Green Belt through the Local Plan process is supported.
PO9242	Mr Lee Dawkin	Renew Land	Mr Ben Weatherley	Knights LLP	Support	In response to the proposed increase in the annual housing requirement from 300 in the adopted Core Strategy to 320 dwellings per annum as part of the Local Plan Review our client supports the proposed increase in the annual housing requirement as this increase is considered to be justified by the latest evidence of housing need contained in the updated Strategic Housing Market Assessment.

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO9838	St Modwen Development Ltd	St Modwen Developments Limited	Ms Stacey Green	Barton Willmore	Object	<p>Email containing letter and Evidence Report submitted [both attached]: SMDC SHMA (2014) concluded that there was a need for 260-440 homes per year across SMDC plus affordable housing. The Consultation Document states at paragraph 3.10 that choosing the middle of the range would 'retain the same number of jobs as the present day'. However the Council have chosen a requirement of just 320 dwellings per annum, and this figure falls slightly short of the middle of the range position. The Staffordshire Moorlands 2012-based Sub-National Household Projections Update - January 2016 Revision provides a summary of the scenarios that were tested. All scenarios led to a decrease in job growth. A 10% uplift is then added in a second Scenario's table within the 2016 Update. the analysis within Appendix 4 of the 2nd March Council Assembly report does not justify why the full OAN of 440 dwellings per annum cannot be met, given that the report lists the benefits of delivering 440 dwellings. a requirement of 440 p.a. will provide affordable housing and economic benefits; 320 p.a. will not. In a District where there has not been a five year housing land supply for 6 years; and where affordable housing need is set to outstrip any market housing that will be delivered in the next 2 years at least, there can be no greater pressure for a LPA to choose to meet its full OAN. Therefore object to para 3.11 Preferred Options Consultation document which states 320 p.a.would ". .Sustain a modest increase in jobs over the plan period by increasing the size of the workforce in comparison with lower levels of housing growth ". To plan for economic growth, the Council must plan for the higher end of the range, i.e. 440 dwellings (minimum). consider that the Plan is internally inconsistent, confusing ie para 3.10 conflicts with para 3.11: "maintain jobs" v "modest increase in jobs". A less than midpoint figure means jobs would decrease. NPPF states..Where sites are available, suitable and achievable, with the support of a willing landowner – as in this case, then strong support should be given towards their development. St Modwen maintained the support for the allocation of the Blythe Vale site for employment use [since 2015]. St Modwen consider that the delivery of the Blythe Vale site is most achievable in circumstances where the development is of a mixed use, as opposed to the restricted use class that the RIS allocation supports [and restrictive planning conditions on existing consent]. The SHLAA methodology explains that sources of supply should include: 'land allocated in plans for employment and other uses' and 'unimplemented /outstanding planning permissions' however later states areas identified in the Employment Land Study as appropriate for retention, are excluded. The St Modwen site was not, (and should have been at the time of the SHLAA being prepared), assessed as a potential development site for housing. The NLP 2014 Employment Land Review does not, in reporting on the availability of land, state that the RIS must be retained and therefore we considered it should have been assessed within the SHLAA. NLP report states investment is needed to improve the quality of key employment sites. This will be possible where a scheme is viable and deliverable and it is through making these representations that St Modwen seek to achieve this for Blythe Vale. The SHLAA (2015) identifies the land that has been assessed as part of the Council's consideration of suitable housing land [excluded this site]. This approach was flawed, given that within the Local Plan Boundary, the St Modwen site (and the adjoining land south of the A50) is the only site at Blythe Bridge and Forsbrook that is not within the Green Belt. [Evidence Base Report includes comparative assessment of the site and this clearly demonstrates the suitability of the St Modwen site for allocation]. In respect of the potential for allocating the St Modwen site, we have reviewed the infrastructure capacity of the settlement of Blythe Bridge and Forsbrook, and present a review of services and facilities within the accompanying Evidence Base Report. Given that neither the SMBC Local Plan consultation document nor its evidence base assesses the potential of the St Modwen site to deliver housing or a mixed use scheme, there has been no assessment of the balanced range of these environmental effects. We consider the most appropriate scenario to follow is the 'policy-off' economic-led scenario whereby the net commuting ratio is maintained at the existing level, and the level of housing required to support the Oxford Economics forecast is determined. Growth of at least 438 dpa (rounded to 440 dpa) is therefore considered justified.. as full OAN. [We acknowledge that this would have the effect of reducing the five year housing land supply position further from the 1.64 years..] We also consider that the distribution of housing requirement should be reconsidered and that a greater proportion should be afforded to the settlement of Blythe Bridge and Forsbrook. If the Housing Requirement were increased to 440 dpa, this would equate to an additional 638 dwellings within the Rural Area. Blythe Bridge and Forsbrook receives 15% of the new allocations growth afforded to the Rural Areas. 15% of the increased Rural Area Growth would equate to circa additional 97 dwellings that could be required in Blythe Bridge and Forsbrook. Given the nature of Blythe Bridge and Forsbrook and its tightly constrained boundaries, the rationale would be for any additional growth to be on an allocated site or sites, not a windfall. Our sustainability assessment of the village..clearly</p>

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
						demonstrates that a larger proportion, (and a larger proportion within an increased overall Housing Requirement) is justified. Council may wish to consider a new designation of 'Main Rural Centre' that could be afforded to certain Larger Villages [such as Blythe Bridge], recognisant of their role and potential for growth.
PO10250	Mr Andy Brown	Harlequin Development Strategies (Crewe) Limited	Mr Alan Knott	Knights LLP	Support	Support proposal for increased annual housing requirement from 300 dwellings per annum to 320 dwellings per annum. This increase is considered to be justified by the latest evidence of housing need contained in the updated Strategic Housing Market Assessment. The proposed distribution of housing across the area is also supported including providing 28% of the overall housing requirement in rural areas. The provision of additional housing in the rural area would enable the open market and affordable housing needs of rural communities to be met in areas local to them which would support the delivery of sustainable communities in terms of meeting housing needs and supporting local services.
PO4710	Mr Gez Willard	Willardwillard Ltd			General comment	Response form and letter submitted, providing responses to questions 1, 33, 34 (ie Alton boundary), 37 and 41. Question 1 response: The council have decided to plan for a middling level of housing growth. This is a complicated area of planning policy and the site owner in this case wishes to reserve the right to object to it as the plan evolves and should they consider the figures unsound. The council are especially urged to be mindful of seeking affordable housing contributions on smaller and medium sized housing sites which may be either financially unviable or undeliverable because of the smaller number of units on site. Lower thresholds and accepting off site contributions may prove to be a more pragmatic means of achieving the delivery of affordable housing units whilst without preventing the delivery of adequate housing supply. Table 4.16 indicates that 13 new houses might be provided on this site (AL012) . The council have taken the figure from the submission of an indicative housing layout submitted with planning application SMD/2014/0824. The site may not be developed as set out on this indicative plan which itself provided for the retention of the existing house. The site is considered suitable for a variety of housing types and forms dependent upon the assessed needs of the market at the time and the intentions of the site owner (who may indeed choose to continue to live on site). Such uncertainties could mean that under 10 houses are actually provided on the site or as many as 20 or so. The council need to allow for such flexibility in their plan making.

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO609	MRS ELLEN FAULKNER				Object	The infrastructure of biddulph first needs upgrading to meet demand of extra residents
PO548	Mr Terry Barber				Object	We have, in the Biddulph North ward, in the last three years, been subjected to a new housing estate of nearly 200 houses on the old Selectus Ribbon factory land. This new estate has already imposed pressure with traffic, education, policing and health needs onto the area. Greenbelt land is proposed to be lost on the land that stretches towards Biddulph Moor. Loss of soak up, in this area will increase the likelihood of flooding to the Biddulph North area and also to the lower lying areas of Biddulph (the lower end of Thames Drive and Pennine Way) which have suffered from flooding in the past. Any reduction in trees and soil will therefore impose unreasonable threats of environmental hazzards onto the inhabitants of this area and I would strongly recommend that residents take the council to the courts to persue summonses for reckless and irresponsible behaviour that ammounts to willful damage to the lifestyle and livelyhoods of the area's inhabitants.
PO387	Mrs Joanne Chadwick				Object	The proposed number of houses for Cheadle seems far too large and unsustainable for the town as it is. I would ask why stoke on Trent council were not taken up in their offer to take some of our allocation when they have land/areas that are prime for development?
PO9446	Mrs Anne Donaldson				Object	We are writing to register our objections to the proposed development in and around Cheadle. The scale of the proposed development is out of balance with the infra structure and employment opportunities that already exist. The proposed housing developments would create additional surface water issues that already cause Tean to flood. There is a potential of a further 2000/2500 vehicles resulting from building over a 1000 new homes in Cheadle. The roads are already inadequate to deal with the flow of traffic. The proposed link road will not ease this congestion as it will merely move the problem to another part of town. The Public Open Spaces shown on the map are largely playing fields linked to schools to which public have no access. Should the proposed development go ahead on the south west side of the town there will be a great need to public open space that can be accessed by the public, as this area houses predominately the older generation who would lose the open fields that the farmer currently allows access on for walking.

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO1049	Mr John Bevan	Cheadle Unite			Object	At before & since the meeting of 17th May virtually eveyone in Cheadle agrees we dont want any more houses, apart from small scale infilling. Each house would mean an average of 2 or more people & 2 cars. The infrastructure of roads (particularly), doctors, schools, services etc cant cope now. However if we must have more houses the best place for them is a new estate around a new link road between the "new" JCB factory in Leek road and Brookhouses.Many would walk/cycle to JCB (saving the environment) most of the new estate & existing traffic would use the new road towards Cellarhead or Blythe Bridge for S-on-T, Leek & the A50, removing congestion from Cheadle centre, (furthermore if the road from Brookhouses to Draycott over New Haden was improved that would provide a superior route from Leek road, Cheadle to the A50 at Draycott.) You will say its Green Belt, well use the power that enabled you to allow JCB to build in the Green Belt at Leek road to allow this link road/estate scheme to go ahead,- its what the people of Cheadle want- move or use the green belt. Incidentally the proposed road from Brookhouses to Mobberley will not lessen traffic in Cheadle because traffic between Tean & Blythe bridge wont use it - obviously. Small villages need more houses to maintain local services- shops, pubs, schools, churches etc plus if they are on a main road can easily cope with extra traffic.
PO1504 PO1496 PO1511 PO1518	Mrs J L Taylor Mr J P Taylor Mr P Taylor Mr T A Taylor				Object	I object to the housing numbers that have been allocated for Cheadle and Staffordshire Moorlands in general. Particularly the greenfield spaces that fall within the area that has been defined as a Cheadle town boundary. These are the areas that most need the greenfield spaces to prevent oversized blocks of housing and maintain the open and green character enjoyed and used by so many of the existing residents daily.

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO9052		Hourigan Connolly			Object	<p>Covering letter and report promoting land south of A52, Kingsley for housing (on behalf of Dean Lewis Estates) submitted in response to Questions 1, 33, 36, 37 and 41: objecting to the Council's OAHN of 320 dwellings pa and supporting a figure of at least 440 dwellings pa accordingly objecting to the Council's published residual housing requirement for the rural areas as it should be increased to reflect 440 pa figure (at 28% of District total) criticising the Council's 5 year housing supply figure/housing delivery backlog and argues it is actually lower than published, through alternative calculation methodologies objecting to Council assumptions used in factoring in allowance for annual infill, when calculating how much land needs to be formally allocated in rural areas, and arguing this will result in failure to meet (rural) housing needs. accordingly, client's land at A52 Kingsley, should additionally be allocated for residential (around 50 dwellings) Council's Green Belt Review lacks credibility and is not justified. queries Council's 'Suitability' assessment of SHLAA site KG032 submit Landscape and Visual Overview report that concludes client's site is suitable for allocation and preferable to other options sites, including preferred option KG049A. Consequently objects to KG049A. [Refer to attachments].</p>

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO855	Mr Daniel Noble				Object	<p>There are three main topics on which I object to these plans, specifically the draft potential allocations and reserve sites along Mount Road. Concerns that the local infrastructure cannot support the level of building proposed The spoiling of a popular amenity Concerns over flood risk Many of the proposed potentially developable sites are in the East of Leek, suggesting a large quantity of housing will be built in the east end to fulfill the proposed housing requirements. The east side of Leek is already stretched when it comes to critical amenities such as schools and County Education acknowledged this in the 2015 consultation. However I don't believe that any suggestions have been put forward by the District and County Council. I believe this to be a significant roadblock and should be addressed before continuing with the housing consultation. It should be clear that any significant building on this or any of the Mount sites will require improvements to the road including, but not limited to, widening and creation of pavements and better access from the Ashbourne Road end. Access for residents on this site will make the Mount much busier - especially considering my comments above that multiple proposed sites will need to be built on to support the plan. This will mean a popular "quiet lane" will become not only much busier but a "rat run" from the Buxton Road to the Ashbourne Road. This would be a hugely negative impact on an important local amenity i.e. The Mount. The Options Site Assessments report (Options Site Assessments - Towns.pdf) acknowledges that building on this site will require improvements to the badly potholed eastern end of Kniveden Lane, thus creating a through access for motor vehicles that doesn't currently exist in a satisfactory form. The estate taking in Kniveden Lane and Moorland Road is currently very quiet and is not generally used as a through route. This makes it a relatively safe place for children to play outside and I have significant concerns that losing this sense of security would be another reason to discourage children from playing outside. Our children need encouragement to be active, not discouragement through reduced safety. The Mount - particularly south of Kniveden Lane - is an extremely popular semi-rural location which is used by many for walking, cycling, horse-riding and running. It is a sound surface with superb far-reaching views, offering uniquely easy access to enjoy a stunning countryside location. Any building on the proposed LE128 site will spoil the views that extend to the Roaches, Shutlingsloe, the Cloud and beyond. With well-recognised concern that many people are not maintaining a satisfactorily healthy lifestyle, any spoiling or removal of a locally and culturally important leisure amenity would be a huge blow to not just the east end of Leek but the whole town. I am astounded that Leek and Moorlands Historic Buildings Trust responded to the 2015 consultancy claiming LE140 has no major views out. This plot is an extremely popular amenity and building on here would be a huge loss of an open space for local residents. Severn Trent Water have acknowledged that "t hey have a duty to complete necessary improvements to sewers to provide the capacity for new development." However I've not seen any specifics in the Options Site Assessments - Towns.pdf and this concerns me in relation to plot LE128a/b which continues to have significant drainage issues. Frequently rainwater can be seen draining off LE128b at the SW corner and onto Moorland Road. My concern is that if draft potential allocation LE128a is built on (regardless of whether reserve allocation LE128b is built on) this drainage problem will be exacerbated and I've seen no plan or evidence of how that will be remedied. As per my 2015 consultation response I should re-iterate that the land drains that lead off LE128 into the culvert under the gardens of the easterly Moorland Road properties already struggle to cope with the water run-off from LE128. I have grave concerns that the existing drains will not support the necessary drainage of the proposed housing development. This is especially pertinent since I'm resident at the SW corner of the proposed plot on the Moorland Road side and get the bulk of the water draining under and across our plot.</p>
PO3918		Hourigan Connolly			Object	<p>Hourigan Connolly is promoting land at Buxton Road, Leek for inclusion in the Staffordshire Moorlands District Local Plan as a housing allocation. [Report submitted that responds to Questions 1, 6, 10 and 14 from consultation document].</p>

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO3921	Mr John Coxon	Emery Planning Partnership			Object	Emery Planning is instructed by Wainhomes (North West) Limited to submit representations to the Preferred Option Site and Boundaries Consultation Booklet. The representations are made specifically with regard to our client 's site adjacent to Wardle Gardens, Leekbrook. [Report submitted which responds to consultation Questions 1,2,9,10,34.37,38].
PO63	Mr. and Mrs. Frederick and Nora Cartlidge				Object	<p>Firstly building on Greenbelt land is a complete no no for me. Especially as there is ugly brown field sites which could benefit our area were they used for development. It seems extraordinary that greenbelt is even being suggested as Prime Minister's manifesto stated that greenbelt land would be protected. Since March 2015 and in contradiction to the manifesto policy to , "protect the greenbelt," 25% more houses are planned on greenbelt land. It would make sense to make FULL USE OF BROWNFIELD SITES WITHIN BIDDULPH CONURBATION. i.e. CHATTERLEY WHITFIELD SITE. THE DAVERA FURNITURE BUILDING.(MINSTER MILLS) in the town centre. Could they be made an offer , to move onto another site so as to free up the huge building/area where they now reside? OLD MILL BUILDING ON STATION ROAD. OLD DYE WORKS CONGLETON ROAD. At this point it would seem absolutely the most efficient way in which to solve this problem. Indeed, an excellent chance to tidy up and definitely impress; the overall area of natural beauty such as is BIDDULPH, enhanced, made even more attractive for visitors to Staffs. Moorlands. We need to retain our greenbelt. Even our Prime Minister vowed "to protect the greenbelt" (Manifesto speech). Last week , in Parliament I witnessed George Osborne stating exactly this. In doing so we prevent urban sprawl and protect our wildlife, flora and fauna, an absolute must for our ECO SYSTEM. Dame Fiona Reynolds, previously Director General of the National Trust for eleven years, 2001-2012, stated in the Telegraph 8/5/16 that planning applications for these areas has risen by more than a quarter since last year`s election. To back this claim she quoted research carried out by the Campaign to Protect Rural England (CPRE) SHOWING274,792 homes are planned on Green-belt land in England, 55,000 more than were planned in March last year, proving the Government was contradicting their manifesto pledge to PROTECT GREENBELT LAND., THE RIBBON OF LAND STRETCHING AROUND TOWNS AND CITIES TO PREVENT URBAN SPRAWL. The Conservative Manifesto said some really good and positive things. The question is can it be sustained? The easier it is to nibble away at the green-belt the less effort gets put into imaginative regeneration. So, lets ALL make sure we protect the green-belt in and around Biddulph. Indeed, that goes for the whole of Staffs. Moorlands Once its gone we shall never get it back. But the ugly Brownfield sites will still remain. Dame Fiona Reynolds is now Master of Emmanuel College Cambridge.</p>

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO955	Mr Kenneth Wainman	Ken Wainman Associates Ltd	Mr Kenneth Wainman	Ken Wainman Associates Ltd	General comment	<p>It is contended that the Council's approach allocating particular proportions of development to the towns, villages and rural areas is too regimented and arbitrary and that allocations or requirements for specific areas rather being allocated on a percentage or formula basis should be based on the capacity of a town or village to absorb or provide for development without material harm. It is possible that some of the rural settlements could accommodate more houses than proposed by either extending development boundaries(incl. infill) or allocating sites. This could help relieve or avoid the issues associated with some proposed sites in the District, such as for example the Mount in Leek. More development could be accommodated in villages. This would be in accord with Paragraph 55 of the National Planning Framework which states that to promote sustainable development in rural areas housing should be located where it would enhance or maintain the vitality of rural communities. Locating more houses in the villages would help maintain them and enhance their vitality as well as possibly increasing services and facilities such as supporting village schools.</p>

Question 1 – Do you any comments regarding the proposed housing requirement ?

ID	Full Name	Company / Organisation	Agent Name	Agent Company / Organisation	Support/ Object/ General comment	General comment - reasons - Please explain your views.
PO1613	Mr Charles Harris				Object	<p>Without the detailed analysis it difficult to comment on the plan as a whole other than in general terms, however I am not convinced that the assessment of future housing need underpinning the plan is sufficiently robust and sensitive, nor does it take into account demographic change and other population trends. For example; Over 80% of the UK population lives in towns and cities; this ratio is expected to rise to c90% by 2035 (NB Concentrating populations can help to tackle climate change and reduce carbon emissions) The population growth in areas like Staffordshire Moorlands is likely to grow at a slower rate than for England as a whole Lower levels of per capita income in the area suggest there is a need for a greater emphasis on affordable housing The housing needs of an aging population are not adequately recognized - a missed opportunity as this could improve housing market opportunities for growing families Cuts in rural public transport services are a great concern to many. This has led to a greater use of private cars and is increasing isolation and deprivation for people without access to the own personal transport further. This supports the need to focus growth on towns and cities National policies and fiscal actions affecting second homes and the private rented sector have not been factored in The opportunity to bring existing vacant and derelict properties back into use is missed, greater emphasis should be placed on using brownfield sites - there is strong support for this from both local councillors and local people. One of the core principles of the NPPF is to “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that is it not of high environmental value”. This suggests to me that more dwellings are being planned for than will be needed over the lifetime of the plan. My concern is that this may lead to more building than is necessary; too many of the wrong sort of homes, in the wrong place, at the cost of a irreversible loss of green field and priority habitats. This is exacerbated by a narrow interpretation of sustainability, which gives insufficient weight to the importance and value of biodiversity and infrastructure. Biodiversity has a key role in defining the local Moorlands character and distinctiveness and is an important part of local cultural heritage. I have chosen to comment by e-mail rather using the on-line option, which is not particularly user friendly. I hope that this feedback can be taken into account in reviewing the plan.</p>

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Question 2 – Do you any comments regarding the proposed employment land requirement?

ID	Consultee Name	Company / Org	Agent Name	Agent Company / Org	Issue	Support / Object / General	Consultee Comments
PO9041	Gallagher Developments Ltd	Gallagher Developments Limited	Mark Rose	Define	Biddulph BD076 / BD076a	Object	My clients would object to a mixed use and employment allocation of 3.5ha in the northern part of Core Strategy Broad Area 4 (BD076 / BD076A). There has been a long standing allocation on that site, and they have marketed it for employment and commercial uses for over 10 years without success. Their firm view is that residential development is the only viable use on the site, and as such the entire site should be allocated for residential development in the Local Plan review. That course of action is explicitly supported by the NPPF which states (para. 22) that “Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. ” Indeed, the Employment Land Requirements Study states (para. 8.4) that: “Whilst adopted and emerging Local Plan policies may seek to safeguard against the loss of employment land to other uses it is likely that, over the course of the plan period, some land will be lost to alternative use (for example where they are no longer suitable for employment use). In accordance with the Practice Guidance, market signals should be used by the LPAs as a guide to whether losses in certain areas will be appropriate or not.” It later (para 8.18) states: “any new provision should ensure that the layout, location and type of space is attractive to the market rather than purely focusing on the quantum of space delivered”. Furthermore, it is questioned whether the need actually exists for an employment allocation on this site in Biddulph. The consultation paper refers to an employment land requirement of 35ha in the District (para 3.16) which is in the middle of the range identified in the Employment Land Requirements Study (para 7.108: 25-45ha). However, the Study states: “it is recognised that the labour supply projections which link to the Objectively Assessed Housing Need are towards the lower end of this range. Whilst it has been acknowledged that there is not a direct causal link between housing and employment land requirements, there is nevertheless a need to ensure that the two dovetail together to avoid any unsustainable outcomes”. Moreover, in relation to Biddulph specifically the consultation paper identifies a residual employment land requirement of only 1.95ha in Table 3.3, and a need for a 1000m2 discount foodstore in Table 3.4, but then proposes the allocation of a total of 10.24ha of employment land in and around the town. Consequently, in relation to Broad Area 4, given the clear lack of market interest in employment or commercial uses on the site, and the over riding need to increase the housing land supply in town as highlighted above, it is contended that these areas in the site should also be allocated for residential development in the Local Plan review as part of the wider site allocation.
PO362	Miss Jenna Woolliscroft				Biddulph	Object	Wildlife, beautiful scenery,
PO513	Mr Denver Johnson				Biddulph	Object	I've been a resident of Biddulph for forty one years and have seen many developments in the location over the years. Happily over that time the green spaces and views have survived relatively unchanged within that time, maintaining the spirit of a rural conurbation. The current threat to those very Green Belt spaces that set Biddulph apart as a little gem is untenable. It seems that crooked National government have connived with big developers (party sponsors) to twist arms up backs of Development Officers and override Councillors/Local Public Opinion to cherry pick development locations that they hope will bring in the most cash. Stupid insofar that any big development so close would bring down local property prices.
PO43	Mr P Rushton				Brown Edge	General comment	In the not too distant past Brown Edge had considerable employment sites occupied by a multiplicity of businesses. The SMDC Planning Authority have consistently allowed their replacement with houses, creating a situation which obliges residents to seek facilities and services in the adjacent City. Even before the proposed major housing development, Brown Edge is in dire danger of losing identity as a large Moorlands village and of becoming yet another urban housing area on the lines of neighbouring Norton but without the facilities and services. .

Question 2 – Do you any comments regarding the proposed employment land requirement?

ID	Consultee Name	Company / Org	Agent Name	Agent Company / Org	Issue	Support / Object / General	Consultee Comments
PO388	Mrs Joanne Chadwick				Cheadle EM2	General comment	The employment land allocation for Cheadle is accessed by Draycott Cross road which is not suitable for heavy traffic and HGV's. It is steep, windey and narrow in places. Why has there not been further development in the north area where JCB have already erected 2 factories and improved the road to make access out of Cheadle More streamlined. This would seem to make more sense and have less impact on town traffic.
PO2735 PO2747 PO2743 PO2682 PO2677 PO3752 PO2656 PO2664 PO2723 PO2652 PO2696 PO2714 PO2615 PO2639 PO2604 PO2608	Mr R Snow Mrs V Weston Mr J Weston Mr A Hide Mrs D Hide Mrs J Richardson MR R OWEN-JONES Mr C Alcock Mr Albert Allen Mrs Lara Austin Mr Eric Cartlidge Mrs Karen Cartlidge Mr Alan Eaton Mrs Carole Edwards Mr Michael Feather Mrs Angela Feather				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.
PO2718 PO2739 PO2673 PO2643 PO2764 PO2894 PO2878 PO2855 PO2760 PO2975 PO2939 PO2934 PO2985 PO2970 PO2792 PO2814 PO2769 PO2777 PO2990 PO2838 PO2944 PO2648 PO2668 PO2660	Mr Andrew Gibson Mrs Karen Green Mr Gareth Owen-Jones Mr And Mrs T & J Prince Mrs J Weston Mr Alan Moss Mrs Margaret Moss mr michael tunnicliffe Mr Andrew Weston Mr Jason Baggley Mr Barry Fraser Mrs Catherine Fraser Mr Ronald Fryer M Glover Miss Angela Gregory Mrs Vera James Mrs H Keeling Mr Stefan Lilleker Mr I Menzies Lingard Mrs Christine Pickin D Pittman Mr & Mrs T & J Prince Miss Lynne Sanders Mr A Emery				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.

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ID	Consultee Name	Company / Org	Agent Name	Agent Company / Org	Issue	Support / Object / General	Consultee Comments
PO2631 PO2635 PO2727 PO2731 PO2686 PO2690 PO2625 PO2752 PO3014 PO3019	Mrs Rosemarie Green Mr Clive Green Mr John Elks Mrs Mavis Elks Mr Philip Simcock Ms Marie Kennaway Mrs J Whitefield Mr D Weston Mrs J Foster Cllr Helen Lingard	Cheadle Town Council					
PO3034 PO3010 PO3049 PO3044 PO2949	Mr & Mrs L & D Stevenson Mr Desmond Barnes Mrs Eva Moulton Mr K G Moulton D Pittman						
PO2773 PO3100 PO3024 PO2980 PO2801 PO2909 PO2964 PO3029 PO2995 PO3000 PO2954 PO2844 PO3039 PO3105 PO3054 PO3246 PO3137 PO3147 PO3236 PO3152 PO3095 PO3090 PO3132 PO3220 PO3241 PO3213 PO3085 PO3208 PO3203	Mrs K Rogers Mrs J Seddon Mr D Waring Mrs Susan Wiseman Mrs Florence Worsley Mr Raymond James Mr John Shipley Mrs Angela Jones Mr Michael Sposito Elvira Sposito Mr R Griffiths Mr H Simcock Mrs Susan Clare Mr D Gould Mr A Shenton Mr C Smith Mr N Watson Mrs J Davies Mrs M Snow Mrs J Titterton Mrs C Goodwin Mrs B Barks Mr A Ainsworth Mr D Ratcliffe Mr R Lees Mr R Ball Mr A Hewitt Mr J Hewitt Miss K Pickford-Avery				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.

Question 2 – Do you any comments regarding the proposed employment land requirement?

ID	Consultee Name	Company / Org	Agent Name	Agent Company / Org	Issue	Support / Object / General	Consultee Comments
PO3198 PO3193 PO3188 PO3080 PO3075 PO3070 PO3298 PO3303 PO3390 PO3544 PO3533 PO3583 PO3252 PO3607 PO3572 PO3427 PO3586	Mrs P Routledge Mrs A Rogers Miss S Ford Ms J Croft Mr W Wordsworth Mr J Lawler Mrs J Birks Mr M Birks Helen Abbey Mrs Michelle Plant Mr Lee Plant Ms Gina Boston K W Alcock Mrs Patricia Allum Mr Lee Austin Mr Craig Beardmore Mr Matthew Boston						
PO3456 PO3453 PO3366 PO3342 PO3374 PO3318 PO3411 PO3403 PO3339 PO3268 PO3262 PO3398 PO3406 PO3292 PO3183 PO3065 PO3177 PO3060 PO3230 PO3111 PO3116 PO3121 PO3225 PO3273 PO3279 PO3284 PO3289 PO3419 PO3666 PO3631 PO3626	Mrs Susan Brindley Mr Darryl Brindley Mr Tommy Frost Mr Colin Hayes Mrs F R Hayward Mrs Mary Jones Mrs Brenda Mills Mr David Tavernor Mr S Waring Mrs J.F. Eaton Mr A.R. Eaton Mr Saul Cutler Mrs Sara Tavernor Mr D Renshaw Mrs P Wordsworth Mr C Foster Mr P Hollywood Mrs A Hollywood Mr N Hewitt Mr I Millward Miss P Millward Mr B Clare Mr P Heath Mr and Mrs A Brown Mr S Hassell Mrs C Moseley Mrs B Heesman Mr A Massey K W Alcock Mr N Brooks Mrs P Brooks				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.

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ID	Consultee Name	Company / Org	Agent Name	Agent Company / Org	Issue	Support / Object / General	Consultee Comments
PO3461 PO3602 PO3437 PO3440 PO3506 PO3501 PO3577 PO3591 PO3523 PO3489 PO3514 PO3634 PO3486 PO3445	Mr D Campbell Mr K Davall Mr G Davall Mrs I Davall Mr R Dennis Mrs S Dennis Mrs K Drummond Mr A Drummond Mr J Edwards Mr M Elvidge Mrs Anne Fox Mrs Heather Frame Mr Frank Harding Mr Roger Johnson						
PO3477 PO3610 PO3561 PO3618 PO3674 PO3548 PO3615 PO3525 PO3569 PO3564 PO3594 PO3652 PO3497 PO3494 PO3509 PO3347 PO3472 PO3469 PO3517 PO3358 PO3371 PO3334 PO3332 PO3522 PO3553 PO3556 PO3387 PO3350 PO3639 PO3854 PO3661 PO3677 PO3682 PO3685	Mr & Mrs D Keates Mrs H Keeling Mr K Mannion Mr Darren Potts Mrs G Potts Mr & Mrs J & C Smith Mr David Thomas Maria Turley Mrs Jennifer Vasselin Miss Rachel Vasselin Mr K Weston Mr Kenneth Whitefield Mrs Avril Woodward Mr David Woodward M Stevenson Mr Christopher Jones Mr D Hancock Mrs J M Hancock Master J Kennaway Mr David Kennaway Mrs M E Nicholls Ms Allison Keates Mr Alan Keates Mr H J Gibson Mr John W Bossons Mrs R H Bossons Mr A Gough Mrs J Brown Mr D Renshaw Mr Philip Silk Mr and Mrs V M Elks Mr G Hodgkinson Mrs K Smith Mr I Crawford				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.

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ID	Consultee Name	Company / Org	Agent Name	Agent Company / Org	Issue	Support / Object / General	Consultee Comments
PO3690 PO3698 PO3703 PO3706 PO3712 PO3714 PO3719 PO3724 PO3728 PO3733 PO3736 PO3741	Mrs J Crawford Mr JA Hayes Mr M Shirley Mr & Mrs M Nadova Mr P Cope Mrs J Cope Mr W Elks Mr D Richards Mr M Nad Ms T Janete Miss T Boulton Mrs J Sagers						
PO3744 PO3749 PO3757 PO3760 PO3765 PO3768 PO3776 PO3781 PO3784 PO3789 PO3792 PO3797 PO3800 PO3805 PO3809 PO3814 PO3817 PO3822 PO3825 PO3647 PO3830 PO3833 PO3838 PO3841 PO3846 PO3849 PO4792 PO4800 PO4815 PO4822 PO4780 PO4805 PO7468 PO7462 PO7456	Mr C Loving Mr T Loving Mrs C Hopkinson Mr and Mrs S Abbey Mrs P Richards Mr B Johnson Mrs J Richards Mr R Broad Miss E Clough Mr P Clough Mr G Barks Mr A Wilson Mr P Titterton Miss K Wilson Miss R Oulsnam Miss R Allen Miss J Seddon Mr A Fox Miss T Milward Mr K Pickin Mr A Millward Mr R Turley Mrs D Harrison Mr A Wright Mr D Tomkinson Mrs J Tomkinson Mr Richard Gallagher Jean Horsley Mrs Gillian Smith Ms Mary Walchester Mr & Mrs R & J Lovatt Mrs R Johnson Mr Jack Dempsey Ms Linda Powell Mr C Machin				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.

Question 2 – Do you any comments regarding the proposed employment land requirement?

ID	Consultee Name	Company / Org	Agent Name	Agent Company / Org	Issue	Support / Object / General	Consultee Comments
PO3157 PO3172 PO3414 PO3323 PO3315	Mrs P Dunn Mr D Ratcliffe Mr Basil Brunt Mr Peter Brunt Mrs Hazel Brunt						
PO7075 PO7071	MRS PENNY PLANT Mr Alex Plant				Cheadle	Object	The housing allocation for Cheadle should be reduced to reflect the employment land allocation.
PO3379 PO3382 PO3326 PO3464 PO3395 PO3422 PO3363 PO3257 PO3355 PO3167 PO3127 PO3162	Mr Stanley Byatt Mrs Vera Byatt Mrs Jill Callear Mrs Joyce Campbell Miss L Chadwick Mrs Maureen Clewes Mr Harvey Cope Mr Roger Davis Mr David Fernihough Mr D Ainsworth Mr G Clewlow Mr D Dunn				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.
PO403	Mr David John Allen				General	Support	Generally support the allocation of employment sites. Would request that these are kept separate and not part of any mixed development.
PO1621	Mr John Steele				General	Object	Again the employment land requirement is based on an historical model which no longer holds true.
PO4393	Mr Andy Frost				General	Object	On behalf of our client, The Kemshead Family, we wish to make Representations in respect of a parcel of land at the Mount, Leek. The aim is to secure the allocation of the entire site within their ownership for residential development in the emerging Local Plan. 320 homes per year across District (2012-2031) remains inadequate because it fails to support potential employment growth. [Proposed District employment land requirement should be increased for the reasons set out in Supporting Statement attached to Question 1]. For the reasons given the Plan is therefore 'unsound' at present.

Question 2 – Do you any comments regarding the proposed employment land requirement?

ID	Consultee Name	Company / Org	Agent Name	Agent Company / Org	Issue	Support / Object / General	Consultee Comments
PO9928	St Modwen Development Ltd	St Modwen Developments Limited	Ms Stacey Green	Barton Willmore	General	Object	<p>Email containing letter and Evidence Report submitted [both attached to PO9838]: the range of additional employment land proposed is 25-45 ha to support the identified 320 homes per annum. we consider that the overall employment land requirement should be balanced against any increase in housing requirement. We also note that the Council has chosen to support a mid point within the range, at 35ha. This does not point to a Local Plan that is seeking to be aspirational or responsive to growth opportunities. The residual requirement for new employment land, after completions and commitments, is only 19.4ha across the District. Just 6.37ha is identified as the residual requirement for the rural areas, which includes Blythe Bridge and Forsbrook. [Section 5 of attached Evidence Report seeks clarity on the calculation of the residual land requirement of 19.4ha and also explore the risks of the Rural Areas delivery of employment land, given that only one site (Cresswell) is allocated to meet this need for the entire District]. SMD/2014/0576 draft allocation at Cresswell: B1/B2/B8 uses, amounting to 33,480 sqm of employment floorspace. However, this site is not being marketed and it is not clear how deliverable it is. Question its suitability and marketability as access to the A50 is relatively constrained. [Committee report refers to 'enabling' housing development to cross subsidise employment development. Scheme attracted Policy objections because Cresswell not spatial strategy village. By direct comparison, Blythe Bridge and Forsbrook is a Larger Village, already acknowledged with a role within the distribution of the Local Plan Housing Requirement, and [with proposed] new sites.. for housing development. The St Modwen site already benefits from an allocation, an extant planning permission and the case that St Modwen make for a mixed use scheme, with cross funding and enabling development is entirely consistent with the principles that underlie the recently approved Cresswell proposals. the employment allocation at Blythe Bridge and Forsbrook appears to be made in respect of serving a Regional Need, as opposed to local needs. However our view that the St Modwen site is well placed to accommodate and attract local requirements as well as strategic requirements. Moreover, we see both local and regional markets as complementary, rather than being mutually exclusive. Council state RIS ' may have a role to play in supporting the Northern Gateway Regeneration Initiative. ' Both Stoke Staffs+ Cheshire Warrington LEPS see this Zone as a potential opportunity to establish high economic and housing growth predicated on HS2 investment in the area. Senior officers from the LEP and composite LPAs attended MIPIM in October 2015 to boost the awareness of the Initiative. The unknown timescales, uncertainty of the Phase 2 HS2 station at Crewe/Stoke on Trent, funding and potential for the site to have the necessary strong links with HS2, mean that there is a disconnect between the aims of St Modwen to deliver development within the next five years on this site, and the potential for it to tie into a Gateway Initiative that is still within its fledging stages. The Blythe Vale site represents a scheme that has been identified, allocated and consented over a period of almost 30 years, as a site offering strategic potential..The site is yet to come forward however there are initiatives within the local area (i.e. HS2, the growth ambitions of the LEP) that will assist over a period of time. In order to prime this delivery, St Modwen are proposing a more favourable mix of uses on the site, to include a broadening of the B Use Classes and residential development to assist with the viability and delivery of the site. Our position that part of the site, and the land south of the A50 can still offer employment opportunities, however, in order to facilitate development occurring on this site within the next five years, and with certainty within this Plan Period to 2031, a broader mix of uses is more appropriate. However, delivery of the site has also been obstructed by the infrastructure required to service Phase 1 and the reliance Phase 2 places on the successful development of Phase 1. Phase 2 forms the most obvious location for any large inward investor. However it is effectively landlocked as we understand no direct access from the A50 is likely to be permitted. As such, the Development Brief requires a crossing by bridge (or bridges) from Phase 1 in order to access the Phase 2. The technical solution to create a robust A521 access to Phase 1, which has detailed planning permission, is expensive. Delivering this access requires up-front investment and despite a significant improvement in market conditions, the funding of industrial and office development remains challenging. This is evidenced by the relatively few speculative developments undertaken within the wider region recently. Without external funding, the development of the first phase for just B class uses is unlikely to be viable. Instead, other more valuable uses, such as residential (including affordable housing), a local centre and leisure (e.g. a pub/restaurant), are required in order to enable the traditional employment elements (i.e. B class) of the scheme. These uses can all be delivered without altering Green Belt boundaries. The mix of uses needed to fund the infrastructure requirements of the overall development of the first phase is currently being reviewed. St Modwen are wholly supportive of the development of this site, but consider [refer to Evidence Base Report] that a more attractive opportunity, that will deliver benefits to the local community of Blythe Bridge and Forsbrook, would be for a mixed use development comprising housing, employment and ancillary</p>

Question 2 – Do you any comments regarding the proposed employment land requirement?

ID	Consultee Name	Company / Org	Agent Name	Agent Company / Org	Issue	Support / Object / General	Consultee Comments
							development.
PO901	Dr Anthony Shallcross				Hollington	General comment	Hollington is a working village with jobs in agriculture, quarrying and increasingly recreation and tourism. The main problem is that young people who were born in the village cannot afford to buy properties in the village. An affordable housing development and/or a relaxation of planning restrictions on building on homesteads (see Housing) would make the village a more vibrant community with a lower age profile.

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ID	Consultee Name	Company / Org	Agent Name	Agent Company / Org	Issue	Support / Object / General	Consultee Comments
PO3932	Mr Mike O Brien	WYG			Leek	Object	Refer to submitted Representations Report [attached to Question 1] which states: The Preferred Options document identifies a residual requirement for the delivery of up to 8.02ha of new employment land in Leek up until 2031. The proposed employment land allocations comprise 14.23ha, a significant surplus of 6.21ha over the residual requirement of 8.02ha. There is a clear and significant oversupply of employment land in Leek and therefore the loss of LE243 will have no detrimental impact on SMDC's employment strategy for Leek, particularly given the existing constraints; namely the residential location, access issues for HGV's and the proximity to playing fields and play area. The area strategy for Leek and subsequent allocations, as proposed within the Preferred Options Document, further support the lack of value of LE243 as an employment site. It is considered that [sites EM1 and EM2], as well as other in the south of the settlement as a whole offer much more appropriate opportunities for viable employment development in the future.
PO3922	Mr John Coxon	Emery Planning Partnership			Leekbrook	Object	Emery Planning is instructed by Wainhomes (North West) Limited to submit representations to the Preferred Option Site and Boundaries Consultation Booklet. The representations are made specifically with regard to our client 's site adjacent to Wardle Gardens, Leekbrook. [Refer to Report attached to Question 1 which also covers this question].
PO1278	Mr Yendole	Stafford Borough Council			Northern Gateway	Support	Stafford Borough Council has a border with Staffordshire Moorlands in the Cresswell and Blythe Bridge areas. A Regional Investment Site is proposed at Blythe Vale alongside the A50 to support the Northern Gateway regeneration initiative; Stafford Borough Council supports a focus on economic development in this locality through the Regional Investment Site, an employment allocation of 8.5 hectares proposed as an extension to Blythe Business Park at Cresswell as well as the Hadleigh Park Major Developed Site within Stafford Borough.

Appendix 6 – Housing requirement options analysis

Option	Affordable housing delivery ¹ and shortfall ²	Positives	Negatives
<p>Past trends job growth + partial catch up</p> <p>450 homes per year</p> <p>Total requirement³ - 7650</p>	<p>Delivery – 149</p> <p>Shortfall – 75 to 283</p>	<ul style="list-style-type: none"> • Most closely relates to the affordable housing need. This would also best serve Corporate Aim 1 which seeks to improve the supply of quality affordable housing • Most support for delivery of specialist housing needs such as Self-Build and Custom-Build • Likely to generate the most economic benefits by boosting the labour force, supporting jobs growth (approx. 3038) and wider financial benefits such as New Homes Bonus⁴ and Council Tax⁵ income. This would align with Corporate Aims 2 and 3 • Meets demographic needs 	<ul style="list-style-type: none"> • Option above the recommended OAN range as the scenario was considered to be a statistical “outlier” • Most unlikely to be deliverable in terms of the supply of suitable sites, infrastructure and past delivery rates – highest risk that the 5 year housing supply and Housing Delivery Test will not be met in the future • Most likely to impact upon economic aspirations of neighbouring authorities by encouraging highest level of net in-migration • Highest landscape and environmental impacts. This would least serve Corporate Aim 4.
<p>Combined Jobs Growth + partial catch</p>	<p>Delivery – 109</p> <p>Shortfall – 115 to 323</p>	<ul style="list-style-type: none"> • More closely relates to the affordable housing need than lower options. This would serve Corporate Aim 1 which seeks to improve the supply of quality affordable housing 	<ul style="list-style-type: none"> • More challenging to deliver than lower options – higher risk that the 5 year housing supply and Housing Delivery Test will not be

¹ Potential annual affordable housing delivery as a viable proportion of market housing – 33% as required by Core Strategy Policy H2

² Potential annual shortfall against the annual affordable housing need of 224 to 432

³ Gross requirements over the projection period 2014 to 2031. The net requirement for the Preferred Options Local Plan will take account of completions and commitments as at 31 March 2017

⁴ For homes developed over and above the 0.4% of dwelling stock in band D equivalents (for Staffordshire Moorlands: 175 units or 158 band D equivalents), the Council could receive approximately £1200 per unit per year for four years or £4800 per unit over four years.

⁵ The Council retains 12.08% of Council Tax generated by each new dwelling. Considering the average house in Staffordshire Moorlands is classified in Council Tax Band D, this equates to £183.71 per dwelling per year.

<p>up</p> <p>330 homes per year</p> <p>Total requirement - 5610</p>		<ul style="list-style-type: none"> • Support for delivery of specialist housing needs such as Self-Build and Custom-Build • Likely to generate greater economic benefits than lesser options by boosting the labour force, supporting jobs growth (approx. 870) and wider financial benefits such as New Homes Bonus income. This would align with Corporate Aims 2 and 3 • Meets demographic needs 	<p>met in the future when compared to lower options</p> <ul style="list-style-type: none"> • Higher landscape and environmental impacts than lower options. This would not support Corporate Aim 4 as well as lower options but evidence indicates that this issue is not severe • Higher levels of in-ward migration when compared against lower scenarios – however no objections received from neighbouring authorities in response to 320dpa previously.
<p>Job stabilisation</p> <p>260 homes per year</p> <p>Total requirement – 4420</p>	<p>Delivery – 86</p> <p>Shortfall – 138 to 346</p>	<ul style="list-style-type: none"> • Meets demographic needs • More deliverable than higher options – lower risk of failing 5 year housing land supply and Housing Delivery tests • Lower level of inward migration and potential conflict with neighbouring Local Plans 	<ul style="list-style-type: none"> • Lower delivery of affordable housing in comparison to higher options • Fewer economic benefits in comparison to higher options. Does not support the growth of the local economy in terms of job creation (0 jobs)
<p>Demographic needs + uplift for affordable housing and market signals</p> <p>235 homes per year</p>	<p>Delivery – 78</p> <p>Shortfall – 146 to 354</p>	<ul style="list-style-type: none"> • Lowest environmental and landscape impacts consistent with Corporate Aim 4 • Meets demographic needs • Most to be deliverable in terms of land supply – lowest risk of failing 5 year housing land supply and Housing Delivery tests • Lowest level of inward migration and potential conflict with neighbouring Local Plans growth aspiration 	<ul style="list-style-type: none"> • Provides the least number of affordable homes and is therefore least consistent with Corporate Aim 1 • Negative impact on the economy due to a declining labour force and the subsequent loss of jobs when compared to current levels. Such a level of growth is contrary to the NPPF and likely to found unsound. Fewer related financial benefits such as household expenditure, investment, and New Homes Bonus income. Least likely to

Total requirement - 3995			support Corporate Aims 2 and 3.
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