



Gladman Developments Limited

Staffordshire Moorlands Local Plan Examination in Public

Hearing Statement in Respect of Matter 4: Housing Land Supply

1. Components of Housing Supply

1.4 Is the windfall allowance justified by compelling evidence (large site allowance for Leek and Biddulph and small site allowance for all areas)?

Gladman considers that the windfall allowance as set out in the Council's Housing Trajectory for March 2018 is not justified by the evidence. With the new Local Plan in place at some stage during 2019, the scope for on allocated sites being granted planning permission is likely to be limited, compared to the position prior to adoption.

1.5 Is there an over-reliance on windfalls?

Gladman considers that the Local Plan is heavily over reliant on windfalls. The March 2018 trajectory suggests that of the projected completions between 2018/19 and 2030/31 on sites currently without the benefit of planning permission, some 26% will be windfalls (including the Peak District National Park allowance of 100 dwellings). In its Policy Topic Paper (June 2018), the Council provides very little supporting evidence to the predicted level of windfalls that are expected to be achieved. In paragraphs 2.47 to 2.54 of that document, there is evidence that the small windfall rate for the towns of Leek, Biddulph and Cheadle between 2006 and 2016 is broadly in line with projections for the remainder of the plan period, however there is no evidence to support the large site windfall allowances for these towns nor the high small windfall projection for the rural areas. No evidence has been provided regarding the robustness of the Peak District National Park allowance of 100 dwellings.

Paragraph 67 of the revised National Planning Policy Framework requires that planning policies should identify a supply of specific deliverable sites for years one to five of the plan period and specific developable sites or broad locations for growth for years 6 to 10 and where possible for years 11 to 15 of the Plan. Because of the extremely high level of windfalls, the Plan fails to meet these requirements. The level of windfalls does not comply with paragraph 70 of the RNNPF which states that *"any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends."*

1.6 Should there be a slippage/lapse allowance as in the CS? If so what figure would be justified taking into account previous non-implementation rates?

Gladman considers that a slippage/lapse allowance should be applied by the Council to the housing land supply as it is unlikely that 100% of the existing commitments within the Council's trajectory will be delivered during the plan period. Gladman therefore suggests that a slippage/ lapse factor of between 10 and 20% should be applied to the Council's housing land supply calculation.

1.8 Is the shortfall in supply of housing for Leek in Policy SS4 justified (980 dwellings compared to a requirement of 1015 dwellings)?

The shortfall in housing supply for Leek is not justified, given that this is the largest settlement in the District. The Local Plan should allocate additional sites for housing development in the town in order that the housing requirement for the town is met and to provide flexibility in the event that allocated sites do not deliver at the rates expected or do not come forward during the plan period.

1.9 Should there be an allowance for demolitions?

Yes, an allowance for demolitions should be incorporated in the housing supply calculations, although Gladman accepts that this is unlikely to be significant.

2. The Housing Trajectory and Implementation Strategy (HIS)

2.3 Is the approach to making up any shortfall in delivery over the LP period justified (the Liverpool approach)?

The Council considers that the "Liverpool" method should be adopted in calculating the 5 year supply of housing land on the basis that the "Sedgefield" method would result in a five year requirement that is not realistically achievable. Gladman does not agree that the five year supply that would result from utilising the Sedgefield method is unachievable. Given a wide range of deliverable sites without land assembly issues and /or significant infrastructure requirements, Gladman considers that the house building industry has the capacity to deliver a significant increase in building rates in the District. Lower building rates in recent years has largely been due to a lack of allocated sites and housebuilders have consequently been forced to rely on speculative planning applications many of which have been refused but granted on appeal. The Council's approach in advocating the Liverpool methodology does not accord with the Government's objective of significantly boosting housing supply.

Moreover, the National Planning Practice Guidance (PPG) is clear that local planning authorities should aim to deal with any undersupply within the first five years of the plan period where possible i.e. the 'Sedgefield' method. PPG explicitly states that where the undersupply cannot be met in the first five years, local planning authorities will need to

work with neighbouring authorities under the 'Duty to Cooperate'; this is the route to be followed where the Sedgefield methodology cannot be followed.

The PPG makes no reference to that shortfall being addressed over the remainder of the plan period. A literal reading of the PPG would therefore appear to exclude the Liverpool method in its entirety; either the shortfall is met in the first five years or it is met in another authority under the duty to co-operate.

3. Five Year Housing Land Supply

3.1 Is the use of a 20% buffer to calculate the housing land supply position appropriate?

Yes. There has been persistent under delivery of housing in the District for many years and the use of a 20% buffer is in accordance with the revised NPPF.

3.2 Generally, are the assumptions about the delivery from commitments and allocations realistic taking into account past completions, for example in relation to Cheadle where development has been slow to take off?

No. The assumptions of the Council in respect of commitments and allocations in the housing trajectory are over optimistic. This is well illustrated in the most recent housing trajectories for March 2017 and 2018. In the March 2017 trajectory the Council anticipated that there would be 313 completions (including 76 windfalls) during 2017/2018. Data from the March 2018 trajectory reveals that there were, in fact, only 142 completions. Unfortunately the information provided by the Council does not disaggregate completions to show the number of windfall completions for that year.

3.3. Are lead in times and build out rates realistic?

Gladman does not consider that the lead in times and build out rates as set out in Figure 2.4 of the Council's Policy Topic Paper are realistic. The Council relies upon a number of large allocations to deliver the bulk of its housing requirement. Gladman understands the need for large scale urban extensions and the role that they can play in delivering the long term supply of housing. However it is imperative that the local planning authority is realistic in relation to the delivery and timescales associated with these types of developments. Delays in sites coming forward are due principally to lead in times, gaining outline consent, negotiations on Section 106 agreements, reserved matters applications, discharge of conditions, the need for major infrastructure investments, site clearance and difficulties caused by sites in multiple ownerships.

As identified in Sir Oliver Letwin's draft analysis published on 25th June 2018 the delivery of housing sites may be delayed or aborted by numerous constraints including discharge of pre-commencement planning conditions, limited availability of skilled labour, limited supplies of building materials, limited availability of capital, constrained logistics of sites, slow speed of installation by utility companies, difficulties of land remediation, provision of local transport infrastructure, absorption sales rates of open market housing and limitations on open market housing receipts to cross subsidise affordable housing.

Generally Gladman considers that the Council is overly optimistic regarding the timing of housing delivery on a substantial number of its allocated sites. In considering the Council's trajectory, Gladman refers to a study published in September 2017 by Nathaniel Lichfield and Partners based on an assessment of 70 large sites (500 – 2,000 dwellings). The study found an average lead in time of 3.9 years for large sites prior to the submission of the first planning application, and an average of 5 years for the planning approval period, with a further period of 9-10 months to first housing delivery.

Accordingly Gladman considers that the Council's trajectory for delivery on a number of large housing allocations (e.g. Leek The Mount, Biddulph Wharf Road, Cheadle North, Cheadle Mobberley and Blyth Vale) is overly optimistic. These are large sites, many of which are in multiple ownership and have significant infrastructure requirements. All are likely to be subject to complex Section 106 agreements. The Wharf Road and Mobberley sites are also dependent upon the release of land from the Green Belt which will not be decided until the Local Plan is adopted. Whilst it is acknowledged that the Council has resolved to grant permission for part of the Blyth Vale site, it appears that the Section 106 agreement has yet to be finalised.

3.4 Will there be a five year supply of deliverable housing sites on adoption of the LP?

Because of the above mentioned concerns regarding the delivery of large sites and the amount of windfall development, Gladman considers it extremely unlikely that the Council will be in a position to demonstrate a five year supply of housing on adoption of the Local Plan assuming that it occurs in 2019. The table below demonstrates that, utilising the Sedgfield methodology, as recommended by PPG, the Local Plan would provide only a 4.2 years supply on adoption, assuming the Council's trajectory is reasonable, which Gladman disputes for reasons set out in this statement.

Table 1. 5 Year Supply Assessment

A	Annual requirement	320
B	Requirement 2012-2018 (A x 6)	1920
C	Completions 2012-2018	821
D	Shortfall (b - c)	1099
E	5 year requirement (A x 5)	1600
F	5 year requirement including shortfall (E + D)	2699
G	5 year requirement including buffer (F x 1.2)	3239
H	Annualised 5 year requirement (G/5)	648
I	Deliverable supply	2719
J	Years supply (I/H)	4.2

The Plan would therefore be considered to be out of date on adoption. In order to address this unacceptable position, it will be necessary for additional housing allocations to be included in the Plan which are capable of being brought forward in the early years of the Plan following adoption.

