

**MATTER 3 – HOUSING AND EMPLOYMENT OBJECTIVELY
ASSESSED NEEDS (OAN) AND REQUIREMENTS**

Response on behalf of

Muller Property Group – 1130072

MATTER 3

Introduction

Harris Lamb Property Consultancy (HLPC) are instructed by Muller Property Group (MPG) to prepare a response to the Inspector's issues and questions in relation to Staffordshire Moorlands Local Plan Examination. MPG's interest is in land to the west of Cheadle which is identified as the Mobberley Strategic Development Area. In addition, MPG are promoting additional land to the south of the draft allocation for removal from the Green Belt and to be identified for housing within this Plan if needed, or to be safeguarded for development beyond the end of the Plan Period. Our comments to Matter 3 should be read in this context. We set out our detailed responses to the Inspector's questions below.

Questions

1. The Housing OAN and Requirement

1.1) Does the evidence base support the requirement for housing of 320 dpa or 6080 dwellings for the LP period within an OAN range of 235 to 330 dpa taking into account demographic and economic factors, market signals and affordable housing need?

1. The Council have prepared a Strategic Housing Market Assessment (SHMA) to support the preparation of the Local Plan and have undertaken further updates to it as the Plan has progressed. We have no in principle objection to the conclusions that the SHMA reaches in terms of the range of OAN and the housing requirement. We do, however, question the Council's decision to choose a housing requirement that is less than the upper end of the range identified in the SHMA. We return to this point below.

1.2 Or should the requirement be higher to support job growth and the delivery of affordable housing e.g. at the top of the range identified in the SHMA – 330 dpa?

2. Yes. We consider that the housing requirement should be 330 dpa. The Council state in its Spatial Vision for Staffordshire Moorlands on page 33 of the Pre-submission Draft Local Plan that:

“The economy of the Moorlands will have undergone a significant change with more diversified and higher quality employment provision better meeting the skills and needs of its workforce and more opportunities for business start-ups across the whole of the District. There will be a more flexible and proactive approach to employment development, raising the District's economic fortunes by exploiting its assets, raising local skill levels and opportunities and addressing

deficiencies and disadvantages. Importantly, we will tackle the potential issues relating to an ageing population by supporting inward investment providing desirable housing for people of working age. The District will support economic growth initiatives for the wider area, including those led by the Local Enterprise Partnership”

3. Similarly, Spatial Objective S03 reinforces the Council’s commitment to developing and diversifying the District’s economy. It is, therefore, perverse that one of the stated aims of the Local Plan is to deliver economic development and improvements to the economy but when it comes to helping deliver this, the Council have backed away from providing the houses that will be needed in order to deliver the growth they want.
4. Similarly, paragraph 7.22 of the Pre-submission Draft Local Plan sets out the issues that the Council face in respect of the delivery of affordable housing. In acknowledging that the Council do face problems delivering affordable housing, again it seems perverse that they do not want to maximise the opportunities to deliver new housing, including the provision of affordable housing.

1.3) *Alternatively should the requirement be lower so that it is ‘aspirational but realistic’ taking into account past delivery rates?*

5. No. We consider that this would be a retrograde stance to take and would be wholly contrary to the Government’s objective of local planning authorities significantly boosting the supply of housing as set out in paragraph 47 of the Framework. Just because the Council have not delivered housing previously is no reason not to set ambitious targets going forward.
6. If such an approach were taken, it is likely that the Council’s previous inability to meet housing need by under delivering new housing will be just swept under the carpet. In our view, this is not acceptable and the Council should be looking at ways that it can increase supply in a sustainable way, that will meet the full market and affordable needs of the District.

1.4 *Does the requirement reflect the failure to deliver housing to meet past ‘targets’?*

7. No. The requirement is only slightly higher than the previous Core Strategy requirement of 300 dpa. Furthermore, it is significantly less than the annual requirement of 486 dpa the Council have calculated on its latest five year land supply position paper (Examination document 19.1b). The Council have calculated the five year land supply position using the Liverpool method. The Planning Practice Guidance advises that any under delivery in supply should be made up within the first five years rather than being distributed over the remainder of the Plan Period and you are therefore, presented with a choice as to whether this is a sound approach or not. It is our view that this isn’t a sound approach.
8. If the Sedgefield had been used and the shortfall made up within the first five years the annual requirement would be 647dpa. As such, we do not consider the annual requirement of 330 dpa as set out in the Plan adequately reflects the failure of the Council to meet past targets.

1.5) No comment

1.6) *Whilst policies in the 2012 Framework should apply in examining the LP does the new methodology for calculating housing need proposed within the revised Framework have any implications for the OAN?*

9. The Government's consultation document entitled "Planning for the right homes in the right places" included proposals for a standard methodology for calculating OAN. It provided a set of figures for each local authority in England for what their OAN would be with the standard methodology. For Staffordshire Moorlands this equated to an annual requirement of 190 dpa. This is lower than the bottom end of the range of 225 dpa identified in the Council's SHMA.
10. In light of the Council's strategy and desire to achieve economic growth and job creation in the District, we do not consider that an annualised housing requirement of 190 dwellings would be sufficient for the Council to achieve its growth aspirations. We, therefore, are wholly supportive of the Council's desire to submit this plan with a higher, more aspirational housing requirement. As such, we do not consider that the standard methodology should have any influence on the housing requirement in this instance. As we have said elsewhere in our response, a lower housing target would be a retrograde stance to take and not one that we could support.

1.7) *Is the discrepancy between the plan period (2016-2031) and the period for the housing requirement within Policy SS3 justified?*

11. No. It is not clear whether the housing requirement of 6,080 dwellings covers the period 2012 – 2031 or the Plan Period of 2016 – 2031. If it, as it should, covers the Plan Period, we would expect the annual housing requirement to be 405 dwellings per annum and not the 320 dpa as stated. The effect that using a longer period has is to reduce the annual housing requirement, which has implications for how the Council calculate its five year supply. The latest five year land supply position (Examination document 19.1b) indicates that the Council can demonstrate a five year supply. However, this is based on an annual requirement of 320 dpa and making up the previous under delivery across the remainder of the Plan Period (the Liverpool method). If an annual requirement of 405 dpa was used this would result in a five year supply figure of 4.67 years using the same methodology as used by the Council. It would appear that the discrepancy has been used in order to massage the five year supply figure so that the Council can claim that they have a five year supply of deliverable housing sites.

1.8) *What would be the implications of aligning the housing requirement and the LP period?*

12. As referred to in the response to 1.7 above, aligning the housing requirement of 6,080 dwellings to the Plan Period would result in an increase in the annual requirement to 405 dpa. As noted above, the impact of doing so, would result in the Council not being able to demonstrate a five year supply even when using the Liverpool method and a 20% buffer. If this is the case, it would add weight to the case that further sites should be allocated in order to provide greater certainty that more housing could come forward in the short term in order to make up the shortfall and meet the needs of the District going forward.

2. Phased approach to delivery

13. Yes. We welcome the move away from a phased approach to the delivery of new housing.

3. The Employment OAN

14. No comment

4. Alignment between housing and employment requirements

4.1) *Is there sufficient alignment between housing and employment in that the employment land requirement is at the top of the range whilst the housing requirement is 10 dpa below the top of the range?*

15. We reiterate the point we made above in that the Plan makes it very clear that economic growth objectives and job creation are key deliverables that it is seeking to achieve. In light of this, we question why the Council have not sought to fully align the strategy for the economy with the strategy for housing, when the two are inextricably linked

4.2) *Assuming that the housing requirement remains at 320 dpa should the employment land requirement be reduced?*

16. No. This would undermine the achievement of the Council's vision and spatial objectives for the District. Furthermore, it would not be planning positively for the area, as advised by paragraph 157 of the Framework and would enable the Council to meet its full objectively assessed needs.