

Staffordshire Moorlands Core Strategy Main Modifications – June 2013

Additional Evidence

1.1 The purpose of this Paper is to provide additional evidence in support of proposed modifications to Policy SS2 (Future Provision of Development) (Modification No. M8), specifically in relation to the modified phasing of the housing provision over the plan period.

Proposed Modifications

1.2 At the Council Assembly on 4th June 2013 the following modifications were approved to Policy SS2:

Provision will be made for ~~5500~~ **6000** additional dwellings (net of demolitions) to be completed in Staffordshire Moorlands (excluding the Peak District National Park) during the period 2006 to 2026. This will be phased at the average development rates to achieve the net additional dwelling completions set out below. Sufficient deliverable land will be identified to provide at least 5 years of development at all times.

Period	Average Annual Development Rate	Net Dwelling Completions
2006 – 2011	220	1100
2011 – 2016	220	1100
2016 – 2021	320 360	4600 1800
2021 - 2026	340 400	4700 2000

The Council will review the overall housing requirement and annual development rate at the beginning of each phase to ensure that future provision will continue to adequately meet identified local needs and reflect development potential.

~~A minimum of 1525 affordable housing units will be provided from all sources between 2006 and 2026 as part of the overall housing provision for the District in order to meet the proven needs of those who are not able to obtain a home in the open market.~~

Provision will be made for at least 24 hectares of additional employment land in Staffordshire Moorlands (excluding the Peak District National Park) during the period 2006 – 2026. Sufficient deliverable land will be identified to provide at least 6 hectares of employment land at all times.

Provision will be made for new retail, transport, recreational, community and tourism facilities and services to meet the identified needs of settlements within Staffordshire Moorlands (excluding the Peak District National Park) up to 2026 as set out in policies SS5 and SS6.

The Council will undertake and complete an early and comprehensive review of the Core Strategy by 2016 to cover the period 2016 – 2031 to ensure that future provision will continue to adequately meet objectively assessed needs and reflect development potential. This will be rolled into a single Local Plan combined with the Site Allocations DPD.

Reasons for the Modifications

1.3 Following the formal Hearings in February the Inspector issued his Interim Conclusions on the Examination in March which identified some key areas which he believes need to be modified before the plan can be adopted. In order to assist in suggesting Main Modifications to the Council which will properly address the issues identified by the Inspector, officers subsequently

contacted the Inspector to set out the nature of the modifications which could be considered and seek further clarification on how other concerns could be addressed. Following this request for clarification, the Inspector issued further comments. The inspector's interim conclusions, the officers' comments on these, and the Inspector's response are available to view on the Core Strategy Examination page of the Council's website¹.

1.4 In respect of the housing land supply, the Inspector commented that the total provision of 5,500 dwellings is a reduction of 500 dwellings from the RSS. The NPPF requires authorities to meet the full objectively assessed needs for market and affordable housing and therefore it is necessary to properly justify the total provision, particularly given the inability to provide a 5 year land supply.

1.5 In response to the Inspector's Interim Conclusions further clarification was sought as to whether having phased development rates (increasing to reflect the additional 500 dwellings) is still a sound approach in the light of his concerns regarding the lack of a 5 year land supply. In response the Inspector commented that a phased approach would be acceptable provided it is a realistic representation and is based on an identified supply.

Supporting Evidence

1.6 The purpose of the phased development rates in Policy SS2 is to manage the rate of development to reflect anticipated housing needs and future supply.

1.6 The modification to the phasing table in Policy SS2 proposes to maintain the development rate at 220 dwellings per annum up to 2016 and thereafter significantly increase the development to 360 dwellings per annum between 2016 and 2021 and to 400 dwellings per annum between 2021 and 2026. An analysis of the evidence for each of the phases is set out below:

2006 - 2011

1.7 The development rate up to 2011 (220 dwellings per annum) reflects actual dwelling completions between 2006 and 2011 which amounted to 1083 dwellings. This equates to 217 dwellings per annum which has been rounded up to 220 dwellings per annum.

2011 - 2016

1.8 The development rate for 2011 – 2016 (220 dwellings per annum) reflects the latest projected household growth rates which indicate a reduced level of household growth to 2021 as well as reflecting anticipated housing land supply and completions to 2016.

¹ <http://www.staffsmoorlands.gov.uk/sm/council-services/core-strategy/examination>

1.9 Evidence for the reduced household growth derives from the DCLG 2011-based interim household projections² which indicate a reduction in the household growth rate for Staffordshire Moorlands over the period 2011 – 2021 to 200 households per annum compared with 250 households in the previous 2008-based household projections (see table below). Allowing for vacancies, second homes and constrained demand, this would equate to a housing need of around 220 dwellings per annum.

1.10 This is considered to be a realistic development rate which can be delivered from identified housing supply. Between 2011 and 2013 there have been 167 completions, leaving a residual requirement for the remainder of the 5 year period to 2016 of 933 dwellings. The latest housing land supply monitoring (31st March 2013) demonstrates a deliverable supply of 1163 dwellings which have planning permission or are under construction. The housing trajectory in Appendix G (modification no. M84) demonstrates how the projected completions from committed sites will meet the residual requirement to 2016.

	2008-based projections			2011-based projections		
	Households 2011	Households 2021	Total Change	Households 2011	Households 2021	Total Change
Staffordshire Moorlands	41,000	44,000	+3,000	42,000	44,000	+2,000

2016 - 2021

1.11 The modification proposes a significant uplift in the rate of development post-2016 to 360 dwellings per annum. The housing trajectory in Appendix G (modification no. M84) demonstrates how the Council will manage housing development to achieve the projected development rates. This entails delivering specific housing allocations identified through the Site Allocations DPD and the review of the Core Strategy to further boost supply which will progressively come on stream up to 2021. Additionally there will be a contribution from existing committed sites as well as from smaller unallocated sites coming forward. The SHLAA (examination document ML5) shows that there is a potential supply of developable housing land on large and smaller sites significantly in excess of the projected completions in the housing trajectory for this phase.

1.12 In the light of further evidence from an update to the Strategic Housing Market Assessment to inform the review of the Core Strategy, this development rate may be subsequently amended.

2021 – 2026

1.13 Post-2021 the development rate continues to increase to 400 dwellings per annum reflecting the continued contribution from allocated sites and from

² <https://www.gov.uk/government/publications/household-interim-projections-2011-to-2021-in-england>

smaller unallocated sites. The SHLAA (examination document ML5) again shows that there is a potential supply of developable housing land on large and smaller sites significantly in excess of the projected completions in the housing trajectory for this phase.

1.14 As with the 2016 – 2021 phase, this development rate may be subsequently amended in the light of further evidence from an update to the Strategic Housing Market Assessment to inform the review of the Core Strategy.

Maintaining a Deliverable Supply of Housing Land

1.15 The NPPF requires that authorities identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their housing requirement, with an additional buffer of 5% to ensure choice and competition. Where there is a record of persistent under-delivery of housing, this buffer should be increased to 20%.

1.16 In assessing the 5 year land supply account has previously only been taken of sites with planning permission or under construction. The NPPF on the other hand advises that the 5 year land supply should include all sites which can be demonstrated to be deliverable within 5 years, including an allowance for windfall sites having regard to the Strategic Housing Land Availability Assessment (SHLAA). The Inspector has clarified that including sites which don't have planning permission but can clearly be shown to be deliverable and which meet current policy considerations is an acceptable approach.

1.17 In order to ensure that there a 5 year supply is maintained at all times, the Council has proposed a modification to policy SS4 of the Core Strategy (modification no. M15) which establishes the Council's intent to identify sites from the SHLAA and future reviews sufficient for 5 years' supply, including any allowance for under-delivery.

Conclusion

1.18 The evidence above demonstrates that the proposed development rates, as modified, represents a realistic and deliverable phasing of housing completions over the plan period. It represents the actual need for growth (as evidenced by the latest household projections) and the actual supply (as evidenced by the commitments and by the SHLAA). Through subsequent progress on the Site Allocations DPD and the Review of the Core Strategy, the Council will be able to bring forward sites to deliver housing in suitable locations to meet identified needs, as set out in the housing trajectory. The review of the Core Strategy will also assess, in the light of more up-to-date evidence, whether any change is required to the development rates to ensure objectively assessed needs are being fully met in the longer term.