

STAFFORDSHIRE MOORLANDS LOCAL PLAN EXAMINATION

Agenda

Session 4 – 13.30 Wednesday 10 October 2018

Matter 4

Housing Land Supply

This matter considers how the housing requirement will be met; whether those means of meeting the requirement have been justified and will be effective; and whether the LP will be able to maintain a five year housing land supply.

Information is available to allow the LP to reflect a base date of 31 March 2018. In this respect the Council has put forward Main Modifications (MMs) to update Policy SS4 and Tables 7.2 and 7.2 within the LP. The Council has also indicated that a Housing Implementation Strategy (HIS) will be prepared

Delivery from individual sites will be considered during Week 2 of the hearings.

Issues

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)?

The Council refers to MM7-11.

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

The Council refers to Policy SS4 and the supporting text (as proposed to be modified by MM7-10).

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

The Council refers to Tables 7.2, 7.3 and Policy SS4 (as proposed to be modified by MM7-10).

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

The Council refer to the justification in the Policy Topic Paper supported by evidence from the SHLAA; that the allowances are broadly in line with those in the Core Strategy (CS) but that the cap on the size of windfall sites within the CS has been removed.

Supplementary Question – *Is there double counting because of the assumption that windfall completions will occur from 2018/19?*

1.5 Is there an over-reliance on windfalls?

The Council refer to past trends.

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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?

The Council indicates that it would consider an MM to this effect and that average lapse rates of about 5% have occurred in the last few years.

Supplementary Question – *Alternatively should flexibility be built into the projected supply so that it exceeds the requirement by say 10% or 20%?*

1.7 Is the Peak District National Park (PDNP) allowance of 100 dwellings within the Plan period justified?

The Council points to the justification within para 7.30 of the LP and also the support in the Statement of Common Ground (SOCG) with the PDNP (Appendix 1 to the Duty to Cooperate Statement SD9.2). The Council refers to a similar approach being adopted in High Peak and Derbyshire Dales.

Supplementary Question – *Where can the evidence about past completions in the PDNP be found?*

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 Council advises that data for 2017/18 shows a surplus in supply for Leek albeit small deficits in Biddulph and Cheadle.

1.9 Should there be an allowance for demolitions?

The Council suggest that demolitions will not be a significant factor moving forward. It is noted that the housing requirement is a net figure.

Supplementary Question – *What level of demolitions has occurred in the past few years?*

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?

The Council refers to the Policy Topic Paper which sets out the assumptions underlying the trajectory (see in particular Appendices 2 and 3). A revised trajectory will be included in the LP reflecting data up to 31 March 2018.

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

The Council refers to various measures that will be included in the HIS.

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

The Policy Topic Paper provides justification for the Liverpool approach. The Council refers to the high shortfall in completions (1099 units as of 31/03/18) which if added to the 5 year requirement would lead to an unrealistic requirement.

Supplementary Question – *As the Council is not relying on neighbouring authorities to deal with undersupply¹ and there is the potential to increase the number and range of allocations (see Preferred Options Stage) should the Sedgfield approach be used?*

3. Five Year Housing Land Supply

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

The use of a 20% buffer reflects advice in the Framework re 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?

The Council has used the Local Plan and Site Allocations Viability Study to support assumptions about delivery.

Supplementary Question – *Does the low number of completions for 2017/18 (142 units compared to an anticipated 313 completions) have any implications for the trajectory?*

3.3 Are lead in times and build out rates realistic?

Again the Council rely on the Local Plan and Site Allocations Viability Study together with officers' local knowledge.

Supplementary Question – *Is there evidence of local lead in times and build out rates to support the assumptions?*

Supplementary Question – *Taking into account the reliance on large allocations to deliver its housing requirement (with potential ownership and infrastructure constraints and long planning application timescales) is the trajectory and 5 year housing supply position of the Council realistic?*

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

The Policy Topic Paper shows a 5 year supply at the monitoring dates of 31 March 2017 and 31 March 2018 based on the assumptions relied on by the Council and referred to above.

¹ Planning Practice Guidance ID: 3-035-20140306

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4. The wording of housing supply policies

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

The Council refer to SS4 as modified by MM10.

Main Evidence Base

SD.9.2 – Duty to Cooperate Statement

SD.13.5 - Policy Topic Paper

SD.19 – Housing Land Supply Schedules and Housing Trajectory Data

SD.24.1 - Local Plan and Site Allocations Viability Study

SD.26 - Strategic Housing Land Availability Assessment (SHLAA)

SD.33.6 – Cabinet Report – Accelerated Housing Delivery Programme

EL1.001b - Council response to Inspector's Preliminary Questions

EL3.001a - Schedule of Main Modifications

Participants

Staffordshire Moorlands District Council (SMDC) EL2.049

Knights for Harlequin Development LPS526 EL2.002

Advance Planning for Seabridge Development Ltd - LPS384 EL2.003

Cheadle Unite LPS429 EL2.030

Mrs Thalia Bode LPS42 EL2.036

Emery Planning for Mr and Mrs Webb LPS354 EL2.040

Turley for St Modwen Homes (LPS130) EL2.015

Gladman LPS434 EL2.039

WW Planning LPS309 EL2.033

CBRE Ltd for Ollerton Estates LLP LPS265

Mr William Henry Stanley + Mike Seddon LPS68

Paul Windmill for Mrs Susan Kneill-Boxley LPS459 EL2.075

Ken Wainman Associates Ltd for Mr N Mountford LPS50

Ken Wainman Associates Ltd for Mr and Mrs Gibbins LPS101

Ken Wainman Associates Ltd LPS102

Statements

Staffordshire Moorlands District Council (SMDC)

Knights for Harlequin Development LPS526

Advance Planning for Seabridge Development Ltd - LPS384

Cheadle Unite LPS429

Mrs Thalia Bode LPS42

Emery Planning for Mr and Mrs Webb LPS354

Jo Russell Turley for St Modwen LPS130

Gladman LPS434

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WW Planning LPS309

CBRE Ltd for Ollerton Estates LLP LPS265

Paul Windmill for Mrs Susan Kneill-Boxley LPS459