

MATTER 4

Housing Land Supply

Issue 1 – Components of Housing Supply

1.1 Is the up to date housing supply position clearly shown in the LP (base date of 31 March 2018)?

1.1.1 The Local Plan Submission Version (ED1.1, Table 7.2, 7.3 and SS4 provides housing data as of 31 March 2017. However, updated data as of 31 March 2018 is available as set out in the Policy Topic Paper (ED13.5, Appendix 3 and 5). Main modifications are proposed to update the relevant figures in the Local Plan (MM7 – MM11).

1.2 What are the components of the housing supply that will meet the housing requirement?

1.2.1 The components of the housing land supply are set out in Policy SS4 and the supporting text and tables that precede it (as modified - see MM7 – MM10). The broad components that make up the supply of completions over the plan period are; implementation of extent commitments, an allowance for completions within the Peak District National Park, site allocations and windfall allowances. Requirements for identified neighbourhood areas are also provided in Policy SS4 (Table 7.9), but this provision is already factored in to the Local Plan requirements.

1.3 Are the components of supply clearly shown within the LP?

1.3.1 Yes. Tables, 7.2, 7.3 in the supporting text to Policy SS4 and the tables in Policy SS4 itself (as modified) set out the components of supply.

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

1.4.1 Yes. The Policy Topic Paper sets out the justification for the windfall allowances which are broadly in line with those set out in the adopted Core Strategy (ED13.5, Paragraphs 2.46 to 2.54). The allowances reflect past trends. A large windfall site allowance is identified in Leek and Biddulph. This reflects evidence from the SHLAA in terms of potential opportunities for development within the settlement boundaries.

1.4.2 Furthermore, it should be noted that the past trends have been achieved in a more restrictive policy context than that now proposed. Core Strategy Policy H1 applied indicative maximum sizes for windfall sites of 9 dwellings within the boundaries of the towns and larger villages and 5 dwellings in the smaller villages. Only exceptionally were larger windfall schemes supported. This upper limit is proposed to be removed and the new Policy H1 encourages the delivery of appropriate windfall without a prescriptive cap.

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1.5 Is there an over-reliance on windfalls?

1.5.1 No. As set out above, the windfall allowance is reflective of past trends with a track record of delivery.

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?

1.6.1 The Council's position in relation to the absence of a slippage allow is set out in the response to the Inspector's preliminary questions (EL.001b, pages 13-14 and EL.001d, page 2). As indicated, the Council could consider a modification to introduce an appropriate allowance if considered necessary.

1.6.2 Analysis of monitoring data over the period 2015/16 to 2017/18 is summarised in the table below. Whilst the lapse rate varies year on year, the average taken over this period is 5.3%

	Completions	Under construction	Not started	Units lapsed	Rate
2014/15	307	306	811	27	3.3%
2015/16	100	266	1034	120	11.6%
2016/17	128	230	1227	15	1.2%
Total	535	802	3072	162	5.3%

1.7 Is the PDNP allowance of 100 dwellings within the Plan period justified?

1.7.1 Yes. Paragraph 7.30 of the Local Plan Submission Version states:

"The objectively assessed need for housing as identified in the Strategic Housing Market Assessment relates to the District as whole. As such, this includes the parts of the District that lie within the Peak District National Park. The Peak District National Park Authority have their own adopted Core Strategy which governs development across the National Park. Due to the constraints and purposes of the National Park, the Core Strategy does not include housing requirements. However, in recognition of the fact that the identified housing requirements for Staffordshire Moorlands includes parts of the National Park, the National Park Authority has agreed to an allowance of 100 dwellings being identified in the housing land supply for the Staffordshire Moorlands Local Plan. This allowance reflects long terms annual average housing completions in the parts of the District that lie within the National Park. Whilst the Peak District National Park Core Strategy does not allocate land for housing, the allowance will be factored in to the windfall allowance for the District and housing completions and commitments within the National Park will be monitored accordingly. The allowance of 100 homes in the Peak District National Park does not infer a development requirement for the National Park" (ED1.1, Paragraph 7.30).

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1.7.2 This approach is set out in the Statement of Common Ground agreed with the National Park Authority (ED9.2, Appendix 1). A similar approach has been applied in other Local Plans where the local authority boundary falls partly within the Peak District National Park, namely, the adopted High Peak Local Plan (2016) and adopted Derbyshire Dales Local Plan (2017).

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

1.8.1 New monitoring data for the year 2017/18 as reflected in the main modification to Policy SS4 (MM10) indicates that the net housing requirement for Leek would fall from 1015 to 874 to reflect the latest position on housing commitments and completions. The windfall allowances (large and small sites) have also been reduced to subtract windfall from 2017/18 to avoid double counting. Comparing the new net requirement with the updated land supply position, there is a surplus of 81 dwellings in the Leek area. The consequences of the monitoring update for each of the Local Plan areas are summarised in the table below. For the avoidance of doubt, this approach applies the same base date and annual requirement as the Local Plan Submission Version.

Area	Net housing requirement	Planned provision	Difference
Leek	874	955	+81
Biddulph	909	880	-29
Cheadle	1200	1156	-44
Rural Areas	766	851	+85
Total	3749	3842	+93

1.9 Should there be an allowance for demolitions?

1.9.1 No. It is not anticipated that demolitions will be a significant factor in the implementation of the Local Plan housing supply as it has been in the past.

Issue 2 – The Housing Trajectory and Housing Implementation Strategy (HIS)

2.1 Is the data that supports the Housing Trajectory in Appendix 7 (SD19.2b) based on realistic assumptions?

2.1.1 Yes, it is.

2.1.2 The Policy and Strategy Topic Paper (ED13.5 para 2.55) explains the assumptions behind the Housing Trajectory. After the publication of the Local Plan Submission Version, the Council completed its housing monitoring for the year 2017/18 as of 31 March 2018. Due to the timing of the availability of

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this information, it was not included in the Local Plan Submission Version. However, for completeness, a copy of an updated trajectory along with background data is provided in Appendix 3 of the Topic Paper (ED13.5 page 47). An updated trajectory at 31/03/18 will be included in the Local Plan (MM68).

2.1.3 The housing trajectory is underpinned by assumptions regarding the rate of development and sales. The Local Plan and Site Allocations Viability Study (ED24.1) provides commentary on the local housing market and this evidence has led to assumptions which have informed the trajectories. The housing trajectory assumptions are provided in the Policy and Strategy Topic Paper (ED13.5 pages 18 - 19). The Council also intends to be proactive in delivering sites and its accelerated housing delivery programme is underway (ED33.6).

2.2 Does the HIS (when available) demonstrate that a five year supply can be maintained through the plan period?

2.2.1 Yes, it will.

2.2.2 In response to the Inspector's preliminary – matters, issues and soundness (EL1.001b) the Council will prepare a Housing Implementation Strategy (HIS) document which sets out how the five year housing land supply will be maintained in accordance with the trajectory. This process has already begun through the Council's Accelerated Housing Delivery Programme. A report approved by the Council's Cabinet on 24th April 2018 (ED33.6) identified a number of measures to be taken by the Council in order to ensure the timely delivery of housing land. These include the preparation of masterplans for key sites and working with land owners, developers, Homes England and Registered Providers to identify constraints and realise opportunities. A main modification is proposed to include reference to the HIS in Policy SS4 (MM10).

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

2.3.1 Yes, it is justified.

2.3.2 The Policy and Strategy Topic Paper (ED13.5 para 2.63) explains the approach adopted. The "Liverpool method" has been applied to spread the housing shortfall up to the year 2031. The shortfall in completions is currently very high (1099 as of 31 March 2018). If it is met over 5 years using the Sedgefield method, this gives a very high annual requirement which is considered to go beyond the requirement in the National Planning Policy Framework to be aspirational but realistic. Net completions have averaged 163 homes per year across the District between 2006/7 and 2016/17 with the highest net completion total in a single year being 278 in 2014/15. Further details of historic completions in the District are provided in Appendix 6 of the Topic Paper.

2.3.3 Therefore it is considered that it is more appropriate that the shortfall should be met over the plan period using the Liverpool method of calculation as this gives a more realistic scenario for development to come forward whilst still boosting housing supply as required by the National Planning Policy Framework. In response to the Inspector's preliminary – matters , issues and

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soundness (EL1.001b) a main modification is proposed to para 7.24 to express the key assumptions and parameters used (MM3).

Issue 3 – Five Year Housing Land Supply
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3.1 Is the use of a 20% buffer to calculate the housing land supply position appropriate?

3.1.1 Yes, it is.

3.1.2 The housing land supply applies a 20% buffer as required by the 2012 National Planning Policy Framework to reflect persistent under delivery.

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?

3.2.1 Yes, they are.

3.2.2 The trajectory provided in Appendix 3 of the Policy and Strategy Topic Paper (ED 13.5, page 44) shows the anticipated delivery rates for each allocation. As stated above in response to Question 2.1 assumptions about delivery are based on the Local Plan and Site Allocations Viability Study (ED 24.1) which provided commentary on the local housing market.

3.2.3 Historically, housing delivery has been slow in Cheadle with a corresponding low level of commitments. Recently however, there have been a number of large sites that have received planning permission for residential development. These are listed in the updated housing trajectory (ED13.5, p47).

3.3 Are lead in times and build out rates realistic?

3.3.1 Yes, they are.

3.3.2 The lead in times and build out rates are provided in the Policy and Strategy Topic Paper (ED13.5, pages 18 - 19). As stated above assumptions about lead in times and build out rates are based on information in the Local Plan and Site Allocations Viability Study (ED24.1) which provided commentary on the local housing market combined with officers knowledge and experience of the area.

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

3.4.1 Yes, there will.

3.4.2 The Local Plan Submission Version as published demonstrates a five year housing land supply. As explained in the Policy and Strategy Topic Paper (ED13.5) the Local Plan Submission Version is based on monitoring date as of 31 March 2017. For completeness, an updated five year housing land supply statement as of 31 March 2018 has also been prepared. Both assessments confirm that the Local Plan Submission Version enables a five year supply of housing land:

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- March 2017 supply (ED13.5, Appendix 4) - 5.9 years
- March 2018 supply (ED13.5, Appendix 5) - 5.6 years

Issue 4 – The wording of housing supply policies

4.1 Is Policy SS4 as modified clear to the decision maker?

- 4.1.1 Yes, SS4 as modified (MM10) sets out the net development requirements for housing and employment for each of the Towns and the Rural Areas and the components of supply and implementation. It goes on to specify requirements for neighbourhood areas. The policy provides the strategic context for many of the policies that follow on from it e.g. SS5-SS10, H2 and E2.