

Sent: 21 January 2019 10:53
To: Forward Plans
Subject: Allocation of housing to Biddulph.

Follow Up Flag: Follow up
Flag Status: Flagged

Hi All,

I would like to ensure that the formula used to allocated housing quota's to all the areas, including Biddulph is scientific and thorough and based on the needs of the communities.

If this could be seen as reliable and comprehensive then the chance you have of convincing the people that this is for them.

Regards

Rob.

From: [REDACTED]
Sent date: 24/01/2019 - 13:00
To: Programmeofficer@staffs Moorlands.gov.uk
Subject: Post hearings advice

Good afternoon Angela,

We did believe that the debate regarding sites as being complete is now a matter of extension. Of considerable concern is a letter addressed to the Planning Inspector dated 17th January 2019 sent by Dia Larna (Executive Director-Place). Specific attention is drawn to Mr Larna's second page, commencing " Never the less, in reaching a balanced view" and reference to United Utilities. In the spirit of correct evidence and willingness of disclosure for that hearing, our planning Barrister included evidence in respect of confirmation that United Utilities clearly setting out the position, UU having NO objections to our initial submissions (we can cross refer that written evidence) In order to confirm this position, at a later time, two others and myself attended an arranged meeting at the UU head office in Warrington with the Head of Operations Mrs Paula Steer. Mrs Steer confirmed the no objections principle. It is wholly wrong for that evidence (as set out above) not to have been referred and referenced in that Larna letter to the Inspector. There is a significant requirement for me to respond to this wrong doing ensuring that Mr Mark Dakeyne has proper lawful access to the correct information and the facts of the matter.

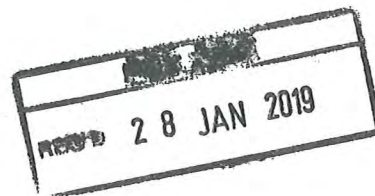
Will you please ensure that the information contained within this email amounts to my formal representation as a matter of some urgency to the Inspector.

For the record, I am sending by hard mail, signed for post (within the time limit as laid down) Staffordshire Moorlands Local Plan Examination in Public, Reply to Consultation on Housing Implementation Strategy.

That document in relation to Biddulph sites BD068 (Land to the West of Portland Drive) and BD087 (Land off Beaumont Close) Both sites previously preferred sites as part of the Local plan SMDC.

Kind regards [REDACTED]

ROBERT JAMES SIMCOCK



LOGGED

Staffordshire Moorlands Local Plan Examination in Public

Reply to Consultation on Housing implementation Strategy on behalf of Mr Robert Simcock

In relation to Biddulph sites BD068 (Land to the West of Portland Drive) and BD087 (Land off Beaumont Close)

Firstly, as point of general principle I wish to express concern that the Council is relying on existing housing commitments from unimplemented planning approvals to "*contribute significantly towards future housing delivery*" (page 14). This includes sites with no developer currently on site (around 290). I cannot see how a site which has not yet delivered housing despite benefitting from planning permission, and which has no developer interest, can reasonably be considered as likely to make a significant contribution to housing delivery in the area. These are evidently problem sites and should be treated with caution, not over-optimism.

Further, the reliance on sites where the Council has been minded to approve a housing scheme but the decision notice has not yet been released as it is subject to a signed section 106 legal agreement (such sites being regarded as allocated or unidentified windfall), gives rise to the same concern. It is well known that s.106 negotiations can take years and often break down, resulting in permission being refused. These sites should not be relied on.

To turn to the matters with which I am most concerned (sites BD068 and BD087), I note that in line with Inspector Whitehead's conclusion that exceptional circumstances existed to warrant a revision of the Green Belt boundary surrounding Biddulph, Inspector Dakeyne has advised (at paragraph 10 of his Advice dated December 2018):

"In Biddulph there is a need for a range of sites to provide market and affordable housing and employment opportunities to enhance the town's role as a service centre and support regeneration. In principle I can see the case for exceptional circumstances existing to justify the alteration of Green Belt boundaries around Biddulph"

As this consultation relates solely to the Housing Implementation Strategy ("the HIS"), I restrict my comments to the implications of the Inspector's subsequent conclusion that the revision of the Green Belt boundary so as to release BDNEW to the west of Biddulph Valley Way from the Green Belt has not been justified.

The Council strongly relies on delivery of housing in Biddulph, sensibly, as this is one of the most sustainable settlements in the Council's area alongside Cheadle and Leek. It is a settlement to which the Council seeks to "focus growth". To deliver the housing numbers – including urgently needed affordable housing – that are required the Council must now, as anticipated by Inspector Whitehead, release BD068 and BD087.

I note that the HIS records that the need for affordable housing calculated in 2014 was deemed to be 707 gross over the next five years (page 4). 172 affordable homes per year for the next five years were estimated as being required just to clear the backlog. The 2017 SHMA Update reviewed the Housing Register as of October 2016 and noted that there is a current net backlog of 408 affordable homes, and a net annual need for affordable housing of 224 to 432 homes per year (page 5). This situation is therefore getting worse, not better. There is clearly a desperate need for affordable housing in this area. BD068 and BD087 would make a meaningful contribution to alleviating these desperate circumstances, there being no viability constraints ruling out the delivery of a policy-compliant quantum of affordable housing.

I note that the Council has not ruled out further Green Belt releases in Biddulph, stating in its reply to the Advice dated 17 January 2019) "*[i]t is accepted that the [Green Belt] review identified further sites that could also be released from the Green Belt under exceptional circumstances, including some that were found to have a more limited contribution towards Green Belt purposes.*" Those sites included BD068 and BD087, which had been highlighted as suitable for release based on their limited contribution to the purposes of including land within the Green Belt. There are no constraints relevant to the delivery of these sites.

The subsequent deficit in housing supply arising from the proposed MM in relation to BDNEW must be addressed during the Plan period in order for the Plan to set out the most appropriate

strategy for the Council's area. As noted above, Biddulph is one of the most sustainable settlements in the Council's area and a focus for growth. The allocations over the Plan period should accordingly reflect an appropriate level of growth for Biddulph over that period. Leaving the location for the delivery of the remaining housing numbers over the Plan period unspecified risks giving rise to unsustainable growth patterns.

At paragraph 21 of his Advice Inspector Dakeyne notes that "*[d]elivery from other Green Belt releases in Biddulph equivalent to BDNEW could commence in the same [5 year] period.*" I wholly agree. There are no technical hurdles to overcome in relation to either site. In fact, the relevant statutory consultees have already been consulted and have confirmed there are no impediments to the immediate delivery of housing on these sites.

This adds significant weight to the critical importance of releasing these two sites from the Green Belt so as to enable the immediate delivery of badly needed housing and community facilities on land that makes no meaningful contribution to the purposes of including land within the Green Belt. In the present circumstances this is simply common sense.

The most appropriate strategy, and the most sustainable, is for these two sites to be released from the Green Belt now as a proposed MM and allocated for housing in order to partly make up for the deficit caused by the MM in relation to BDNEW.

Robert Simcock

23 January 2019

Sent: 30 January 2019 11:35
To: Forward Plans
Subject: Comment on SMDC Local Plan: Housing Implementation Strategy EL7.001

It is interesting to note that following the Inspectors Recommendations concerning Policy DSL2 – Land at the Mount , Leek - the Planners have taken their normal stance and not taken a 'blind bit of notice'.

The inspector recommended that the plan should be modified to give *'Recognition of the recreational value of the Mount to the community and reflect this in master planning proposals through the sensitive treatment of Mount Road and Kniveden Lane, appropriately located green infrastructure, recognition of key views and connectivity to public rights of way.'*

To me the only way to provide more green infrastructure and recognise the importance of the key views is to reduce the number of houses being crammed into the sites by 10 perhaps 20%.
So instead of modifying the HIS document the planners have chosen to still continue with the draft document dated November 2018 showing a total of 345 dwellings instead of reducing the numbers to take account of the Inspectors comments.

Instead of listening you (the Planners) hope that no one will notice!

Regards

John Pigott

Sent from [Mail](#) for Windows 10



28 January 19

Regeneration Department
Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
Leek
Staffordshire
ST13 6HQ

Dear Sirs

Re:- STAFFORDSHIRE MOORLANDS LOCAL PLAN – CONSULTATION

With reference to your letter of 16 January in respect of the above I wish to comment.

I understand from your letter the Planning Inspector has recommended Main Modifications to the Staffordshire Moorlands Local Plan following the examination hearings, and suggests a further period of focused consultation regarding the implications for the soundness of the Local Plan and I could not agree more.

Your consent for the Blythe Vale site, its quantity of dwellings, location and time scale totally dismisses more opportunity to recommend a change of your current proposed five year supply, as noted and suggested by the Inspector following the examination.

You are aware of your own shortfall of dwellings in the Local Plan and your consent for the above site just indicates a compliance of ticking your own box to meet Government numbers, without looking at advantageous, smaller sites which you proposed as potential development parcels in your consultation period.

The Inspector has intimated that you have to drive forward, deliver and maintain a five year land supply by proactive measures, and it is about time you looked at sites which you keep in the green belt, adjacent to fantastic transport links, providing sustainable, environmental, social benefits to all generations.

Your accelerated housing delivery programme needs to accommodate the Inspector's comments as well as foresight into local building projects encouraging smaller business opportunities providing a good cross section of housing to meet all needs.

I hope you will take on board the above.

Yours faithfully

A rectangular white box used to redact the signature of Mrs D Brough.

MRS D BROUGH

28 January 19

Regeneration Department
Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
Leek
Staffordshire
ST13 6HQ

REC'D 30 JAN 2019

Dear Sirs

Re:- STAFFORDSHIRE MOORLANDS LOCAL PLAN – CONSULTATION

I am in receipt of your letter of 16 January and after attending a number of Examination Hearings I comment as follows with regard to housing supply issues in the Blythe Bridge area, in particular the proposed St. Modwen Homes development at Blythe Vale, south east of the A521, A50.

In local press it has been announced that St. Modwen Homes have applied to extend their current application of 118 dwellings to 146 dwellings. The Local Plan allocation of 300 dwellings for Blythe Bridge, over the period of the Local Plan, is monopolised by this one site, to be known as Blythe Vale.

The above site is to be constructed in an approximate time scale of 5 years, as intimated by the representative of Turley on behalf of St. Modwen Homes, (viz 25 to be built in 2019 and a further 50 dwellings a year onwards!) In view of the proposed development of Blythe Vale even the Inspector questioned that this site would benefit the City of Stoke-on-Trent more than Staffs Moorlands! The quota for 300 dwellings will be saturated in one area!

Your oversight in representing the Blythe Bridge area for smaller, preferential, micro sites is evident. The proposed Blythe Vale development, with its historic claim of not being green belt gives your Council an easy convenient option of meeting Government targets without really assessing the impact of up to 300 dwellings, situated off busy roads and demonstrating how this will meet sustainability objectives bringing financial benefits of social infra structure.

Surely common sense prevails that questions will be raised as to the congestion, disruption and impact in the one area once the development commences, and it is incredible that you believe residents will walk from that location to the railway station or catch a bus when services are being reduced in order to reduce carbon emissions. Are you really expecting the elderly (not sure how many bungalows are planned) in the mix of accommodation sizes, as stated in the Cheadle Times, families with young children, the disabled are actually going to walk, or cycle along A50/A521 in order to minimise carbon emissions by leaving their cars at Blythe Vale?

There are identified green belt areas more suited to development because of location to amenities, transport links, and yet you will not move same into the green field category, even though it would

meet an objective appraisal of sustainability and ultimately would offer financial benefits of social infra structure.

The aforementioned points should be considered when you decide your housing implementation strategy.

Yours faithfully

A rectangular white box redacting the signature of Richard Goodall.

Richard Goodall



Our ref:
Your ref: Staffordshire Moorlands Local Plan

Regeneration
Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
Leek
Staffordshire
ST13 6HQ.

Graham Broome
Asset Manager
Operations Directorate

The Cube
199 Wharfside Street
Birmingham
B1 1RN
www.highways.gov.uk

Direct Line: 0121 6788419

6 February 2019

Via Email:
regeneration@staffsmoorlands.gov.uk

Dear Sir/Madam,

STAFFORDSHIRE MOORLANDS LOCAL PLAN – HOUSING IMPLEMENTATION STRATEGY

Thank you for forwarding me details of the consultation on the Staffordshire Moorlands Local Plan (SMLP) Housing Implementation Strategy (HIS).

Highways England is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England. The network includes all major motorways and trunk roads. Highways England are therefore committed to supporting Government objectives on economic growth and sustainable transport, and recognises the need for closer integration of transport and land use planning as set out in the Department for Transport (DfT) Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development'.

The SRN that runs through Staffordshire Moorlands District consists of the A50 trunk road between Blythe Bridge and Uttoxeter.

Highways England are supportive of the SMLP's stance on promoting active travel in order to reduce the need for travel by private car and also the revisions to the HIS.

The Staffordshire Moorlands HIS gives detail of the revisions to the previous 2014 Staffordshire Moorlands Strategic Housing Market Assessment (SHMA) "Objectively Assess Needs (OAN) housing" assumptions which now reflect the latest household projections issued by the government. However, little detailed analysis has been made of potential trip generation of the revised housing OAN and its potential traffic impact on the Strategic Road Network (SRN).

We note there may be material implications for our network at the A50/A521 Blythe Bridge roundabout junction arising from development in the Staffordshire Moorlands District. In this light we have identified that more detailed traffic assessment of the A50/A521 junction is a priority. Furthermore, the implications of development traffic at this junction are likely to be cumulative with emerging issues arising from the plans and strategies of East Staffordshire Local Plan and the emerging revised North Staffordshire Joint Local Plan.

At a site specific level, a number of developments are in close proximity to the A50; particularly the major Blythe Vale development. As the access to this site, and developments in the area are likely to have a direct impact on the SRN, Highways England will seek continued communication with site developers and yourselves to ascertain traffic impacts and potential mitigation proposals.

It is also recommended that the individual site promoters should undertake detailed transport analysis and assessment of their sites, either at this plan making stage or as part of future planning applications. Highways England would wish to be involved the scoping of these assessments.


Highways England will seek to work in partnership with you and Staffordshire County Council as the local highway authority to consider the traffic implications of the identified sites and work with you to confirm any mitigation measures that will be required to deliver the local plan. This is necessary in order to ensure the Strategic Road Network continues to operate its primary role as a strategic route.

Please do not hesitate to contact me if you require any more information or clarification.

Yours sincerely



Graham Broome



GLADMAN DEVELOPMENTS LIMITED

**REPRESENTATIONS IN RESPECT OF THE STAFFORDSHIRE
MOORLANDS LOCAL PLAN FOCUSED CONSULTATION ON
HOUSING**

FEBRUARY 2019



1. INTRODUCTION

- 1.1 This submission provides Gladman Development's written representations on the Staffordshire Moorlands Local Plan Focused Consultation on the Housing Implementation Strategy and other housing evidence which was published in January 2019.
- 1.2 This consultation has taken place at the request of the Inspector who is examining the Local Plan. In his advice note to the Council, issued on 11th January 2019, the Inspector noted that there were a number of strands of new evidence relating to housing land supply which ought to be the subject of consultation. The Inspector advised that the Council will have the opportunity to consider the responses and decide whether to put forward additional MMs as a result. The Inspector will then consider the responses and the Council's position. In particular it will allow him to come to conclusions on the issue of housing land supply.
- 1.3 Gladman has previously submitted representations in respect of the Submitted Local Plan and has participated in the Examination Hearing Sessions which took place in October 2018.
- 1.4 These representations concern the following documents produced by the Council:
- The Housing Implementation Strategy (EL7.001) (November 2018);
 - Background Information on Windfall Allowance and Justification (EL7.002) (November 2018); and
 - Updated Housing Trajectory and supporting information (EL7.003) (January 2019)

2. HOUSING IMPLEMENTATION STRATEGY

- 2.1 The Council's Housing Implementation Strategy is intended to provide information regarding how the housing requirement in the Local Plan will be monitored and managed over the lifetime of the Plan. It provides:
- A summary of the spatial strategy and housing requirement set out in the Local Plan

- Latest information on the components of supply consisting of the housing completions, commitments and other sources of housing supply and
 - Commentary on the mechanisms that will be used to ensure the delivery of key allocations and the overall housing requirement for the plan area
- 2.2 The Housing Implementation Strategy is also intended to address the Inspector's concerns regarding housing supply, in particular the need for the Plan to maintain a 5 year supply of housing land throughout its life, as required by the National Planning Policy Framework (NPPF).
- 2.3 In its representations on the Submission Local Plan and in its Hearing Statement for the Examination, Gladman has contended that the housing requirement within the Local Plan is unlikely to be delivered because of a number of reasons including:
- An overly optimistic reliance upon windfalls
 - An unrealistic housing trajectory, particularly in respect of large urban extensions allocated in the Local Plan
- 2.4 As a result, Gladman considers that the Local Plan will not provide for a five year supply of housing land to be in place upon adoption (assuming this takes place towards the end of 2019), nor is such a supply likely to be in place throughout the plan period as required by the NPPF.
- 2.5 In Gladman's opinion the Housing Implementation Strategy provides scant evidence that the housing requirement will be delivered. It demonstrates that windfall rates historically have been relatively high, however, as Gladman has consistently maintained, this has occurred during a period when there has not been an up-to-date Local Plan in place, the last comprehensive local plan for the District having been approved in 1998. The new Local Plan, once adopted, does not provide a policy framework that will allow for a similar level of windfall development to come forward.
- 2.6 Although the Council has made a number of alterations to its Housing Trajectory, unfortunately it remains overly optimistic in relation to lead in times and delivery rates for many sites that are critical in delivering the Local Plan housing requirement. As Gladman has stated in previous representations, the lead in period for larger sites is impacted by a number of factors including, gaining outline consent, negotiations on Section 106 agreements, the preparation of development briefs, reserved

matters applications, discharge of conditions, the need for major infrastructure investments, site clearance and difficulties caused by sites in multiple ownerships.

- 2.7 This propensity for delay is clearly illustrated in Section 11 of the Housing Implementation Strategy. The table of sites with unimplemented planning approvals contains 25 sites (both large and small, totalling 1090 dwellings) with planning approval (either outline or reserved matters) or awaiting S106 agreement on which a start has not been made. Of the relevant planning permission for each of these sites, one dates from 2013, five from 2014, three from 2015, seven from 2016, eight from 2017 and one from 2018. Developments concerning 267 dwellings therefore remain un-started five or more years from the grant of planning permission or a resolution to grant permission.
- 2.8 The Housing Implementation Strategy also describes actions that the Council is taking to bring housing sites forward for development. These measures are to a large extent set out in the Council's Accelerated Housing Delivery Programme introduced in April 2018. One of the aims of the programme is to *"drive forward the delivery of the Local Plan and maintain 5 year land supply by proactive measures and Council led interventions where appropriate"*.
- 2.9 The programme focuses on 4 key delivery areas as follows:
- Open for business approach to planning applications and the regulatory process
 - Facilitating development on sites with un-implemented planning approvals
 - Accelerating delivery of emerging Local Plan sites
 - Council-led proactive interventions
- 2.10 Whilst Gladman welcomes the recognition by the Council that its housing delivery has been poor, the actions that it proposes to take are those that one would expect all Council's to inherently seek to put in place.
- 2.11 Bearing in mind that the Programme has only been in place since April 2018, Gladman considers that it is far too early to say with any certainty that *"the Council's proactive approach to improving dialogue with landowners, developers and agents is*

*starting to improve delivery rates”*¹ Certainly the Council has not provided any evidence that this is the case.

3. BACKGROUND INFORMATION ON WINDFALL ALLOWANCE AND JUSTIFICATION FOR LEEK LARGE WINDFALL SITE ALLOWANCE.

3.1 Gladman notes the historic evidence of windfall housing development between 2006 and 2018 that the Council has provided. However, as referred to above, this level of windfall development has occurred during a period when there has not been an up-to-date Local Plan. The previous full Local Plan for the District was adopted in 1998 and although a Core Strategy was adopted in 2014, this contained only a small number of allocated strategic sites. The remaining allocations were to be identified in a Site Allocations document which was never progressed.

3.2 The determination of planning applications for residential development during this period 2006 to 2018 therefore took place in the absence of an up-to-date comprehensive local planning policy and (since the 2012 NPPF) a lack of a 5 year supply of housing land. In these circumstances, the granting of permission for windfall development not surprisingly increased. Once the emerging Local Plan is adopted, in theory a five year housing supply ought to be in place as will policies restricting housing development on unallocated sites and consequently the scope for planning applications for windfall housing developments to be approved will be reduced.

4. UPDATED HOUSING TRAJECTORY AND SUPPORTING INFORMATION

4.1 Gladman remains of the view that the Council’s revised Housing Trajectory is unrealistic and will not have in place a five year supply on adoption of the plan , even allowing for the utilisation of the “Liverpool” approach, spreading the historic undersupply over the whole of the plan period.

4.2 The Council’s trajectory assumes that 185 dwellings will be completed in 2019/2020 and 354 dwellings in 2020/2021 on sites which do not currently have planning permission. This figure comprises 75 dwellings on large sites with outline planning permission only, 95 on small sites (although it appears that some of these may have full planning permission) and 15 at the Cheadle North allocation. The equivalent figures for 2020/21 is 183 dwellings on large sites with outline planning permission only, 96 on small sites and 75 dwellings on proposed allocations.

¹ Housing Implementation Strategy (Page 19)

4.3 In the light of empirical evidence that is set out in its representations and hearing statement, Gladman considers that these sites are unlikely to deliver any dwellings at all until 2021/22. Therefore the expected output from these sites should be pushed back by two years in the trajectory. This means that the projected completions for 2019/20 should be reduced to 201 and for 2020/21 to 186. The Council's projected output from these sites for 2019/20 and 2020/21 should replace the projected outputs for 2021/22 and 2022/23 respectively. On that basis it is unlikely that the Council would be able to demonstrate a five year supply of housing land on adoption of the plan.



The Coal
Authority

Staffordshire Moorlands Local Plan - Housing Implementation Strategy and other housing evidence

Contact Details

Planning and Local Authority Liaison Department
The Coal Authority
200 Lichfield Lane
Berry Hill
MANSFIELD
Nottinghamshire
NG18 4RG

Planning Email: planningconsultation@coal.gov.uk
Planning Enquiries: 01623 637 119

Date

7 February 2019

Staffordshire Moorlands Local Plan - Housing Implementation Strategy and other housing evidence

Thank you for your notification received on the 17 January 2019 in respect of the above consultation.

I have reviewed the information available and can confirm that the Coal Authority has no additional comments to make.

Regards

Melanie Lindsley

Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI
Development Team Leader

INSPECTOR'S POST HEARING ADVICE – MAIN MODIFICATIONS AND RELATED MATTERS (EL6004)

We have considered the inspector's post hearing advice. We have previously made submissions on the Local Plan. Having considered the inspector's advice, we believe that our site can assist in addressing some of the deficiencies and shortfalls identified in that document.

A Contribution Towards the Employment Requirement

We make comments in relation to paragraphs 14 and 15 of the inspector's note as follows.

The overall employment land requirement is 32 hectares. The inspector recommends the deletion of allocation DSR3. There is also an identified small shortfall in appendix B to EL5.005 which will be increased by the deletion of DSR3. There is a suggestion that the shortfall could be made up by windfalls.

Reliance on windfalls is not necessarily a reliable mechanism for the delivery of employment land particularly at times of economic downturn. We suggest that our proposed site could assist in meeting this shortfall through the provision of around 0.5 hectare of employment land as part of a mixed development in this sustainable location.

Housing Land Supply

The inspector has identified a number of strands of new evidence on housing land supply which are subject to this further period of consultation. This will give the inspector the opportunity to come to conclusions on the issue of housing land supply. We therefore take this opportunity to comment upon specific issues.

We are concerned that the council's assessment of future housing delivery was based upon more positive economic circumstances. Since those assessments were undertaken there has been a period of considerable uncertainty not only relating to Brexit but also in terms of future economic growth. The effect of this has been a significant downturn in the number of planning applications and housing completions. The council has not factored these in. Consequently, its expectation of delivery is likely to be optimistic and unrealistic. There is a very real prospect that there will be a delay in the commencement of housing development on allocated or committed sites and a slowing down in the number of houses delivered on particular sites. Our land at Moor Green Farm in Forsbrook will be unlikely to be affected by these factors because of our ownership, control and our more philanthropic vision to deliver a development which meets particular needs and contributes to the vitality of Forsbrook.

This contrasts with the proposed Blythe Vale Allocation (EL7.008) which depends upon the provision of elaborate new infrastructure including causeways and perimeter drainage canals. This will be very costly. It will also have a significant environmental impact, imposing a new and incongruous modification to the topography of the land. The proposed fly-over will also be intrusive. It will be costly at a time of economic slow-down. These costly measures are likely to further delay both implementation and delivery. By contrast, our site could be developed in a way that would complement the landscape rather than challenge it. It is also a site which is very well related to the village and has much better and shorter pedestrian links.

The development of our site would meet the wider strategy of the Local Plan and particularly Policy SS8. The scheme would provide employment, affordable housing and housing targeted to meet the specific needs of the increasingly elderly population and those wishing to enter the housing market.

The scheme would incorporate areas of woodland and public open space. The proposals would therefore support the role of Forsbrook, enhancing its vitality and helping to meet its social and economic needs.

We note that the inspector has two concerns related to the reliance upon windfalls. The first is whether that reliance will deliver the number of houses which are expected and which are required. The second is whether it will create opportunities for affordable housing, particularly in the rural areas. He goes on to recommend a specific monitoring requirement in relation to windfalls.

We are concerned at what we consider to be an unrealistic and excessive reliance on windfalls as a means of delivering the required housing.

Affordable Housing

The inspector identifies a reliance upon a significant windfall allowance to deliver the housing which is needed. He is concerned about whether the reliance on a significant number of windfalls will create opportunities for affordable housing.

Our site would help address the projected difficulties in providing affordable housing, assisting not only dealing in with the backlog but in providing the affordable housing which Forsbrook needs.

We are also concerned that the delivery of affordable housing from the allocated sites may be significantly less than anticipated due to viability issues. In tighter economic times, developers will likely seek to demonstrate through viability studies that the development is not viable unless a significantly reduced proportion of, or no affordable housing, is provided.

Self-Build

Our proposals are also significantly different from the norm in that we would be prepared to release part of the site for self-build plots – possibly up to 10 to meet the increasing demand for this form of housing provision.

Housing for Older Persons

The council's Housing Implementation Strategy (November 2018) also identifies the need for an increasing amount of accommodation for older persons.

Again, our site would make provision for older people, not only by providing properties which provide flexible and accessible accommodation but also in making provision which is specifically designed for older people in the form of specialist housing. In this way, part of our site would specifically cater for the needs of residents over the age of 75 whose numbers will increase by almost 40% over the next 12 years.

Conclusion

Our previously submitted hearing statement identified the important characteristics of the site and demonstrated how it scored well in relation to the 5 purposes of Green Belt land as set out in the NPPF. We also pointed out how well the site scored in the council's Green Belt Review Study 2015 and how this indicated a greater potential for release than many other promoted sites.

Our site at Forsbrook not only addresses the existing unsatisfactory transition from the built up part of the settlement to the adjoining countryside by providing a more attractive and softer edge. This advantage was recognised by an inspector at the North Staffordshire Green Belt Subject Plan Local Inquiry of December 1981 who stated:

“30.7. I agree with the objector that the present interface between built-up area and open farmland is unsatisfactory and that his submitted sketch layout would be an improvement in physical planning terms. However, this illustrative layout does not provide a suitable basis for redrawing the Green Belt boundary, and the objector accepts that any such proposals should be considered within the context of a District Plan.”¹

Our representations also demonstrate how we could deliver a range of necessary development to meet local needs.

Overall, in light of the obvious concerns about over-reliance upon windfalls (both for employment land and housing), possible unrealistic optimism about delivery and concerns about meeting specific demographic needs and requirements in relation to employment land, we invite the inspector to reconsider our proposals. We invite him to include our land as an allocation, to include housing for first time buyers, for families and the elderly, to include a full policy-compliant delivery of affordable housing, for small scale employment use and for extensive areas of woodland and open space.

Greg Powell

Ref: 2019/02/CU/PI/HIS

Cheadle Unite
Response to the Planning Inspectors post hearing advice EL6.004 and comments relating to the Housing Implementation Strategy and supporting documents (EL7.001 – EL7.009).

Committee absence and illness has restricted our response in such a tight 3-week timeframe and it has not been possible to reach out to various members of the committee and local residents with a full response.

Regarding The HIS EL7.001

Section 3 Objectively Assessed Needs

Cheadle Unite made a representation to the Planning Inspector In October 2018 (Inspection Documents EL2.030 and Appendices EL2.030A- EL2.030F) which included a case for overall provisions of Housing for Cheadle (and the Moorlands) to be reduced significantly. Highlighting SMDC have used a flawed 'Oxford economics' model from Lichfield Consultants, which heavily influences the overall provision and have failed to account for wider constraints such as road infrastructure and local opinion.

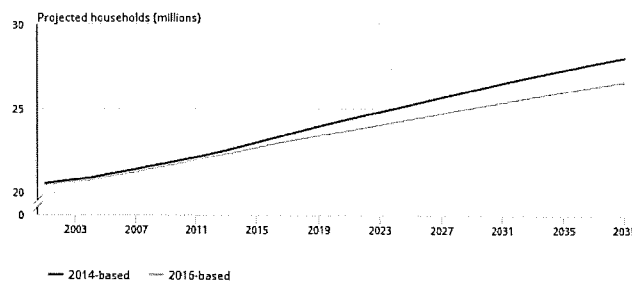
We believe the Lichfields report should only have been considered alongside a number of wider factors.

By example, the model clearly argues for a significant housing uplift for 7,697 new migrants to secure a marginal increase of only 85 Jobs over the planning period. An unsustainable policy. With no control over the age demographic of new occupants, likely to be elderly, the strategy would in fact exacerbate the claimed argument for the higher housing provision. Increasing the working population is dependent on work prospects and suitable infrastructure, not least roads, which are clear challenges for Cheadle.

The above work was commissioned after the 2012 ONS population Figures and the subsequent 2015 DCLG Housing Projections suggested a significant levelling off of the Housing Projection needs. Residents see this as nothing more than an attempt to justify an entrenched position.

The latest 2016 UK housing projections (published Sept 2018, graph below) show a further significant fall off in housing requirement.

Figure 1: Projected number of households, 2016-based and 2014-based projections
England, 2001 to 2039



Source: Office for National Statistics

A further revised version by Lichfields appears to argue for a further heavily weighted uplift due to 'Demographic led needs for affordable housing' locally to yet again retain high levels of housing provision.

The so claimed 'Short Technical Note' of 13 Pages, prepared on a short timescale and with no public accountability (suitable get-outs are also included in the document) referred to in the planning inspection and subsequently added to the evidence base (Planning Inspection Document EL5.001), is complex and we suspect out of scope for general understanding. We are unclear on the Inspectors proficiency in interpreting this data, but would draw on the Secretary of State for housing and C&LG Sajid Javid MP who has on record stated in Sept 2017 that:

' The system simply isn't good enough, (Housing) assessments commissioned by individual authorities according to their own requirements carried out by expensive consultants using their own methodologies. The Result is an opaque mish-mash of different figures that are consistent only in their complexity. This piecemeal approach simply does not give an accurate picture of housing need across the country. Nor does it impress Local People who see their area taking on a huge number of new homes while a town on the other side of a local authority boundary barely expands at all'

Further at the Planning Inspection Cheadle Unite requested that the Lichfield Report be removed from the evidence base due to the adverse uplift created by the 'Oxford model'. The Inspector may recall that It is on record at the Planning Inspection that the Lichfield representative indicated that if the report was removed that SMDC will have no evidence base. SMDC made no comments on this statement regarding the objectively assessed needs for Housing.

Cheadle Unite subsequently clarified at the hearing a range of options that SMDC had at their disposal to make a more balanced and informed judgement:

- Local opinion as expressed in the vast majority of 16,000 representations to SMDC over 3 rounds of consultation (As detailed in the sizeable community response data held by SMDC), including petitions.
- Health issues including air pollution levels and a need to work on Emission reductions under UK and EU directives in line with basic Human Rights (detailed further below).
- Infrastructure constraints
- Environmental issues including loss of agricultural land, wildlife and green spaces including the habitats directive
- Economic realities
- Long term sustainability (not least in a post fossil fuel economy)
- Effective co-operation with our over-lapping City Councils as part of an effective Wider Strategy informed by National Policy.
- Draw a more rational interpretation of the raw 2012, 2014 ONS Population Predictions
- Draw a more rational interpretation of the raw 2014, 2016 DCLG Housing Projections

Commissioning so called 'experts' to produce reports or models to re-enforce a perspective does not make that perspective sound. The 'Black-Scholes' equation used by so called 'financial experts' as a method for assessing the value of an ongoing contract along with the 'Gaussian Copula Function' modeling of Complex risk, have clearly caused great financial damage in 2008, not least with a connection to sub-prime housing loans. Decisions that brought great hardship to many and implemented by a disconnected few.

The level of housing provision proposed by SMDC is excessive, with Cheadle looking at a significant swell of over 20% of the population over around 15 years. Cheadle Unite have seen no evidence that the voice of those likely to be affected has had any impact to reduce the numbers as a balanced approach, despite reasoned arguments and the fact that we are the thousands that will suffer, as the infrastructure buckles, air pollution rises and quality of life is reduced.

The HIS document Sections 3 clearly reflects the continued use of the Lichfields Report in terms of a 10% uplift for affordable housing, plus a 10% unsubstantiated lift for 'Market Signals'. It also talks of enabling a higher level of inward migration from neighbouring areas. Cheadle Unite presented a case to the Inspector that SMDC had not worked effectively on a 'Duty to co-operate', with FOI requests detailing no significant co-operation over nearly a decade up to submission of the Local Plan between SMDC and Stoke City and the Potteries. This draw of inward

migration will not help address the much needed regeneration of Stoke-on-Trent and the Potteries with their available sites for genuinely affordable housing, where there is proven infrastructure (existing road, rail Buses etc.). The SMDC plan for the proposed level of housing fails to identify the true costs needed in making adequate infrastructure improvements to roads, doctors and hospital provision (to name a few) and address an increasing commuter base and the impacts to health and the environment. The objectively assessed needs do not appropriately factor in Traffic congestion, health and environmental issues.

Cheadle Traffic Congestion

At the Planning Inspection hearings regarding Cheadle, during discussions on Infrastructure and Traffic issues a representative of Staffordshire County Council referenced a Transport document. The Staffordshire Moorlands District Integrated Transport Strategy (Oct 2018) has subsequently been added to the Planning Inspection documentation (EL5.003).

The document states that the ‘network generally operates within capacity’ reflected by the Officer from Stafford County, however what was not made clear was that Section 2.12 and 2.13 clearly states:
‘ during the PM peak hour there is currently queuing traffic southbound along the A522 Leek Road and Tape Street and westbound along Queen Street. The proposed development sites in Cheadle will exacerbate this problem, with queuing in future years likely along these corridors in both the AM and PM peak hours, with additional queuing northbound on Tape street at the junction with Ashbourne Road.’

Use of an ‘averaging’ process to infer ‘general operation within capacity’ is a seriously flawed approach (not least for Nitrous Dioxide emissions detailed below, when increased congestion occurs where our children walk to and from school). By inference the comment clearly infers there may be areas that are not within capacity. The reality is that the road traffic survey clearly will be impacted by developments in and around Cheadle. The Transport Study Report 2015 (COSTCDT6573/Rep 003 FINAL) held by SMDC contains a number of illustrations. Including the one detailed below:

Project Name Cheadle Town Centre
 Document Title Transport Study Report

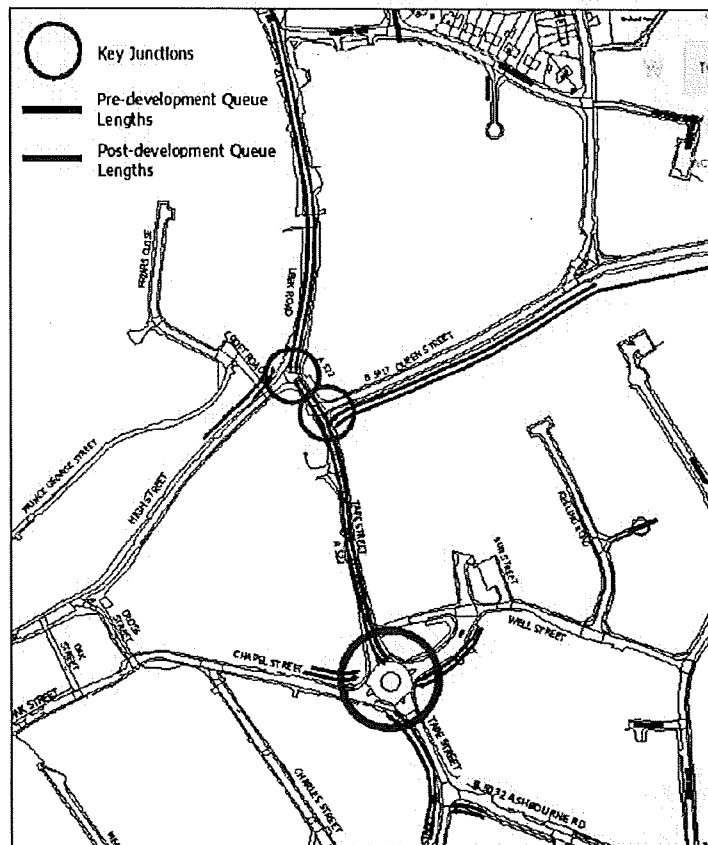
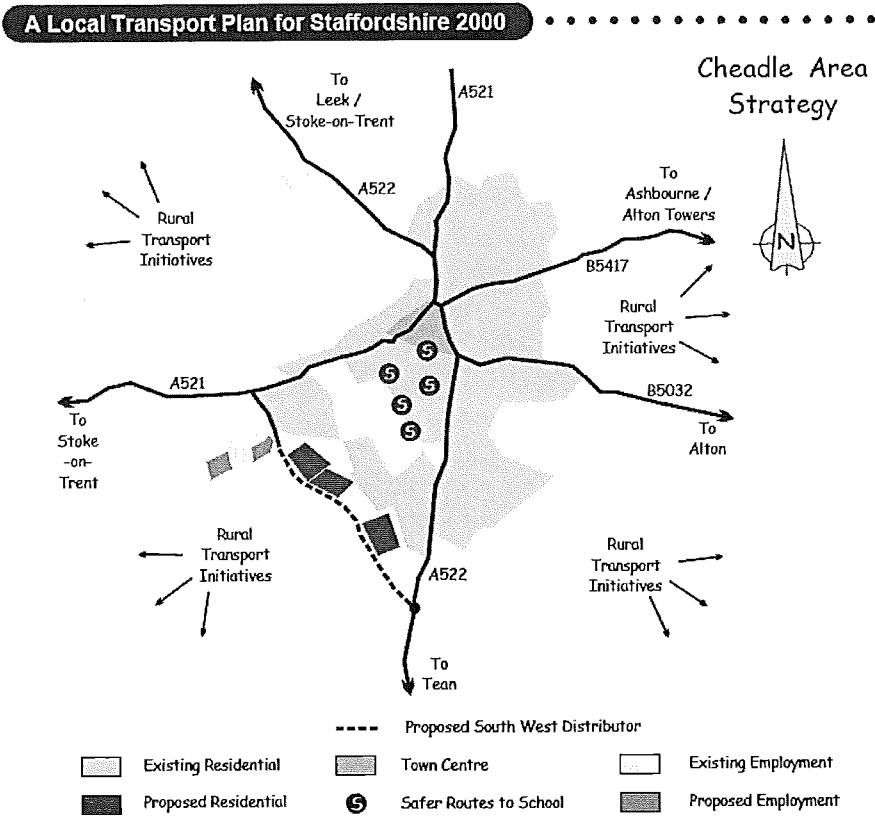


Figure 5-2 PM Peak Average Queue Length Increases

The red lines (running off the map) clearly indicate the predicted tailback of traffic post development. It is clearly a significant increase. Cheadle only has the A521 and A522 arterial roads.

It has been established for many decades that Cheadle has a road infrastructure constraint. We believe the matter dates back to the mid 1930's as detailed by local councillors. The Transport Plan for Staffordshire 2000 highlighted a South West distributor (detailed below) and to further address traffic issues that 'The reliability, frequency and quality of public transport will be improved'. Neither has been delivered.



With the current state of our roads with countless long term pot holes in desperate need of repair, there is no rational outlook for significant investment in road improvements.

Subsequent to the 2015 Road traffic Survey there has already been additional significant building at the JCB site North of Cheadle that adds to Cheadle traffic. SMDC clearly are aware of the traffic constraints around Cheadle and have even explored a North-West link road option with JCB. The costs were understandably prohibitive. Yet the housing plans have not been reduced to account for practicalities not least to form a long term strategy to constrain and reduce Nitrous Dioxide Emissions.

Environmental Pollution, Quality of Life and Human Rights.

The Environment Act 1995 and subsequent Regulations require local authorities to review and assess air quality in their area from time to time to achieve air quality objectives. Further it a clear legal requirement that SMDC work to reduce locally and regionally in line with UK and EU law (EU 99/30/EC and the Air control Strategy 2000) the Level of Nitrogen Dioxide (NO₂)

Since 2010 a strategy is required to meet a maximum measured NO2 level of:

- 40uG/m³ average per year
- The hourly average must not exceed 200uG/m³ more than 18 times in a year

Through a FOI request by Cheadle residents in 2017 figures show average levels are already close to target limits.

Request:

Under the Freedom of Information Act 2000, please provide copies of all NOx (nitrogen oxide) readings taken in Cheadle Staffordshire for the past 6 years to date (28/10/2017) and any related Air Quality readings /comparisons.

Response:

NOx data presented below. Results are expressed as an average annual mean, which is the average concentration of NOx over a year. Results for 2017 have not yet been completed and so are not yet available. The Annual Mean Objective for NOx is 40µg/m³

Results of NO₂ Diffusion Tubes, 2011 - 2016

Location:	Ref:	Annual Mean Nitrogen Dioxide (µg/m ³)					
		2011	2012	2013	2014	2015	2016
Cheadle (Leek Road Rbt_ North)	29	41.2	39.0	39.4	34.3	31.0	34.6
Cheadle (Leek Road Rbt_ Central) (mean)	7	41.0	38.4	38.5	39.8	37.0	39.1
Cheadle (Leek Road Rbt_ South)	30	38.8	36.4	33.2	38.9	36.0	38.7
Cheadle Roundabout	45					29.0	37.0

It is clearly not acceptable and against basic Human Rights to plan increased congestion that will impact and raise NO₂ levels against a long term legal and ethical objective to lower NO₂ emissions. Not least when there are clear alternative solutions in regeneration of Brownfield sites in the City where public transport options can drastically reduce net NO₂ emissions.

The only way to make the local plan sound is to reduce the overall housing allocation based on an OAN that includes these wider issues.

Section 4 Affordable Housing

Affordable housing is a contentious issue not least in its presentation. Lack of affordability is a growing problem not least for our young and first time buyers looking to start a home. High levels of housing provision are retained based on the Lichfields report accommodating an up-lift on affordable housing. Despite a requirement for affordable housing historic data shows a very poor ability to deliver on affordable housing.

- 2014/15 19
- 2016/17 33
- 2017/18 5

The reasons for this are complex and are not only restricted to House builds. For example from the purchaser side, a typical young family are likely to require 2 vehicles to commute travel to employment (identified as outward commute migration in the traffic surveys) with all the associated on-costs of fuel etc (which aren't effectively included in true affordability) in addition to the mortgage cost and potential loss of income through any accumulated

student debt. From the community perspective significant infrastructure improvements are needed if any significant development is justified. The required costs of Roads, doctors and hospitals etc are not factored in to an excessive growth plan for example in Cheadle. Quality of life and health through excessive commute times are also not factored in a wider interpretation of 'Affordable Housing'.

The HIS has not set an annual target for Affordable Housing on the basis that the SMHA 2017 update indicates a required need above the level set by the OAN. Without effective Co-operation with Stoke City and the Potteries on a joint plan the HIS Section 4 clearly suggests all new builds need to be affordable. This clearly cannot be achieved especially in isolation and the context detailed above. Developers historically and continually seek amendments to lift affordable housing requirements after planning application have been granted reflected in the figures above. This process does not deliver affordable housing. It does further burden our struggling infrastructure.

Only by identifying affordable housing provision in our city on Brownfield sites where proven infrastructure exists (Roads, Rails buses, streets infrastructure drainage and lighting etc) can a practical affordable housing level for local need be determined with an effective cross council joint plan. Our City needs regeneration focus as do many high streets in the six potteries towns that need re-occupancy over shops and re-purposed mixed use high streets. Their need for certainty of development is far higher than in rural areas (something claimed as a barrier in SMDC's own plans in the Moorlands). Only when it is clear that derelict and waste ground will be rebuilt will Stoke and the Potteries be able to secure the very certainty for developers that they do genuinely need.

Section 5 Strategic Housing Market Assessment

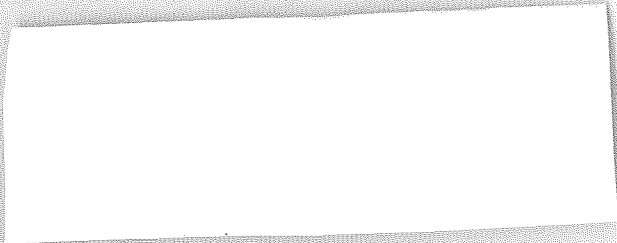
The Plan makes some progress on identifying a need for smaller 1 and 2 bedroom properties for a growing age population. Cheadle Unite are aware of an increasing demand for suitable accommodation for an aging community. Providing bungalows and better care in the community provision has the potential to release 3 and 4 bedroom properties for our younger population. We believe this will be effective for local demand. However and in line with the above on affordable housing it can only be effective if development sits within realistic levels of development and the right type of housing is approved and built.

Accelerated Housing Delivery.

Cheadle Unite have been made aware of the 'Accelerated Housing Delivery Programme' including an SMDC report Dated 24th of April 2018. We believe there are a number of questions to the legality of the process and level of Councillor and community engagement in its creation and objectives not least in relation to the Local plan. We have not had time to interpret this information for comment but understand that it will be raised by other interested parties with whom we share concerns.

Cheadle Unite Committee.

6th February 2019



COMMENTS ON THE HOUSING IMPLEMENTATION STRATEGY

**from
KEN WAINMAN.**

KEN WAINMAN ASSOCIATES Ltd.

- Date: 7th February 2019.

1. INTRODUCTION

1.1. My observations follow in the text below and are summarised in Section 9 at the end of the document.

2. SPATIAL STRATEGY

2.1. My comments are: -

- ❖ The proposed distribution of housing between towns, larger villages and smaller villages is a major concern in relation to the larger and smaller villages and rural areas generally. **The 28% allocation for rural areas needs to be increased.**
- ❖ Housing supply is not just about the number of houses but is about its distribution.
 - Under the present Plan proposals several of the larger rural villages do not contain any allocated housing sites. The villages in question are Biddulph Moor, Brown Edge, Cheddleton, Ipstones, Kingsley and Wetley Rocks. Only Ipstones is not in the Green Belt. In all six cases the proposed village boundary is drawn tightly around the village leaving little available space for windfalls. Green Belt policy, in particular means that only “limited infilling in the village” can be carried out. All six villages have been under intense pressure for housing development in the last twenty years or so and there are relatively few, if any, sites remaining which could be developed used for infill.

The reliance on windfall allowance alone in these villages will mean that the housing need – both open-market and affordable (not to mention social) - will not be met.

Specific sites need to be identified in these villages to meet local need for open-market housing and affordable housing - including possible rural exception sites. This is particularly true for those sites which are located in the Green Belt. Such allocations would be sustainable as defined in the National Planning Policy Framework (NPPF) as they would bring material economic and social benefits outweighing any disbenefits.

- Even in the larger villages with allocations the proposed allocated sites will not provide sufficient new housing to meet likely housing demand – both open market and affordable housing. **It is contended that more housing sites need to be allocated in these villages. Such allocations would be sustainable - as defined in the National Planning Policy Framework – because they would bring material economic and social benefits outweighing any disbenefits.**

Only one village – Alton – is not in the Green Belt - and new allocations would mean removing sites from the Green Belt. However, if the housing needs of the larger villages are to be realistically met then I believe that this is necessary.

Policy SS8 identifies the larger villages as particularly important as it is intended that they will provide the bulk of housing requirement in the rural areas. For the reasons advanced above it is difficult to see how this will be achieved and how the needs of all the larger villages will be met. In effect, particularly in the villages with no allocated housing sites, the vitality of the larger villages will be adversely affected and there will be little, if any, growth; housing, economic or otherwise. Paragraph 77 of the 2018 NPPF states that *“planning policies should be responsive to local circumstances and support housing that supports local needs”*.

I appreciate that this is in the current version of the NPPF but paragraph 54 in the 2012 NPPF is very similar.

It is contended that both policies SS8 and SS9 do not accord with the advice in the NPPF as regards local needs.

- ❖ Policy SS8 (2) sets out how the housing requirements of these villages would be met. It is difficult to see how these requirements – particularly *“increasing the range of available and affordable house types”*, *“allocating a range of deliverable housing sites with good accessibility to services and facilities”* will be met in all the larger villages particularly in those with no allocated housing sites. In the latter, in particular, it is hard to see how a range of house types and affordable houses can be provided. Please see later comments on rural exception sites.
- ❖ The large site at Blythe Vale will provide a significant proportion of the proposed rural housing in the plan period meaning that they would not be an even-provision across the rural areas and as result need in those areas would not be met.

3. WINDFALL

Infill windfall

3.1. The document “Background Information on Windfall Allowance” states: -

“The small windfall allowance included in the Local Plan Submission Version for the rural area is 30 dwellings per annum to reflect increased flexibility for infill within and on the edge of the villages”.

3.2. Looking at the smaller villages maps and based on my own knowledge of the villages whilst there may be potential in some of the villages for windfalls in the form of infills both within and on the edge of villages in many of the villages there is little or no potential for infill contrary to Policy SS9. It effectively means that there will be no new housing in the next 14 years in many small villages where, I there is both a local need and demand.

Windfall rates

- 3.3. I question the assumption that in the future that there will be a reliable supply of sites particularly in the rural areas. I suspect that the tilted balance has influenced the windfall figures particularly in the last few years? Many developments, including small schemes in open countryside, have been allowed because of the tilted balance. Such opportunities will not be available when the Local Plan is adopted. The boundaries around the larger villages are fundamentally the same as in the 1998 Local Plan and there comes a point when there are few, if any, windfall/infill sites left. Residential gardens (para. 48 in the NPPF) are not to be included in the allowances.
- 3.4. Only two of the twelve larger villages are not in the Green Belt where peripheral expansion is not possible. All of the larger villages have been subject to intense development pressure for many years and most potential windfall/infill sites have either been developed or have had permission refused. This is also true of many of the smaller villages in the Green Belt such as Dilhorne and Longsdon.

4. AFFORDABLE HOUSING

Affordable Housing in the Rural Areas including both the large and small villages

- 4.2 Paragraph 8.59 in the states that *“In the rural areas it is anticipated that the bulk of the provision of affordable houses will be in the larger villages, either on allocated sites or on windfall sites”*.
- 4.3 As stated in Section 2 above there is not sufficient land – either allocated sites or windfalls – in the larger villages to meet likely need for affordable housing. In those villages, such as Werrington, where the 33% affordable housing requirement in Policy H3 (as modified) is not likely to be viable, the supply of affordable dwellings is likely to be lower than 33% on the allocated sites. In those villages without any allocated housing land and where there are no sites with potential for ten or more houses – then it is hard to see how affordable - let alone social - housing would be provided in the larger villages.
- 4.4 The deletion of the provision of affordable housing on sites of five dwellings or more in Policy H3 (as modified) will compound the problem as there are few, if any, unallocated potential sites in both the larger and smaller villages where 10 dwellings could be built.
- 4.5 **More land needs to be allocated to meet the need in the villages and the percentage of housing in the Rural Areas increased from 28%. The percentage of housing in the Rural Areas should be amended to more reflect the likely level of need.**
- 4.6 See the suggestion on the next page that there should be detailed parish surveys. It is appreciated that assessing this need now would delay the adoption of the Local Plan significantly. **Therefore, it is suggested that the need is assessed before the first review of the Plan.**

Rural Exception Sites

4.7 It is appreciated that Policy H3 (3) proposes that rural exception sites will be permitted in, or on the edges of, villages. However, such sites are difficult to finance. Since 2006 only one rural exception scheme has been approved in the Moorlands; SMD/2011/0193. This was approved in December 2014 and construction is due to start in April this year.

4.8 Given that there are likely to be few opportunities in the rural villages for affordable housing, except where there are allocated sites, there will be a significant need for rural exception sites. This is particularly true for the smaller villages where there are no allocated sites. Rural exception sites would provide the best way – possibly the only way in many villages – of providing affordable housing in the Green Belt.

4.9 The District has a poor record for providing such sites. Also, the focus on providing affordable housing in the larger villages will mean that the actual local need for affordable housing in the smaller villages will be ignored and housing not provided where it is needed.

4.10 **For this reason, it is asked that the Delivery Mechanism should include:**

- **Establishing an active programme of Housing Need Assessments for all the rural parishes.**
- **Detailed Parish Housing Need Assessments that would be carried out by the Council, or on behalf of the Council, of the affordable and special housing needs rather than relying on applicants to carry out need surveys in the rural villages.**

Relying on applicants to carry out housing need surveys is unrealistic and unlikely to work because of the costs, time and effort involved and ensuring that they are carried out properly and comprehensively. Whilst bigger developers may be willing to carry out such surveys small developers and individuals are unlikely to be willing or able to carry out such surveys.

Paragraph 54 of the NPPF (2012) requires local planning authorities to be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing. The best way to assess local needs for affordable housing is parish surveys. The Council used to carry out such surveys and the present reliance on developers to carry out such surveys is a significant backward step and unlikely to be effective in assessing the real need and supplying affordable housing. I believe that an active programme of parish surveys would properly inform the need for rural exception sites rather than relying on applicants to bring them forward.

- **Instigate, develop, and implement a Strategy for the Provision of Rural Exception sites during the Plan period to be meet the need revealed by the parish surveys. Such a programme could consider the use of compulsory purchase powers as appropriate.**

I understand that the decision to ask applicants to carry out local housing needs surveys, rather than the Council carry them out, is for financial reasons. However, I believe this is contrary to NPPF policy particularly because the proposed annual housing rate of 320 homes per year will not will not meet the actual local need for affordable housing. This latter statement is based on the fact that the HMA 2017 update identified an annual need for affordable housing of up to 432dpa. I understand the reasons why the proposed rate is much lower than this but it makes the need for the development of rural exception sites more imperative – to help bridge the gap.

5 SETTLEMENT BOUNDARIES

- 5.1 I note the Inspector's concern regarding the removal of settlement boundaries. I share these concerns and welcome his request that the approach be re-considered as a part of a review of the plan. I would ask that **this is done as part of the first review.**
- 5.2 The lack of development boundaries in the smaller villages in the Green Belt will effectively mean that in most of the villages no new housing development is likely to take place as most possible infill sites have either been developed or applications for infill have been refused. **To improve the supply of dwellings in these villages and to prevent them becoming moribund I believe it important that development boundaries should be provided in the Green Belt. These boundaries should not be tightly drawn but should be drawn to include potential infill sites including some which have been refused in the past.**

6. OLDER PERSONS ACCOMMODATION

- 6.1. Section 7 in the Housing Implementation Strategy states that new homes should, where possible, be designed to provide flexible, accessible accommodation capable of future adaptation to meet differing and changing needs. This is to be welcomed but how will it be achieved? Whilst the new national space standards are part of the answer **there needs to be clear formal guidance and standards as to what is required. For instance, should all doorways be designed to be suitable for disabled use? There needs to be clear formal guidance and standards as to what is required. Without clear formal standards flexible, accessible adaptable accommodation is unlikely to be provided.**

7. DELIVERY MECHANISMS

- 7.1. I welcome the proposals. However, I have some skepticism as to how effective it might be given the Council's reluctant approach to housing delivery over the last ten or so years. **What is proposed is a major change in approach but I am concerned that there needs to be more detail.** For instance, when will phase 1 letters be sent out to applicants with unimplemented planning permissions; immediately after the approvals or after three years? Also, what happens with respect to the applicants who don't reply?
- 7.2. **I would also ask that a more positive approach be given when deciding planning applications for housing.** Applications which are in the grey areas of policy where the benefits are materially greater than the disbenefits should be looked at more positively. **Equally, I would ask that Council officers take a positive approach to defining what is a village.** At the moment it is often used to resist development. e.g. in Longsdon which is a dispersed village where the Council only part constitutes the village.

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T – 01538 386 808 M – 0796 877 4785 Email: ken@sgaplanners.co.uk

7th February 2019

8. SUMMARY

To summarise:-

1. **Insufficient land has been allocated in the larger villages to meet the housing needs; particularly affordable housing needs.**
2. **It is contended that more housing sites need to be allocated in the larger villages including removing land from the Green Belt. Such allocations would be sustainable - as defined in the National Planning Policy Framework – because they would bring material economic and social benefits outweighing any disbenefits. All but two of the larger villages are in the Green Belt where there are significant constraints on new housing development.**
There are five larger villages in the Green Belt with no allocations and it is hard to how their vitality can be maintained and how affordable housing can be provided given the Council's poor record in respect of rural exception sites. Even in those larger villages with housing allocations there is insufficient allocated land to meet local demand for open-market and affordable housing.
3. **To improve the supply of dwellings in the smaller villages and to prevent them becoming moribund I believe it important that development boundaries should be provided in the Green Belt. These should not be tightly drawn but should be drawn to include potential infill sites including some which have been refused in the past.**
4. **There are insufficient potential windfall sites in the larger villages to meet housing targets and local needs.** The reliance on windfall allowance alone in these villages will mean that the housing need – both open-market and affordable (not to mention social) - will not be met.
5. **Rural Area windfall sites are extremely unlikely to provide any affordable housing.**
6. **It is contended that both policies SS8 and SS9 do not accord with the advice in the NPPF as regards local needs.**
7. **The assumptions on which future likely windfall provision are based are flawed as historical figures may include sites only given permission because of the “tilted balance”.**
8. **More land needs to be allocated to meet the affordable housing and other local need in the villages and the percentage of housing in the Rural Areas increased from 28% to at least 30%. The percentage of housing in the Rural Areas should be amended to more reflect the likely level of need.**
9. **it is asked that the Delivery Mechanism should include:**
 - a. **Establishing an active programme of Housing Need Assessments for all the rural parishes.**
 - b. **Detailed Parish Housing Need Assessments that would be carried out by the Council, or on behalf of the Council, of the affordable and special housing needs rather than relying on applicants to carry out need surveys in the rural villages.**
 - c. **Instigate, develop and implement a Strategy for the Provision Rural Exception sites during the Plan period to be meet the need revealed by**

the parish surveys. Such a programme could consider the use of compulsory purchase powers as appropriate and needed.

- 10. To improve the supply of dwellings in the smaller villages in the Green Belt and to prevent them becoming moribund it is important that development boundaries are be provided for these villages. These boundaries should not be as tightly drawn as those proposed in the Core Strategy but should be drawn to include potential infill sites including some which have been refused in the past.**
- 11. There needs to be clear formal guidance and standards should be designed to provide flexible, accessible accommodation capable of future adaptation. Without clear formal standards flexible, accessible adaptable accommodation is unlikely to be provided.**
- 12. The Council's commitment to proactive interventions is welcomed particularly the CPO powers and joint venture schemes.**

Ken Wainman.

Date 2nd February 2019

FTAO the Public Inquiry's inspector Mr M. Dakeyne

Submission response to the Planning Inspectors post hearing advice EL6.004 relating to the Housing Implementation Strategy and supporting documents (EL7.001 – EL7.009).

Submission Response to the Planning Inspectors post hearing advice EL6.004 and comments relating to the Housing Implementation Strategy and supporting documents (EL7.001 – EL7.009).

The statement and figures below is substantiated by a careful count of the numbers quoted in the Submission Version of the Local Plan by Cllr D.J.Williams.

It indicates that just **2847** are actually allocated geographically to sites within the plan - just 46.82% of the total. The Inspector though has in effect worsened the position further by questioning the development in Biddulph of 588 homes in the BDNEW area. This has the effect of decreasing further the total of site allocations to just 2259 or 3715% of the total.

This means that 63% of the new homes required by the proposed Local Plan is subject to a 'free for all' planning approach. A travesty of what a Local Plan should be.

The vast majority of this 'free for all' total will end up being constructed in rural areas, especially since it is proposed that development boundaries are to be removed from all smaller villages, this policy will create chaos in the countryside. An example is the Cresswell development where SMDC and its planning committee gave planning permission for 168 houses in a small rural hamlet.

This will not only effect the proposed Blythe Vale development but will further impact on the village of Blythe bridge and its services with sustainability at the forefront of this disastrous decision.

This is clearly made worse with proposals remove development boundaries from all smaller villages.

There has been a large increase in new homes being granted planning permission despite the unsustainability of developing in such a remote rural location such as Cresswell.

Cars are the only available transport for this hamlet and across virtually all of rural Staffordshire Moorlands.

it is indeed foolhardy and negligent to say that any large-scale development in a rural hamlet such as the hamlet of Cresswell is sustainable and considering the impact it will have with Blythe Vale on the village of Blythe bridge.

For the above reasons the Housing (Non) Allocation element of Local Plan should be rejected and full reconsideration given to preparing a completely new version of the Local Plan. One that actually considers where housing is required, is sustainable and represents that whole number of new homes to be built, with just a small allowance remaining unspecified as to their site location.

There is a case for overall provisions of Housing for the Staffordshire Moorlands and certainly Cresswell be reduced significantly. SMDC have used a flawed 'Oxford economics' model from Lichfield Consultants, which heavily influences the overall provision and have failed to account for wider constraints such as road infrastructure and local opinion.

This commissioned work was carried out after the 2012 ONS population Figures and the subsequent 2015 DCLG Housing Projections it suggested a significant levelling off of the Housing Projection needs. Residents see this as nothing more than an attempt to justify an entrenched position with bonus incentives at its heart.

The previous secretary of state for housing and C&LG Sajid Javid MP who has on record stated in Sept 2017 that:

' The system simply isn't good enough, (Housing) assessments commissioned by individual authorities according to their own requirements carried out by expensive consultants using their own methodologies. The Result is an opaque mish-mash of different figures that are consistent only in their complexity. This piecemeal approach simply does not give an accurate picture of housing need across the country. Nor does it impress Local People who see their area taking

on a huge number of new homes while a town on the other side of a local authority boundary barely expands at all'

Is this why SMDC are attempting to build 168 new houses in the rural hamlet of Cresswell !This Lichfield Report must be removed from the evidence base as the previous secretary of state for housing clearly points out in his statement above.

The level of housing provision proposed by SMDC is excessive, and rural areas have and will continue to bear the brunt of this flawed models. There is no evidence that the voice of those likely to be affected has had any impact to reduce the numbers as a balanced approach, despite reasoned arguments and the fact that we are the thousands that will suffer, as the infrastructure buckles, air pollution rises and quality of life is reduced.

The 'Accelerated Housing Delivery Programme' report Dated 24th of April 2018. Pose a number of questions to the legitimacy of the report and process level of community engagement in its creation and objectives not least in relation to the Local plan.

Yours sincerely L A Horleston



Angela Weate - Programme Officer
Staffordshire Moorlands Local Plan
Moorlands House,
Stockwell Street,
Leek. ST13 6HQ

24 January 2019

Dear Angela,

EL6.005 - Council's Response to the Post-Hearings Advice

We have just noticed that the Council has written to the Inspector to contend his soundly based recommendation that BDNEW should be deleted and replaced by suitable alternative sites to an equivalent capacity. It is regrettable that the Council now appears to be seeking to extend the debate on Biddulph long after the hearing session has ended and we respectfully feel the need to respond in order to ensure that the Inspector has the correct information and our perspective on the Council's latest comments.

We made our objections to BDNEW quite clear at the Hearing. Indeed, I made the point that it was one of the worst proposed allocations I had come across in my 40 years in planning. I am absolutely sure that the Inspector has reached the correct conclusion in respect of BDNEW.

What concerns us more, however, is the Council's inference that United Utilities (UU) objected to the previously proposed 'preferred options' sites near to its works for instance, at Gillow Heath.

For the record, UU has never objected to the potential allocation and residential development of the Preferred Options (2016) sites at Gillow Heath, including BD062 and BD068. Instead it strongly recommended that any such allocations be informed by an odour impact assessment and a noise assessment.

Subsequently, our client, Seabridge Developments Limited (BD062) and also the owner/promoter to the north-east of the treatment works (BD068) undertook separate odour and noise assessments in consultation with UU, which then confirmed in writing that it was satisfied with the empirical evidence and that it had no objection to the proposed allocation of our client's land for housing. **The Council was provided with the odour and noise assessments, along with UU's written confirmation and Officers duly confirmed that there were no sustainable objections in respect of these two issues.**

The letter from the Council to the Inspector (17th January 2019) is therefore very misleading (deliberately or otherwise) and so we would suggest that there is no reason for the Inspector to change his previously expressed advice.

With regards to the issue raised in the penultimate paragraph of the Council's letter, we find this quite incredulous.

This Council has an abject record of housing delivery, resulting in the suggested use of the Liverpool approach to dealing with the shortfall, throughout the Plan period up to 2033 (not 2031). Furthermore, the Plan proposes to allocate only a few large sites in Biddulph. The Wharf Road site has significant constraints and delivery issues which are well documented.

We continue to maintain that there is a need for additional smaller sites that are unconstrained and capable of early delivery. Moreover, the Core Strategy Inspector gave a strong indication of the opportunity to review the Green Belt at Gillow Heath and as the local Plan Inspector has suggested, there is also a potential requirement to safeguarded land.

All of this points to the fact that the Council should properly plan for the entire Plan period (and beyond) and so we strongly dispute the Council's assertion that it need not allocate replacement sites for BDNEW. This would make a mockery of the Plan-making process, potentially leaving it open to challenge.

We appreciate it if you could forward this representation to the Inspector for his urgent attention.

Yours sincerely,

A J Williams Dip TP, MRTPI
Director

From:
To: Programme Officer
Subject: En128 Endon proposed development
Date: 23 January 2019 17:29:11

As requested I am sending this email to you so that you can ask the independent inspector (following the hearings) and subsequent amendments to the Local Plan developments, the following:

Did the inspector visit Endon to see the problem of school traffic in Brookfield Avenue?

If so, what are his recommendations\thoughts?

Are there any amendments to be made to the proposed development, as set out in the Local Plan?

Thank you, in anticipation of your reply,
Carol Burton



Staffordshire Moorlands Local Plan

Dear sir,

Many thanks for giving me the opportunity to comment further on this issue.

I have read the Housing implementation Strategy as set out on the SMDC website.

I note that the majority of the building will be by 2 un-named developers who have already obtained funding of £1.7m and £2.7m respectively.

I assume that this funding is purely for the sole use of the developers, and will inflate the prices of any social housing coming into ownership of The Parliamentary approved process which made up the Ascent Program. Why is it right that the split for development between social development and Developer led housing is so in the favour of the developer.

I also question as to how funding is in place prior to any outline planning consent. It makes it appear a Done Deal, which ridicules the point of a public consultation and planning review.

I also note that the sites earmarked for development were chosen before the reports relating to the above average CO2 emissions and the need to reduce the Carbon Footprint of the Staffordshire Moorlands were published.

I wish to tell you about our small villages. The ones you propose to remove the boundaries from in order to further develop housing and tourism which is not permitted under our current status.

We are the caring society politicians ask us to be to save public money. When the buses were stopped to the village, we didn't all move out to bigger towns with transport. We arranged to car share, taking neighbours to the doctors, the shops and anything else that's needed. I order for neighbours with my online shopping and only have a delivery once a week. We have reduced our carbon footprint. We don't expect our rubbish to be removed weekly from our doorstep, nor do we expect outside Carers to be funded as a right. We look after ourselves and each other. We are not under privileged.

Section 12 refers to the land to be developed having issues that need to be addressed.

These issues are real and current and must not be ignored. I have in previous correspondence referred to the Globaly famous Oakamoor Sinkhole that appeared after undue care was taken preparing the site for development. The houses have now been built. They are fenced off with site fencing and remain unsold. There is water pouring out of the hillside into the gardens as the site has been hollowed out of the clay. Who is going to insure such a property and who is going to give a mortgage.

We have another small development up Riverside. Planning permission was granted with the site specified as having all services connected. A new substation has had to be built to facilitate this build. Riverside has a history of subsidence. Public funds were used to build up the bank and resurface the road to a level suitable for normal vehicular access. We have huge lorries and stone wagons making deliveries to the site. We have had 4 gas leaks to date, sewerage backing up into houses due to pipe damage and the road is once again subsiding.

I doubt anyone has told Laver Leisure who now own the adjacent land, that their river bank is on the move. These are only the initial problems. Who will take responsibility for any illnesses caused by the toxins in the soil.

Brexit was mentioned. The figures for housing for future needs was done when we were experiencing huge amounts of immigration from the EU this may now change.

The Ascent program was initiated by Parliament. It was paid for by public funds. Harvest Housing is now Your Housing. A not for profit provider of social housing. They should be the key leaders in providing social housing. They should not be having to purchase from developers who will in turn be making a profit.

The Developer led mass expansion into the Staffordshire Moorlands with only 2 Key Developers raises the question as to the safety of putting your eggs in one basket. We cannot afford a Carrilian style crisis here.

The issues you raised to be addressed have been fudged over to make it all appear OK now.

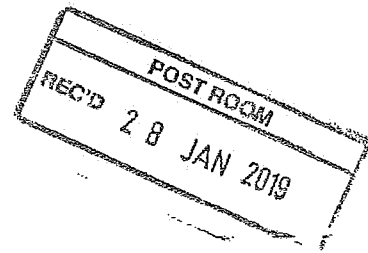
Staffordshire is made up of people who have lived and worked here for generations and know the pitfalls of the area. Please listen to them.

Rachel Finney



Janet & Aad van Adrichem

Staffordshire Moorlands District Council
Programme Officer Ms. Angela Wheate
Moorlands House
Stockwell Street
Leek - Staffordshire Moorlands
ST13 6HQ



January 23rd 2019

Ref: Independent Inspector's Hearing - LOCAL PLAN / Boundry lines

Dear Ms. Wheate,

I wrote to you on 25/09/2018 requesting the reasoning behind the change of the boundary lines and I have yet to receive a reply? The same happened back on 10/4/2018 when I wrote a similar letter to SMDC Planning Department with the same request, nothing. I guess there is no responsibility to answer letters.

We are extremely disappointed that there has been no consultation on village boundary line changes to date and according to your Statement of Community Involvement Adopted 13/4/2016, there should have been. To stay on top of this and other related issues one has to be spent hours searching various web sites and reading 100's of pages to see if the SMDC Planning Department is pulling a fast one as has happened in the past, we are wearing out.

Kind regards,

~~Aad & Janet~~ van Adrichem

From:
To: [Programme Officer](#)
Subject: STAFFORDSHIRE MOORLAND'S LOCAL PLAN EXAMINATION
Date: 06 February 2019 16:20:23

Dear Sir,

I attach below my representations in compliance with the Inspector's advice of December 2018. I ask that it be forwarded to the Inspector and that you acknowledge receipt.

Yours faithfully,
Paul Housiaux

STAFFORDSHIRE MOORLAND'S LOCAL PLAN EXAMINATION

REPRESENTATIONS MADE PURSUANT TO THE INSPECTOR'S POST HEARING ADIVCE- MAIN MODIFICATIONS AND RELATED MATTERS. DATED DECEMBER 2018.

THESE REPRESENTATIONS SENT TO THE PROGRAMME OFFICER FOR THE INSPECTOR'S ATTENTION AS HE REQUESTS.

INTRODUCTION.

1. Logically and by virtue of the Inspector identifying in excess of 60 Main Modifications it is clear that the Inspector is dealing with the SMDC Local Plan which accordingly he finds **unsound**.
2. Although these representations will focus necessarily on Whiston and surrounding area as a Small Village, as the Local Plan is a district wide plan my representations should be read in the wider context of SM District.
3. Whiston is a typical village of ' Hard to reach ' residents a majority of which are elderly and have no internet facility. As such the SMDC Statement of Community Involvement (SCI) has direct applicability. I submit that both generally and with regard to the specifics of the December 2018 advice by the Inspector the proposals in that advice and on the evidence already in the public domain demonstrates none compliance with the SCI.
4. I note the Inspector's observations at paragraphs 5, 8, 9, 10, 11, 30, 31, 32, and , in the light of what follows I reserve my right to develop these representation and on the balance of the Inspector's advice as and when meaningful evidence comes forward upon the matters highlighted by the Inspector in his December 2018 advice.
5. I ask that the Inspector notes that in an attempt to meet the criteria and deadlines he has set a number of Freedom of Information Act (FOIA) requests sent to SMDC remain outstanding. Under the guidelines set in the FOIA SMDC is entitled to take 20 working days to supply the information requested. As the deadline set by the Inspector was only made known at the time the ' response clock ' was started, this inevitably means that necessary information to provide an evidenced base response will not be available to me and others, who I know are similarly affected. I therefore respectfully submit that the process adopted by the Inspector and now operated by SMDC is neither legal, nor Franks or Nolan compliant. (See also others grounds below).

6. Since the consultation period dictated by the Inspector commenced I have seen and read a representation made by SMDC Officer Mr. Dai Larner in a letter dated 17th. January 2019 and addressed to the Inspector in response to his December 2018 advice. As I prepare these representations it is still not clear if Mr. D. Larner's letter has been made publicly available. Replies to FOIA requests might clarify this. In my case I received a copy of the letter via a SMDC Councillor. It appears to me that this letter places the Inspector in some procedural difficulties. In what follows I assume that the Inspector has received and read the Larner letter. Whilst respectfully referring the Inspector to the totality of the letter I would quote the following; (At paragraph 3 in respect of Wharf Road) - **“ In particular, the statement that the evidence base*, including the Green belt review in particular.... The Council fully considered the respective merits of the site options during the preparation of the plan. A summary of the relevant evidence and subsequent conclusions are set out in...”** para 4 - The Inspector is referred to the totality of the discussion about the BDNEW The closing remarks - Mr Larner says this - **“ On terms of your wider recommendations the Council will give further consideration** to the supporting evidence for the Local Green Space designations and other identified modifications”** These additional representations raise the following procedural problems. They are; (a) The new evidence or it's correct interpretation is dated and submitted after the residents ' consultation clock has begun to run. It maybe that the Inspector will insist upon the letter of the 17th. January 2019 be displayed in the examination library in due course. All I can say at the time of typing these representations is that the letter does not appear to be available for public consumption and therefore meaningful representations cannot be made within the time constraints imposed by the Inspector by a majority of residents with a right to know it's contents. (b) despite the claims made by Mr. Larner in the letter at paragraph 3 as it relates to Wharf Road and paragraph 4 as it relates to BDNEW, repeated and extensive searches of the SMDC LP website by three people with extensive knowledge of computer systems so far it has not been possible to identify the evidence base as it was when the LP was deemed sound (February 2018) and ready for submission to the Secretary of State. Further, after consulting my hand written notes taken at the public examination, the claims made by Mr. Larner on those specific issues raised by him do not appear to accord with the representations made by those Council Officers presenting the LP to the Inspector. I think it unlikely in the extreme that the Inspector would have made the remarks he has and set out in his advice in the way in which he did in December 2018, if he had not been convinced that SMDC had failed to meet the requirements. for ' soundness' in respect of those specific issues he highlights. Mr. Larner is of course entitled to his personal views but I respectfully suggest that his protestations are not securely evidence based. I know that the Inspector has available to him both by short hand record and recording exactly what was said to him by the presenting Officers and he is, of course, invited to check the record for accuracy's sake. (c) Taking Mr. Larner's letter of 17th. January 2019 in it's entirety it is impossible to avoid the conclusion that the letter introduces into the realm of the ' targeted and time limited consultation' on those issues the Inspector highlights in his December 2018 advice, new and substantive claims that do not appear to be supported by the evidence base. Some matters are undoubtedly new, some may be inaccurately represented in the letter. What is also clear is that those residents with a right to be heard on these topics have been disadvantaged by the late admission into the Inspection process of this new material***. Further it remains unclear how if at all Mr. Larner's expressed views had be consulted on by the Councillors of SMDC and have been approved by them as part of the LP. (As to * /**/** items, see later under the main body of the representation). REPRESENTATIONS. It is with respect that at this early stage I assert that the SMDC LP is neither Legally Compliant* nor is it Sound.

7. I develop my argument below dealing firstly with the issue of ‘ Soundness’ as this is the easiest to deal with. That the plan is not ‘ Sound’ in the terms recognised both in Planning procedural terms and in legal terms is axiomatic. If it were sound the Inspector would not now be considering 60+ Main Modifications to the plan. As this response is in respect of a ‘ targeted and time restricted ‘ direction given by the Inspector in his December 2018 advice I will, in these representation, limit my response to the issues the Inspector himself highlights. Of course I reserve my rights to make further more detailed and wider representations in the later consultations to which the Inspector refers in paragraphs 34 and 35. It is important to note that the way the LP Inspection process has unfolded and continues, a serious difficulty has arisen. It is this. The demarkation of ‘ issues’ that the Inspector has drawn in his December 2018 advice to SMDC cannot properly be commented upon without drawing to attention that each and every one of those issues must be judged against the requirement of legal compliance and soundness upon which those making representations are entitled to comment. To attempt to do so against a constantly moving target puts all parties save SMDC at a factual, procedural and legal disadvantage. Some of these are evidenced unequivocally on the face of the record as is so far disclosed. I will exemplify the problem by referring the Inspector to paragraph’s 2 and 3 of his December 2018 advice. At paragraph 2 the Inspector says this, “ A significant amount of the further evidence provided [nb no dates provided] relating to housing land supply and delivery. In addition the Council has produced a Housing Implementation Strategy (HIS).”... In paragraph 3 the Inspector confirms that “the SMDC submission version of the Local Plan was dated February 2018”. It is a matter of record that on Tuesday **2/4/2018** under a heading entitled. ‘ FORWARD PLAN’ , the SMDC Cabinet met and resolved that (item 57) **be approved’**. The Inspector is invited to request a copy of the report prepared for the Committee which as he will see relates to the proposal for ‘ ACCELERATED HOUSING DELIVERY PROGRAMME’ (AHDP)and the resolution at item 58 to adopt that policy. It may also assist the Inspector to obtain and read the minutes of the next SMDC Committee before which the AHDP came. In the public domain it remains unclear how SMDC has since progressed that resolution, although I have seen an email from the CEO to a Councillor that appears to leave the status of the AHDP process in doubt. Common sense would suggest this is the HIS or at least part of it which is mentioned In paragraph 2 of the December 2018 advice. I submit that on the issue of the ‘soundness ‘ these findings and disclosures go to the heart of all the Inspector’s Issues. [I deal with later the legal implications to which I refer the Inspector to 8 below.] I invite the Inspector to read my further representations as to ‘ soundness’ together with my representations as to ‘ legal compliance’ below and the legal authorities quoted.
8. LEGAL COMPLIANCE. The law requires that. (a) SMDC is duty bound to prepare a LP based on appropriate evidence. (b) The LP must be submitted with a **full and complete evidence base** in order for the Secretary of State to make an informed judgement on ‘ soundness’. (c) The Council cannot lawfully submit a plan for examination on the basis that further key evidence can be provided at a later date, for example once requested by the Inspector. (d) Leading Counsel advises that to do so would risk undermining the statutory scheme and is likely to be in conflict with the ‘ **Gunning Principles’**.*. (e) Therefore the. Council must undertake a proper and reasoned consultation on **all** aspects of the Published Draft including: (i) A full and credible evidence base which correctly models both the existing ‘base’ position and the position with key mitigation in place: (ii) An up to date infrastructure Delivery Plan which demonstrates that essential mitigation is deliverable and when. *[See R v Brent London Borough Council Ex p Gunning (1985) 84 LGR 168 Hodgson J; R (Moseley) v Haringey LBC [2014] 1 WLR 3947 para 25 Lord Wilson; (Royal Brompton and Harefield NHS Foundation Trust v Joint Committee of Primary Care

Trusts (2012) 126 BMLR 134, para 9 - ‘ **prescription for fairness**’.] There are many ways in which the SMDC LP failed in February 2018 to meet the legal ‘ **prescription for fairness**’ established and approved by the above quoted legal authorities. Some of these have been outlined above by the evidence and the dates thereof. Additionally there can be few more forceful examples of SMDC’s failure to demonstrate ‘ soundness’ than that the Inspector has to be asked to rule upon 60+ Major Modifications. The SMDC LP was unsound in February 2018 and by his interim findings the Inspector has identified that it always was so. Despite the efforts of SMDC since the Submission version was finalised in February 2018 to remedy some of the LP’s failings and lack of ‘ **a full and complete evidence base**’ in order that the Secretary of State can make an informed judgement on ‘ soundness’, the LP remains unsound.

9. I submit that the draft plan proposes a **wholly unsustainable approach**. It’s strategy, policies, delivery timescales and evidence base are simply not aligned, and this presents a fundamental flaw. For example and as the Inspector’s December 2018 advice brings sharply into focus the housing delivery target are dependent on the resolution of those issues he cites. See generally the Inspectors matters 1-8 inclusively (nb there appears to be no matter 7?). Of particular concern to me are : (i)the clear conflicts between the SMDC (as yet incomplete) Strategy and the Core Strategic policies. (Ii) The proposed removal of settlement boundaries and the Countryside and the (un- consulted upon) change of the 2016 version of settlement boundaries maps which were a part of the evidence base for the Submission Version of the LP approved as ‘ sound’ in February 2018, and the later (again un- consulted upon) the 2018 maps giving other versions of settlement boundaries. These have the potential to greatly undermine the protection currently given in the Core Strategy to Small Villages. In his advice the Inspector recognises this. (Iii) Green Belt and in particular the intention that areas of it should be released for development. It is noted in this regard that nowhere in the evidence base forming part of the February 2018 version has there been found any evidence that : (a) SMDC provided a definitive measurement of emissions data against which it could test it’s LP proposals so as to test the mitigation it plans , to comply with the Core Strategy and the effects of it’s proposed LP changes. The Statutory background to the SMDC’s duty is set out in Government Guidance titled Local Air Quality Assessment. No reference to R.M.S.F calculations or assessment have been found in the LP submitted version although a number of Inspection participants have conducted extensive searches. (b) There has been no evidence found that prior to submission of the February 2018 version of the LP that SMDC has tested its (then) ‘base’ plan and it’s future mitigation plans on Green Belt and Emissions against it’s duty of compliance with the Habitat Directive*. * The Irish ECJ case on the HD was discussed before the Inspector at the October 2018 public hearings. I have found instructive on the issue of emissions the following documents which I assume form part of the Inspector’s library; Air Quality Index, Effects of Air Pollution, Causes of Air Pollution, National Air Quality Objectives, Air Quality Strategy 2010-2015, Draft Clean Air Strategy 2018, Local Air Quality Management, part 1V Environment Act 1995 et al.
10. Against the background of the representation set out above I submit that the SMDC LP could not lawfully have been submitted to the Secretary of State. Now that it has been I further submit that the Inspector should not further sit to determine a LP that is demonstrably Void Ab Initio. The LP demonstrates that it has been prepared without sound reasoning or logic and is not and was not, as at February 2018, supported by a co- ordinated robust evidence base, To continue with the SMDC LP will lead to a significant further waste of public money.
11. Peak Park. The SMDC area contains a significant part of the Peak Park (PP). The LP must take account of the likely affects of it’s proposals upon the PP. I found the submission made by the PP to the current Inspection process informative and

helpful. I am sure that the Inspector will have made himself familiar with it's detailed, well reasoned and professional submission. As the Inspector has handed to SMDC the role of 'targeting' the current limited round of consultation it is not possible for me to know in the time constraints imposed on me if the PP has been 'targeted' for further consultation on the detail of the Inspector's December 2018 advice. If not I respectfully suggest that they should be. Obviously the removal of community boundaries, the release of Green belt land, the proposal to encourage building in Small Villages etc., has the potential for direct impact upon the PP. As the PP own statutes and procedures make clear, as does the NPPF etc., it is not just land within the SMDC area which has to be considered by the LP but land adjacent to it that will or might be adversely affected by the proposals. Flora, fauna, wild life and toxic emissions are no respecters of boundaries. As I recall the PP submission was made in 2016. The LP has changed much since then. I submit that they should be invited to comment upon the issues raised in the Inspector's December 2018 advice. I found the PP's 2016 contribution helpful in two particular regards both with respect to the Inspector's December 2018 issues but also with regard to the wider MM and LP future. I refer the Inspector to the full content of the PP submission but at this point **I take two main themes** from it which I ask the Inspector to particularly note in the context of his current advised targeted consultation. The first may be briefly characterised as "The PP Statutory Framework" and trumps any guidance (eg NPPF) having superior statutory weight in considering the SMDC LP. The second point is that the NPPF must be interpreted **as a whole** when it comes to considering how it will or might impact upon PP land. It is not appropriate to pick and choose between parts of the NPPF as best suits the interests of the SMDC LP. I respectfully submit that this approach is a correct legal interpretation between the conflicting desires of SMDC and the legal duty of the PP and I invite the Inspector to adopt that approach in his deliberations.

12. MATTER 1. As to time table (para 6 and 7) there is little to add. I would however ask the Inspector to note that. (1) his predecessor Mr. Patrick Whitehead in both his interim and final report - out of which the current 5 year housing land supply local plan review arises- gave SMDC 2 years from the adoption of the SMDC Core Strategy to complete it's proposals to rectify the unsoundness he found in that aspect of the plan. This makes the current LP Strategic Housing Land Allocation Assessment almost 3 years late. (2) At a public meeting in Whiston in 2013 Council Planning Officer Mr. Gavin Clarke , who was to present the 2012-13 SMDC Local Core Strategy Plan before Mr. Whitehead and which was adopted in 2014, told a large audience of Whiston residents that the LP meant that during the life time of the plan , then up to 2031, Whiston would be required to accept eight (8) new house within the village. Since that time 26 new homes have been built within the village, 4 more are currently marked for ' approval' and 250 Lodges have been granted outline approval. Many of the homes built within Whiston between 2012 and 2019 stand empty for long periods or attract only a quick turn over of short term tenants. In all cases SMDC planners have argued that there was no need for infrastructure changes. Infrastructure remains as it has been for very many years. The current LP to approve further housing supply within Whiston and area and the related determination to remove village boundaries to facilitate those plans is frankly an insult to common sense. Any further building expansion of Whiston seriously undermines the nature, quality , historical and architectural heritage that residents fought so hard to retain before Mr. Patrick Whitehead in 2013-2014. It would lead to a complete change of character to a special landscape that need protection and not further expansion. It also puts into context that the open public promise Council Officer Gavin Clarke gave to residents in 2013 was simply a deceit that brings the SMDC Planning Policy into disrepute. Residents can have little or no confidence that whatever the determination the Inspector makes in the current LP, that it will be

honoured. If and in so far as the Inspector is tempted to carry out the requested removal of Settlement boundaries and impose monitoring - which I predict based on past experience will be honoured in the breach and not in the observance- he is urged to: (1) Hear further detailed argument at a public hearing and direct the submission of additional evidence. (2) require a system of strict antecedent and clear rules to be consulted upon and then come back to the Inspectorate before final determination. No further latitude should be given to SMDC officials to break promises they make to the residents.[see Inspectors December advice Paragraphs 8&9.]

13. GREEN BELT.- ISSUE 5. Whilst the paragraphs 10-13 are Biddulph. centric the underlying concerns apply with equal force throughout the Churnet Valley. In supporting the conclusion that the LP is unsound [paragraph 12] in respect of Biddulph, the same lack of a demonstration of **exceptional circumstances** as at February 2018, bedevils the whole consideration of release of Green Belt land. To restate the problem. The evidence base with regard to Green Belt issues across the district did not exist either at all or in a way which was legally compliant in February 2018. Please see reasons and examples earlier stated under soundness and lack of legal compliance. What singles Biddulph out for special mention is simply the extent and the degree to which the SMDC LP fails. If the Inspector has had chance to view the General Assembly webcast of the meeting of 13th. January 2018 he will have seen Councillor Chris Woods attempting to make the point that the late and un-consulted switch with regard to Wharf Road et al, made by SMDC, destroyed proper argument about exceptional circumstance, a finding of fact now made by the Inspector in paragraphs 11- 13. I respectfully submit the nature and quality of arguments about ‘ exceptional circumstances’ in the case of Biddulph Green Belt land is simply a difference in degree and not in principle. Logically the evidence base as at February 2018 cited by the Inspector in paragraph 11 is the same across the Green Belt areas within the ambit of the LP. The finding by the Inspector in paragraph 12 and in 13 demonstrates that the LP “ Therefore, exceptional circumstances **have not been demonstrated** for the specific proposals in Biddulph and this aspect of the Plan is unsound.” He has also said in paragraph 12, “ I would ask that the Council set out how this soundness issue is to be resolved”. I would respectfully submit that the only way it can be resolved legally is to withdraw the LP, then to produce an evidence base that addresses the concerns about Green belt land district wide and [Matter3] Employment Objectively Assessed Needs -(eg admittedly absent in the Blythe Vale LP proposals as per Inspectors findings in the public hearing when Mr. Johnson for SMDC admitted this failure)- and which evidence base is fit to be submitted to the Secretary of State and against which base the future provisions of a LP can be objectively judged with regard to mitigation measures.
14. MATTER 3. (Paragraph 14). I am at a loss to understand how the statement ; “ The overall requirement will still be 6080 dwellings” is justified following the downward revision of housing need by the ONS in 2018. I submit that the figure of 6080 in Policy SS3 should be revised downwards to reflect the more accurate factual information now available. To do otherwise seems perverse.
15. Paragraph 15. SMDC have demonstrated over a period of approximate ten years - some residents would say a longer period- a failure and/ or an inability or unwillingness to be open about the revelation of information and where they do so it has often proved necessary to utilise the FOIA with consequent added costs and delays. If any monitoring indicator is to be included within Chapter 10 it should expressed in mandatory and tightly drawn language that gives no room for slippage or failure to comply.
16. MATTER 4. Paragraphs 16-24. Paragraph 16- There is no verifiable evidence base that the 2014 housing supply figures are accurate. If they are to form a future

evidence base it is respectfully suggested that evidence should be produced, heard and subject to challenge if necessary, before they are incorporated as suggested. Paragraph 17. It is noted that EL5.005 was produced after the suspension of the public hearing in October 2018. The Inspector is reminded of my submissions above (7-10) as to soundness and legal compliance. Whilst the Inspector may indeed be entitled to call for further information as previously quoted above. **“ The Council cannot lawfully submit a plan for examination on the basis that further key evidence can be provided at a later date, for example once requested by the Inspector.”** Reliance upon ‘ Windfall Figures’ was argued by SMDC before Mr. Patrick Whitehead when he settled the Core Strategy in 2013-2014. There is no evidence base to show that the proposed windfall figures that formed part of the February 2018 submission version of the LP made any attempt to reconcile the windfall provision in the adopted CS in 2014 with the newly disclosed EL5.005. This is not **legally compliant with the principles set out above.** Further as the Inspector has now found as a fact on the face of the record , thus: **“However, the effect of making allocations, the removal of development boundaries for small villages and the implementation of other housing policies of the LP on delivery of windfalls is uncertain.”** This neatly demonstrates the dilemma that SMDC has placed the Inspector in. It is part of the legal requirement to submit an evidence base but also to demonstrate that the LP contains evidence to show how it has incorporated in to the LP mitigation measures ..etc. The Inspector has already highlighted that this has not been carried out.

17. Paragraph 18. With specific regard to Whiston, a small village, since 2014 it has already massively exceeded the 8 additional dwelling, the upper limit given by Planner Gavin Clarke to residents in public consultations about the Local Plan development (see above). When the 250 lodges planned for Moneystone (0.9 mile on the Oakamoor side of Whiston village centre) and which the Developers have predicted will generate 470,000 additional vehicle movements per annum on a narrow country lane which currently carries a (monitored) daily average of 70 vehicle movements per day, are factored in then it becomes clear that approving ANY form of additional housing in Whiston during the LP period is unsound. The inconsistency of the SMDC’s approach to development in Whiston against the background of actual and planned and approved development is not simply bizarre, it breaches the authorities already quoted above as to the ‘ **prescription of fairness.**’ It also demonstrates as far as Whiston is concerned a ‘ **wholly unsustainable approach**’, clear evidence that it’s ‘housing strategies and policies are not aligned’ and that they are fundamentally flawed. With no disrespect to the Inspector, who might not have been provided with all the necessary factual data by SMDC (something that would not surprise Whiston residents), to suggest a regime of ‘ monitoring’ is frankly itself ‘unsound’ again on the basis of the legal authorities. The Inspector is asked to urgently review this aspect of his advice set out in paragraph 18 of the advice.
18. Paragraph 19. See above. It is clear beyond any doubt that the Inspector cannot have been supplied with accurate figures for development in and within the environs of Whiston. To attempt to apply any % figures to a slippage allowance would be nugatory in the absence an accurate evidence base. The Inspector is asked to **URGENTLY** reconsider his advice in paragraph 19 insofar as it applies to Whiston.
19. Paragraph 20. I understand that Cheadle residents, Cresswell residents and Blythe residents will be making their own detailed representations to the Inspector’s advice of December 2018 which I leave them to do. I draw the Inspector’s attention specifically to my earlier comments on the EL5.005 documentation and it’s status within the Inspection process.
20. Paragraph 21. As earlier stated any assumption about a housing trajectory of a five year supply is in my respectful view unlawful and therefore would be void ab initio.

21. Paragraph 22. If the Inspector has read the Officer reports to both the SMDC General assembly meetings of the 13th. January 2018 which determined that the LP was 'sound' and the similar report before the meeting of 13th. July 2018, he will have read that the Author of those reports concluded that the LP would not meet the 'housing requirement'. If SMDC accepts that they will not meet the housing supply figures the conclusions in this paragraph seem at odds with the facts acknowledged by SMDC.
22. Paragraph 23. Please see my earlier comments with regard to the questionable legal and procedural status of the 'recently' prepared HIS.
23. Whilst agreeing that the 'new strands' of evidence should be consulted upon, the unfortunate interjection of Mr. D. Larner and his commentary that are included in his letter of 17th. January 2019 make the legal process as to how that must be done problematic. Further comment would seem otiose until the Inspector decides on a way forward.
24. MATTER 5. Issue 2 - Affordable Housing. Paragraph 25. I would support a policy that promoted a policy of affordable housing permission which contained a policy proviso that any permission granted for market price housing could not be used until Developers had completed the building of the affordable housing. A further provision that any application to change planning permission from affordable housing to market housing would result in the cancellation of all the permission granted at the site. I would also favour a '**living above the shop policy**' in the Market Towns within SMDC specifically aimed at bring life and commerce back to those Towns.
25. MATTER 6- Employment Policies. Issue 4- Tourism. The proposed change of wording would have my support.
26. Matter 8- Allocations. Policy DSL2. The suggested change would meet with my support although I have only passing knowledge of the location and the way planning policy would affect the residents so I feel it is for them to be consulted and whose views should be given primacy.
27. Policy DSR3- Land west of Basford Lane, Leekbrook. Paragraphs 28 and 29. The content has my support.
28. Policy DSB1- Wharf Road Strategic Development Area, Biddulph. Paragraph 30. I support the recommendation in the first sentence as to paragraph 11. As to policy DSB1 and the balance of the observation I would only comment thus. I have relatives with long term family contacts in Biddulph. I believe the history of the SMDC LP demonstrates a lack of genuine consultation with residents and a cavalier attitude to the need to listen to the opinions of residents and give those views proper weight. I respectfully submit that the Inspector should firmly advise SMDC to carry out a new and full public consultation before he reaches his decision.
29. Green Infrastructure Designations. Paragraphs 31, 32 and 33- I find it difficult to make any meaningful comment with regard to the content in these paragraph. My reasons are: My experience tells me that a vast majority of residents would regard LGS '**as demonstrably special to a local community**'. If other residents have shared my experience of having SMDC routinely ignore my representations in other planning cases then they will feel that they have been entirely excluded from the Impact Study. At best they will see it as another desk top generated document having little to do with their wishes. The Inspector will be familiar with the introduction given by the Minister Greg Clark to Localism Act 2011 and the NPPF when he commented about the way in which residents whose opinions are ignored feel no ownership of the planning system and that their opinions do not matter. Such feelings have been widespread across the Staffordshire Moorlands. Interest groups trying to work constructively to help shape their community for the future benefit of all continue to be ignored by SMDC. Factual evidence to that effect is itself ignored.

Paul Housiaux

6/2/19

Sent from my iPad

From:
To: [Weate, Angela; Programme Officer](#)
Subject: Representation to Planning Inspector Mark Dakeyne re Housing Allocation within the SMDC Local Plan
Date: 07 February 2019 12:38:22

Dear Ms Weate

I would be grateful for this representation to be brought to the attention of the Public Inquiry's Inspector, Mr M. Dakeyne.

Although there is considerable public doubt that 6080 new homes are actually required in the Staffordshire Moorlands, given the slow development of housing numbers over the preceding 30 years, it is nevertheless the figure quoted. However, the disposition across the District of this large number of new homes is at best extremely questionable and at worst ludicrous.

I have made a careful count of the numbers quoted in the Submission Version of the Local Plan. It indicates that just 2847 are actually allocated geographically to sites within the plan - just 46.82% of the total. The Inspector though has in effect worsened the position further by questioning the development in Biddulph of 588 homes in the BDNEW area. This has the effect of decreasing further the total of site allocations to just 2259 or 37.15% of the total.

This means that 63% of the new homes required by the proposed Local Plan is subject to a 'free for all' planning approach. A travesty of what a Local Plan should be in my opinion.

The vast majority of this 'free for all' total will end up being constructed in rural areas, especially since it is proposed that development boundaries are to be removed from all smaller villages. This policy has every potential to create the equivalent of urban sprawl in the countryside with villages being enlarged such that they join up with other villages. Blythe Bridge and Forsbrook, having already suffered this fate many years ago, is now a large urban area conjoined with a large part Stafford Borough (also called Blythe Bridge) and is very close to 2 urban areas of Stoke on Trent.

The two parts of Blythe Bridge, and Forsbrook, at least have the advantage of having reasonably good public services and public transport, something that is not available across much of the SMDC district. The only railway station is in Blythe Bridge, whilst the remainder of the District has no connection to the national rail network. Furthermore, since April 2018 public bus services within Staffordshire as a whole have been reduced such that my village, Foxt, no longer has any bus service, essential for older and younger non-driving residents to use. Again, using Foxt as an example there is no shop, only a public house that has closed only to reopen again from time to time. Yet there has been a large increase in new homes being granted planning permission despite the unsustainability of developing in such an

example location. Cars are the only available transport across virtually all of rural Staffordshire Moorlands, and given its steep hilly aspect, it is indeed a misnomer to say that any large-scale development across rural Staffordshire Moorlands could be considered 'Sustainable'. Large scale, in this instance, being both single developments such as that proposed at Moneystone Quarry as well as the virtually random disposition of 3821 (63% of the total) undesignated new homes allowed for in the proposed Local Plan.

For these reasons the Housing (Non) Allocation element of Local Plan should be rejected and full reconsideration given to preparing a completely new version of the Local Plan. One that actually considers where housing is required, is sustainable and represents that whole number of new homes to be built, with just a small windfall allowance remaining unspecified as to there site location.

Yours Sincerely
Cllr D.J.Williams

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Mr Mark Dakeyne
Planning Inspector
c/o Programme Officer
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Staffordshire
ST13 6HQ

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Markfield
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LE67 9RE

7th February 2019

Dear Sir,

RE: Further Consultation on Housing Implementation Strategy – January 2019

I am instructed by my client, Ms Debbie Evans, to the latest consultation on the emerging Staffordshire Moorlands Local Plan. My client has previously put forward site ref. BE032 for housing and has, in order to meet a demonstrable local need, also offered to the Council an area of land of in excess of 12 acres for formal recreation and public open space.

It is noted that the Council's latest Housing Implementation Strategy states (page 12) that, as of March 2018, there was a shortfall in housing completions of 662, which is not expected to be corrected until at least 2021/22. It is considered that this timescale is unacceptable and is based on several assumptions that may, or may not, be correct, particularly when several sites have been discarded.

My client's site was deemed to be acceptable and capable of being released from the Green Belt in a previous iteration of the Site Allocations document, but was subsequently dropped, for what appears to be political rather than planning reasons. The April 2016 Preferred Option Sites and Boundaries Consultation Booklet states at paragraph 3.3.7 that *'The [Green Belt] review identifies several opportunities for Green Belt release including in Biddulph, Cheadle, Blythe Bridge and Forsbrook, Endon, Cheddleton and clusters elsewhere in the District. Given the commitment in the Core Strategy to review the Green Belt and the development requirements for the district, it is considered that exceptional circumstances apply'*. My client notes that the only Green Belt site that is now proposed to be released is not in private ownership and is owned by Homes England, and she questions the Exceptional Circumstances in this case when all other Green Belt sites have been rejected.

Section 12 – Delivery Mechanisms, of the Council's latest Housing Implementation Strategy lists a serious of site specific constraints limiting potential development of sites for housing – see text box below:

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It appears that the LPA is completely out of step with the assessment of local need for housing in Brown Edge, and that the allocation of BE032 would contribute significantly towards meeting the most recent assessment of need. It should also be noted that the local Post Office is closing, the local newsagent closed recently and the Public House is also in danger of closure. Brown Edge needs additional housing in order to maintain local services, an issue often overlooked.

Site BE032 is needed, viable, deliverable and will provide substantial community recreational assets for the benefit of all and it is considered that, in the light of the above, the site ought to be released from the Green Belt to meet a demonstrable need for housing and public open space.

While it is appreciated that we are well down the line in the production of the Local Plan, it is considered that as it stands, the plan does not provide for the numbers of housing needed to meet the extant shortfall and longer term needs and that the decision to only release one site (owned by a Government body) came at a very late stage of the process and without sufficient reasons stated for this decision. It is therefore considered that the plan remains unsound and the most reason HNA clearly demonstrates the need for more housing in Brown Edge.

I trust that these comments will be taken into consideration.

Yours Sincerely,

Mr. Peter Bond BSc (Hons), MA, MRTPI
Director

29th January 2019

Ms D Evans

Dear Debbie

Further to our recent communications, please see below a brief summary of the thoughts and ideas of the development firm I am currently liaising with re your above property.

SSG (UK) are interested in holding further discussions from a development perspective where they feel your site, the remaining 5.25 acres, would be suitable for a mix of small to medium size (2 to 4 bed) homes. We have seen plans previously produced by yourselves presenting a scheme of much larger homes however based upon current market conditions and demand within Brown Edge more specifically, we feel a varied mix of both small and medium sized homes would be more suitable and saleable.

To clarify one element of our most recent discussions, this particular developer would be looking to develop using a modern method of modular construction, a build process that is becoming increasingly more popular with house builders across the UK. This construction method is more eco friendly and much more time efficient, producing high quality, highly insulated homes within a reduced build timeframe. We have heard that next year the government will be looking to implement a scheme to encourage modular construction and so would be ahead of the game on this.

This is an exciting opportunity for all involved and I feel the best solution to the current requirement for not only small and more affordable homes with Brown Edge but the lack of 'green space' and recreational grounds.

If you have any queries then please do not hesitate to contact me otherwise I look forward to speaking with you again soon.

Yours sincerely

Chris Evans MARLA
Land & New Homes Manager

1626 High Street, Knowle, Solihull, B93 0JU | 01564 778779
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**Town and Country Planning Act 1990
(As Amended)**

Staffordshire Moorlands Local Plan
Examination

Response to the publication of the Housing
Implementation Strategy and Other
Supporting Evidence / Appendices

SITE: BE041

DOCUMENT DATE: February 2019

CLIENT: Harlequin Development Strategies
(Crewe) Limited

REF: HAR823/1/HISResponse

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Appendix 1 Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?,
Nathaniel Lichfield & Partners, November 2016

1. INTRODUCTION

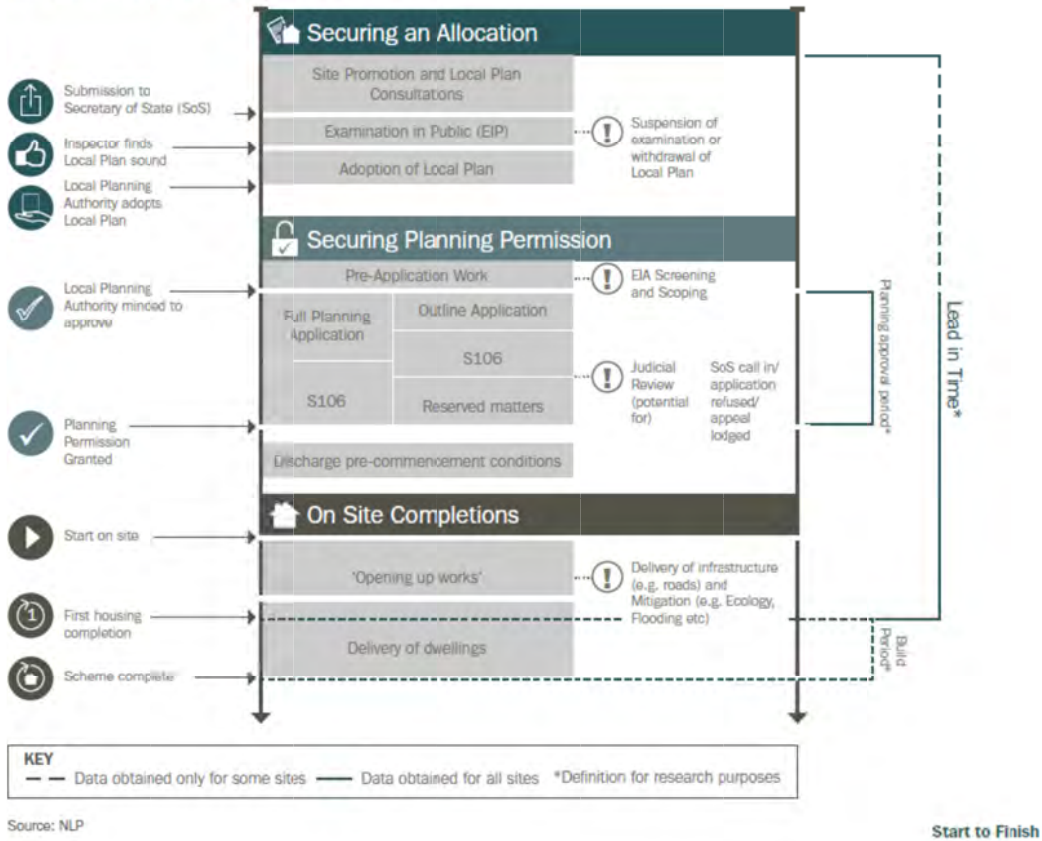
- 1.1 This response to the publication of the Council's Housing Implementation Strategy and supporting appendices is made by Knights on behalf of Harlequin Development Strategies (Crewe) Limited.
- 1.2 The response responds to various matters raised within the above submission, cross-referring to other evidence that already forms part of the evidence base and included in the examination library.
- 1.3 It is respectfully requested that these representations are fully taken into account by the Inspector as part of the ongoing examination into the soundness of the Staffordshire Moorlands Local Plan.

2. LEAD-IN TIMES AND BUILD RATES

- 2.1 As part of our submissions to the hearing sessions that have already taken place, ourselves and other representors highlighted the fact that the SHLAA was dated 2015, and has not been updated in the interim. It is therefore more than three years old and therefore does not reflect the latest status of various sites that the LPA has previously assessed.
- 2.2 The HIS now submitted to the examination at Section 10 lists assumptions made by officers in terms of determining the delivery rate that informs the housing trajectory. This suggests that:
- (a) Sites with full planning permission start in year 1
 - (b) Large sites with outline permission start in year 2
 - (c) All other planning permissions are developed over 3 years (years 1-3)
- 2.3 The Site Allocations Viability Study does not provide a detailed assessment to determine the lead in time and build out rate for sites of different sizes other than to identify development programmes based on average sales rates.
- 2.4 It is a well known fact that larger sites typically have longer lead in times as they often have to deal with more complex planning and site specific issues and often have a greater proportion of up front infrastructure to deliver.
- 2.5 The attached research¹ at **Appendix 1** by Nathaniel Lichfield and Partners, now known as “Lichfield’s” identifies the timeline / steps that have to be taken to secure the delivery of a strategic housing site. This is provided below for ease of reference. This clearly shows the process that has to be observed before the first comes are completed (“the lead in time”)

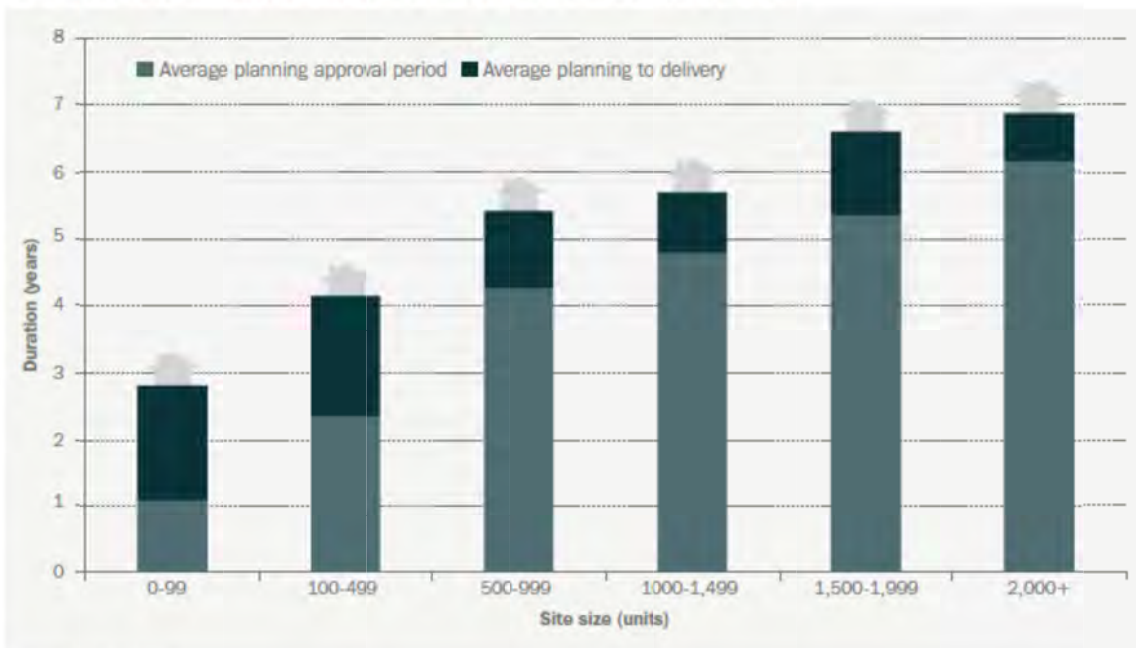
¹ *Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?*, Nathaniel Lichfield & Partners, November 2016

Figure 2: Timeline for the Delivery of a Strategic Housing Site



2.6 Figure 4 of the Lichfield's document then provides an average lead in time for the delivery of the first dwellings on a particular site, depending upon the site size.

Figure 4: Average planning approval period and delivery of first dwelling analysis by site size



- 2.7 The above shows that the first completions for sites of 0-99 dwellings and 100-499 dwellings are delivered in around 18 months to 2 years following the grant of planning permission. This reflects the fact that after planning permission is granted, applications to discharge conditions have to be prepared, submitted and approved, and developers often “wait out” the 6 week period after receiving a grant of planning permission pending any potential Judicial Review challenges in the High Court. Once conditions have been discharged, many developments will begin with site set up, including setting up the main site office and compound, delivery of materials, plant and machinery, followed by initial groundworks, the installation of the site access, and the installation of initial infrastructure, such as drainage for example.
- 2.8 It will then take a further period of time to complete a dwelling to a habitable standard from start to finish.
- 2.9 Therefore, for a large site with full planning permission, the first dwellings are not likely to be delivered until at least 18 months from the date of permission, allowing for discharge of conditions, the installation of the first phases of infrastructure, and the work to construct the dwellings themselves to a habitable standard.
- 2.10 In light of the above, a “start” in year 1 is not the same as a “completion” in year one, which the LPA seem to infer would occur from their trajectory, and it is more likely that in most circumstances, particularly for larger sites, that the first homes are completed in year 2.
- 2.11 For a site with outline permission, a subsequent reserved matters application, or indeed a fresh full application would need to be prepared, submitted and determined, followed by discharge of conditions and the construction of up-front infrastructure. It is therefore likely that the first homes would be delivered in year 3.

3. HOUSING TRAJECTORY

- 3.1 The Council have provided a housing trajectory with their HIS subject to the current consultation. The Council's assumptions of a start in year 1 and a start in year 2 for sites with full or outline permission respectively they have presented within the housing trajectory on page 12 of the HIS, with a background summary of planning permission details provided at pages 15 - 16 of the HIS.
- 3.2 It would appear that the LPA's assumptions of a "start" to development in either year 1 or 2 also results in the first completions in the same year. This is not considered to be accurate or realistic as set out in section 2 of this statement.
- 3.3 Looking at some of the specific sites identified in the Council's housing trajectory in more detail, we make the following observations.

Forge Colour Works

- 3.4 Planning permission for this site was granted under application reference 2014/0580 on 1 April 2018. Applications to discharge further pre-commencement conditions are still pending and a decision date is not known. Work has yet to start on site. The Council's housing trajectory indicates that this site is already delivering housing within the current monitoring year and that 15 dwellings should be delivered by 31 March 2019. Without the discharge of pre-commencement conditions and the subsequent completion of the site remediation, it is impossible that the first homes will be delivered in the next 7 weeks and within the current monitoring year as indicated by the LPA. **Therefore, the housing trajectory should be amended to show delivery of homes from the year 2019/20 and 2020/21.**

Sugar Street, Rushton

- 3.5 Planning permission and reserved matters consent for this site has been granted under applications references SMD/2012/0155 and SMD/2016/0015. Reserved matters was granted on 20 April 2016, however development has yet to commence on site. The site is currently subject to a planning application (reference SMD/2018/0365) which has yet to be determined on part of the site for the erection of two dwellings to replace plots 8 and 9 of the approved development. The application documents confirm that the developer has been unable to acquire a parcel of land required to implement the original planning permission so the scheme has had to be re-designed.
- 3.6 The LPA suggest in the trajectory that this site will deliver all 9 units by 31 March 2019, however as development has yet to commence on site, this is impossible. **Therefore, the housing trajectory should be amended to show the first delivery of homes from the year 2019/20.**

London Mill, Leek

- 3.7 Outline planning permission for this site was granted on 12 May 2016. This proposal seeks the demolition of the existing mill, the retention of some of the building facades, and the

construction of the development. This site is currently on the market for sale. No applications to discharge conditions or applications for the approval of reserved matters have been submitted. This site is tightly constrained by surrounding buildings and the surrounding highway. Following any grant of planning permission, buildings will need to be carefully demolished given the surrounding constraints, and structural works will be required to retain the existing facades if the outline approval is to be implemented. The above assumes that the site is sold and a reserved matters planning permission will be submitted before 12 May 2019.

- 3.8 The LPA suggest in the trajectory that this site will start to deliver housing in the 2019/20 monitoring year, however given the above, it is unlikely to start delivering housing until at least 2021 given the need for the submission of reserved matters and discharge of conditions applications, or the need to submit a fresh full application. **Therefore, the housing trajectory should be amended to show the first delivery of homes from the year 2021/22.**

Barnfields, Leek

- 3.9 Outline planning permission was granted for residential development of this site on 17 August 2015 with a three year period for the submission of reserved matters applications. This planning permission lapsed on 17 August 2015, and a fresh application for planning permission will therefore need to be submitted. There is no known developer actively promoting this site for development, and there is no evidence before the examination hearings that this is the case. The applicant for this site was not a developer, and a certificate B notice was served with the planning application showing that the site is subject to multiple ownership. It is not clear if the land has been acquired by a developer, and if it has not, then there will be a period of time required for an option and/or sale to be agreed and the necessary legal time period required for the exchange of contracts and subsequent acquisition of the site. The site was in the planning system for around a year from the submission of the first application, a resubmission, and a resolution to grant planning permission by the planning committee. It then took a further 8 months for the section 106 agreement to be negotiated and signed.
- 3.10 Given that the planning permission has lapsed, the whole process will need to be undertaken again, including updated ecology surveys, other updated technical reports where required, proposed site layout plans, and the submission and determination of the application. This process is likely to take at least 12 months.
- 3.11 The discharge of relevant pre-commencement conditions and site preparation works and the first installation of site infrastructure will then need to be undertaken before the first homes can be completed. Therefore, without a valid planning permission in place, no completions are likely to take place on this site for at least 3 years.
- 3.12 Whilst the table at page 15 of the HIS suggests that a “joint masterplan has been commissioned with developer including adjacent Cornhill site”, a masterplan commission is not a planning permission and does not clearly demonstrate immediate delivery on this site. **Therefore, the housing trajectory should be amended to show the delivery of the first homes on this site from the year 2021/22.**

Cresswell

- 3.13 Outline planning permission for 168 dwellings and B1, B2 and B8 employment space on this site was granted on 24 May 2016. Reserved matters approval was granted on 11 December 2018 for the first phase of development comprising the access road, and the commercial aspect of the outline approval. Reserved matters applications have yet to be submitted for the residential aspect of the outline planning permission.
- 3.14 The outline planning application was in the system for around 20 months. It was then a further 17 months before the reserved matters application was submitted, which took a further 13 months to determine.
- 3.15 The residential reserved matters application has yet to be submitted. It is therefore likely to be at least a year before any reserved matters are determined. **Therefore, the housing trajectory should be amended to show the delivery of the first homes on this site from the year 2020/21.**

Fole Dairy

- 3.16 The Council resolved to grant outline planning permission for residential development of this site at its planning committee meeting of September 2018, subject to the signing of a Section 106 legal agreement. The section 106 agreement has yet to be signed, and therefore this site does not currently benefit from an outline planning permission.
- 3.17 The applicants are a site promoter, so upon grant of outline planning permission, they are likely to seek to dispose of the site to a developer.
- 3.18 The subsequent developer would then need to submit either a reserved matters application or a full application for the approval of a detailed development. On the basis of other planning permissions referred to in this submission, this could take around 12 months after the issue of the decision notice for the outline permission. This would mean a detailed consent and the discharge of conditions could possibly be achieved towards the end of 2019/20 monitoring year if the section 106 agreement is completed in the next couple of months.
- 3.19 **Therefore, the first homes are not likely to be delivered until at least the 2020/21 monitoring year and the housing trajectory should be amended accordingly.**

Cheadle North

- 3.20 This development proposal is to be considered at planning committee on 14 February 2019. Following any resolution to grant planning permission, the Section 106 agreement will need to be signed, the decision issued and pre-commencement conditions discharged before initial site works and up front infrastructure is provided before the first homes are delivered. It is therefore unlikely that the first homes will be delivered in 2019/20. **Therefore, the trajectory should be amended to show the first completions of new homes during the 2020/21 monitoring year.**

Blythe Vale

- 3.21 There is no dispute that this site is deliverable, or with the delivery rates submitted to the examination. However, the trajectory presented by the Council indicates that 25 dwellings will be completed by the end of March 2019 (i.e. in approximately 7 months time). At the time of writing, initial site works have commenced, including the provision of the access. It is therefore unlikely that any dwellings, let alone 25 will be delivered by the end of March 2019. **Therefore, the trajectory should be amended to show the first delivery of new homes in the 2019/20 monitoring year.**

Summary

- 3.22 In light of the above considerations, the following adjustments to the trajectory should be made:
- (a) Forge works - first year of completions 2019/20
 - (b) Sugar Street - first year of completions 2019/20
 - (c) London Mill - first year of completions 2021/22
 - (d) Barnfields - first year of completions 2021/22
 - (e) Cresswell - first year of completions 2020/21
 - (f) Fole Dairy - first year of completions 2020/21
 - (g) Cheadle North - first year of completions 2020/21
 - (h) Blythe Vale - first year of completions 2019/20
- 3.23 The above adjustments may therefore result in a shortfall in the council's initial 5 year housing land supply.
- 3.24 Indeed, the current definition of "deliverable" in the revised Framework would remove the sites at Fole, Cresswell, London Mill, and Barnfields from the 5 year housing land supply immediately. This is particularly so given the very limited evidence that the Council has presented to the examination to clearly demonstrate deliverability. This is an important material consideration given that the revised Framework will be a material consideration in the determination of applications following any adoption of the Staffordshire Moorlands Local Plan.

4. OTHER OBSERVATIONS FROM THE HOUSING TRAJECTORY INCLUDING WINDFALLS

- 4.1 Knights share the concerns that the Inspector has expressed with the Council with regard to the overall shortfall of 412 dwellings over the plan period demonstrated in the trajectory. There are no further allocations currently proposed to address this shortfall, and this is with a large windfall allowance of 30 dwellings per annum for the rural area in addition to windfall allowances for the main towns. As set at paragraph 4.14 of our initial submission in response to the submission of the Local Plan dated 11 April 2018, the 30 dwellings per annum windfall allowance for the rural area is not justified by the evidence, in particular the SHLAA. We have previously identified a capacity for around 271 dwellings for the rural area in the SHLAA, a shortfall of 149 dwellings. Over a 15 year period, this amounts to around 18 dwellings per annum in terms of sites which might become available within the settlement boundaries, which is at odds with the 30 dwellings per annum windfall allowance for the rural area.
- 4.2 When the 149 dwelling shortfall referred to above is added to the shortfall of 412 dwellings in the trajectory, this amounts to a material shortfall of some 561 dwellings. It therefore remains our view that further sites should be identified for allocation, and that the potential for some Green Belt release around some of the larger villages, including Brown Edge, as proposed in previous versions of the Local Plan be reconsidered by the LPA as main modifications.
- 4.3 In light of the observations highlighted in this submission, it is respectfully requested that further main modifications are proposed by the Council to allocate a sufficient supply of sites to deliver its housing requirement over the plan period, in particular for the rural areas where we have demonstrated a significant shortfall in terms of the windfall allowance.
- 4.4 The Framework 2012 is clear that *compelling* evidence that windfall sites *will continue* to provide a reliable source of supply. Our findings from the Council's SHLAA clearly demonstrates that the level of windfall development for the rural area would not be as high as the Council contends, and clearly demonstrates that the Council should not simply rely upon extrapolating past trends into the future. Our position on this point is clearly logical. As windfall sites come forward over time, then naturally, the availability of such windfall sites will reduce as a result. It is therefore considered that a windfall allowance of 30 dwellings per annum for the rural areas is not realistic and should be amended accordingly.
- 4.5 Furthermore, small windfall sites within the settlement boundaries in the rural areas are unlikely to deliver a significant number of affordable homes. In particular, the HIS document at section 14, page 23 states that of the affordable homes to be delivered by the Ascent programme, only 17 homes were to be developed in the rural areas.
- 4.6 The latest SHMA update reviewed the housing register as of October 2016 and indicated that there were 1141² households seeking social housing in Staffordshire Moorlands at that time.
- 4.7 Appendix 6 of the documents submitted to the examination by the Council identify that all of the Ascent properties were delivered by the end of 2015, and despite that, there was still a significant number of households on the Council's housing register by October 2016.

² Paragraph 6.22 Staffordshire Moorlands SHMA Update 2017 by Nathaniel Lichfield and Partners, EL27.6

4.8 Furthermore, a significant number of those households in need are likely to be households from within the rural area in need of a locally available affordable home in areas where house prices are higher. This further justifies the need for specific site allocations on the edge of larger villages to meet some of those affordable housing needs.

5. PEAK DISTRICT NATIONAL PARK

- 5.1 The Development Management Policies Part 2 Local Plan for the Peak District National Park is currently subject to examination.
- 5.2 Parts of the Staffordshire Moorlands administrative area fall within the Peak District National Park boundary, with the area comprising small rural villages and hamlets.
- 5.3 Appendix 5 of the additional information submitted by the Council indicates that housing delivery totalled 68 dwellings over 10 years, and this is used to justify the Council's allowance of 7 dwellings per annum in the Peak Park.
- 5.4 Policy HC1 of the Part 1 Local Plan is very clear that provision will not be made for housing solely to meet open market demand, and housing land will not be allocated in the development plan for the Peak District National Park.
- 5.5 New housing can only be provided to meet local need.
- 5.6 No evidence has been submitted to suggest that on the edge of the villages and hamlets in the Peak District National Park that fall within Staffordshire Moorlands that 7 dwellings per annum will come forward. No evidence of local need for any of the villages or parishes have been submitted to the examination, nor has any assessment or evidence of potentially suitable sites / infill plots been provided to demonstrate that there would be no conflict with the policies of the Peak District National Park Local Plan.
- 5.7 It is therefore considered that little reliance should be placed on the housing trajectory for housing completions in the Peak District National Park, particularly as it is based on past trends and no other compelling evidence that housing in the Peak District National Park would provide a reliable source of supply at the level envisaged by the Council.

6. SUMMARY

6.1 Our observations and assessment of the Council's Housing Implementation Strategy document and supporting appendices can be summarised as follows:

- (a) Lead in times and build out rates:
 - (i) The council's assumption of a "start" on site is not the same as the delivery of a completion and the council's trajectory does not take into account lead in times from a resolution to grant planning permission, the completion of a section 106 legal agreement where required, the discharge of pre-commencement conditions, and the initial site preparation work and installation of up front infrastructure. This will therefore have a bearing on the Council's housing trajectory.
- (b) The Housing Trajectory:
 - (i) Some of the assumptions made in the Council's housing trajectory are unrealistic, in part because some sites either don't have a valid planning permission, or for the case where sites already have planning permission, the council assumes that some sites are delivering now, even though they are subject to applications to discharge conditions. Therefore the trajectory should be adjusted for relevant sites as set out in the points below.
 - (ii) Forge works - first year of completions 2019/20
 - (iii) Sugar Street - first year of completions 2019/20
 - (iv) London Mill - first year of completions 2021/22
 - (v) Barnfields - first year of completions 2021/22
 - (vi) Cresswell - first year of completions 2020/21
 - (vii) Fole Dairy - first year of completions 2020/21
 - (viii) Cheadle North - first year of completions 2020/21
 - (ix) Blythe Vale - first year of completions 2019/20
- (c) Windfalls:
 - (i) It is not considered that the Council's approach and justification for the windfall development in the rural areas is robust, nor is it justified by the evidence base. In particular, the capacity of sites identified in the SHLAA does not correspond with a windfall allowance of 30 dwellings per annum.
- (d) Affordable housing:
 - (i) More sites are needed to be identified in the rural area, particularly around the larger villages to address affordable housing needs, in particular because a significant proportion of those on the council's housing register are likely to require housing in the rural area.
- (e) Peal District National Park - it is not considered that the allowance for 7 dwellings per annum in the area covered by the National Park would provide a reliable source

of supply as there is no robust evidence that future sites will come forward to deliver this number as any home provided in the National Park can only come forward to meet an identified local need, and no evidence for that at the relevant village or parish level has been submitted to the examination.

APPENDIX 1

TRIP

Targeted Research
& Intelligence Programme



Nathaniel Lichfield
& Partners

Planning. Design. Economics.

Start to Finish

How Quickly do Large-Scale Housing Sites Deliver?

November 2016

Executive Summary

There is a growing recognition that large-scale housing development can and should play a large role in meeting housing need. Garden towns and villages – planned correctly – can deliver sustainable new communities and take development pressure off less sustainable locations or forms of development.

However, what looks good on paper needs to deliver in practice. Plans putting forward large sites to meet need must have a justification for the assumptions they make about how quickly sites can start providing new homes, and be reasonable about the rate of development. That way, a local authority can decide how far it needs to complement its large-scale release with other sites – large or small – elsewhere in its district.

This research looks at the evidence on speed and rate of delivery of large-scale housing based on a large number of sites across England and Wales (outside London). We draw five conclusions:

1. If more homes are to be built, more land needs to be released and more planning permissions granted. There is no evidence to support the notion of systemic 'land banking' outside London: the commercial drivers of both house builders and land promoters incentivises rapid build out of permissions to secure returns on capital.
2. Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required.
3. Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times.
4. Plans should reflect that – where viable – affordable housing supports higher rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand for those products). This might mean some areas will want to consider spatial strategies that favour sites with greater prospects of affordable or other types of housing delivery.
5. For large-scale sites, it matters whether a site is brownfield or greenfield. The latter come forward more quickly.

In our conclusions we identify a check list of questions for consideration in exploring the justification for assumed timing and rates of delivery of large-scale sites.

The Research in Figures

70 number of large sites assessed

3.9 years the average lead in time for large sites prior to the submission of the first planning application

6.1 years the average planning approval period of schemes of 2,000+ dwellings. The average for all large sites is circa 5 years

161 the average annual build rate for a scheme of 2,000+ dwellings

321 the highest average annual build rate of the schemes assessed, but the site has only delivered for three years

40% approximate increase in the annual build rate for large sites delivering 30%+ affordable housing compared to those delivering 10%-19%

50% more homes per annum are delivered on average on large greenfield sites than large brownfield sites





Introduction

When it comes to housing, Government wants planning to think big. With its Garden Towns and Villages agenda and consultation on proposed changes to the National Planning Policy Framework (NPPF) to encourage new settlements, planning authorities and developers are being encouraged to bring forward large-scale housing development projects, many of them freestanding. And there is no doubt that such projects will be necessary if England is to boost supply and then consistently deliver the 300,000 new homes required each year¹.

Large-scale sites can be an attractive proposition for plan-makers. With just one allocation of several thousand homes, a district can – at least on paper – meet a significant proportion of its housing requirement over a sustained period. Their scale means delivery of the infrastructure and local employment opportunities needed to sustain mixed communities.

But large-scale sites are not a silver bullet. Their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick start. And once up and running, there is a need to be realistic about how quickly they can deliver new homes. Past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result.

So, if Local Plans and five year land supply assessments are to place greater reliance on large-scale developments – including Garden Towns and Villages – to meet housing needs, the assumptions they use about when and how quickly such sites will deliver new homes will need to be properly justified.

“Local planning authorities should take a proactive approach to planning for new settlements where they can meet the sustainable development objectives of national policy, including taking account of the need to provide an adequate supply of new homes. In doing so local planning authorities should work proactively with developers coming forward with proposals for new settlements in their area.”

DCLG consultation on proposed changes to national planning policy (December 2015)

The Planning Practice Guidance (PPG) offers little guidance other than identifying that timescales and rates of development in land availability assessments should be based on information that “*may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year*”². It also requires housing land availability assessments to include: “a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome.”³

This research provides insights to this topic – which has become a perennial discussion at Local Plan examinations and Section 78 appeals in recent years – by focusing on two key questions:

1. what are realistic lead-in times for large-scale housing developments?; and
2. once the scheme starts delivering, what is a realistic annual build rate?

NLP has carried out a desk-based investigation of the lead-in times and build-out rates on 70 different strategic housing sites (“large sites”) delivering 500 or more homes to understand what factors might influence delivery. For contrast 83 “small sites” delivering between 50 and 499 homes have been researched to provide further analysis of trends in lead in times and build rates at varying scales.

As well as identifying some of the common factors at play during the promotion and delivery of these sites it also highlights that every scheme has its own unique factors influencing its progress: there can be significant variations between otherwise comparable developments, and there is no one ‘typical scheme’. This emphasises the importance of good quality evidence to support the position adopted on individual projects.

¹ House of Lords Select Committee on Economic Affairs (2016) Building more homes: 1st Report of Session 2016-17 - HL Paper 20

² PPG ID: 3-023-20140306

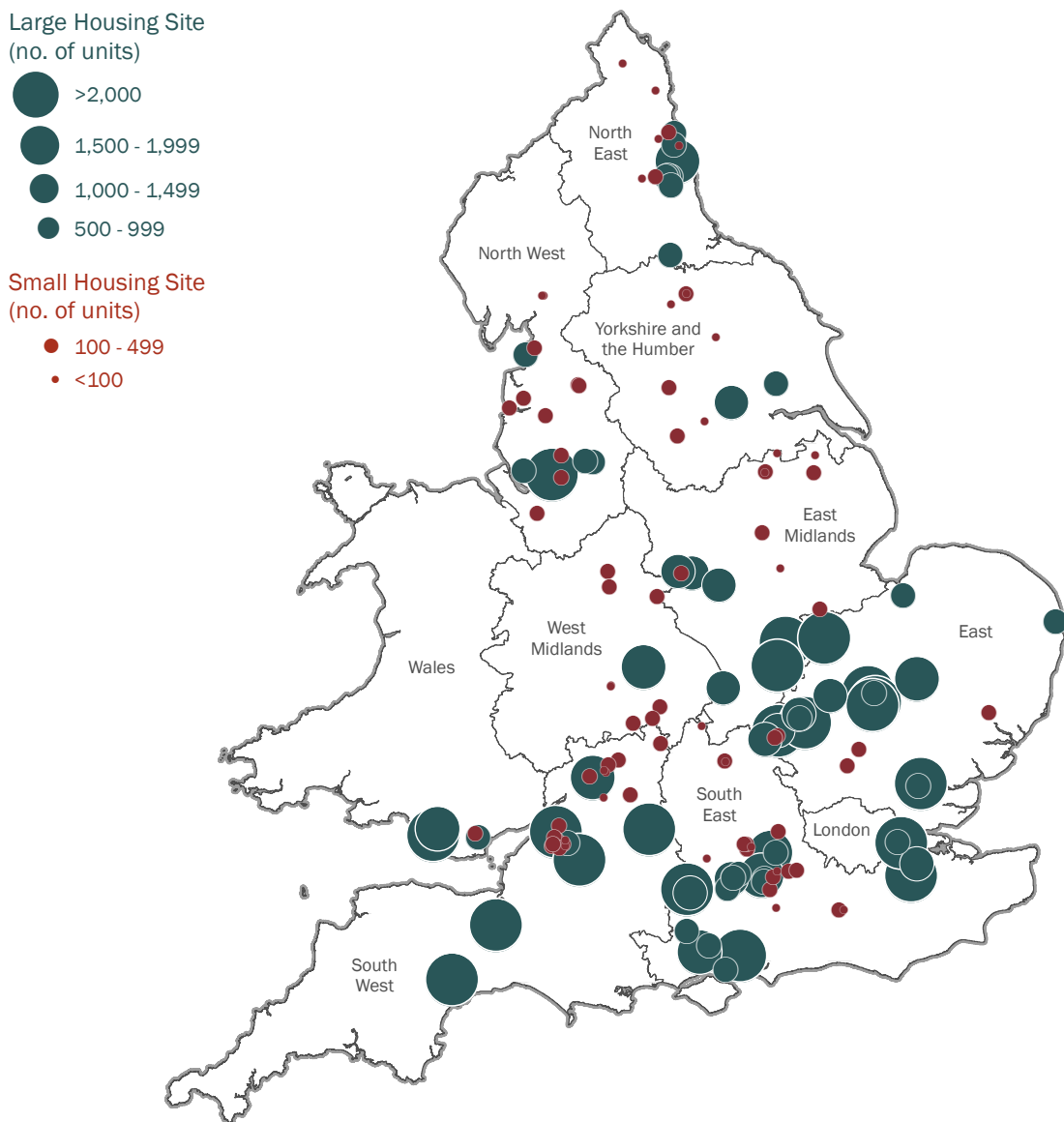
³ PPG ID: 3-028-20140306

Data Sources and Methodology

In total NLP reviewed 70 strategic sites (“large sites”) which have delivered, or will deliver, in excess of 500 dwellings. The sites range in size from 504 to 15,000 dwellings. The geographic distribution of the 70 large sites and comparator small sites is set out below in Figure 1. A full list of the large sites can be found in Appendix 1 and the small sites in Appendix 2. NLP focused on sites outside London, due to the distinctive market and delivery factors applicable in the capital.

Efforts were made to secure a range of locations and site sizes in the sample, but it may not be representative of the housing market in England and Wales as a whole and thus conclusions may not be applicable in all areas or on all sites.

Figure 1: Geographic Distribution of the 70 Large Sites and 83 Small Sites Assessed



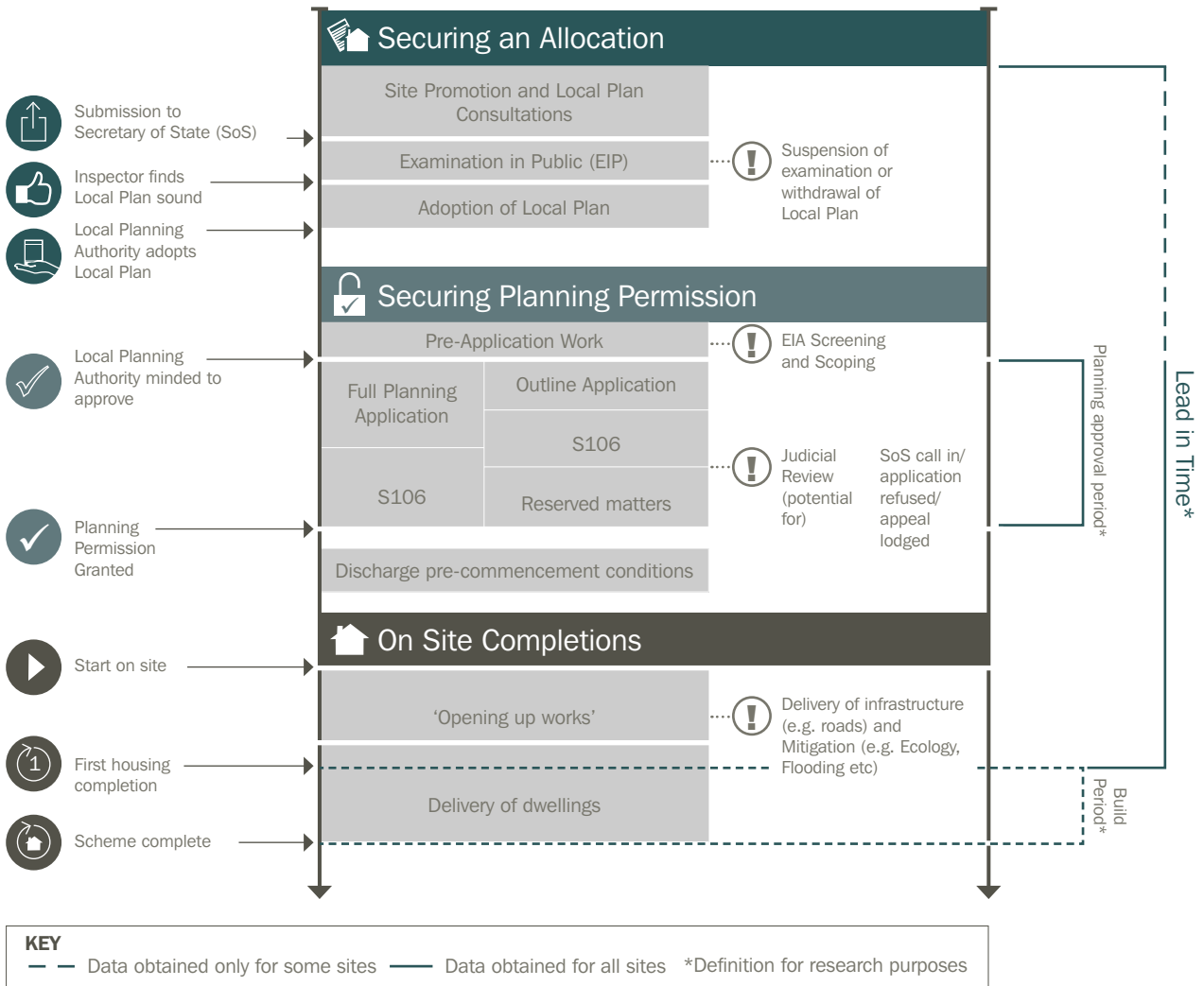
Source: NLP analysis

Methodology

The research aims to cover the full extent of the planning and delivery period. So, wherever the information was available, the data collected on each of the 70 sites covers the stages associated with the total lead-in time of the development (including the process of securing a development plan allocation), the total planning approval period, starting works on site, delivery of the first dwelling and the annualised build rates recorded for the development up until to the latest year where data is available (2014/15). To structure the research and provide a basis for standardised measurement and comparison, these various stages (some of them overlapping) have been codified.

Figure 2 sets out the stages and the milestones used to measure them. These are assumed to fall under what are defined as 'lead-in times', 'planning approval periods' and 'build periods', with 'first housing completion' denoting the end of the lead-in time and start of the build period. Not every site assessed will necessarily have gone through each component of the identified stages sequentially, or indeed at all (for example, some sites secure planning permission without first being allocated).

Figure 2: Timeline for the Delivery of a Strategic Housing Site



Source: NLP

Start to Finish

The approach to defining these stages for the purposes of this research is set out below:

- The **'lead-in time'** – this measures the period up to the first housing completion on site from either a) the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document) or where not applicable, available or readily discernible – b) the validation date of the first planning application made for the scheme.
- The **'planning approval period'** is measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwellings on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). The discharge of any pre-commencement and other conditions obviously follows this, but from a research perspective, a measurement based on a detailed 'consent' was considered reasonable and proportionate milestone for 'planning' in the context of this research.
- The date of the **'first housing completion'** on site (the month and year) is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a mid-point of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.
- The **'annual build rate'** falls within the overall 'build period'. The annual build rate of each site is taken or inferred from the relevant Local Planning Authority's Annual Monitoring Reports (AMR) or other evidence based documents where available. In some instances this was confirmed – or additional data provided – by the Local Planning Authority or County Council.

Due to the varying ages of the assessed sites, the implementation of some schemes was more advanced than others and, as a function of the desk-based nature of the research and the vintage of some of the sites assessed, there have been some data limitations, which means there is not a complete data set for every assessed site. For example, lead-in time information prior to submission of planning applications is not available for all sites. And because not all of the sites assessed have commenced housing delivery, annual build rate information is not universal. The results are presented accordingly.



Getting Started: What are Realistic Lead-in Times?

How long does it take for large-scale sites to get up and running? This can be hard to estimate. Understandably, those promoting sites are positive about how quickly they can deliver, and local authorities choosing to allocate large-scale sites in their plans are similarly keen for these sites to begin making a contribution to housing supply. This leads some local housing trajectories to assume that sites can be allocated in Local Plans and all detailed planning approvals secured in double-quick time. However, the reality can prove different.

Our main focus here is on the average 'planning approval period' and the subsequent period from receiving a detailed planning approval to delivery of the first house on site. However, another important metric is how long it takes from the site being first identified by the local authority for housing delivery to getting started on site. Unfortunately, getting accurate data for this on some of the historic sites is difficult, so this analysis is focused on a just 18 of the sample sites where information was available.

Lead-in Times

The lead-in time prior to the submission of a planning application is an important factor, because many planning issues are flushed out in advance of planning applications being submitted, not least in terms of local plan allocations establishing the principle of an allocation. In a plan-led system, many large-scale sites will rely on the certainty provided by Local plans, and in this regard, the slow pace of plan-making in the period since the NPPF⁴ is a cause for concern.

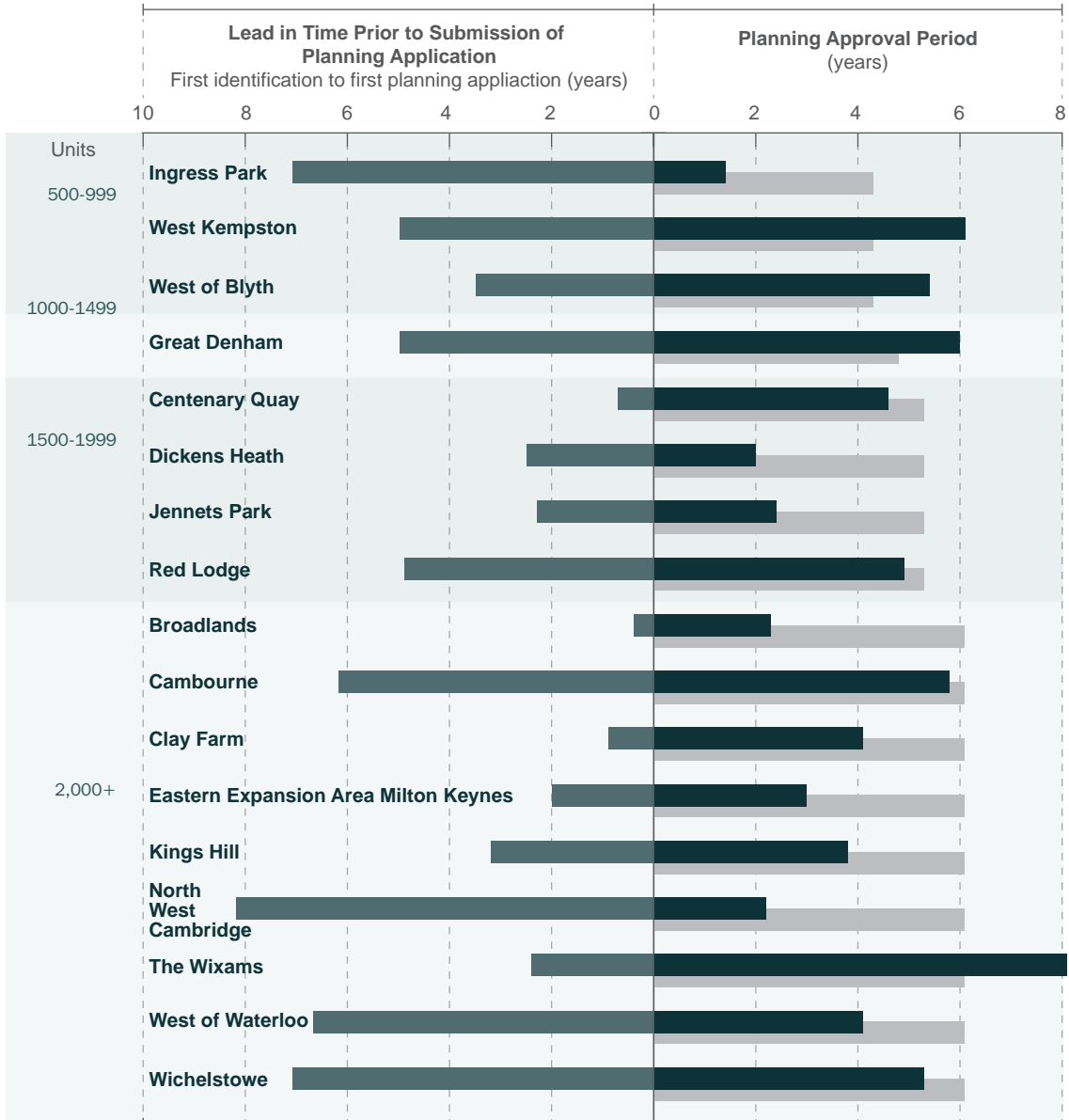
If the lead-in time prior to submission of an application is able to focus on addressing key planning issues, it can theoretically help ensure that an application – once submitted – is determined more quickly. Our sample of sites that has lead-in time information available is too small to make conclusions on this theory. However, there is significant variation within these sites highlighting the complexity of delivering homes on sites of different sizes. Of this sample of sites: on average it was 3.9 years from first identification of the site for housing to the submission of the initial planning application.

Moreover, a substantial lead-in time does not guarantee a prompt permission: 4 of the 18 sites that took longer to gain planning permission than the average for sites of comparable size and also had lead-in times prior to submission of a planning application of several years⁵.

⁴ As at September 2016, just 34% of Local Authorities outside London have an up-to-date post-NPPF strategic-level Local Plan. Source: PINS / NLP analysis.

⁵ The sites in question were The Wixams, West Kempton, West of Blyth, and Great Denham.

Figure 3: Average lead-in time of sites prior to submission of the first planning application



KEY
 ■ Lead in time prior to submission of planning application
 ■ Planning approval period
 ■ Average planning application period for site of that size

Source: NLP analysis

The Planning Approval Period: Size Matters

The term ‘planning approval period’ in this report measures the period from the validation date of the first planning application for the scheme to the decision date of the first application which permits development of dwellings on site (this could be a full, hybrid or reserved matters application). Clearly, in many cases, this approval will also need to be followed by discharge of pre-commencement conditions (a focus of the Government’s Neighbourhood Planning Bill) but these were not reviewed in this research as a detailed approval was considered an appropriate milestone in this context.

The analysis considers the length of planning approval period for different sizes of site, including comparing large-scale sites with small sites. Figure 4 shows that the greater the number of homes on a site, the longer the planning approval period becomes. There is a big step-up in time for sites of in-excess of 500 units.

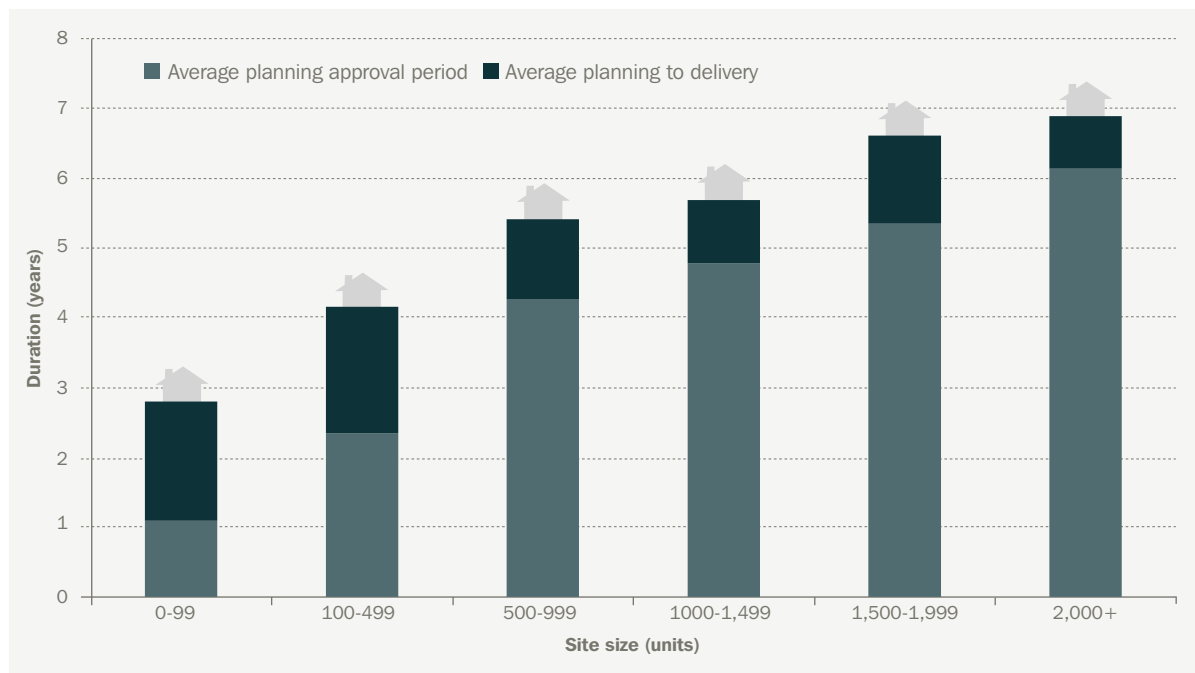
Time Taken for First Housing Completion after Planning Approval

Figure 4 also shows the time between the approval of the first application to permit development of dwellings on site and the delivery of the first dwelling (during which time any pre-commencement conditions would also be discharged), in this analysis this is the latter part of the lead in time period. This reveals that the timescale to open up a site following the detailed approval is relatively similar for large sites.

Interestingly, our analysis points to smaller sites taking longer to deliver the first home after planning approval. This period of development takes just over 18 months for small sites of under 500 units, but is significantly quicker on the assessed large-scale sites; in particular, on the largest 2,000+ dwelling sites the period from receiving planning approval to first housing completion was 0.8 years.

In combination, the planning approval period and subsequent time to first housing delivery reveals the total period increases with larger sites, with the total period being in the order of 5.3 – 6.9 years. Large sites are typically not quick to deliver; in the absence of a live planning application, they are, on average, unlikely to be contributing to five year housing land supply calculations.

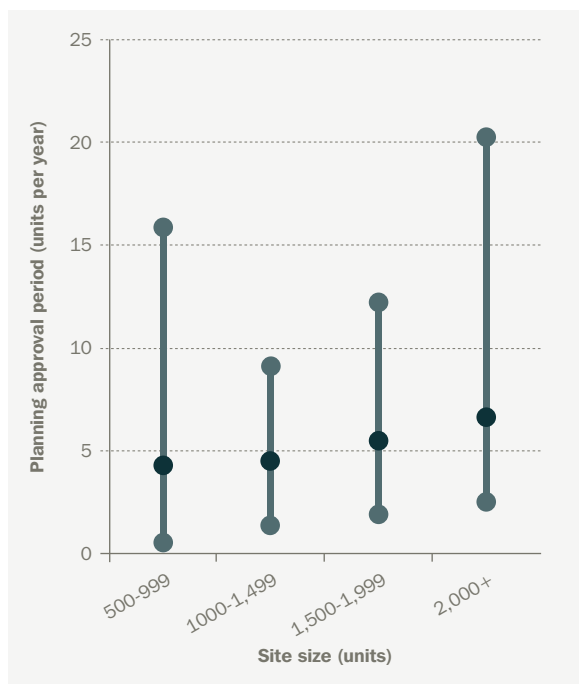
Figure 4: Average planning approval period and delivery of first dwelling analysis by site size



Source: NLP analysis

Of course, these are average figures, and there are significant variations from the mean. Figure 5 below shows the minimum and maximum planning approval periods for sites in each of the large size categories. This shows even some of the largest sites coming forward in under two years, but also some examples taking upwards of 15-20 years. Clearly, circumstances will vary markedly from site to site.

Figure 5: Site size and duration of planning



Source: NLP analysis

Case Studies

If some sites are coming forward more quickly than the average for sites of that size, what is it that is driving their rapid progress? We explored this with some case studies. These suggest that when schemes are granted planning permission significantly faster than the above averages, it is typically due to specific factors in the lead-in time prior to the submission of a planning application.

Gateshead – St James Village (518 dwellings): Planning approval period 0.3 years⁶

This site was allocated as a brownfield site in the Gateshead UDP (2000) prior to the submission of a planning application for the regeneration scheme. A Regeneration Strategy for East Gateshead covered this site and as at 1999 had already delivered high profile flagship schemes on the water front. Llewelyn Davis were commissioned by the Council and English Partnerships to prepare a masterplan and implementation strategy for the site which was published in June 1999. Persimmon Homes then acquired the site and it was agreed in autumn 1999 that they should continue the preparation of the masterplan. East Gateshead Partnership considered the masterplan on the 08th March 2000 and recommended approval. Subsequently, the outline application (587/00) with full details for phase 1 was validated on the 6th September 2000 and a decision issued on the 9th January 2001.

It is clear that although it only took 0.3 years for the planning application to be submitted and granted for a scheme of more than 500 units, the lead in time to the submission of the application was significant, including an UDP allocation and a published masterplan 18 months ahead of permission being granted. By the time the planning application was submitted most of the site specific issues had been resolved.

⁶ St James Village is excluded from the lead-in time analysis because it is unclear on what date the site was first identified within the regeneration area

Dartford – Ingress Park (950 dwellings): Planning approval period 1.4 years

This site was initially identified in a draft Local Plan in 1991 and finally allocated when this was adopted in April 1995. The Ingress Park and Empire Mill Planning Brief was completed in three years later (November 1998).

The submission of the first planning application for this scheme predated the completion of the Planning Brief by a few months, but the Council had already established that they supported the site. By the time the first application for this scheme was submitted, the site had been identified for development for circa seven years.

The outline application (98/00664/OUT) was validated on the 10th August 1998 and permission granted on the 21st Nov 2000, a determination period of 1 year and 3 months). A full application for the First Phase for 52 dwellings (99/00756/FUL) was validated and approved in just two months, prior to approval of the outline. Clearly, large-scale outline permissions have to wrap up a wide range of other issues, but having first phase full applications running in parallel can enable swifter delivery, in situations where a 'bite sized' first phase can be implemented without triggering complex issues associated with the wider site.

Cambridge and South Cambridgeshire – North West Cambridge (3,000 dwellings and 2,000 student bed spaces): Planning approval period 2.2 years

Cambridge University identified this area as its only option to address its long-term development needs, and the Cambridgeshire and Peterborough Structure Plan 2003 identified the location for release from the Green Belt. The site was allocated in the 2006 Cambridge Local Plan, and the North West Cambridge Area Action Plan was adopted in October 2009. The Area Action Plan established an overall vision and set out policies and proposals to guide the development as a whole.

As such, by the time the first application for this scheme was submitted, there had already been circa eight years of 'pre-application' planning initially concerning the site's release from the Green Belt, but then producing the Area Action Plan which set out very specific requirements.. This 'front-loaded' consideration of issues that might otherwise have been left to a planning application.

The outline application (11/1114/OUT – Cambridge City Council reference) for delivery of up to 3,000 dwellings, up to 2,000 student bed spaces and 100,000 sqm of employment floorspace was validated on the 21st September 2011 and approved on the 22nd of February 2013. The first reserved matters application for housing (13/1400/REM) was validated on the 20th September 2013 and approved on the 19th December 2013. Some ten years from the concept being established in the Structure Plan.

Summary on Lead-in Times

1. On average, larger sites take longer to complete the planning application and lead-in processes than do smaller sites. This is because they inevitably give rise to complex planning issues related to both the principle of development and the detail of implementation.
2. Consideration of whether and how to implement development schemes is necessary for any scheme, and the evidence suggests that where planning applications are determined more quickly than average, this is because such matters were substantially addressed prior to the application being submitted, through plan-making, development briefs and/or master planning. There is rarely a way to short-circuit planning.
3. Commencement on large sites can be accelerated if it is possible to 'carve-out' a coherent first phase and fast track its implementation through a focused first phase planning application, in parallel with consideration of the wider scheme through a Local Plan or wider outline application.
4. After receiving permission, on average smaller sites take longer to deliver their first dwelling than do the largest sites (1.7-1.8 years compared to 0.8 years for sites on 2,000+ units).

Lapse Rates: What Happens to Permissions?

Not every planning permission granted will translate into the development of homes. This could mean an entire site does not come forward, or delivery on a site can be slower than originally envisaged. It is thus not realistic to assume 100% of planning permission granted in any given location will deliver homes. Planning permissions can lapse for a number of reasons:

1. The landowner cannot get the price for the site that they want;
2. A developer cannot secure finance or meet the terms of an option;
3. The development approved is not considered to be financially worthwhile;
4. Pre-commencement conditions take longer than anticipated to discharge;
5. There are supply chain constraints hindering a start; or
6. An alternative permission is sought for the scheme after approval, perhaps when a housebuilder seeks to implement a scheme where the first permission was secured by a land promoter.

These factors reflect that land promotion and housebuilding is not without its risks.

At the national level, the Department for Communities and Local Government has identified a 30-40% gap between planning permissions granted for housing and housing starts on site⁷. DCLG analysis suggested that 10-20% of permissions do not materialise into a start on site at all and in addition, an estimated 15-20% of permissions are re-engineered through a fresh application, which would have the effect of pushing back delivery and/or changing the number of dwellings delivered.

This issue often gives rise to claims of 'land banking' but the evidence for this is circumstantial at best, particularly outside London. The business models of house builders are generally driven by Return on Capital Employed (ROCE) which incentivises a quick return on capital after a site is acquired. This means building and selling homes as quickly as possible, at sales values consistent with the price paid for the land. Land promoters (who often partner with landowners using promotion agreements) are similarly incentivised to dispose of their site to a house builder to unlock their promotion fee. Outside London, the scale of residential land prices has not been showing any significant growth in recent years⁸ and indeed for UK greenfield and urban land, is still below levels last seen at least 2003⁹. There is thus little to incentivise hoarding land with permission.

The LGA has identified circa 400-500,000 units of 'unimplemented' permissions¹⁰, but even if this figure was accurate, this is equivalent to just two years of pipeline supply. More significantly, the data has been interpreted by LGA to significantly overstate the number of unimplemented permissions because 'unimplemented' refers to units on sites where either the entire site has not been fully developed or the planning permission has lapsed¹¹. It therefore represents a stock-flow analysis in which the outflow (homes built) has been ignored.

Insofar as 'landbanking' may exist, the issue appears principally to be a London – rather than a national – malaise, perhaps reflecting that land values in the capital – particularly in 'prime' markets – have increased by a third since the previous peak of 2007. The London Mayor's 'Barriers to Housing Delivery – Update' of July 2014 looked at sites of 20 dwellings or more and reported that only about half of the total number of dwellings granted planning permission every year are built (Table 3); a lapse rate of circa 50% across London.

Clearly, the perceived problem of landbanking is seeing policy attention from Government, but caution is needed that any changes do not result in unintended consequences or act as a disincentive to secure planning permissions.

A more practical issue is that Plans and housing land trajectories must adopt sensible assumptions, based on national benchmarks, or – where the data exists – local circumstances, to understand the scale of natural non-implementation.

⁷ DCLG Presentations to the HBF Planning Conference (September 2015)

⁸ Knight Frank Residential Development Land Index Q1 2016 <http://content.knightfrank.com/research/161/documents/en/q1-2016-3844.pdf>

⁹ Savills Development Land Index <http://www.savills.co.uk/research/uk/residential-research/land-indices/development-land-index.aspx>

¹⁰ Glenigan data as referenced by Local Government Association in its January 2016 media release (a full report is not published) http://www.local.gov.uk/web/guest/media-releases/-/journal_content/56/10180/7632945/NEWS

¹¹ This would mean that a site which has built 99% of homes will still show up as 100% of units being 'unimplemented'

Build Rates: How Fast Can Sites Deliver?

The rate at which sites deliver new homes is a frequently contested matter at Local Plan examinations and during planning inquiries considering five year housing land supply. Assumptions can vary quite markedly and expectations have changed over time: in 2007, Northstowe – the new settlement to the north west of Cambridge – was expected by the Council to deliver 750-850 dwellings per annum¹²; it is now projected to deliver at an annual rate of just 250¹³.

There is a growing recognition that the rate of annual delivery on a site is shaped by ‘absorption rates’: a judgement on how quickly the local market can absorb the new properties. However, there are a number of factors driving this for any given site:

- the strength of the local housing market;
- the number of sales outlets expected to operate on the site (ie the number of different house builders or brands/products being delivered); or
- the tenure of housing being built. Are market homes for sale being supplemented by homes for rent, including affordable housing?

The analysis in this section explores these factors with reference to the surveyed sites.

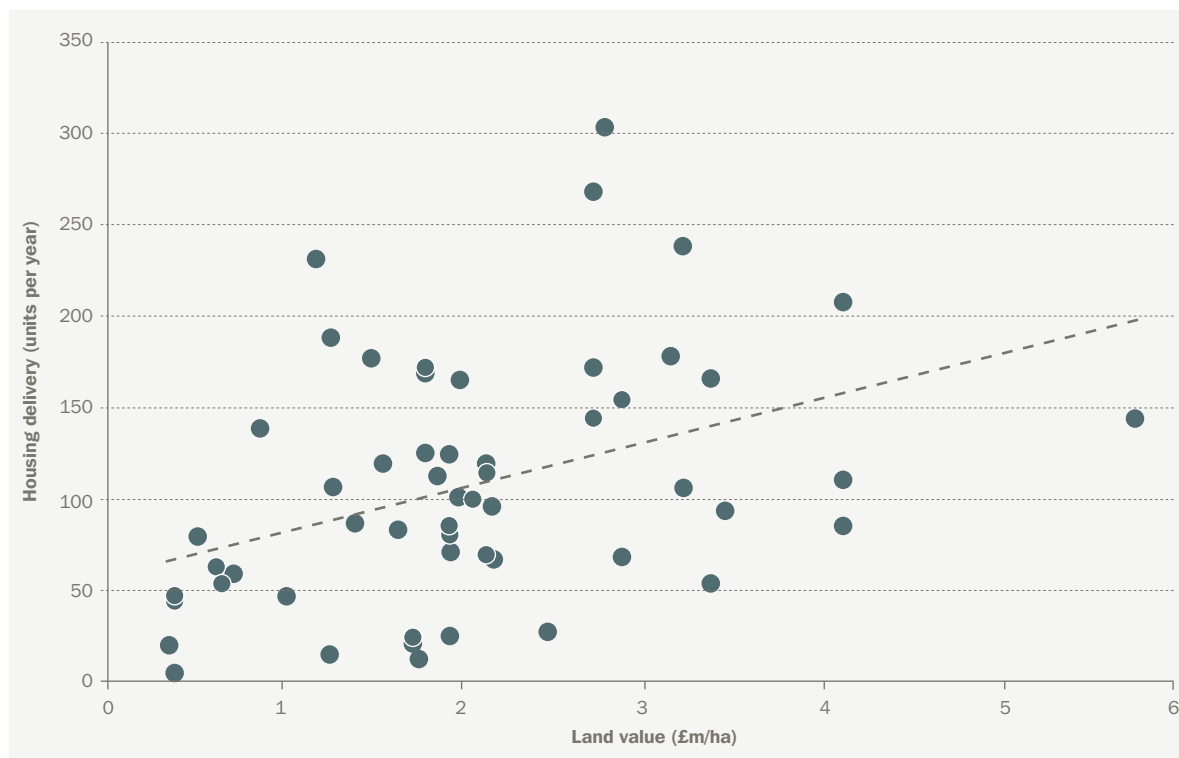
Market Strength

It might seem a truism that stronger market demand for housing will support higher sales and build rates – but how far is that the case and how to measure it?

Figure 6 below compares CLG data on post-permission residential land value estimates (£/ha) by Local Authorities in 2014¹⁴ to the average build out rate of each of the assessed strategic sites. Unfortunately the residential land value estimates are only available for England and as such the Welsh sites assessed are excluded, leaving 57 sites in total.

The analysis shows that markets matter. Relatively weaker areas may not be able to sustain the high build-out rates that can be delivered in stronger markets with greater demand for housing. There are significant variations, reflecting localised conditions, but the analysis shows a clear relationship between the strength of the market in a Local Authority area and the average annual build rates achieved on those sites. Plan makers should therefore recognise that stronger local markets can influence how quickly sites will deliver.

Figure 6: Average Annual Build-out Rates of sites compared to Land Values as at 2014



Source: NLP analysis and CLG Post-permission residential land value estimates (£/ha) by Local Authorities (February 2015)

¹² South Cambridgeshire Annual Monitoring Report 2006/07

¹³ South Cambridgeshire Annual Monitoring Report 2014/15

¹⁴ Post-permission residential land value estimates were released in December 2015, however the end date of the build rate data obtained is 2014/15; as such land value estimates at February 2015 are better aligned to the build periods assessed in this report and have been used for consistency.

Size Matters

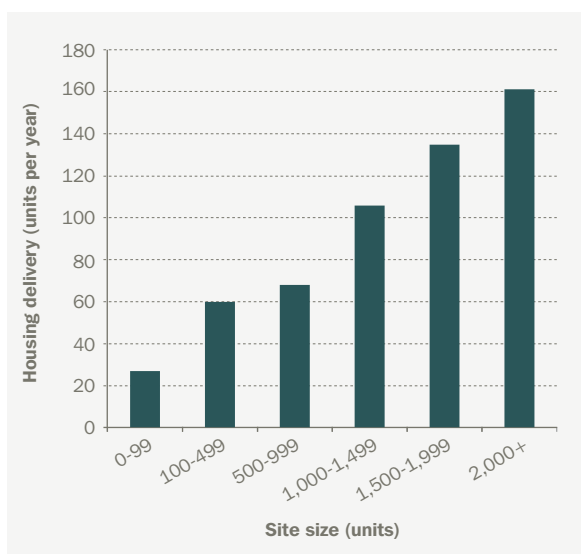
A key metric for build rates on sites is the number of sales outlets. Different housebuilders will differentiate through types or size of accommodation and their brands and pricing, appealing to different customer types. In this regard, it is widely recognised that a site may increase its absorption rate through an increased number of outlets.

Unfortunately, data limitations mean that the number of outlets is not readily available for the large sites surveyed within this research, and certainly not on any longitudinal basis which is relevant because the number of outlets on a site may vary across phases.

However, it is reasonable to assume that larger sites are likely to feature more sales outlets and thus have greater scope to increase build rates. This may relate to the site being more geographically extensive: with more access points or development ‘fronts’ from which sales outlets can be driven. A large urban extension might be designed and phased to extend out from a number of different local neighbourhoods within an existing town or city, with greater diversity and demand from multiple local markets.

Our analysis supports this concept: larger sites deliver more homes each year, but even the biggest schemes (those with capacity for 2,000 units) will, on average, deliver fewer than 200 dwellings per annum, albeit their average rate – 161 units per annum – is six times that of sites of less than 100 units (27 units per annum).

Figure 7: Average annual build rate by site size



Start to Finish

14 Source: NLP analysis

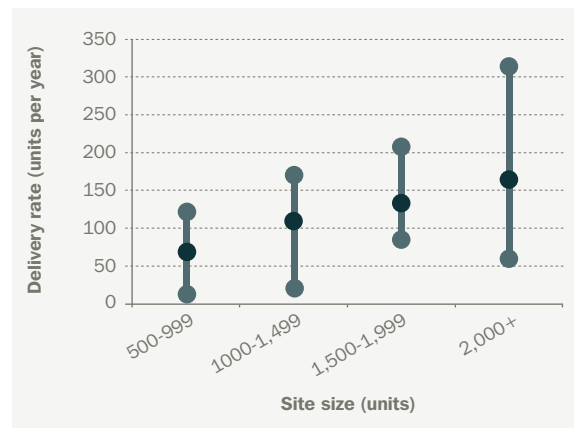
Of course, these are average figures. Some sites will see build rates exceeding this average in particular years, and there were variations from the mean across all categories (see Figure 8), suggesting that higher or lower rates than this average may well be possible, if circumstances support it.

Nevertheless, it is striking that annual average delivery on sites of up to 1,499 units barely exceeds 100 units per annum, and there were no examples in this category that reached a rate of 200 per annum. The highest rate – of 321 units per annum – is for the Cranbrook site, but this is a short term average. A rate of 268 per annum was achieved over a longer period at the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes. The specific circumstance surrounding the build rates in both these examples are explored as case studies opposite. It is quite possible that these examples might not represent the highest rate of delivery possible on large-scale sites in future, as other factors on future sites might support even faster rates.

Our analysis also identifies that, on average, a site of 2,000 or more dwellings does not deliver four times more dwellings than a site delivering between 100 and 499 homes, despite being at least four times the size. In fact it only delivers an average of 2.5 times more houses. This is likely to reflect that:

- it will not always be possible to increase the number of outlets in direct proportion to the size of site – for example due to physical obstacles (such as site access arrangements) to doing so; and
- overall market absorption rates means the number of outlets is unlikely to be a fixed multiplier in terms of number of homes delivered.

Figure 8: Average annual build-out rate by site size, including the minimum and maximum averages within each site size



Source: NLP analysis

Cranbrook: East Devon

The highest average annual build out rates recorded in this analysis comes from the Cranbrook site in East Devon where an average of 321 dwellings per annum were delivered between 2012/13 and 2014/15. Delivery of housing only started on this site in 2012/13, with peak delivery in 2013/14 of 419 dwellings.

Cranbrook is the first new standalone settlement in Devon for centuries and reportedly – according to East Devon Council – the result of over 40 years of planning (this claim has not been substantiated in this research). It is the circumstances surrounding its high annual delivery rate which is of most interest, however.

Phase 1 of the development was supported by a £12 million repayable grant from a revolving infrastructure fund managed by the Homes and Communities Agency. The government also intervened again in the delivery of this site by investing £20 million for schools and infrastructure to ensure continuity of the scheme, securing the delivery of phase 2. The government set out that the investment would give local partners the confidence and resources to drive forward its completion.

The Consortium partnership for Cranbrook (including Hallam Land, Persimmon Homes (and Charles Church) and Taylor Wimpey) stated the following subsequent to the receipt of the government funding¹⁵.

“Without this phase 2 Cranbrook would have been delayed at the end of phase 1, instead, we have certainty in the delivery of phase 2, we can move ahead now and commit with confidence to the next key stages of the project and delivering further community infrastructure and bringing forward much needed private and affordable homes”.

Clearly, the public sector played a significant role in supporting delivery. The precise relationship between this and the build rate is unclear, but funding helped continuity across phases one and two of the scheme. More particularly, the rate of delivery so far achieved relates just to the first three years, and there is no certainty that this high build-out rate will be maintained across the remainder of the scheme.

Eastern Expansion Area (Broughton Gate & Brooklands): Milton Keynes

The second highest average build out rates recorded in this analysis comes from the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes where an average of 268 dwellings per annum were delivered between 2008/09 and 2013/14. As is widely recognised, the planning and delivery of housing in Milton Keynes is distinct from almost all the sites considered in this research.

Serviced parcels with the roads already provided were delivered as part of the Milton Keynes model and house builders are able to proceed straight onto the site and commence delivery. This limited the upfront site works required and boosted annual build rates. Furthermore, there were multiple outlets building-out on different serviced parcels, with monitoring data from Milton Keynes Council suggesting an average of c.12 parcels were active across the build period. This helped to optimise the build rate.

¹⁵ <https://www.gov.uk/government/news/government-funding-to-unlock-delivery-of-12-000-new-homes>

Peak Years of Housing Delivery

Of course, rates of development on sites will ebb and flow. The top five peak annual build-out rates achieved across every site assessed are set out in Table 1 below. Four of the top five sites with the highest annual peak delivery rates are also the sites with the highest annual average build out rates (with the exception of Broughton & Atterbury). Peak build rates might occur in years when there is an overlap of multiple outlets on phases, or where a particular phase might include a large number of affordable or apartment completions. It is important not to overstress these individual years in gauging build rates over the whole life of a site.

Table 1: Peak annual build-out rates compared against average annual delivery rates on those sites

Scheme	Peak Annual Build-Out Rate	Annual Average Build-Out Rate
Cambourne	620	239
Hamptons	548	224
Eastern Expansion Area	473	268
Cranbrook	419	321
Broughton	409	171

Source: NLP analysis and various AMRs

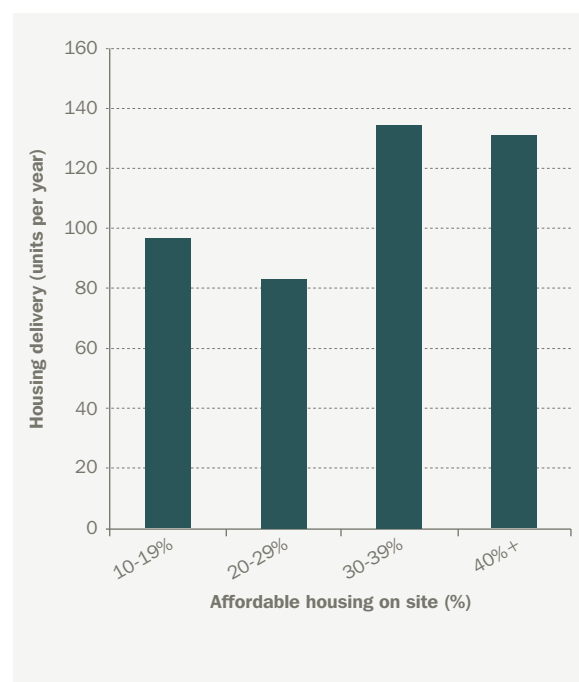
Affordable Housing Provision

Housing sites with a larger proportion of affordable homes (meeting the definition in the NPPF) deliver more quickly, where viable. The relationship appears to be slightly stronger on large-scale sites (500 units or more) than on smaller sites (less than 500 units), but there is a clear positive correlation (Figure 9). For both large and small-scale sites, developments with 40% or more affordable housing have a build rate that is around 40% higher compared to developments with 10-19% affordable housing obligation.

The relationship between housing delivery and affordable (subsidised) housing is multi-dimensional, resting on the viability, the grant or subsidy available and the confidence of a housing association or registered provider to build or purchase the property for management. While worth less per unit than a full-market property, affordable housing clearly taps into a different segment of demand (not displacing market demand), and having an immediate purchaser of multiple properties can support cash flow and risk sharing in joint ventures. However, there is potential that starter homes provided in lieu of other forms of affordable housing may not deliver the same kind of benefits to speed of delivery, albeit they may support viability overall.

This principle – of a product targeting a different segment of demand helping boost rates of development – may similarly apply to the emergent sectors such as ‘build-to-rent’ or ‘self build’ in locations where there is a clear market for those products. Conversely, the potential for starter homes to be provided in lieu of other forms of affordable housing may overlap with demand for market housing on some sites, and will not deliver the kind of cash flow / risk sharing benefits that comes from disposal of properties to a Registered Provider.

Figure 9: Affordable housing provision and housing output



Source: NLP analysis

The Timeline of the Build-out Period

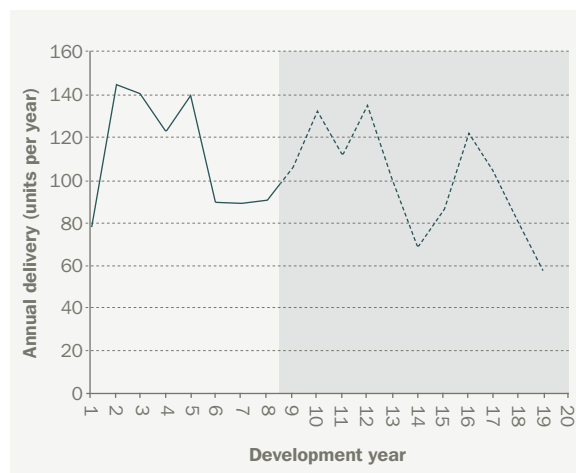
Many planners’ housing trajectories show large sites gradually increasing their output and then remaining steady, before tailing off at the end. In fact, delivery rates are not steady. Looking at the first eight years of development – where the sample size of large sites is sufficiently high – NLP’s research showed that annual completions tended to be higher early in the build-out period before dipping (Figure 10).

For sites with even longer build out periods, this pattern of peaks and troughs is potentially repeated again (subject to data confidence issues set out below). This surge in early completions could reflect the drive for

rapid returns on capital in the initial phase, and/or early delivery of affordable housing, with the average build rate year by year reducing thereafter to reflect the optimum price points for the prevailing market demand. Additionally, the longer the site is being developed, the higher the probability of coinciding with an economic downturn – obviously a key factor for sites coming forward over the past decade – which will lead to a reduction in output for a period.

Our sample of sites where the development lasted for more than eight years is too small to draw concrete findings, but it does flag a few other points. On extremely large sites that need to span more than a decade, the development will most likely happen in phases. The timing and rate of these phases will be determined by a range of factors including: the physical layout of the site, the ability to sell the homes; trigger points for payment for key social and transport infrastructure obligations; the economic cycle; and local market issues. Predicting how these factors combine over a plan period is self-evidently difficult, but plan makers should recognise the uncertainty and build in flexibility to their housing trajectories to ensure they can maintain housing supply wherever possible.

Figure 10: Average annual build-out rate per year of the build period



Source: NLP analysis

Summary

1. There is a positive correlation between the strength of the market (as measured by residential land values) and the average annual build rates achieved.
2. The annual average build-rate for the largest sites (of 2,000 or more units) is circa 161 dwellings per annum
3. The rate of delivery increases for larger schemes, reflecting the increased number of sales outlets possible on large sites. However, this is not a straight line relationship: on average, a site of 2,000 units will not, deliver four times as fast as a site of 500. This reflects the limits to number of sales outlets possible on a site, and overall market absorption rates.
4. There is significant variation from the average, which means some sites can be expected to deliver more (or less) than this average. However, the highest average build-out rate of all the assessed sites is 321 dwellings per annum in Cranbrook. But this relates to just three years of data, and the scheme benefitted from significant government funding to help secure progress and infrastructure. Such factors are not be present in all schemes, and indeed, the data suggests sites tend to build at a higher rate in initial years, before slowing down in later phases.
5. Build rates on sites fluctuate over their life. The highest build rate recorded in a single year is 620 units at Camborne, but for the duration of the development period the average annual build rate is 239 dwellings.
6. There is a positive correlation between the percentage of affordable homes built on site and the average annual delivery of homes with sites delivering 30% or more affordable housing having greater annual average build rates than sites with lower affordable housing provision. The introduction of different tenures taps into different market segments, so a build to rent product may similarly boost rates of delivery – where there is a market for it – but starter homes may have the opposite effect if they are provided in lieu of other forms of affordable homes, and displace demand for cheaper market homes.

A Brownfield Land Solution?

The NPPF encourages the effective use of previously-developed land, and recent Government announcements suggest increased prioritisation of development for brownfield sites. Efforts to streamline the planning process for brownfield sites may also speed up their delivery. But, is there a difference in how quickly brownfield sites can come forward compared to greenfield sites?

Research produced by CPRE and Glenigan in March 2016¹⁶ suggested that the time between planning permission being granted and construction work starting is generally the same for brownfield and greenfield sites, but suggested that work on brownfield sites is completed more than six months quicker. However, it was not clear if this finding was because the greenfield sites were larger than the equivalent brownfield sites surveyed in that study. We therefore looked at how lead in times and build rates compared for large-scale sites of 500+ dwellings on greenfield and brownfield sites.

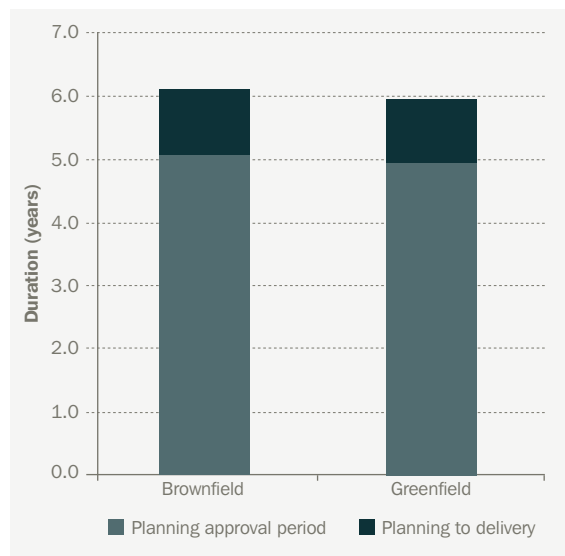
The Planning Approval Period

Whether land is brownfield or greenfield does not impact on the planning approval period. On average, for all sites, the planning approval period for the sites delivering 500 dwellings or more is almost identical at 5.1 years for brownfield and 5.0 years for greenfield – see Figure 11, although this is skewed by the very largest sites of 2,000+ units (see Table 2), with brownfield sites in the smaller-size bands being on average slightly quicker than their greenfield counterparts (albeit caution is required given the small sample size for some size bandings).

What the analysis tends to show is that it is the scale of development – rather than the type of land – which has the greatest impact on the length of planning process, and that despite government prioritisation on brownfield land in the NPPF, this is unlikely to result in significant further improvements in timescales for delivery.

The time period between gaining a planning approval and the first delivery of a dwelling is also similar overall.

Figure 11: Previous land use and duration of planning



Source: NLP analysis

Table 2: Previous land use and duration of planning approval period

	Site Size (dwellings)	Number of sites in this group	Average Planning Approval Period
Greenfield Sites	500-999	14	4.5
	1,000-1,499	9	5.3
	1,500-1,999	7	5.5
	2,000+	13	5.0
	Total/Average	43	5.0
Brownfield Sites	500-999	16	4.1
	1,000-1,499	3	3.3
	1,500-1,999	1	4.6
	2,000+	7	8.6
	Total/Average	27	5.1

Source: NLP analysis

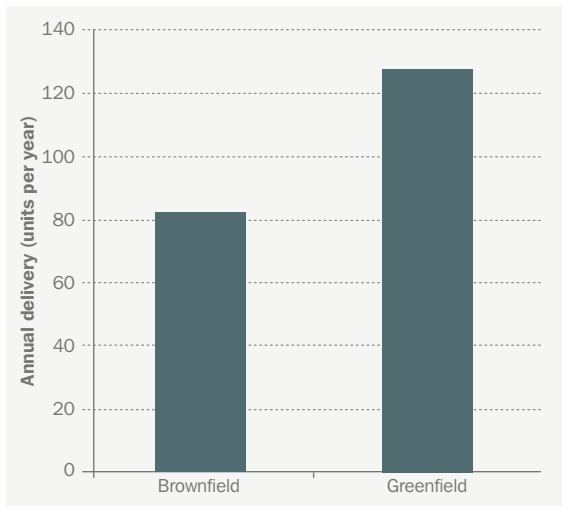
¹⁶ Brownfield comes first: why brownfield development works CPRE, March 2016

Build-out Rates

There is a more discernible difference between brownfield and greenfield sites when it comes to the annual build out rates they achieve, with the analysis in Figure 12 suggesting that brownfield sites on average deliver at lower rates than their greenfield counterparts, both overall and across the different size bandings (see Table 3) albeit recognising the small sample size for some sizes of site. On average, the annual build-out rate of a greenfield site is 128 dwellings per annum, around 50% higher than the 83 per annum average for brownfield sites.

This may reflect that brownfield sites carry extra costs (e.g. for remediation) which reduces the scale of contribution they make to infrastructure and affordable housing provision (which as shown can boost rates of delivery).

Figure 12: Previous land use and housing delivery



Source: NLP analysis

Table 3: Previous land use by size and average annual build out rate

	Site Size (dwellings)	Number of sites in this group	Average Annual Build-out Rate
Greenfield Sites	500-999	14	86
	1,000-1,499	9	122
	1,500-1,999	7	142
	2,000+	13	171
	Total/Average	43	128
Brownfield Sites	500-999	16	52
	1,000-1,499	3	73
	1,500-1,999	1	84
	2,000+	7	148
	Total/Average	27	83

Source: NLP analysis

Summary

1. Brownfield and greenfield sites come forward at broadly similar rates, although at the smaller end of the scale, there does appear to be some 'bonus' in speed of decisions for previously-developed land. For the largest sites (of 2,000+ units) the sample of brownfield sites suggests an extended time period (3.6 years longer) compared to their equivalent greenfield sites;
2. Once started, large-scale greenfield sites do deliver homes at a more rapid rate than their brownfield equivalents, on average 50% quicker.

Conclusion

There is a growing recognition that large-scale housing development can and should play a large role in meeting housing need. Garden towns and villages – planned correctly – can deliver sustainable new communities and take development pressure off less sustainable locations or forms of development.

However, if planners are serious about wanting to see more homes built each year and achieve the government's target of one million by 2020 (or indeed, deliver the 300,000 per annum that are needed), simply allocating a site or granting a permission is not enough. The Government recognises this: the Minister for Planning has been quoted as saying that *"you cannot live in a planning permission"*.

Part of the debate has focused on perceptions of 'land banking' – the concept that developers are hoarding land or slowing down development. Equally, suggestions have been made that proposals for large-scale development should be 'protected' from competition from smaller sites or from challenge under five year land supply grounds. The evidence supporting these propositions appears limited.

In our view the real concern – outside London, at any rate – is ensuring planning decisions (including in plan-making) are driven by realistic and flexible housing trajectories in the first place, based on evidence and the specific characteristics of individual sites and local markets.

Based on the research in this document, we draw five conclusions on what is required:

1. If more homes are to be built, more land needs to be released and more planning permissions granted. Confidence in the planning system relies on this being achieved through local plans that must be sufficiently ambitious and robust to meet housing needs across their housing market areas. But where plans are not coming forward as they should, there needs to be a fall-back mechanism that can release land for development when it is required.
2. Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required.
3. Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times. To secure short-term immediate boosts in supply – as is required in many areas – a good mix of smaller sites will be necessary.
4. Plans should reflect that – where viable – affordable housing supports higher rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand for those products). Trajectories will thus need to differentiate expected rates of delivery to respond to affordable housing levels or inclusion of other market products. This might mean some areas will want to consider spatial strategies that favour sites with greater prospects of affordable or other types of housing delivery. This plays into the wider debate about support for direct housing delivery for rent by local government and housing associations and ensuring a sufficient product mix on sites.
5. Finally, in considering the pace of delivery, large-scale brownfield sites deliver at a slower rate than do equivalent greenfield sites. The very largest brownfield sites have also seen very long planning approval periods. Self-evidently, many brownfield sites also face barriers to implementation that mean they do not get promoted in the first place. In most locations outside our biggest cities, a good mix of types of site will be required.

A Checklist for Understanding Large-scale Site Delivery

In setting or assessing reasonable housing trajectories for local plans or five year housing land supply, the lead-in times and average rates of housing delivery identified in this research can represent helpful benchmarks or rules of thumb, particularly in situations where there is limited local evidence.

However, these rules of thumb are not definitive. It is clear from our analysis that some sites start and deliver more quickly than this average, whilst others have delivered much more slowly. Every site is different.

In considering the evidence justifying the estimated time and rate of delivery, the questions listed in Table 4 below represent a checklist of questions that are likely to be relevant:

Table 4: Questions to consider on the speed of housing delivery on large-scale sites

Lead-in times to getting started on site	Factors affecting the speed of build out rate
<input checked="" type="checkbox"/> Is the land in existing use?	<input checked="" type="checkbox"/> How large is the site?
<input checked="" type="checkbox"/> Has the land been fully assembled?	<input checked="" type="checkbox"/> Will the scale, configuration and delivery model for the site support more sales outlets?
<input checked="" type="checkbox"/> If in multiple ownership/control, are the interests of all parties aligned?	<input checked="" type="checkbox"/> How strong is the local market?
<input checked="" type="checkbox"/> To what extent is there any challenge to the principle of development?	<input checked="" type="checkbox"/> Does the site tap into local demand from one or more existing neighbourhoods?
<input checked="" type="checkbox"/> Is the site already allocated for development? Does it need to be in order for release?	<input checked="" type="checkbox"/> Is the density and mix of housing to be provided consistent with higher rates of delivery?
<input checked="" type="checkbox"/> Does an SPD, masterplan or development brief help resolve key planning issues?	<input checked="" type="checkbox"/> What proportion of affordable housing is being delivered?
<input checked="" type="checkbox"/> Is the masterplan/development brief consistent with what the developer will deliver?	<input checked="" type="checkbox"/> Are there other forms of housing – such as build to rent – included?
<input checked="" type="checkbox"/> Is there an extant planning application or permission?	<input checked="" type="checkbox"/> When will new infrastructure – such as schools – be provided to support the new community?
<input checked="" type="checkbox"/> Are there significant objections to the proposal from local residents?	<input checked="" type="checkbox"/> Are there trigger points or phasing issues that may affect the build rate achievable in different phases?
<input checked="" type="checkbox"/> Are there material objections to the proposal from statutory bodies?	
<input checked="" type="checkbox"/> Are there infrastructure requirements – such as access – that need to be in place before new homes can be built?	
<input checked="" type="checkbox"/> Are there infrastructure costs or other factors that may make the site unviable?	
<input checked="" type="checkbox"/> Does the proposal rely on access to public resources?	
<input checked="" type="checkbox"/> If planning permission is secured, is reserved matters approval required?	
<input checked="" type="checkbox"/> Does the scheme have pre-commencement conditions?	
<input checked="" type="checkbox"/> Is the scheme being promoted by a developer who will need time to dispose of the site to a house builder?	

Appendix 2: Small Sites Reviewed

Site Name	Local Planning Authority	Site Size
Holme Farm, Carleton Road, Pontefract	Wakefield	50
Part Sr3 Site, Off Elizabeth Close, Scotter	West Lindsey	50
Former Downend Lower School, North View, Staple Hill	South Gloucestershire	52
Fenton Grange, Wooler	Northumberland	54
Land at the Beacon, Tilford Road, Hindhead	Waverley	59
Land To Rear Of 28 - 34 Bedale Road, Aiskew	Hambleton	59
Hanwell Fields Development, Banbury	Cherwell	59
Land at Prudhoe Hospital, Prudhoe	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Clewborough House School, St Catherines Road	Cherwell	60
Land south of Pinchington Lane	West Berkshire	64
Land Off Cirencester Rd	Stroud	66
Springfield Road Caunt Road	South Kesteven	67
Land off Crown Lane	Wychavon	68
Former Wensleydale School, Dent Street, Blyth	Northumberland	68
Land at Lintham Drive, Kingswood	South Gloucestershire	68
Hawthorn Croft (Off Hawthorn Avenue Old Slaughterhouse Site), Gainsborough	West Lindsey	69
Land to the North of Walk Mill Drive	Wychavon	71
Watermead, Land At Kennel Lane, Brockworth	Tewkesbury	72
North East Area Professional Centre, Furnace Drive, Furnace Green	Crawley	76
Land at Willoughbys Bank, Clayport Bank, Alnwick	Northumberland	76
The Kylins, Loansdean, Morpeth	Northumberland	88
MR10 Site, Caistor Road, Market Rasen	West Lindsey	89
OS Field 9972 York Road Easingwold	Hambleton	93
Land At Green Road - Reading College	Reading	93
North East Sandylands	South Lakeland	94
Auction Mart	South Lakeland	94
Parcel 4, Gloucester Business Park, Brockworth	Tewkesbury	94
Former York Trailers Yafforth Road Northallerton Scheme 1/2	Hambleton	96
Poppy Meadow	Stratford-on-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Land South of Station Road	East Hertfordshire	111
Former Bewbush Leisure Centre Site, Breezehurst Drive, Bewbush	Crawley	112
Land West Of Birchwood Road, Latimer Close	Bristol, City of	119
Land Between Godsey Lane And Towngate East	South Kesteven	120
Bibby Scientific Ltd	Stafford	120
Kennet Island Phase 1B - E, F, O & Q, Manor Farm Road	Reading	125
Primrose Mill Site	Ribble Valley	126
Land Rear Of Mount Pleasant	Cheshire West and Chester	127
Land to the east of Efflinch Lane	East Staffordshire	130
North of Douglas Road, Kingswood	South Gloucestershire	131
Land at Farnham Hospital, Hale Road, Farnham	Waverley	134
Bracken Park, Land At Corringham Road, Gainsborough	West Lindsey	141
Doxey Road	Stafford	145
Former York Trailers Yafforth Road Northallerton Scheme 2/2	Hambleton	145

Site Name	Local Planning Authority	Site Size
London Road/ Adj. St Francis Close	East Hertfordshire	149
MR4 Site, Land off Gallamore Lane, Market Rasen	West Lindsey	149
Queen Mary School	Fylde	169
Sellars Farm, Sellars Road	Stroud	176
Land South of Inervet Campus Off Brickhill Street, Walton	Milton Keynes	176
Notcutts Nursery, 150 - 152 London Road	Cherwell	182
Hoval Ltd North Gate	Newark and Sherwood	196
Hewlett Packard (Land Adjacent To Romney House), Romney Avenue	Bristol, City of	242
128-134 Bridge Road And Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
GCHQ Oakley - Phase 1	Cheltenham	262
Land off Henthorn Road	Ribble Valley	270
Land Between A419 And A417, Kingshill North, Cirencester	Cotswold	270
Hortham Hospital, Hortham Lane, Almondsbury	South Gloucestershire	270
Land At Canons Marsh, Anchor Road	Bristol, City of	272
M & G Sports Ground, Golden York and Middle Farm, Badgeworth	Tewkesbury	273
Long Marston Storage Depot Phase 1	Stratford-on-Avon	284
Land at Brookwood Farm, Bagshot Road	Woking	297
Land at, Badsey Road	Wychavon	298
Land At Fire Service College, London Road, Moreton in Marsh	Cotswold	299
Land At Dorian Road	Bristol, City of	300
Kennet Island Phase 1 - H, M, T, U1, U2 Manor Farm Road	Reading	303
Chatham Street Car Park Complex	Reading	307
Former NCB Workshops, Ellington Rd, Ashington (aka Portland Park)	Northumberland	357
Former Masons Cerement Works and Adjoining Ministry of Defence Land, Gipping Road, Great Blakenham	Mid Suffolk	365
Woolley Edge Park Site	Wakefield	375
Luneside West	Lancaster	403
Radyr Sidings	Cardiff	421
New World House, Thelwall Lane	Warrington	426
Land at former Battle Hospital, 344 Oxford Road	Reading Borough Council	434
New Central (Land at Guildford Road and Bradfield Close including Network House, Merrion House, Bradford House and Coronation House	Woking Borough Council	445
Kingsmead South	Milton Keynes Council	450
Bleach Green, Winlaton	Gateshead	456
Farington Park, East of Wheelton Lane	South Ribble	468
Bickershaw Colliery, Plank Lane, Leigh	Wigan	471
Farnborough Business Park	Rushmoor	476
Horfield Estate, Filton Avenue, Horfield	Bristol City Council	485
Stenson Fields	South Derbyshire	487
Cookridge Hospital	Leeds	495

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Consultation on the Housing Implementation Strategy

Examination – Staffordshire Moorlands Local Plan

for Mr & Mrs Webb

Emery Planning project number: 17-204

Project : 17-204
Site address : Staffordshire Moorlands
Local Plan
Client : Mr & Mrs Webb

Date : February 2019
Author : John Coxon

Approved by : Caroline Payne

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1. Introduction

1.1 Emery Planning Partnership is instructed by Mr & Mrs Webb to submit representations to the focused consultation on the Housing Implementation Strategy (examination documents EL7.001 to EL7.009). We have made detailed representations at each stage of the local plan and participated at the Examination hearings in October 2018.

2. Inspector's post hearing advice note

2.1 The Inspector published a Post Hearing Advice Note on 11 January 2019 (EL6.004) which set out potential main modifications.

2.2 Whilst we note that the main modifications will not be finalised until the current consultation is complete and Matter 4 is concluded, the initial main modifications set out by the Inspector do not address a number of very significant objections raised by our client. For the avoidance of doubt, we consider that main modifications are required to address these fundamental issues of soundness. In particular we have outstanding concerns in respect of:

- the distribution of development to the rural areas;
- the distortion of the spatial strategy / housing land supply in the rural areas caused by including the Blythe Vale strategic site within the rural area, despite its location and character forming part of Stoke-on-Trent;
- the failure to provide any allocations within Biddulph Moor despite its designation as a larger village;
- a fundamental absence of evidence in relation to housing land supply; and,
- the need to allocate additional sites to meet the identified housing requirement.

2.3 Our client has put forward a suitable and deliverable allocation at Biddulph Moor which, if allocated, would assist in addressing a number of issues of soundness. The allocation of the site would accord with the Council's own evidence in relation to the Green Belt, and the site was proposed as a draft allocation in a previous consultation on the plan. We refer to our previous representations on this matter.

3. Addressing the shortfall in Biddulph

- 3.1 The Inspector's Post Hearing Advice Note identifies that the allocation of the BDNEW site is not justified. The Inspector sought clarification on how this soundness issue is to be resolved.
- 3.2 In the Council's response to the Inspector (EL6.005), the Council makes it clear that other site options around Biddulph are constrained, such that they cannot be allocated. The constraints put forward (heritage and the wastewater treatment works) are significant and it must follow that they cannot be overcome, given that the Council then seeks the Inspector's view on *"the potential for the site to be removed from the Local Plan without the subsequent deficit in housing supply being made up elsewhere."*
- 3.3 There is a logical solution which the Council must now consider making up the shortfall elsewhere, via a minor amendment to the spatial strategy. Specifically there is suitable, deliverable land available in the closest large village of Biddulph Moor which could assist in meeting the shortfall. In particular the allocation of our client's site would accord with the Council's evidence base in relation to Green Belt, landscape impact and delivery. Our client's site is not subject to any significant constraints.
- 3.4 We note that the Council has not considered amending the spatial strategy in spite of a host of constraints and issues being identified on the draft allocations, for example the viability assessment which clearly establishes that many of the draft allocations are not viable and/or will not deliver the policy requirement of affordable housing. This is a fundamental error as the Council is required to adopt the most appropriate strategy, when considered against the reasonable alternatives. The approach must be re-considered in view of the changes required by the Inspector.
- 3.5 Finally in relation to the Council's suggestion of not allocating sites for years 11-15 of the plan, such an approach is not appropriate in Staffordshire Moorlands because much of the plan area is constrained by the Green Belt. When Green Belt boundaries are reviewed, authorities must have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. This requires the allocation of sufficient sites for the current plan period (which itself is not even a full 15 years from adoption) and safeguarded land for at least another plan period beyond.

4. Housing Implementation Strategy (HIS)

- 4.1 The need for a HIS is set out at paragraph 47 of the Framework. Local planning authorities should:

“for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.”

- 4.2 Therefore the purpose of the HIS is to describe how the Council will maintain delivery of a five-year supply of housing land.
- 4.3 We note that the HIS features a significant amount of repetition from the Council's case to the examination on matters such as the OAN, affordable housing need etc. We do not repeat our full case here and refer to our previous representations, hearing statements and oral submissions on such matters. However we do respond where new information is provided.

Section 9: Windfall

- 4.4 The HIS contains further justification of the windfall allowances included in the Local Plan. We comment on this information below in our response to examination document EL7.002.

Section 10: Housing trajectory and 5 year supply

- 4.5 The HIS contains an updated housing trajectory and housing land supply information. We comment on this information below in our response to examination document EL7.003.

Section 11: Sources of future housing delivery and assumptions

- 4.6 As we have previously stated, the Council's evidence in relation to housing land supply is wholly inadequate and does not accord with the previous guidance in the NPPG. No documentary evidence is provided anywhere in the evidence base in relation to the sites listed in the tables at Section 11. There are numerous planning application references which date back to 2014 or earlier, with no reserved matters applications submitted.
- 4.7 Whilst this plan is being examined against the previous Framework, it should be noted that the revised Framework requires clear evidence to be demonstrated in relation to all sites that do

not have full planning permission if they are to be considered deliverable. Paragraph 3-036 of the NPPG states:

“For sites with outline planning permission, permission in principle, allocated in a development plan or identified on a brownfield register, where clear evidence is required to demonstrate that housing completions will begin on site within 5 years, this evidence may include:

- *any progress being made towards the submission of an application;*
- *any progress with site assessment work; and*
- *any relevant information about site viability, ownership constraints or infrastructure provision.*

For example:

- *a statement of common ground between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates.*
- *a hybrid planning permission for large sites which links to a planning performance agreement that sets out the timescale for conclusion of reserved matters applications and discharge of conditions”*

4.8 Save for the limited number of sites where reserved matters applications have been submitted, none of the sites fulfil the examples set out in the NPPG.

Section 13: Council strategic response

4.9 The Council's response to the barriers to delivery identified in Section 12 is the 'Accelerated Housing Delivery Programme'. It is stated that the Council's proactive approach is starting to improve delivery rates. However we note that this is not reflected in actual completion rates, which in the last 3 years have averaged only 123 dwellings.

4.10 The HIS then sets out a range of actions for facilitating development on sites with unimplemented planning approvals and accelerating the delivery of local plan sites.

4.11 Whilst actions such as writing letters to applicants/landowners, preparing masterplans and speaking to Registered Providers are clearly well intentioned, ultimately they are the actions that any local authority should be taking, and in any event are unlikely to overcome the constraints that have been identified on strategic sites. For example several of the strategic site allocations are unviable according to the Council's own evidence and will need to negotiate a

reduced or nil affordable housing provision. Several sites are subject to multiple ownerships and/or ransom strips. There is no evidence that the Council's actions can overcome these constraints and will result in the trajectory being met.

- 4.12 Council led interventions have the potential to be effective; however the timescales for exercising CPO powers and acquiring land from unwilling or difficult landowners would almost certainly be prohibitive. If any such action is required the timescales involved would not be sufficient to address delivery issues quickly enough to prevent the housing land supply, and ultimately the plan, from failing. There is also no evidence that the Council has the funding, experience and resources available to effectively deliver such interventionist measures.
- 4.13 The Ascent Programme described in Section 14 provides a reality check for Council interventions and the weight that they should be given in planning for housing delivery. The Ascent Programme was established in 2009/10 and was supported by £8m for funding from the HCA, plus additional funding from Staffordshire County Council and the SMDC. Ascent planned to provide 380 affordable homes in the district by March 2015. However to date only 267 dwellings have been delivered. During that period, housing delivery in Staffordshire Moorlands has remained at levels significantly below the identified housing requirement.
- 4.14 Therefore whilst the measures proposed in section 13 and undertaken to date (section 14) are well intentioned, very little weight can be attached to them in planning terms as mechanisms for boosting delivery. Previous programmes have been ongoing at a time when housing delivery has been remained constantly well below the Council's housing requirement. Therefore the key for this plan is to provide a sufficient supply of viable, deliverable sites in the right locations, which at present it fails to do.

5. Background information on the windfall allowance

- 5.1 Examination document EL7.002 addresses the proposed windfall allowances.
- 5.2 The windfall allowance for the rural areas was achieved under a different policy framework. However as set out in our previous submissions, the approach under this plan would be significantly more restrictive. We do not consider that an early review mechanism is appropriate as a sticking plaster approach, as the same mechanism was used in the Core Strategy. The identified needs of real people in the rural area are not being met.

- 5.3 In terms of the large site windfall allowance for Leek, the schedule of previous completions at Table 1 provides no information on the sites involved and it is impossible to form an appreciation as to how each site came to be windfall rather than an allocation, and how long it took to come forward from first identification.
- 5.4 The schedule of sites at Table 2 refers to the severely out-of-date SHLAA, and indicates that a number of the sites were proposed as allocations in earlier iterations of the plan. It therefore raises the question as to why they were not allocated. It is impossible to pre-judge their suitability for residential development through this process in the absence of allocations.
- 5.5 We therefore maintain that any large sites upon which delivery is expected should be specifically identified and allocated through the Local Plan. This would allow their viability and suitability to be properly considered. If employment sites are to be released for housing, again this should be considered and planned for through the Local Plan, as any release of employment land may need to be compensated for through additional employment allocations.

6. Updated housing trajectory and supporting information

- 6.1 Examination document EL7.003 provides a new housing trajectory and 5 year supply calculations.
- 6.2 Firstly, the trajectory identifies a shortfall of 412 homes over the plan period. Additional sites must be allocated in order to address this shortfall. Whilst the Framework only requires the identification of specific sites for years 11-15 'where possible', in Staffordshire Moorlands much of the district is Green Belt, and this plan is reviewing Green belt boundaries. The Framework requires that authorities must have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.
- 6.3 Secondly, as there is a shortfall against the overall requirement, the trajectory provides zero flexibility in the event that sites do not deliver at the rates anticipated. Substantial windfall allowances are already included. The absence of flexibility is clearly contrary to the Framework's requirement for plans to be sufficiently flexible to adapt to rapid change.
- 6.4 Thirdly, the trajectory does not factor in the vast majority of our comments on the development rates of many sites. For example:

- On numerous sites it was apparent that they do not meet the Framework's definition of deliverable, for example because they are unviable according to the Council's own evidence or are in multiple ownerships.
- On numerous sites the anticipated lead-in times are unrealistic having regard to the many steps that need to be taken before units can be completed. For example normal steps involve the planning application, S106, site marketing, disposal to a developer, reserved matters, discharge of conditions, remediation and site infrastructure before units can be completed. In addition many of the site allocations selected by the Council involve additional complex steps relating to resolving multiple ownership / ransom and viability issues.
- On a number of sites the build rates anticipate 2 developers, when in practice there is no evidence that 2 developers will be involved.
- The Council's own trajectory was (and remains) at odds with the information provided by promoters of the Blythe Vale site at the Matter 8 hearing.

6.5 We refer to our statement to Matter 4, and in particular our response to question 3.2 which deals with specific draft allocations in the trajectory.

6.6 Turning to the supporting information for housing trajectory sites, the information provided is severely lacking in terms of demonstrating that sites will come forward within the timescales and rates anticipated within the trajectory. No documentary evidence is provided, such as Statements of Common Ground or even correspondence with developers. This lack of evidence is compounded by the absence of an up-to-date SHLAA to inform the plan.

6.7 On a number of the sites no evidence is provided or there is no response regarding delivery or start times from the landowner/developer, and yet Council anticipates delivery to commence in the first 5 years of the plan period. These sites include a number of large sites with outline planning permission, and also the allocations at Newton House, Leek (179 dwellings) and The Green, Cheadle (42 dwellings).

6.8 Much of the evidence is outdated and in any event provides no certainty whatsoever of delivery. For example all 3 Biddulph allocations refer to landowner contact from 2017. All of those sites are in multiple ownerships and the information received from developers can at best

be described as minimal. This is compounded by the Council's own viability evidence which identifies that development is not currently viable on all of these sites. The evidence is simply not there to conclude that the sites can be viably delivered during the plan period, let alone the 5 year supply.

- 6.9 We therefore conclude that the Council's latest evidence does not support the housing trajectory, and does not alter the evidence that we put forward at the examination. The Council has had every opportunity to evidence its position through the preparation of the plan and the examination, but has failed to do so. The only conclusion that can be drawn is that the Council's housing trajectory is unrealistic, and contains no flexibility. Additional site allocations are required to provide a realistic prospect of meeting the housing requirement. This can be delivered through an adjustment to the spatial strategy.

7. The local delivery record

- 7.1 Related to the housing trajectory, there was significant discussion at the hearings on build rates and lead-in times, and it was apparent that the Council had not undertaken any assessment of the local delivery record to underpin its assumptions. The Inspector requested any information that the Council has during the Matter 4 hearing. The response from the Council is set out at page 3 of the Council's letter to the Inspector dated 9 November 2018 (EL5.005). We comment on the Council's response as follows.
- 7.2 Firstly, the Council has only provided information on 6 sites. This is wholly inadequate, and cannot under any circumstances be described as an assessment of the local delivery record.
- 7.3 Secondly, the information provided by the Council does not provide an entirely accurate or full picture for each site. For example on the Uplands Mill site, the outline planning application (SMD/2009/0833) was submitted in October 2009. It was approved in February 2010 (not February 2011 as claimed in the Council's response). Therefore the total lead-in time between the original application being submitted and construction commencing in July 2012 was nearly 3 years, despite the outline application being determined within the statutory period. This does not factor in any time for masterplanning or application preparation. This is the only example provided by the Council on a site of 50+ units. Furthermore as far as we are aware, the site was not subject to multiple ownerships as is the case with many of the Council's allocations.

- 7.4 Thirdly, if these sites were truly reflective of delivery, it does not explain actual performance in 2017/18. The trajectory at Appendix 7 of the submission version anticipated that 313 dwellings would be completed. However only 142 dwellings were actually achieved (i.e. less than 50%). This demonstrates that the Council's assumptions are far too optimistic and are not supported by robust evidence.
- 7.5 Fourthly, the sites selected are not reflective of the allocations proposed in the Council's plan, which it is now seeking to justify. Only 1 of the 6 sites is of more than 50 dwellings. That site (Uplands Mill in Biddulph, 197 dwellings) was built out at a rate of 33dpa. No other large sites are assessed. The Council anticipates sites of 200+ dwellings to come forward at a rate of 50 dwellings per annum, even where there is no evidence of 2 developers being involved.
- 7.6 Fifthly, no context is provided as to how these sites have been selected, and so there is no way of proving that the Council has not cherry picked examples. We are aware of numerous sites in Staffordshire Moorlands which have significantly longer lead-in times than those set out in the table. Just taking examples from pages 15 & 16 of the HIS (EL7.001):

- London Mill, Leek: The outline planning application was submitted in September 2015 (SMD/2015/0585), and approved in May 2016 (8 months later). No reserved matters application has been submitted. However, there is a long planning history for the site, with unimplemented residential approvals / renewals dating back to 2009 (08/00940/OUT_MJ). Consequently the lead-in time for the site currently stands at 10 years and counting.

Furthermore there have been more recent applications for a significantly reduced number of residential units (SMD/2018/0475) and an approved commercial development (SMD/2016/0113). Despite this the site is still included in the latest trajectory for 93 dwellings.

- Hughes Concrete, Barnfields, Leek: An outline planning application was submitted in November 2014 (SMD/2014/0750). The application was approved in August 2015 (a determination period of 9 months). More than 4 years since the outline application was submitted, no reserved matters application has been made.
- Macclesfield Road, Leek: Outline application submitted in December 2013 (SMD/2013/1201), approved in December 2016 (3 years later). A reserved matters

application was submitted in November 2018 (SMD/2018/0706) and remains undetermined at the time of writing.

- Brookhouse Way, Cheadle: Outline application submitted in October 2014 (SMD/2014/0655), approved in November 2015. A reserved matters application submitted in November 2018, 3 years after the outline consent was granted, and remains undetermined at the time of writing.
- Cheadle Road, Upper Tean: Outline application submitted in June 2015 (SMD/2015/0424), approved in June 2016. 2.5 years later and the reserved matters application has still not been submitted.
- Forge Colour Works, Biddulph: Full planning application submitted in September 2014 (SMD/2014/0580) and approved in April 2015 (7 months later). Planning permission actually appears to have expired on 1 April 2018, and an application to discharge pre-commencement conditions was not determined prior to expiry.
- Royal Oak Hotel, Cheadle: Full planning application submitted in November 2014 (SMD/2014/0789), validated in March 2015 and approved in October 2015. The consent is listed as unimplemented more than 3 years following the granting of planning permission (and actually appears to have expired in October 2018).
- Another 4 sites listed in EL7.001 (page 16) have resolutions to approve, subject to a Section 106 agreement. The planning application dates range from 2014 to 2017. This again illustrates the point that Section 106 agreements can take months or even years to negotiate and complete, contrary to the lead-in times provided in the Council's housing trajectory.

7.7 In terms of the record on allocations, the Wharf Road Strategic Development Area is already identified as a broad location for 280 dwellings in the existing Core Strategy (adopted in March 2014). However no tangible progress has been made to bring the site forward in the 5 years since adoption of that plan.

7.8 Therefore to conclude, the Council's own evidence indicates that larger sites / sites with outline planning permission take significantly longer to come forward than the Council currently anticipates in the housing trajectory.

7.9 As the Council has not provided any detailed breakdowns of past completions it is impossible to corroborate the purely anecdotal evidence provided in the Council's viability assessment on build rates.

8. Summary and conclusions

- 8.1 Whilst the measures proposed in the HIS are well intentioned, very little weight can be attached to them in planning terms as mechanisms for boosting delivery. The key for this plan is to provide a sufficient supply of viable, deliverable sites in the right locations, which at present it fails to do.
- 8.2 The housing trajectory identifies a shortfall of 412 homes over the plan period. It is clear that additional sites can and should be allocated in order to address this shortfall. Whilst the Framework only requires the identification of specific sites for years 11-15 'where possible', in Staffordshire Moorlands much of the district is Green Belt, and this plan is reviewing Green Belt boundaries. The Framework requires that authorities must have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.
- 8.3 As there is a shortfall against the overall requirement, the trajectory provides zero flexibility in the event that sites do not deliver at the rates anticipated. Substantial windfall allowances are already included. The absence of flexibility is clearly contrary to Framework's requirement for plans to be sufficiently flexible to adapt to rapid change.
- 8.4 The Council's latest evidence on sites does not support the housing trajectory, and does not alter the evidence that we put forward at the examination. The Council has had every opportunity to evidence its position through the preparation of the plan and the examination, but has failed to do so. The only conclusion that can be drawn is that the Council's housing trajectory is unrealistic, and contains no flexibility. Additional site allocations are required to provide a realistic prospect of meeting the housing requirement.
- 8.5 Our client has put forward a suitable and deliverable allocation at Biddulph Moor which, if allocated, would assist in addressing a number of issues of soundness. The allocation of the site would accord with the Council's own evidence in relation to the Green Belt, and the site was proposed as a draft allocation in a previous consultation on the plan. We refer to our previous representations on this matter.

**Town and Country Planning Act 1990
(As Amended)**

Staffordshire Moorlands Local Plan
Examination

Response to the publication of the Housing
Implementation Strategy and Other
Supporting Evidence / Appendices

SITE: BE041

DOCUMENT DATE: February 2019

CLIENT: Harlequin Development Strategies
(Crewe) Limited

REF: HAR823/1/HISResponse

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Appendix 1 Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?,
Nathaniel Lichfield & Partners, November 2016

1. INTRODUCTION

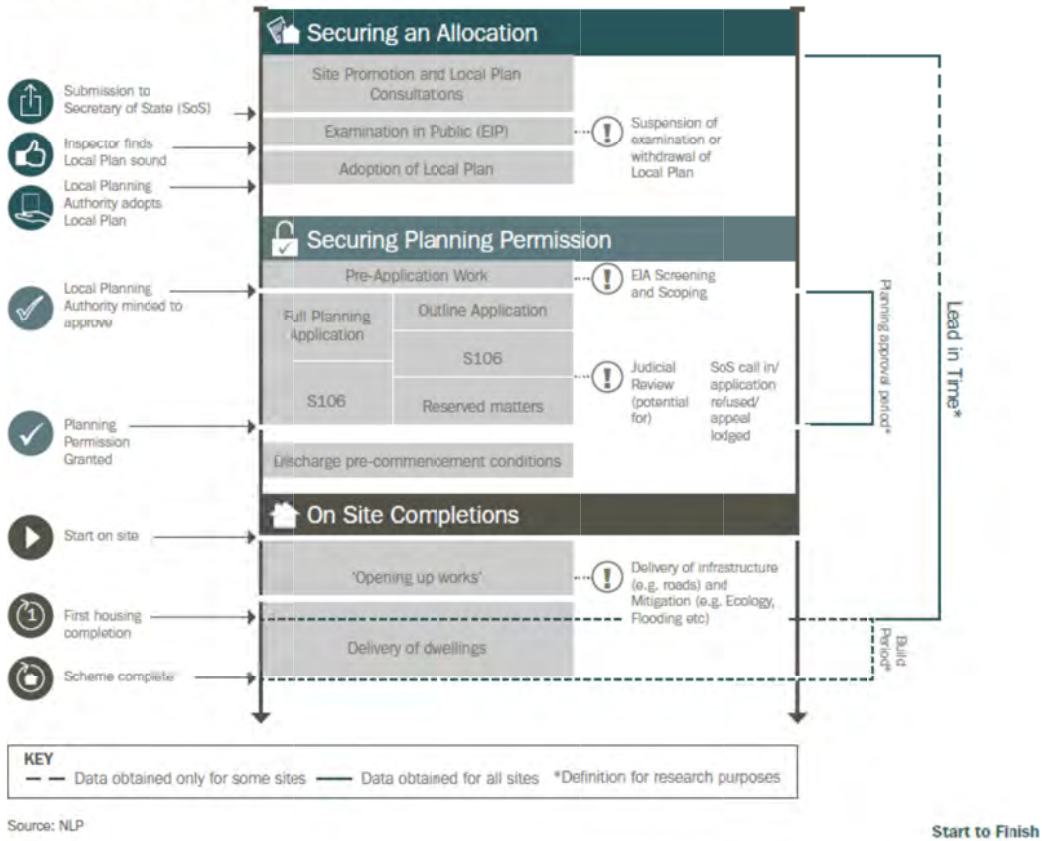
- 1.1 This response to the publication of the Council's Housing Implementation Strategy and supporting appendices is made by Knights on behalf of Harlequin Development Strategies (Crewe) Limited.
- 1.2 The response responds to various matters raised within the above submission, cross-referring to other evidence that already forms part of the evidence base and included in the examination library.
- 1.3 It is respectfully requested that these representations are fully taken into account by the Inspector as part of the ongoing examination into the soundness of the Staffordshire Moorlands Local Plan.

2. LEAD-IN TIMES AND BUILD RATES

- 2.1 As part of our submissions to the hearing sessions that have already taken place, ourselves and other representors highlighted the fact that the SHLAA was dated 2015, and has not been updated in the interim. It is therefore more than three years old and therefore does not reflect the latest status of various sites that the LPA has previously assessed.
- 2.2 The HIS now submitted to the examination at Section 10 lists assumptions made by officers in terms of determining the delivery rate that informs the housing trajectory. This suggests that:
- (a) Sites with full planning permission start in year 1
 - (b) Large sites with outline permission start in year 2
 - (c) All other planning permissions are developed over 3 years (years 1-3)
- 2.3 The Site Allocations Viability Study does not provide a detailed assessment to determine the lead in time and build out rate for sites of different sizes other than to identify development programmes based on average sales rates.
- 2.4 It is a well known fact that larger sites typically have longer lead in times as they often have to deal with more complex planning and site specific issues and often have a greater proportion of up front infrastructure to deliver.
- 2.5 The attached research¹ at **Appendix 1** by Nathaniel Lichfield and Partners, now known as “Lichfield’s” identifies the timeline / steps that have to be taken to secure the delivery of a strategic housing site. This is provided below for ease of reference. This clearly shows the process that has to be observed before the first comes are completed (“the lead in time”)

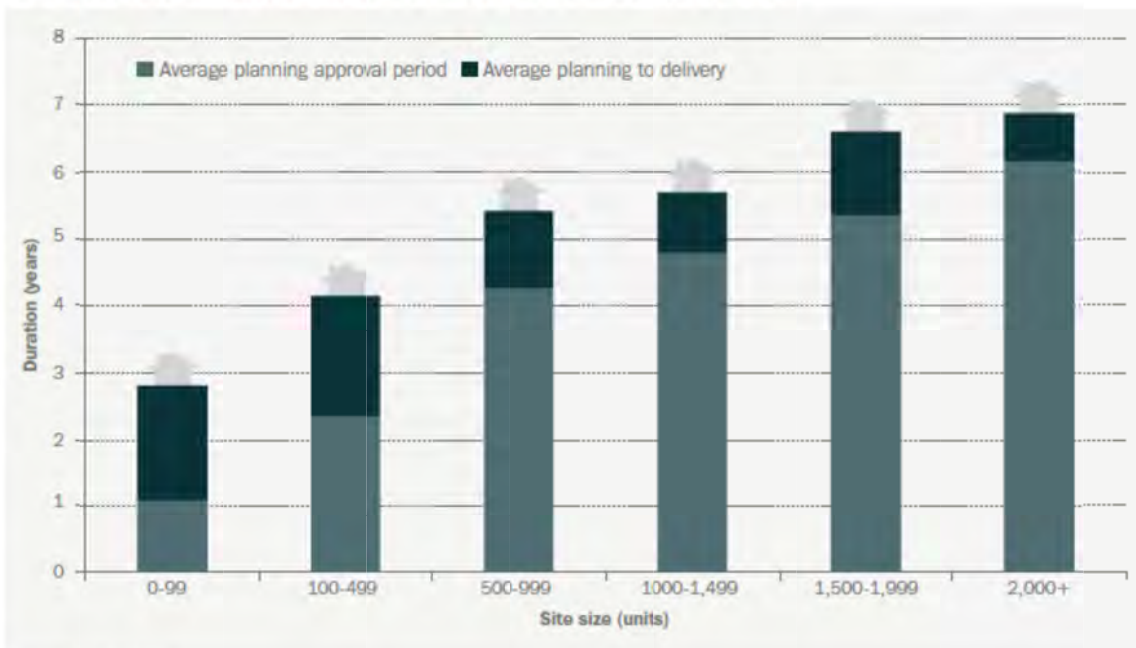
¹ *Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?*, Nathaniel Lichfield & Partners, November 2016

Figure 2: Timeline for the Delivery of a Strategic Housing Site



2.6 Figure 4 of the Lichfield's document then provides an average lead in time for the delivery of the first dwellings on a particular site, depending upon the site size.

Figure 4: Average planning approval period and delivery of first dwelling analysis by site size



- 2.7 The above shows that the first completions for sites of 0-99 dwellings and 100-499 dwellings are delivered in around 18 months to 2 years following the grant of planning permission. This reflects the fact that after planning permission is granted, applications to discharge conditions have to be prepared, submitted and approved, and developers often “wait out” the 6 week period after receiving a grant of planning permission pending any potential Judicial Review challenges in the High Court. Once conditions have been discharged, many developments will begin with site set up, including setting up the main site office and compound, delivery of materials, plant and machinery, followed by initial groundworks, the installation of the site access, and the installation of initial infrastructure, such as drainage for example.
- 2.8 It will then take a further period of time to complete a dwelling to a habitable standard from start to finish.
- 2.9 Therefore, for a large site with full planning permission, the first dwellings are not likely to be delivered until at least 18 months from the date of permission, allowing for discharge of conditions, the installation of the first phases of infrastructure, and the work to construct the dwellings themselves to a habitable standard.
- 2.10 In light of the above, a “start” in year 1 is not the same as a “completion” in year one, which the LPA seem to infer would occur from their trajectory, and it is more likely that in most circumstances, particularly for larger sites, that the first homes are completed in year 2.
- 2.11 For a site with outline permission, a subsequent reserved matters application, or indeed a fresh full application would need to be prepared, submitted and determined, followed by discharge of conditions and the construction of up-front infrastructure. It is therefore likely that the first homes would be delivered in year 3.

3. HOUSING TRAJECTORY

- 3.1 The Council have provided a housing trajectory with their HIS subject to the current consultation. The Council's assumptions of a start in year 1 and a start in year 2 for sites with full or outline permission respectively they have presented within the housing trajectory on page 12 of the HIS, with a background summary of planning permission details provided at pages 15 - 16 of the HIS.
- 3.2 It would appear that the LPA's assumptions of a "start" to development in either year 1 or 2 also results in the first completions in the same year. This is not considered to be accurate or realistic as set out in section 2 of this statement.
- 3.3 Looking at some of the specific sites identified in the Council's housing trajectory in more detail, we make the following observations.

Forge Colour Works

- 3.4 Planning permission for this site was granted under application reference 2014/0580 on 1 April 2018. Applications to discharge further pre-commencement conditions are still pending and a decision date is not known. Work has yet to start on site. The Council's housing trajectory indicates that this site is already delivering housing within the current monitoring year and that 15 dwellings should be delivered by 31 March 2019. Without the discharge of pre-commencement conditions and the subsequent completion of the site remediation, it is impossible that the first homes will be delivered in the next 7 weeks and within the current monitoring year as indicated by the LPA. **Therefore, the housing trajectory should be amended to show delivery of homes from the year 2019/20 and 2020/21.**

Sugar Street, Rushton

- 3.5 Planning permission and reserved matters consent for this site has been granted under applications references SMD/2012/0155 and SMD/2016/0015. Reserved matters was granted on 20 April 2016, however development has yet to commence on site. The site is currently subject to a planning application (reference SMD/2018/0365) which has yet to be determined on part of the site for the erection of two dwellings to replace plots 8 and 9 of the approved development. The application documents confirm that the developer has been unable to acquire a parcel of land required to implement the original planning permission so the scheme has had to be re-designed.
- 3.6 The LPA suggest in the trajectory that this site will deliver all 9 units by 31 March 2019, however as development has yet to commence on site, this is impossible. **Therefore, the housing trajectory should be amended to show the first delivery of homes from the year 2019/20.**

London Mill, Leek

- 3.7 Outline planning permission for this site was granted on 12 May 2016. This proposal seeks the demolition of the existing mill, the retention of some of the building facades, and the

construction of the development. This site is currently on the market for sale. No applications to discharge conditions or applications for the approval of reserved matters have been submitted. This site is tightly constrained by surrounding buildings and the surrounding highway. Following any grant of planning permission, buildings will need to be carefully demolished given the surrounding constraints, and structural works will be required to retain the existing facades if the outline approval is to be implemented. The above assumes that the site is sold and a reserved matters planning permission will be submitted before 12 May 2019.

- 3.8 The LPA suggest in the trajectory that this site will start to deliver housing in the 2019/20 monitoring year, however given the above, it is unlikely to start delivering housing until at least 2021 given the need for the submission of reserved matters and discharge of conditions applications, or the need to submit a fresh full application. **Therefore, the housing trajectory should be amended to show the first delivery of homes from the year 2021/22.**

Barnfields, Leek

- 3.9 Outline planning permission was granted for residential development of this site on 17 August 2015 with a three year period for the submission of reserved matters applications. This planning permission lapsed on 17 August 2015, and a fresh application for planning permission will therefore need to be submitted. There is no known developer actively promoting this site for development, and there is no evidence before the examination hearings that this is the case. The applicant for this site was not a developer, and a certificate B notice was served with the planning application showing that the site is subject to multiple ownership. It is not clear if the land has been acquired by a developer, and if it has not, then there will be a period of time required for an option and/or sale to be agreed and the necessary legal time period required for the exchange of contracts and subsequent acquisition of the site. The site was in the planning system for around a year from the submission of the first application, a resubmission, and a resolution to grant planning permission by the planning committee. It then took a further 8 months for the section 106 agreement to be negotiated and signed.
- 3.10 Given that the planning permission has lapsed, the whole process will need to be undertaken again, including updated ecology surveys, other updated technical reports where required, proposed site layout plans, and the submission and determination of the application. This process is likely to take at least 12 months.
- 3.11 The discharge of relevant pre-commencement conditions and site preparation works and the first installation of site infrastructure will then need to be undertaken before the first homes can be completed. Therefore, without a valid planning permission in place, no completions are likely to take place on this site for at least 3 years.
- 3.12 Whilst the table at page 15 of the HIS suggests that a “joint masterplan has been commissioned with developer including adjacent Cornhill site”, a masterplan commission is not a planning permission and does not clearly demonstrate immediate delivery on this site. **Therefore, the housing trajectory should be amended to show the delivery of the first homes on this site from the year 2021/22.**

Cresswell

- 3.13 Outline planning permission for 168 dwellings and B1, B2 and B8 employment space on this site was granted on 24 May 2016. Reserved matters approval was granted on 11 December 2018 for the first phase of development comprising the access road, and the commercial aspect of the outline approval. Reserved matters applications have yet to be submitted for the residential aspect of the outline planning permission.
- 3.14 The outline planning application was in the system for around 20 months. It was then a further 17 months before the reserved matters application was submitted, which took a further 13 months to determine.
- 3.15 The residential reserved matters application has yet to be submitted. It is therefore likely to be at least a year before any reserved matters are determined. **Therefore, the housing trajectory should be amended to show the delivery of the first homes on this site from the year 2020/21.**

Fole Dairy

- 3.16 The Council resolved to grant outline planning permission for residential development of this site at its planning committee meeting of September 2018, subject to the signing of a Section 106 legal agreement. The section 106 agreement has yet to be signed, and therefore this site does not currently benefit from an outline planning permission.
- 3.17 The applicants are a site promoter, so upon grant of outline planning permission, they are likely to seek to dispose of the site to a developer.
- 3.18 The subsequent developer would then need to submit either a reserved matters application or a full application for the approval of a detailed development. On the basis of other planning permissions referred to in this submission, this could take around 12 months after the issue of the decision notice for the outline permission. This would mean a detailed consent and the discharge of conditions could possibly be achieved towards the end of 2019/20 monitoring year if the section 106 agreement is completed in the next couple of months.
- 3.19 **Therefore, the first homes are not likely to be delivered until at least the 2020/21 monitoring year and the housing trajectory should be amended accordingly.**

Cheadle North

- 3.20 This development proposal is to be considered at planning committee on 14 February 2019. Following any resolution to grant planning permission, the Section 106 agreement will need to be signed, the decision issued and pre-commencement conditions discharged before initial site works and up front infrastructure is provided before the first homes are delivered. It is therefore unlikely that the first homes will be delivered in 2019/20. **Therefore, the trajectory should be amended to show the first completions of new homes during the 2020/21 monitoring year.**

Blythe Vale

- 3.21 There is no dispute that this site is deliverable, or with the delivery rates submitted to the examination. However, the trajectory presented by the Council indicates that 25 dwellings will be completed by the end of March 2019 (i.e. in approximately 7 months time). At the time of writing, initial site works have commenced, including the provision of the access. It is therefore unlikely that any dwellings, let alone 25 will be delivered by the end of March 2019. **Therefore, the trajectory should be amended to show the first delivery of new homes in the 2019/20 monitoring year.**

Summary

- 3.22 In light of the above considerations, the following adjustments to the trajectory should be made:
- (a) Forge works - first year of completions 2019/20
 - (b) Sugar Street - first year of completions 2019/20
 - (c) London Mill - first year of completions 2021/22
 - (d) Barnfields - first year of completions 2021/22
 - (e) Cresswell - first year of completions 2020/21
 - (f) Fole Dairy - first year of completions 2020/21
 - (g) Cheadle North - first year of completions 2020/21
 - (h) Blythe Vale - first year of completions 2019/20
- 3.23 The above adjustments may therefore result in a shortfall in the council's initial 5 year housing land supply.
- 3.24 Indeed, the current definition of "deliverable" in the revised Framework would remove the sites at Fole, Cresswell, London Mill, and Barnfields from the 5 year housing land supply immediately. This is particularly so given the very limited evidence that the Council has presented to the examination to clearly demonstrate deliverability. This is an important material consideration given that the revised Framework will be a material consideration in the determination of applications following any adoption of the Staffordshire Moorlands Local Plan.

4. OTHER OBSERVATIONS FROM THE HOUSING TRAJECTORY INCLUDING WINDFALLS

- 4.1 Knights share the concerns that the Inspector has expressed with the Council with regard to the overall shortfall of 412 dwellings over the plan period demonstrated in the trajectory. There are no further allocations currently proposed to address this shortfall, and this is with a large windfall allowance of 30 dwellings per annum for the rural area in addition to windfall allowances for the main towns. As set at paragraph 4.14 of our initial submission in response to the submission of the Local Plan dated 11 April 2018, the 30 dwellings per annum windfall allowance for the rural area is not justified by the evidence, in particular the SHLAA. We have previously identified a capacity for around 271 dwellings for the rural area in the SHLAA, a shortfall of 149 dwellings. Over a 15 year period, this amounts to around 18 dwellings per annum in terms of sites which might become available within the settlement boundaries, which is at odds with the 30 dwellings per annum windfall allowance for the rural area.
- 4.2 When the 149 dwelling shortfall referred to above is added to the shortfall of 412 dwellings in the trajectory, this amounts to a material shortfall of some 561 dwellings. It therefore remains our view that further sites should be identified for allocation, and that the potential for some Green Belt release around some of the larger villages, including Brown Edge, as proposed in previous versions of the Local Plan be reconsidered by the LPA as main modifications.
- 4.3 In light of the observations highlighted in this submission, it is respectfully requested that further main modifications are proposed by the Council to allocate a sufficient supply of sites to deliver its housing requirement over the plan period, in particular for the rural areas where we have demonstrated a significant shortfall in terms of the windfall allowance.
- 4.4 The Framework 2012 is clear that *compelling* evidence that windfall sites *will continue* to provide a reliable source of supply. Our findings from the Council's SHLAA clearly demonstrates that the level of windfall development for the rural area would not be as high as the Council contends, and clearly demonstrates that the Council should not simply rely upon extrapolating past trends into the future. Our position on this point is clearly logical. As windfall sites come forward over time, then naturally, the availability of such windfall sites will reduce as a result. It is therefore considered that a windfall allowance of 30 dwellings per annum for the rural areas is not realistic and should be amended accordingly.
- 4.5 Furthermore, small windfall sites within the settlement boundaries in the rural areas are unlikely to deliver a significant number of affordable homes. In particular, the HIS document at section 14, page 23 states that of the affordable homes to be delivered by the Ascent programme, only 17 homes were to be developed in the rural areas.
- 4.6 The latest SHMA update reviewed the housing register as of October 2016 and indicated that there were 1141² households seeking social housing in Staffordshire Moorlands at that time.
- 4.7 Appendix 6 of the documents submitted to the examination by the Council identify that all of the Ascent properties were delivered by the end of 2015, and despite that, there was still a significant number of households on the Council's housing register by October 2016.

² Paragraph 6.22 Staffordshire Moorlands SHMA Update 2017 by Nathaniel Lichfield and Partners, EL27.6

4.8 Furthermore, a significant number of those households in need are likely to be households from within the rural area in need of a locally available affordable home in areas where house prices are higher. This further justifies the need for specific site allocations on the edge of larger villages to meet some of those affordable housing needs.

5. PEAK DISTRICT NATIONAL PARK

- 5.1 The Development Management Policies Part 2 Local Plan for the Peak District National Park is currently subject to examination.
- 5.2 Parts of the Staffordshire Moorlands administrative area fall within the Peak District National Park boundary, with the area comprising small rural villages and hamlets.
- 5.3 Appendix 5 of the additional information submitted by the Council indicates that housing delivery totalled 68 dwellings over 10 years, and this is used to justify the Council's allowance of 7 dwellings per annum in the Peak Park.
- 5.4 Policy HC1 of the Part 1 Local Plan is very clear that provision will not be made for housing solely to meet open market demand, and housing land will not be allocated in the development plan for the Peak District National Park.
- 5.5 New housing can only be provided to meet local need.
- 5.6 No evidence has been submitted to suggest that on the edge of the villages and hamlets in the Peak District National Park that fall within Staffordshire Moorlands that 7 dwellings per annum will come forward. No evidence of local need for any of the villages or parishes have been submitted to the examination, nor has any assessment or evidence of potentially suitable sites / infill plots been provided to demonstrate that there would be no conflict with the policies of the Peak District National Park Local Plan.
- 5.7 It is therefore considered that little reliance should be placed on the housing trajectory for housing completions in the Peak District National Park, particularly as it is based on past trends and no other compelling evidence that housing in the Peak District National Park would provide a reliable source of supply at the level envisaged by the Council.

6. SUMMARY

6.1 Our observations and assessment of the Council's Housing Implementation Strategy document and supporting appendices can be summarised as follows:

- (a) Lead in times and build out rates:
 - (i) The council's assumption of a "start" on site is not the same as the delivery of a completion and the council's trajectory does not take into account lead in times from a resolution to grant planning permission, the completion of a section 106 legal agreement where required, the discharge of pre-commencement conditions, and the initial site preparation work and installation of up front infrastructure. This will therefore have a bearing on the Council's housing trajectory.
- (b) The Housing Trajectory:
 - (i) Some of the assumptions made in the Council's housing trajectory are unrealistic, in part because some sites either don't have a valid planning permission, or for the case where sites already have planning permission, the council assumes that some sites are delivering now, even though they are subject to applications to discharge conditions. Therefore the trajectory should be adjusted for relevant sites as set out in the points below.
 - (ii) Forge works - first year of completions 2019/20
 - (iii) Sugar Street - first year of completions 2019/20
 - (iv) London Mill - first year of completions 2021/22
 - (v) Barnfields - first year of completions 2021/22
 - (vi) Cresswell - first year of completions 2020/21
 - (vii) Fole Dairy - first year of completions 2020/21
 - (viii) Cheadle North - first year of completions 2020/21
 - (ix) Blythe Vale - first year of completions 2019/20
- (c) Windfalls:
 - (i) It is not considered that the Council's approach and justification for the windfall development in the rural areas is robust, nor is it justified by the evidence base. In particular, the capacity of sites identified in the SHLAA does not correspond with a windfall allowance of 30 dwellings per annum.
- (d) Affordable housing:
 - (i) More sites are needed to be identified in the rural area, particularly around the larger villages to address affordable housing needs, in particular because a significant proportion of those on the council's housing register are likely to require housing in the rural area.
- (e) Peal District National Park - it is not considered that the allowance for 7 dwellings per annum in the area covered by the National Park would provide a reliable source

of supply as there is no robust evidence that future sites will come forward to deliver this number as any home provided in the National Park can only come forward to meet an identified local need, and no evidence for that at the relevant village or parish level has been submitted to the examination.

APPENDIX 1

TRIP

Targeted Research
& Intelligence Programme



Nathaniel Lichfield
& Partners

Planning. Design. Economics.

Start to Finish

How Quickly do Large-Scale Housing Sites Deliver?

November 2016

Executive Summary

There is a growing recognition that large-scale housing development can and should play a large role in meeting housing need. Garden towns and villages – planned correctly – can deliver sustainable new communities and take development pressure off less sustainable locations or forms of development.

However, what looks good on paper needs to deliver in practice. Plans putting forward large sites to meet need must have a justification for the assumptions they make about how quickly sites can start providing new homes, and be reasonable about the rate of development. That way, a local authority can decide how far it needs to complement its large-scale release with other sites – large or small – elsewhere in its district.

This research looks at the evidence on speed and rate of delivery of large-scale housing based on a large number of sites across England and Wales (outside London). We draw five conclusions:

1. If more homes are to be built, more land needs to be released and more planning permissions granted. There is no evidence to support the notion of systemic 'land banking' outside London: the commercial drivers of both house builders and land promoters incentivises rapid build out of permissions to secure returns on capital.
2. Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required.
3. Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times.
4. Plans should reflect that – where viable – affordable housing supports higher rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand for those products). This might mean some areas will want to consider spatial strategies that favour sites with greater prospects of affordable or other types of housing delivery.
5. For large-scale sites, it matters whether a site is brownfield or greenfield. The latter come forward more quickly.

In our conclusions we identify a check list of questions for consideration in exploring the justification for assumed timing and rates of delivery of large-scale sites.

The Research in Figures

70 number of large sites assessed

3.9 years the average lead in time for large sites prior to the submission of the first planning application

6.1 years the average planning approval period of schemes of 2,000+ dwellings. The average for all large sites is circa 5 years

161 the average annual build rate for a scheme of 2,000+ dwellings

321 the highest average annual build rate of the schemes assessed, but the site has only delivered for three years

40% approximate increase in the annual build rate for large sites delivering 30%+ affordable housing compared to those delivering 10%-19%

50% more homes per annum are delivered on average on large greenfield sites than large brownfield sites





Introduction

When it comes to housing, Government wants planning to think big. With its Garden Towns and Villages agenda and consultation on proposed changes to the National Planning Policy Framework (NPPF) to encourage new settlements, planning authorities and developers are being encouraged to bring forward large-scale housing development projects, many of them freestanding. And there is no doubt that such projects will be necessary if England is to boost supply and then consistently deliver the 300,000 new homes required each year¹.

Large-scale sites can be an attractive proposition for plan-makers. With just one allocation of several thousand homes, a district can – at least on paper – meet a significant proportion of its housing requirement over a sustained period. Their scale means delivery of the infrastructure and local employment opportunities needed to sustain mixed communities.

But large-scale sites are not a silver bullet. Their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick start. And once up and running, there is a need to be realistic about how quickly they can deliver new homes. Past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result.

So, if Local Plans and five year land supply assessments are to place greater reliance on large-scale developments – including Garden Towns and Villages – to meet housing needs, the assumptions they use about when and how quickly such sites will deliver new homes will need to be properly justified.

“Local planning authorities should take a proactive approach to planning for new settlements where they can meet the sustainable development objectives of national policy, including taking account of the need to provide an adequate supply of new homes. In doing so local planning authorities should work proactively with developers coming forward with proposals for new settlements in their area.”

DCLG consultation on proposed changes to national planning policy (December 2015)

The Planning Practice Guidance (PPG) offers little guidance other than identifying that timescales and rates of development in land availability assessments should be based on information that “*may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year*”². It also requires housing land availability assessments to include: “a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome.”³

This research provides insights to this topic – which has become a perennial discussion at Local Plan examinations and Section 78 appeals in recent years – by focusing on two key questions:

1. what are realistic lead-in times for large-scale housing developments?; and
2. once the scheme starts delivering, what is a realistic annual build rate?

NLP has carried out a desk-based investigation of the lead-in times and build-out rates on 70 different strategic housing sites (“large sites”) delivering 500 or more homes to understand what factors might influence delivery. For contrast 83 “small sites” delivering between 50 and 499 homes have been researched to provide further analysis of trends in lead in times and build rates at varying scales.

As well as identifying some of the common factors at play during the promotion and delivery of these sites it also highlights that every scheme has its own unique factors influencing its progress: there can be significant variations between otherwise comparable developments, and there is no one ‘typical scheme’. This emphasises the importance of good quality evidence to support the position adopted on individual projects.

¹ House of Lords Select Committee on Economic Affairs (2016) Building more homes: 1st Report of Session 2016-17 - HL Paper 20

² PPG ID: 3-023-20140306

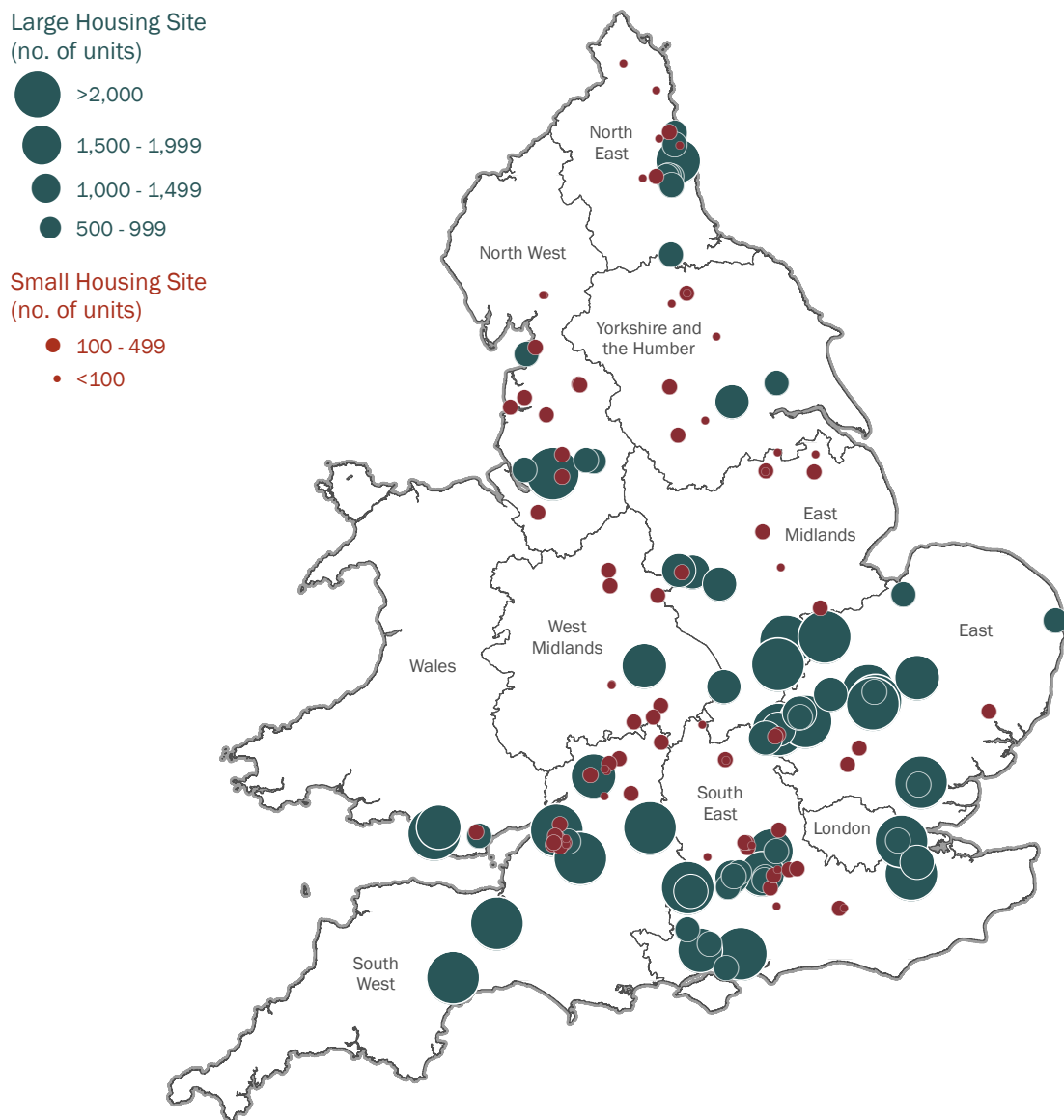
³ PPG ID: 3-028-20140306

Data Sources and Methodology

In total NLP reviewed 70 strategic sites (“large sites”) which have delivered, or will deliver, in excess of 500 dwellings. The sites range in size from 504 to 15,000 dwellings. The geographic distribution of the 70 large sites and comparator small sites is set out below in Figure 1. A full list of the large sites can be found in Appendix 1 and the small sites in Appendix 2. NLP focused on sites outside London, due to the distinctive market and delivery factors applicable in the capital.

Efforts were made to secure a range of locations and site sizes in the sample, but it may not be representative of the housing market in England and Wales as a whole and thus conclusions may not be applicable in all areas or on all sites.

Figure 1: Geographic Distribution of the 70 Large Sites and 83 Small Sites Assessed



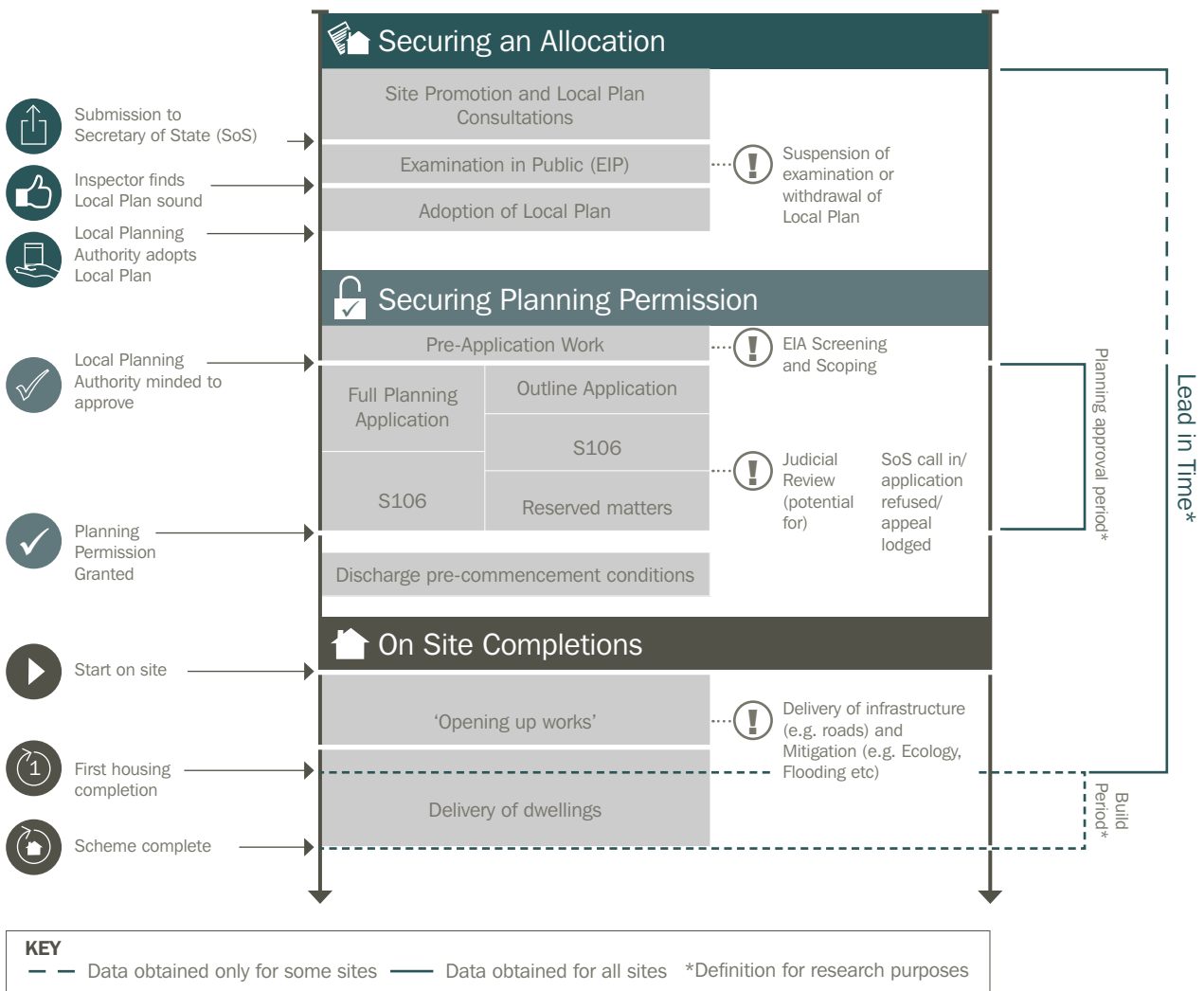
Source: NLP analysis

Methodology

The research aims to cover the full extent of the planning and delivery period. So, wherever the information was available, the data collected on each of the 70 sites covers the stages associated with the total lead-in time of the development (including the process of securing a development plan allocation), the total planning approval period, starting works on site, delivery of the first dwelling and the annualised build rates recorded for the development up until to the latest year where data is available (2014/15). To structure the research and provide a basis for standardised measurement and comparison, these various stages (some of them overlapping) have been codified.

Figure 2 sets out the stages and the milestones used to measure them. These are assumed to fall under what are defined as 'lead-in times', 'planning approval periods' and 'build periods', with 'first housing completion' denoting the end of the lead-in time and start of the build period. Not every site assessed will necessarily have gone through each component of the identified stages sequentially, or indeed at all (for example, some sites secure planning permission without first being allocated).

Figure 2: Timeline for the Delivery of a Strategic Housing Site



Source: NLP

Start to Finish

The approach to defining these stages for the purposes of this research is set out below:

- The **'lead-in time'** – this measures the period up to the first housing completion on site from either a) the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document) or where not applicable, available or readily discernible – b) the validation date of the first planning application made for the scheme.
- The **'planning approval period'** is measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwellings on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). The discharge of any pre-commencement and other conditions obviously follows this, but from a research perspective, a measurement based on a detailed 'consent' was considered reasonable and proportionate milestone for 'planning' in the context of this research.
- The date of the **'first housing completion'** on site (the month and year) is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a mid-point of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.
- The **'annual build rate'** falls within the overall 'build period'. The annual build rate of each site is taken or inferred from the relevant Local Planning Authority's Annual Monitoring Reports (AMR) or other evidence based documents where available. In some instances this was confirmed – or additional data provided – by the Local Planning Authority or County Council.

Due to the varying ages of the assessed sites, the implementation of some schemes was more advanced than others and, as a function of the desk-based nature of the research and the vintage of some of the sites assessed, there have been some data limitations, which means there is not a complete data set for every assessed site. For example, lead-in time information prior to submission of planning applications is not available for all sites. And because not all of the sites assessed have commenced housing delivery, annual build rate information is not universal. The results are presented accordingly.



Getting Started: What are Realistic Lead-in Times?

How long does it take for large-scale sites to get up and running? This can be hard to estimate. Understandably, those promoting sites are positive about how quickly they can deliver, and local authorities choosing to allocate large-scale sites in their plans are similarly keen for these sites to begin making a contribution to housing supply. This leads some local housing trajectories to assume that sites can be allocated in Local Plans and all detailed planning approvals secured in double-quick time. However, the reality can prove different.

Our main focus here is on the average 'planning approval period' and the subsequent period from receiving a detailed planning approval to delivery of the first house on site. However, another important metric is how long it takes from the site being first identified by the local authority for housing delivery to getting started on site. Unfortunately, getting accurate data for this on some of the historic sites is difficult, so this analysis is focused on a just 18 of the sample sites where information was available.

Lead-in Times

The lead-in time prior to the submission of a planning application is an important factor, because many planning issues are flushed out in advance of planning applications being submitted, not least in terms of local plan allocations establishing the principle of an allocation. In a plan-led system, many large-scale sites will rely on the certainty provided by Local plans, and in this regard, the slow pace of plan-making in the period since the NPPF⁴ is a cause for concern.

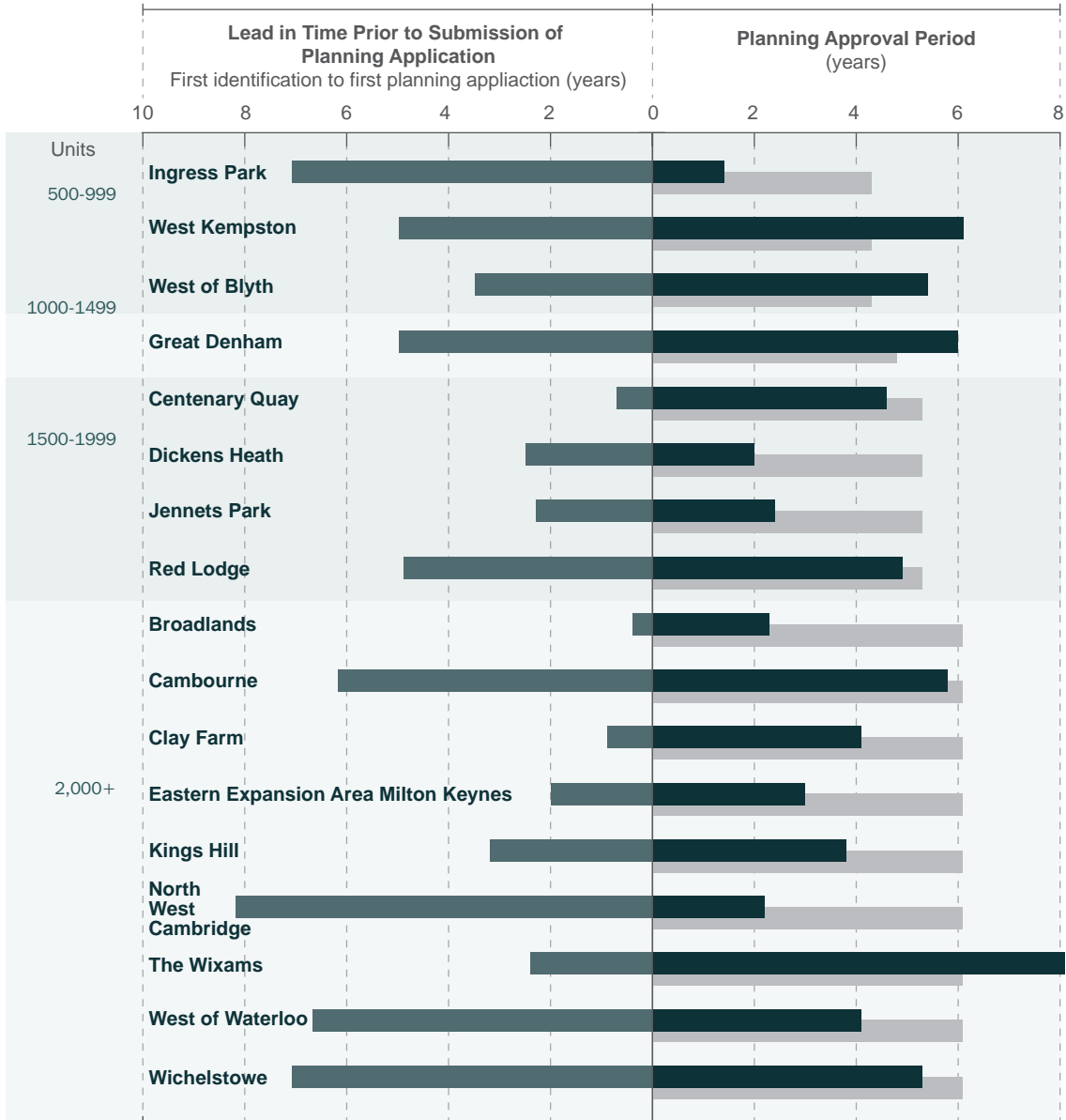
If the lead-in time prior to submission of an application is able to focus on addressing key planning issues, it can theoretically help ensure that an application – once submitted – is determined more quickly. Our sample of sites that has lead-in time information available is too small to make conclusions on this theory. However, there is significant variation within these sites highlighting the complexity of delivering homes on sites of different sizes. Of this sample of sites: on average it was 3.9 years from first identification of the site for housing to the submission of the initial planning application.

Moreover, a substantial lead-in time does not guarantee a prompt permission: 4 of the 18 sites that took longer to gain planning permission than the average for sites of comparable size and also had lead-in times prior to submission of a planning application of several years⁵.

⁴ As at September 2016, just 34% of Local Authorities outside London have an up-to-date post-NPPF strategic-level Local Plan. Source: PINS / NLP analysis.

⁵ The sites in question were The Wixams, West Kempton, West of Blyth, and Great Denham.

Figure 3: Average lead-in time of sites prior to submission of the first planning application



KEY
 ■ Lead in time prior to submission of planning application
 ■ Planning approval period
 ■ Average planning application period for site of that size

Source: NLP analysis

The Planning Approval Period: Size Matters

The term ‘planning approval period’ in this report measures the period from the validation date of the first planning application for the scheme to the decision date of the first application which permits development of dwellings on site (this could be a full, hybrid or reserved matters application). Clearly, in many cases, this approval will also need to be followed by discharge of pre-commencement conditions (a focus of the Government’s Neighbourhood Planning Bill) but these were not reviewed in this research as a detailed approval was considered an appropriate milestone in this context.

The analysis considers the length of planning approval period for different sizes of site, including comparing large-scale sites with small sites. Figure 4 shows that the greater the number of homes on a site, the longer the planning approval period becomes. There is a big step-up in time for sites of in-excess of 500 units.

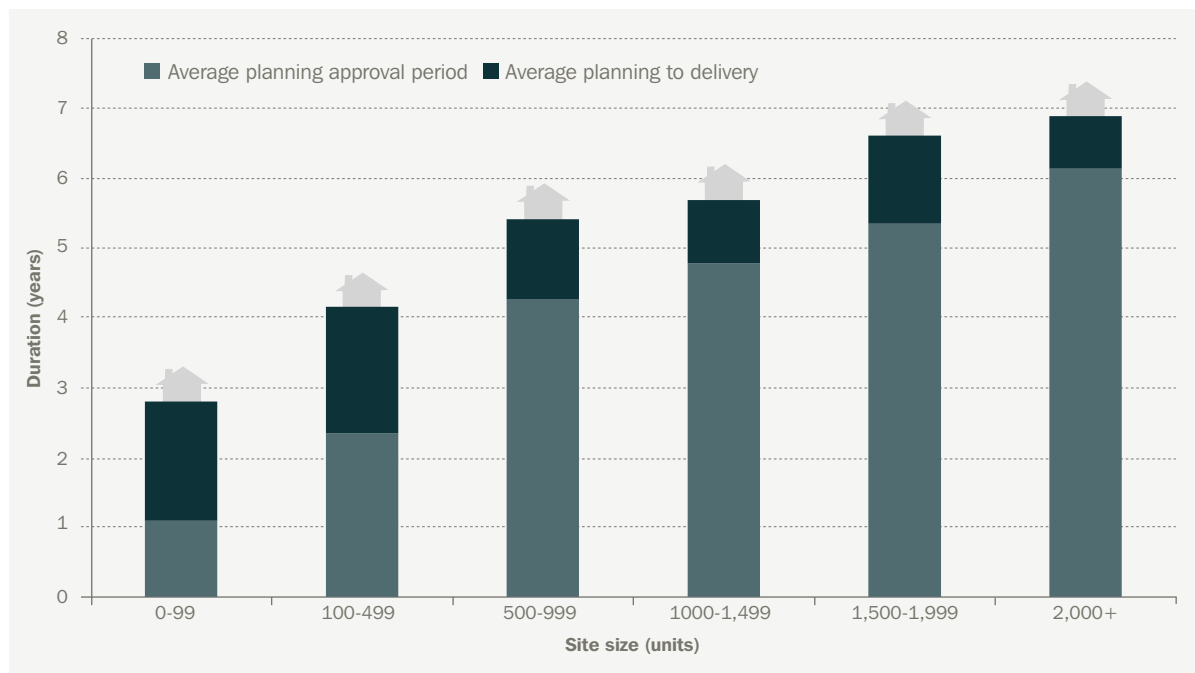
Time Taken for First Housing Completion after Planning Approval

Figure 4 also shows the time between the approval of the first application to permit development of dwellings on site and the delivery of the first dwelling (during which time any pre-commencement conditions would also be discharged), in this analysis this is the latter part of the lead in time period. This reveals that the timescale to open up a site following the detailed approval is relatively similar for large sites.

Interestingly, our analysis points to smaller sites taking longer to deliver the first home after planning approval. This period of development takes just over 18 months for small sites of under 500 units, but is significantly quicker on the assessed large-scale sites; in particular, on the largest 2,000+ dwelling sites the period from receiving planning approval to first housing completion was 0.8 years.

In combination, the planning approval period and subsequent time to first housing delivery reveals the total period increases with larger sites, with the total period being in the order of 5.3 – 6.9 years. Large sites are typically not quick to deliver; in the absence of a live planning application, they are, on average, unlikely to be contributing to five year housing land supply calculations.

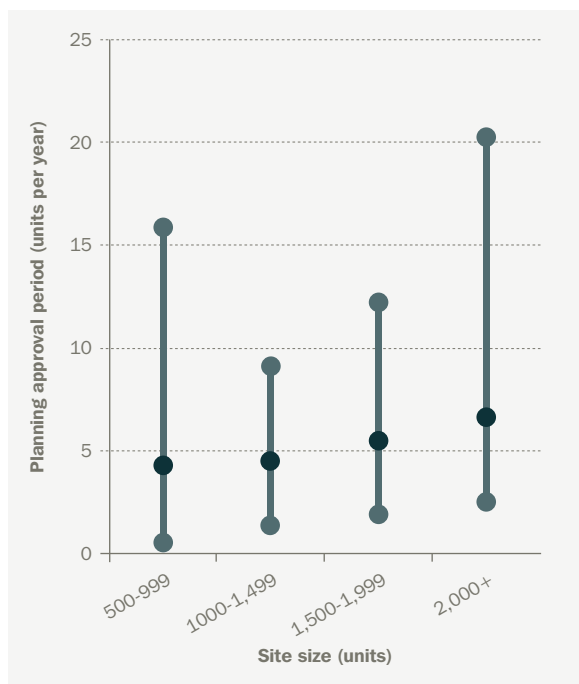
Figure 4: Average planning approval period and delivery of first dwelling analysis by site size



Source: NLP analysis

Of course, these are average figures, and there are significant variations from the mean. Figure 5 below shows the minimum and maximum planning approval periods for sites in each of the large size categories. This shows even some of the largest sites coming forward in under two years, but also some examples taking upwards of 15-20 years. Clearly, circumstances will vary markedly from site to site.

Figure 5: Site size and duration of planning



Source: NLP analysis

Case Studies

If some sites are coming forward more quickly than the average for sites of that size, what is it that is driving their rapid progress? We explored this with some case studies. These suggest that when schemes are granted planning permission significantly faster than the above averages, it is typically due to specific factors in the lead-in time prior to the submission of a planning application.

Gateshead – St James Village (518 dwellings): Planning approval period 0.3 years⁶

This site was allocated as a brownfield site in the Gateshead UDP (2000) prior to the submission of a planning application for the regeneration scheme. A Regeneration Strategy for East Gateshead covered this site and as at 1999 had already delivered high profile flagship schemes on the water front. Llewelyn Davis were commissioned by the Council and English Partnerships to prepare a masterplan and implementation strategy for the site which was published in June 1999. Persimmon Homes then acquired the site and it was agreed in autumn 1999 that they should continue the preparation of the masterplan. East Gateshead Partnership considered the masterplan on the 08th March 2000 and recommended approval. Subsequently, the outline application (587/00) with full details for phase 1 was validated on the 6th September 2000 and a decision issued on the 9th January 2001.

It is clear that although it only took 0.3 years for the planning application to be submitted and granted for a scheme of more than 500 units, the lead in time to the submission of the application was significant, including an UDP allocation and a published masterplan 18 months ahead of permission being granted. By the time the planning application was submitted most of the site specific issues had been resolved.

⁶ St James Village is excluded from the lead-in time analysis because it is unclear on what date the site was first identified within the regeneration area

Dartford – Ingress Park (950 dwellings): Planning approval period 1.4 years

This site was initially identified in a draft Local Plan in 1991 and finally allocated when this was adopted in April 1995. The Ingress Park and Empire Mill Planning Brief was completed in three years later (November 1998).

The submission of the first planning application for this scheme predated the completion of the Planning Brief by a few months, but the Council had already established that they supported the site. By the time the first application for this scheme was submitted, the site had been identified for development for circa seven years.

The outline application (98/00664/OUT) was validated on the 10th August 1998 and permission granted on the 21st Nov 2000, a determination period of 1 year and 3 months). A full application for the First Phase for 52 dwellings (99/00756/FUL) was validated and approved in just two months, prior to approval of the outline. Clearly, large-scale outline permissions have to wrap up a wide range of other issues, but having first phase full applications running in parallel can enable swifter delivery, in situations where a 'bite sized' first phase can be implemented without triggering complex issues associated with the wider site.

Cambridge and South Cambridgeshire – North West Cambridge (3,000 dwellings and 2,000 student bed spaces): Planning approval period 2.2 years

Cambridge University identified this area as its only option to address its long-term development needs, and the Cambridgeshire and Peterborough Structure Plan 2003 identified the location for release from the Green Belt. The site was allocated in the 2006 Cambridge Local Plan, and the North West Cambridge Area Action Plan was adopted in October 2009. The Area Action Plan established an overall vision and set out policies and proposals to guide the development as a whole.

As such, by the time the first application for this scheme was submitted, there had already been circa eight years of 'pre-application' planning initially concerning the site's release from the Green Belt, but then producing the Area Action Plan which set out very specific requirements.. This 'front-loaded' consideration of issues that might otherwise have been left to a planning application.

The outline application (11/1114/OUT – Cambridge City Council reference) for delivery of up to 3,000 dwellings, up to 2,000 student bed spaces and 100,000 sqm of employment floorspace was validated on the 21st September 2011 and approved on the 22nd of February 2013. The first reserved matters application for housing (13/1400/REM) was validated on the 20th September 2013 and approved on the 19th December 2013. Some ten years from the concept being established in the Structure Plan.

Summary on Lead-in Times

1. On average, larger sites take longer to complete the planning application and lead-in processes than do smaller sites. This is because they inevitably give rise to complex planning issues related to both the principle of development and the detail of implementation.
2. Consideration of whether and how to implement development schemes is necessary for any scheme, and the evidence suggests that where planning applications are determined more quickly than average, this is because such matters were substantially addressed prior to the application being submitted, through plan-making, development briefs and/or master planning. There is rarely a way to short-circuit planning.
3. Commencement on large sites can be accelerated if it is possible to 'carve-out' a coherent first phase and fast track its implementation through a focused first phase planning application, in parallel with consideration of the wider scheme through a Local Plan or wider outline application.
4. After receiving permission, on average smaller sites take longer to deliver their first dwelling than do the largest sites (1.7-1.8 years compared to 0.8 years for sites on 2,000+ units).

Lapse Rates: What Happens to Permissions?

Not every planning permission granted will translate into the development of homes. This could mean an entire site does not come forward, or delivery on a site can be slower than originally envisaged. It is thus not realistic to assume 100% of planning permission granted in any given location will deliver homes. Planning permissions can lapse for a number of reasons:

1. The landowner cannot get the price for the site that they want;
2. A developer cannot secure finance or meet the terms of an option;
3. The development approved is not considered to be financially worthwhile;
4. Pre-commencement conditions take longer than anticipated to discharge;
5. There are supply chain constraints hindering a start; or
6. An alternative permission is sought for the scheme after approval, perhaps when a housebuilder seeks to implement a scheme where the first permission was secured by a land promoter.

These factors reflect that land promotion and housebuilding is not without its risks.

At the national level, the Department for Communities and Local Government has identified a 30-40% gap between planning permissions granted for housing and housing starts on site⁷. DCLG analysis suggested that 10-20% of permissions do not materialise into a start on site at all and in addition, an estimated 15-20% of permissions are re-engineered through a fresh application, which would have the effect of pushing back delivery and/or changing the number of dwellings delivered.

This issue often gives rise to claims of 'land banking' but the evidence for this is circumstantial at best, particularly outside London. The business models of house builders are generally driven by Return on Capital Employed (ROCE) which incentivises a quick return on capital after a site is acquired. This means building and selling homes as quickly as possible, at sales values consistent with the price paid for the land. Land promoters (who often partner with landowners using promotion agreements) are similarly incentivised to dispose of their site to a house builder to unlock their promotion fee. Outside London, the scale of residential land prices has not been showing any significant growth in recent years⁸ and indeed for UK greenfield and urban land, is still below levels last seen at least 2003⁹. There is thus little to incentivise hoarding land with permission.

The LGA has identified circa 400-500,000 units of 'unimplemented' permissions¹⁰, but even if this figure was accurate, this is equivalent to just two years of pipeline supply. More significantly, the data has been interpreted by LGA to significantly overstate the number of unimplemented permissions because 'unimplemented' refers to units on sites where either the entire site has not been fully developed or the planning permission has lapsed¹¹. It therefore represents a stock-flow analysis in which the outflow (homes built) has been ignored.

Insofar as 'landbanking' may exist, the issue appears principally to be a London – rather than a national – malaise, perhaps reflecting that land values in the capital – particularly in 'prime' markets – have increased by a third since the previous peak of 2007. The London Mayor's 'Barriers to Housing Delivery – Update' of July 2014 looked at sites of 20 dwellings or more and reported that only about half of the total number of dwellings granted planning permission every year are built (Table 3); a lapse rate of circa 50% across London.

Clearly, the perceived problem of landbanking is seeing policy attention from Government, but caution is needed that any changes do not result in unintended consequences or act as a disincentive to secure planning permissions.

A more practical issue is that Plans and housing land trajectories must adopt sensible assumptions, based on national benchmarks, or – where the data exists – local circumstances, to understand the scale of natural non-implementation.

⁷ DCLG Presentations to the HBF Planning Conference (September 2015)

⁸ Knight Frank Residential Development Land Index Q1 2016 <http://content.knightfrank.com/research/161/documents/en/q1-2016-3844.pdf>

⁹ Savills Development Land Index <http://www.savills.co.uk/research/uk/residential-research/land-indices/development-land-index.aspx>

¹⁰ Glenigan data as referenced by Local Government Association in its January 2016 media release (a full report is not published) http://www.local.gov.uk/web/guest/media-releases/-/journal_content/56/10180/7632945/NEWS

¹¹ This would mean that a site which has built 99% of homes will still show up as 100% of units being 'unimplemented'

Size Matters

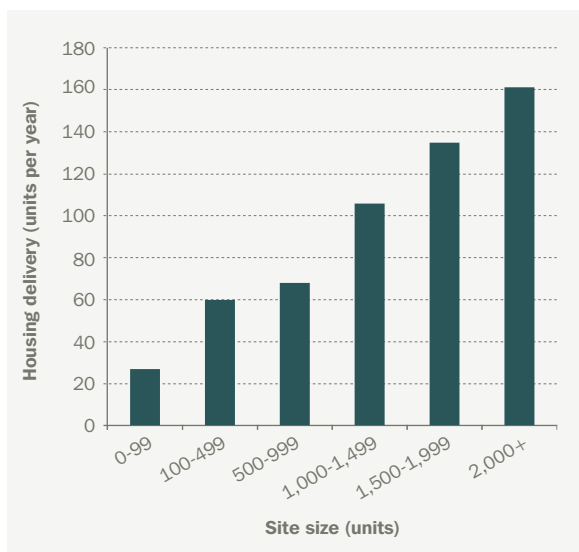
A key metric for build rates on sites is the number of sales outlets. Different housebuilders will differentiate through types or size of accommodation and their brands and pricing, appealing to different customer types. In this regard, it is widely recognised that a site may increase its absorption rate through an increased number of outlets.

Unfortunately, data limitations mean that the number of outlets is not readily available for the large sites surveyed within this research, and certainly not on any longitudinal basis which is relevant because the number of outlets on a site may vary across phases.

However, it is reasonable to assume that larger sites are likely to feature more sales outlets and thus have greater scope to increase build rates. This may relate to the site being more geographically extensive: with more access points or development ‘fronts’ from which sales outlets can be driven. A large urban extension might be designed and phased to extend out from a number of different local neighbourhoods within an existing town or city, with greater diversity and demand from multiple local markets.

Our analysis supports this concept: larger sites deliver more homes each year, but even the biggest schemes (those with capacity for 2,000 units) will, on average, deliver fewer than 200 dwellings per annum, albeit their average rate – 161 units per annum – is six times that of sites of less than 100 units (27 units per annum).

Figure 7: Average annual build rate by site size



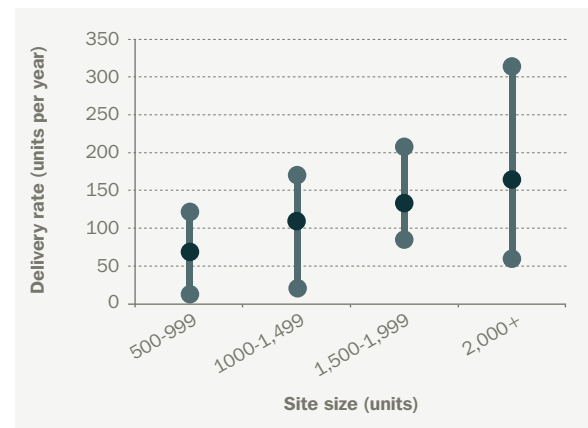
Of course, these are average figures. Some sites will see build rates exceeding this average in particular years, and there were variations from the mean across all categories (see Figure 8), suggesting that higher or lower rates than this average may well be possible, if circumstances support it.

Nevertheless, it is striking that annual average delivery on sites of up to 1,499 units barely exceeds 100 units per annum, and there were no examples in this category that reached a rate of 200 per annum. The highest rate – of 321 units per annum – is for the Cranbrook site, but this is a short term average. A rate of 268 per annum was achieved over a longer period at the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes. The specific circumstance surrounding the build rates in both these examples are explored as case studies opposite. It is quite possible that these examples might not represent the highest rate of delivery possible on large-scale sites in future, as other factors on future sites might support even faster rates.

Our analysis also identifies that, on average, a site of 2,000 or more dwellings does not deliver four times more dwellings than a site delivering between 100 and 499 homes, despite being at least four times the size. In fact it only delivers an average of 2.5 times more houses. This is likely to reflect that:

- it will not always be possible to increase the number of outlets in direct proportion to the size of site – for example due to physical obstacles (such as site access arrangements) to doing so; and
- overall market absorption rates means the number of outlets is unlikely to be a fixed multiplier in terms of number of homes delivered.

Figure 8: Average annual build-out rate by site size, including the minimum and maximum averages within each site size



Source: NLP analysis

Cranbrook: East Devon

The highest average annual build out rates recorded in this analysis comes from the Cranbrook site in East Devon where an average of 321 dwellings per annum were delivered between 2012/13 and 2014/15. Delivery of housing only started on this site in 2012/13, with peak delivery in 2013/14 of 419 dwellings.

Cranbrook is the first new standalone settlement in Devon for centuries and reportedly – according to East Devon Council – the result of over 40 years of planning (this claim has not been substantiated in this research). It is the circumstances surrounding its high annual delivery rate which is of most interest, however.

Phase 1 of the development was supported by a £12 million repayable grant from a revolving infrastructure fund managed by the Homes and Communities Agency. The government also intervened again in the delivery of this site by investing £20 million for schools and infrastructure to ensure continuity of the scheme, securing the delivery of phase 2. The government set out that the investment would give local partners the confidence and resources to drive forward its completion.

The Consortium partnership for Cranbrook (including Hallam Land, Persimmon Homes (and Charles Church) and Taylor Wimpey) stated the following subsequent to the receipt of the government funding¹⁵.

“Without this phase 2 Cranbrook would have been delayed at the end of phase 1, instead, we have certainty in the delivery of phase 2, we can move ahead now and commit with confidence to the next key stages of the project and delivering further community infrastructure and bringing forward much needed private and affordable homes”.

Clearly, the public sector played a significant role in supporting delivery. The precise relationship between this and the build rate is unclear, but funding helped continuity across phases one and two of the scheme. More particularly, the rate of delivery so far achieved relates just to the first three years, and there is no certainty that this high build-out rate will be maintained across the remainder of the scheme.

Eastern Expansion Area (Broughton Gate & Brooklands): Milton Keynes

The second highest average build out rates recorded in this analysis comes from the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes where an average of 268 dwellings per annum were delivered between 2008/09 and 2013/14. As is widely recognised, the planning and delivery of housing in Milton Keynes is distinct from almost all the sites considered in this research.

Serviced parcels with the roads already provided were delivered as part of the Milton Keynes model and house builders are able to proceed straight onto the site and commence delivery. This limited the upfront site works required and boosted annual build rates. Furthermore, there were multiple outlets building-out on different serviced parcels, with monitoring data from Milton Keynes Council suggesting an average of c.12 parcels were active across the build period. This helped to optimise the build rate.

¹⁵ <https://www.gov.uk/government/news/government-funding-to-unlock-delivery-of-12-000-new-homes>

Peak Years of Housing Delivery

Of course, rates of development on sites will ebb and flow. The top five peak annual build-out rates achieved across every site assessed are set out in Table 1 below. Four of the top five sites with the highest annual peak delivery rates are also the sites with the highest annual average build out rates (with the exception of Broughton & Atterbury). Peak build rates might occur in years when there is an overlap of multiple outlets on phases, or where a particular phase might include a large number of affordable or apartment completions. It is important not to overstress these individual years in gauging build rates over the whole life of a site.

Table 1: Peak annual build-out rates compared against average annual delivery rates on those sites

Scheme	Peak Annual Build-Out Rate	Annual Average Build-Out Rate
Cambourne	620	239
Hamptons	548	224
Eastern Expansion Area	473	268
Cranbrook	419	321
Broughton	409	171

Source: NLP analysis and various AMRs

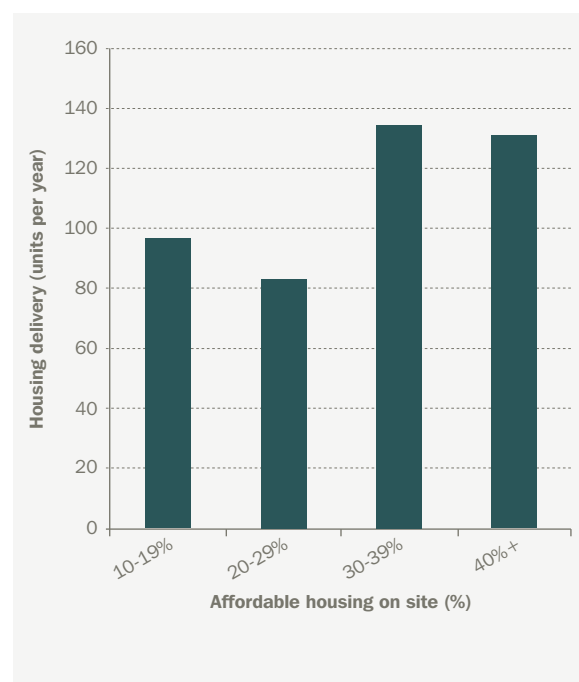
Affordable Housing Provision

Housing sites with a larger proportion of affordable homes (meeting the definition in the NPPF) deliver more quickly, where viable. The relationship appears to be slightly stronger on large-scale sites (500 units or more) than on smaller sites (less than 500 units), but there is a clear positive correlation (Figure 9). For both large and small-scale sites, developments with 40% or more affordable housing have a build rate that is around 40% higher compared to developments with 10-19% affordable housing obligation.

The relationship between housing delivery and affordable (subsidised) housing is multi-dimensional, resting on the viability, the grant or subsidy available and the confidence of a housing association or registered provider to build or purchase the property for management. While worth less per unit than a full-market property, affordable housing clearly taps into a different segment of demand (not displacing market demand), and having an immediate purchaser of multiple properties can support cash flow and risk sharing in joint ventures. However, there is potential that starter homes provided in lieu of other forms of affordable housing may not deliver the same kind of benefits to speed of delivery, albeit they may support viability overall.

This principle – of a product targeting a different segment of demand helping boost rates of development – may similarly apply to the emergent sectors such as ‘build-to-rent’ or ‘self build’ in locations where there is a clear market for those products. Conversely, the potential for starter homes to be provided in lieu of other forms of affordable housing may overlap with demand for market housing on some sites, and will not deliver the kind of cash flow / risk sharing benefits that comes from disposal of properties to a Registered Provider.

Figure 9: Affordable housing provision and housing output



Source: NLP analysis

The Timeline of the Build-out Period

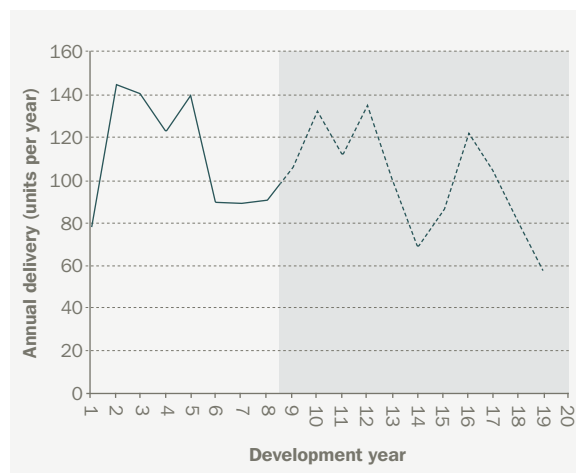
Many planners' housing trajectories show large sites gradually increasing their output and then remaining steady, before tailing off at the end. In fact, delivery rates are not steady. Looking at the first eight years of development – where the sample size of large sites is sufficiently high – NLP's research showed that annual completions tended to be higher early in the build-out period before dipping (Figure 10).

For sites with even longer build out periods, this pattern of peaks and troughs is potentially repeated again (subject to data confidence issues set out below). This surge in early completions could reflect the drive for

rapid returns on capital in the initial phase, and/or early delivery of affordable housing, with the average build rate year by year reducing thereafter to reflect the optimum price points for the prevailing market demand. Additionally, the longer the site is being developed, the higher the probability of coinciding with an economic downturn – obviously a key factor for sites coming forward over the past decade – which will lead to a reduction in output for a period.

Our sample of sites where the development lasted for more than eight years is too small to draw concrete findings, but it does flag a few other points. On extremely large sites that need to span more than a decade, the development will most likely happen in phases. The timing and rate of these phases will be determined by a range of factors including: the physical layout of the site, the ability to sell the homes; trigger points for payment for key social and transport infrastructure obligations; the economic cycle; and local market issues. Predicting how these factors combine over a plan period is self-evidently difficult, but plan makers should recognise the uncertainty and build in flexibility to their housing trajectories to ensure they can maintain housing supply wherever possible.

Figure 10: Average annual build-out rate per year of the build period



Source: NLP analysis

Summary

1. There is a positive correlation between the strength of the market (as measured by residential land values) and the average annual build rates achieved.
2. The annual average build-rate for the largest sites (of 2,000 or more units) is circa 161 dwellings per annum
3. The rate of delivery increases for larger schemes, reflecting the increased number of sales outlets possible on large sites. However, this is not a straight line relationship: on average, a site of 2,000 units will not, deliver four times as fast as a site of 500. This reflects the limits to number of sales outlets possible on a site, and overall market absorption rates.
4. There is significant variation from the average, which means some sites can be expected to deliver more (or less) than this average. However, the highest average build-out rate of all the assessed sites is 321 dwellings per annum in Cranbrook. But this relates to just three years of data, and the scheme benefitted from significant government funding to help secure progress and infrastructure. Such factors are not be present in all schemes, and indeed, the data suggests sites tend to build at a higher rate in initial years, before slowing down in later phases.
5. Build rates on sites fluctuate over their life. The highest build rate recorded in a single year is 620 units at Camborne, but for the duration of the development period the average annual build rate is 239 dwellings.
6. There is a positive correlation between the percentage of affordable homes built on site and the average annual delivery of homes with sites delivering 30% or more affordable housing having greater annual average build rates than sites with lower affordable housing provision. The introduction of different tenures taps into different market segments, so a build to rent product may similarly boost rates of delivery – where there is a market for it – but starter homes may have the opposite effect if they are provided in lieu of other forms of affordable homes, and displace demand for cheaper market homes.

A Brownfield Land Solution?

The NPPF encourages the effective use of previously-developed land, and recent Government announcements suggest increased prioritisation of development for brownfield sites. Efforts to streamline the planning process for brownfield sites may also speed up their delivery. But, is there a difference in how quickly brownfield sites can come forward compared to greenfield sites?

Research produced by CPRE and Glenigan in March 2016¹⁶ suggested that the time between planning permission being granted and construction work starting is generally the same for brownfield and greenfield sites, but suggested that work on brownfield sites is completed more than six months quicker. However, it was not clear if this finding was because the greenfield sites were larger than the equivalent brownfield sites surveyed in that study. We therefore looked at how lead in times and build rates compared for large-scale sites of 500+ dwellings on greenfield and brownfield sites.

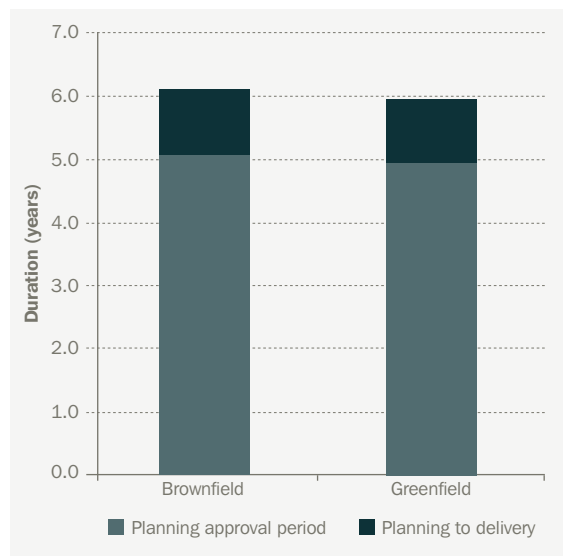
The Planning Approval Period

Whether land is brownfield or greenfield does not impact on the planning approval period. On average, for all sites, the planning approval period for the sites delivering 500 dwellings or more is almost identical at 5.1 years for brownfield and 5.0 years for greenfield – see Figure 11, although this is skewed by the very largest sites of 2,000+ units (see Table 2), with brownfield sites in the smaller-size bands being on average slightly quicker than their greenfield counterparts (albeit caution is required given the small sample size for some size bandings).

What the analysis tends to show is that it is the scale of development – rather than the type of land – which has the greatest impact on the length of planning process, and that despite government prioritisation on brownfield land in the NPPF, this is unlikely to result in significant further improvements in timescales for delivery.

The time period between gaining a planning approval and the first delivery of a dwelling is also similar overall.

Figure 11: Previous land use and duration of planning



Source: NLP analysis

Table 2: Previous land use and duration of planning approval period

	Site Size (dwellings)	Number of sites in this group	Average Planning Approval Period
Greenfield Sites	500-999	14	4.5
	1,000-1,499	9	5.3
	1,500-1,999	7	5.5
	2,000+	13	5.0
	Total/Average	43	5.0
Brownfield Sites	500-999	16	4.1
	1,000-1,499	3	3.3
	1,500-1,999	1	4.6
	2,000+	7	8.6
	Total/Average	27	5.1

Source: NLP analysis

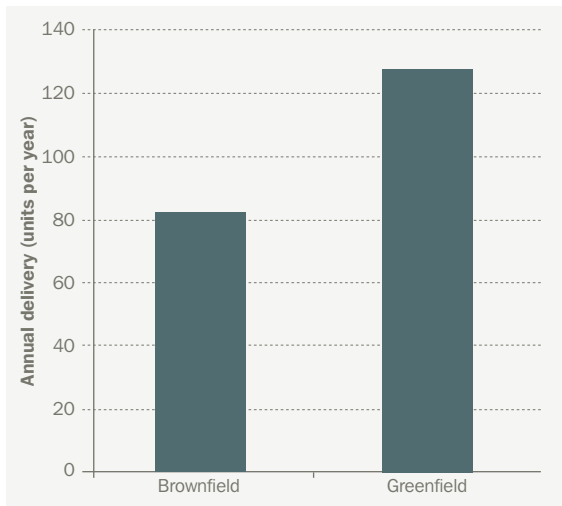
¹⁶ Brownfield comes first: why brownfield development works CPRE, March 2016

Build-out Rates

There is a more discernible difference between brownfield and greenfield sites when it comes to the annual build out rates they achieve, with the analysis in Figure 12 suggesting that brownfield sites on average deliver at lower rates than their greenfield counterparts, both overall and across the different size bandings (see Table 3) albeit recognising the small sample size for some sizes of site. On average, the annual build-out rate of a greenfield site is 128 dwellings per annum, around 50% higher than the 83 per annum average for brownfield sites.

This may reflect that brownfield sites carry extra costs (e.g. for remediation) which reduces the scale of contribution they make to infrastructure and affordable housing provision (which as shown can boost rates of delivery).

Figure 12: Previous land use and housing delivery



Source: NLP analysis

Table 3: Previous land use by size and average annual build out rate

	Site Size (dwellings)	Number of sites in this group	Average Annual Build-out Rate
Greenfield Sites	500-999	14	86
	1,000-1,499	9	122
	1,500-1,999	7	142
	2,000+	13	171
	Total/Average	43	128
Brownfield Sites	500-999	16	52
	1,000-1,499	3	73
	1,500-1,999	1	84
	2,000+	7	148
	Total/Average	27	83

Source: NLP analysis

Summary

1. Brownfield and greenfield sites come forward at broadly similar rates, although at the smaller end of the scale, there does appear to be some 'bonus' in speed of decisions for previously-developed land. For the largest sites (of 2,000+ units) the sample of brownfield sites suggests an extended time period (3.6 years longer) compared to their equivalent greenfield sites;
2. Once started, large-scale greenfield sites do deliver homes at a more rapid rate than their brownfield equivalents, on average 50% quicker.

Conclusion

There is a growing recognition that large-scale housing development can and should play a large role in meeting housing need. Garden towns and villages – planned correctly – can deliver sustainable new communities and take development pressure off less sustainable locations or forms of development.

However, if planners are serious about wanting to see more homes built each year and achieve the government’s target of one million by 2020 (or indeed, deliver the 300,000 per annum that are needed), simply allocating a site or granting a permission is not enough. The Government recognises this: the Minister for Planning has been quoted as saying that “*you cannot live in a planning permission*”.

Part of the debate has focused on perceptions of ‘land banking’ – the concept that developers are hoarding land or slowing down development. Equally, suggestions have been made that proposals for large-scale development should be ‘protected’ from competition from smaller sites or from challenge under five year land supply grounds. The evidence supporting these propositions appears limited.

In our view the real concern – outside London, at any rate – is ensuring planning decisions (including in plan-making) are driven by realistic and flexible housing trajectories in the first place, based on evidence and the specific characteristics of individual sites and local markets.

Based on the research in this document, we draw five conclusions on what is required:

1. If more homes are to be built, more land needs to be released and more planning permissions granted. Confidence in the planning system relies on this being achieved through local plans that must be sufficiently ambitious and robust to meet housing needs across their housing market areas. But where plans are not coming forward as they should, there needs to be a fall-back mechanism that can release land for development when it is required.
2. Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required.
3. Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times. To secure short-term immediate boosts in supply – as is required in many areas – a good mix of smaller sites will be necessary.
4. Plans should reflect that – where viable – affordable housing supports higher rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand for those products). Trajectories will thus need to differentiate expected rates of delivery to respond to affordable housing levels or inclusion of other market products. This might mean some areas will want to consider spatial strategies that favour sites with greater prospects of affordable or other types of housing delivery. This plays into the wider debate about support for direct housing delivery for rent by local government and housing associations and ensuring a sufficient product mix on sites.
5. Finally, in considering the pace of delivery, large-scale brownfield sites deliver at a slower rate than do equivalent greenfield sites. The very largest brownfield sites have also seen very long planning approval periods. Self-evidently, many brownfield sites also face barriers to implementation that mean they do not get promoted in the first place. In most locations outside our biggest cities, a good mix of types of site will be required.

A Checklist for Understanding Large-scale Site Delivery

In setting or assessing reasonable housing trajectories for local plans or five year housing land supply, the lead-in times and average rates of housing delivery identified in this research can represent helpful benchmarks or rules of thumb, particularly in situations where there is limited local evidence.

However, these rules of thumb are not definitive. It is clear from our analysis that some sites start and deliver more quickly than this average, whilst others have delivered much more slowly. Every site is different.

In considering the evidence justifying the estimated time and rate of delivery, the questions listed in Table 4 below represent a checklist of questions that are likely to be relevant:

Table 4: Questions to consider on the speed of housing delivery on large-scale sites

Lead-in times to getting started on site	Factors affecting the speed of build out rate
<input checked="" type="checkbox"/> Is the land in existing use?	<input checked="" type="checkbox"/> How large is the site?
<input checked="" type="checkbox"/> Has the land been fully assembled?	<input checked="" type="checkbox"/> Will the scale, configuration and delivery model for the site support more sales outlets?
<input checked="" type="checkbox"/> If in multiple ownership/control, are the interests of all parties aligned?	<input checked="" type="checkbox"/> How strong is the local market?
<input checked="" type="checkbox"/> To what extent is there any challenge to the principle of development?	<input checked="" type="checkbox"/> Does the site tap into local demand from one or more existing neighbourhoods?
<input checked="" type="checkbox"/> Is the site already allocated for development? Does it need to be in order for release?	<input checked="" type="checkbox"/> Is the density and mix of housing to be provided consistent with higher rates of delivery?
<input checked="" type="checkbox"/> Does an SPD, masterplan or development brief help resolve key planning issues?	<input checked="" type="checkbox"/> What proportion of affordable housing is being delivered?
<input checked="" type="checkbox"/> Is the masterplan/development brief consistent with what the developer will deliver?	<input checked="" type="checkbox"/> Are there other forms of housing – such as build to rent – included?
<input checked="" type="checkbox"/> Is there an extant planning application or permission?	<input checked="" type="checkbox"/> When will new infrastructure – such as schools – be provided to support the new community?
<input checked="" type="checkbox"/> Are there significant objections to the proposal from local residents?	<input checked="" type="checkbox"/> Are there trigger points or phasing issues that may affect the build rate achievable in different phases?
<input checked="" type="checkbox"/> Are there material objections to the proposal from statutory bodies?	
<input checked="" type="checkbox"/> Are there infrastructure requirements – such as access – that need to be in place before new homes can be built?	
<input checked="" type="checkbox"/> Are there infrastructure costs or other factors that may make the site unviable?	
<input checked="" type="checkbox"/> Does the proposal rely on access to public resources?	
<input checked="" type="checkbox"/> If planning permission is secured, is reserved matters approval required?	
<input checked="" type="checkbox"/> Does the scheme have pre-commencement conditions?	
<input checked="" type="checkbox"/> Is the scheme being promoted by a developer who will need time to dispose of the site to a house builder?	

Appendix 2: Small Sites Reviewed

Site Name	Local Planning Authority	Site Size
Holme Farm, Carleton Road, Pontefract	Wakefield	50
Part Sr3 Site, Off Elizabeth Close, Scotter	West Lindsey	50
Former Downend Lower School, North View, Staple Hill	South Gloucestershire	52
Fenton Grange, Wooler	Northumberland	54
Land at the Beacon, Tilford Road, Hindhead	Waverley	59
Land To Rear Of 28 - 34 Bedale Road, Aiskew	Hambleton	59
Hanwell Fields Development, Banbury	Cherwell	59
Land at Prudhoe Hospital, Prudhoe	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Clewborough House School, St Catherines Road	Cherwell	60
Land south of Pinchington Lane	West Berkshire	64
Land Off Cirencester Rd	Stroud	66
Springfield Road Caunt Road	South Kesteven	67
Land off Crown Lane	Wychavon	68
Former Wensleydale School, Dent Street, Blyth	Northumberland	68
Land at Lintham Drive, Kingswood	South Gloucestershire	68
Hawthorn Croft (Off Hawthorn Avenue Old Slaughterhouse Site), Gainsborough	West Lindsey	69
Land to the North of Walk Mill Drive	Wychavon	71
Watermead, Land At Kennel Lane, Brockworth	Tewkesbury	72
North East Area Professional Centre, Furnace Drive, Furnace Green	Crawley	76
Land at Willoughbys Bank, Clayport Bank, Alnwick	Northumberland	76
The Kylins, Loansdean, Morpeth	Northumberland	88
MR10 Site, Caistor Road, Market Rasen	West Lindsey	89
OS Field 9972 York Road Easingwold	Hambleton	93
Land At Green Road - Reading College	Reading	93
North East Sandylands	South Lakeland	94
Auction Mart	South Lakeland	94
Parcel 4, Gloucester Business Park, Brockworth	Tewkesbury	94
Former York Trailers Yafforth Road Northallerton Scheme 1/2	Hambleton	96
Poppy Meadow	Stratford-on-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Land South of Station Road	East Hertfordshire	111
Former Bewbush Leisure Centre Site, Breezehurst Drive, Bewbush	Crawley	112
Land West Of Birchwood Road, Latimer Close	Bristol, City of	119
Land Between Godsey Lane And Towngate East	South Kesteven	120
Bibby Scientific Ltd	Stafford	120
Kennet Island Phase 1B - E, F, O & Q, Manor Farm Road	Reading	125
Primrose Mill Site	Ribble Valley	126
Land Rear Of Mount Pleasant	Cheshire West and Chester	127
Land to the east of Efflinch Lane	East Staffordshire	130
North of Douglas Road, Kingswood	South Gloucestershire	131
Land at Farnham Hospital, Hale Road, Farnham	Waverley	134
Bracken Park, Land At Corringham Road, Gainsborough	West Lindsey	141
Doxey Road	Stafford	145
Former York Trailers Yafforth Road Northallerton Scheme 2/2	Hambleton	145

Site Name	Local Planning Authority	Site Size
London Road/ Adj. St Francis Close	East Hertfordshire	149
MR4 Site, Land off Gallamore Lane, Market Rasen	West Lindsey	149
Queen Mary School	Fylde	169
Sellars Farm, Sellars Road	Stroud	176
Land South of Inervet Campus Off Brickhill Street, Walton	Milton Keynes	176
Notcutts Nursery, 150 - 152 London Road	Cherwell	182
Hoval Ltd North Gate	Newark and Sherwood	196
Hewlett Packard (Land Adjacent To Romney House), Romney Avenue	Bristol, City of	242
128-134 Bridge Road And Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
GCHQ Oakley - Phase 1	Cheltenham	262
Land off Henthorn Road	Ribble Valley	270
Land Between A419 And A417, Kingshill North, Cirencester	Cotswold	270
Hortham Hospital, Hortham Lane, Almondsbury	South Gloucestershire	270
Land At Canons Marsh, Anchor Road	Bristol, City of	272
M & G Sports Ground, Golden York and Middle Farm, Badgeworth	Tewkesbury	273
Long Marston Storage Depot Phase 1	Stratford-on-Avon	284
Land at Brookwood Farm, Bagshot Road	Woking	297
Land at, Badsey Road	Wychavon	298
Land At Fire Service College, London Road, Moreton in Marsh	Cotswold	299
Land At Dorian Road	Bristol, City of	300
Kennet Island Phase 1 - H, M, T, U1, U2 Manor Farm Road	Reading	303
Chatham Street Car Park Complex	Reading	307
Former NCB Workshops, Ellington Rd, Ashington (aka Portland Park)	Northumberland	357
Former Masons Cerement Works and Adjoining Ministry of Defence Land, Gipping Road, Great Blakenham	Mid Suffolk	365
Woolley Edge Park Site	Wakefield	375
Luneside West	Lancaster	403
Radyr Sidings	Cardiff	421
New World House, Thelwall Lane	Warrington	426
Land at former Battle Hospital, 344 Oxford Road	Reading Borough Council	434
New Central (Land at Guildford Road and Bradfield Close including Network House, Merrion House, Bradford House and Coronation House	Woking Borough Council	445
Kingsmead South	Milton Keynes Council	450
Bleach Green, Winlaton	Gateshead	456
Farington Park, East of Wheelton Lane	South Ribble	468
Bickershaw Colliery, Plank Lane, Leigh	Wigan	471
Farnborough Business Park	Rushmoor	476
Horfield Estate, Filton Avenue, Horfield	Bristol City Council	485
Stenson Fields	South Derbyshire	487
Cookridge Hospital	Leeds	495

About NLP

Nathaniel Lichfield & Partners (NLP) is an independent planning, economics and urban design consultancy, with offices in Bristol, Cardiff, Edinburgh, Leeds, London, Manchester, Newcastle and Thames Valley.

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c/o Regeneration
Staffordshire Moorland District Council
Moorlands House
Stockwell Street
Leek
Staffordshire
ST13 6HQ

8th February 2019

Dear Sir/Madam

Planning Inspector's Post Hearing Advice: Consultation on Staffordshire Moorlands Housing Implementation Strategy (HIS) and other housing evidence

This letter responds to Staffordshire Moorlands District Council's [the Council's] preparation of a Housing Implementation Strategy and other housing evidence, as requested by the Inspector following the Local Plan examination hearings; and follows Persimmon Homes' [the Company's] involvement to date in the preparation of the Local Plan, including participation in the hearing session concerning Cheadle.

As confirmed within our hearing statement; the Company can corroborate examination document EL7.009 which confirms a pending hybrid planning application (on land known as Cheadle North (SMD/2018/0180), referred within the Submission Version Local Plan as Site Allocation DSC1 (CH001 and CH132).

Due to recent changes to the Illustrative Masterplan submitted as part of the planning application, the Company is now seeking planning consent for 275 homes (Full planning consent for 125 dwellings and access to proposed primary school, and outline planning permission for up to 150 dwellings and primary school with multi-use game area). This revised quantum of development is considered to be achievable having regard to the known technical constraints and mixed use nature of the allocation site.

The Company are currently working with the Council to agree matters prior to proceeding to Development Control committee in March 2019.

The Company supports the Council's delivery assumptions for the Cheadle North site as set out within the housing trajectory considers 40 dwelling per annum to be an achievable rate of build, having regard to housing market considerations.

We would request that the Council update the housing trajectory accordingly to reflect the above to ensure consistency and a realistic and robust housing land supply.

I trust that the above information is useful and will be given full consideration by the Council in the preparation of the Local Plan.

Should you wish to discuss the contents of this letter further, please do not hesitate to contact me.

Yours sincerely



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Persimmon Homes (North West) Ltd

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Regeneration Manager
Staffordshire Moorlands District Council
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8 February 2019

By Email (forward.plans@staffsmoorlands.gov.uk)

Dear Sir/ Madam

STAFFORDSHIRE MOORLANDS LOCAL PLAN 2016 – 2031: HOUSING IMPLEMENTATION STRATEGY– LAND AT THE MOUNT, LEEK

CBRE Limited has been instructed by Ollerton Estates LLP to submit representations to the Staffordshire Moorlands District Council (SMDC) Local Plan: Housing Implementation Strategy consultation (February 2019) in respect of its landholding at the Mount, Leek (ref. LE128 (a & b)), (the Site) which forms part of Draft Allocation DSL2 'Land at the Mount, Leek'.

This representation seeks to build on previous comments made to SMDC supporting the allocation of the Site for residential development in the emerging Local Plan and to provide evidence demonstrating that new high-quality housing can be delivered at the Mount within 5 years.

A Development Statement, including Illustrative Masterplan, has been jointly prepared with Staffordshire County Council (SCC) which considers matters, such as highways improvements, in a holistic way and indicates how residential development could potentially be accommodated at the Site. This has previously been submitted to SMDC in relation to past Local Plan consultations and as such has not been re-submitted as part of the representation.

Ollerton are generally supportive of the findings and proposals set out in the Housing Implementation Strategy. However, specific comments are made below in respect of the housing trajectory and five year housing land supply, delivery mechanisms and the proposed allocations (Appendix One).

HOUSING TRAJECTORY AND FIVE YEAR HOUSING LAND SUPPLY

The housing trajectory at Land at the Mount proposed by SMDC on page 12 is considered to be realistic and is broadly supported by Ollerton Estates. Given the work done to-date in preparing an Illustrative Masterplan and in light of ongoing discussions with potential developers it is considered that delivery at LE128 could comfortably commence in 2021/22.



DELIVERY MECHANISMS

Ollerton Estates notes the identified barriers to developing houses set out on page 17 and broadly welcomes the Council's strategic response to driving forward delivery. However, further clarity is sought on the matter of the coordinated masterplanning of larger allocations (including land at the Mount, Leek) and how the Council will facilitate and expedite the endorsement process.

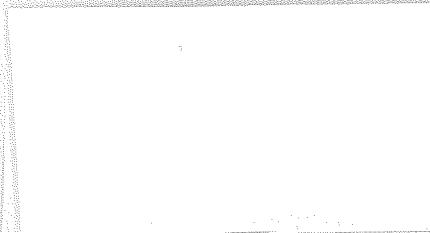
PROPOSED ALLOCATION

In terms of the proposed allocation, in Appendix One the Council notes that LE142b is deliverable within 2 years. Given the advanced work that has been undertaken at LE128, the Council should also consider that this Site is capable of delivering houses within the next two years.

I trust the above is in order and that our comments will be taken into consideration by the Council. I would be grateful if you could confirm safe receipt of this representation.

Should you have any queries or wish to discuss any issues raised above, please do not hesitate to contact me.

Yours sincerely



**Chris Sinton – Associate Director
CBRE LIMITED**

FAO Planning Policy
Staffordshire Moorlands District Council
Moorlands House
Leek
ST13 6HQ

8 February 2019

Delivered by email

Dear Sir / Madam,

STAFFORDSHIRE MOORLANDS LOCAL PLAN (SUBMISSION VERSION) - HOUSING IMPLEMENTATION STRATEGY CONSULTATION

Turley is instructed by St Modwen Homes to submit the following consultation response to the Housing Implementation Strategy (HIS), which forms part of the Staffordshire Moorlands emerging Local Plan (Submission Version).

St Modwen Homes own land within Blythe Vale; a mixed use allocation identified in the Local Plan Submission Version to deliver 300 dwellings and 48 hectares of employment land adjacent to Blythe Bridge.

St Modwen Homes firstly support the continued allocation of 300 dwellings at Blythe Vale, as identified in the HIS and Updated Housing Trajectory (Appendix 4). The Blythe Vale allocation forms a vital contribution to the housing and employment land requirement in Staffordshire Moorlands over the emerging Local Plan period.

We set out below comments on behalf of St Modwen Homes in respect of a small number of detailed points.

UPDATED HOUSING TRAJECTORY

The Updated Housing Trajectory sets out the anticipated implementation of the first 25 dwellings at Blythe Vale during the 2018/2019 period (HIS Page 12 and Appendix 4). The Trajectory then assumes that the total allocation of 300 dwellings at Blythe Vale will be delivered in full by 2024 / 2025, at a rate of 50 dwellings per annum. St Modwen Homes are supportive of this Updated Housing Trajectory, and can confirm that the Blythe Vale allocation is progressing accordingly. Implementation of the first phase of the delivery of the 300 dwellings allocated at Blythe Vale has commenced in line with the expected 2018/2019 start date, and it is expected that the scheme will be built out hereafter at the required rate of 50dpa from 2019/2020 to 2024/2025.

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T 0121 233 0902 turley.co.uk

The first phase of this housing delivery at Blythe Vale is being implemented in accordance with planning permission Ref. SMD/2017/0512, which permits 118 dwellings at Phase 1 of Blythe Vale. Commencement of this Phase 1 development has been enabled by planning permission for a temporary haul road, to allow construction access to the Site, which was granted on 4 February 2019 (Ref. SMD/2018/0696).

A planning application to increase the number of dwellings delivered at Phase 1, from the approved 118 dwellings to a revised figure of 146 dwellings (App Ref. SMD/2018/0790) was submitted in December 2018, and is currently under consideration by Staffordshire Moorlands DC. Any grant of planning permission for this scheme will continue to support housing delivery at Blythe Vale in line with the HIS Updated Housing Trajectory.

It is also relevant to note that St Modwen Homes intend to bring forward the second phase of residential development at Blythe Vale in the near future. This phase is already supported by planning permission for an access road and associated drainage and infrastructure on the Phase 2 site (Ref. SMD/2018/0443), which should assist in the expedient delivery of dwellings on site.

Consequently, reference to planning permission Ref. SMD/2017/0512 as an “*unimplemented planning approval*” on Page 15 of the HIS should be updated accordingly, instead stating that the delivery of residential development at Blythe Vale has now commenced.

CLARIFICATION AT APPENDIX 1

It is also requested that clearer reference be made to the Blythe Vale allocation in Appendix 1 of the HIS (Proposed Allocations in Staffordshire Moorlands Local Plan). HIS Appendix 1 currently states that circa. 182 dwellings are allocated at Blythe Vale. For clarity, this should be corrected to state that 300 dwellings are allocated at Blythe Vale, as specified across all other Local Plan Submission documents. Alternatively, it should be clarified that the 182 dwellings quoted are the residual number of allocated dwellings, after taking into account the planning permission for 118 dwellings at Blythe Vale Phase 1 (Ref. SMD/2017/0512).

CONCLUSION

On behalf of St Modwen Homes, Turley submit the above response to the Staffordshire Moorlands Housing Implementation Strategy (HIS) consultation, with particular focus on Blythe Vale; a mixed use allocation including 300 dwellings adjacent to Blythe Bridge.

St Modwen Homes support the continued allocation of 300 dwellings at Blythe Vale. The implementation of the Blythe Vale allocation has commenced during the 2018/2019 period through the current residential development permission on Site (Ref. SMD/2017/0512). This implementation accords with the HIS and Updated Housing Trajectory, and St Modwen Homes are committed to the future delivery of residential development at Blythe Vale.

Yours sincerely

Peter Hayward

Assistant Planner

peter.hayward@turley.co.uk



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Developer Services and Planning
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Telephone 01925 234 000

unitedutilities.com

Date 8th February 2019

By Email (forward.plans@staffsmoorlands.gov.uk)

Dear Sir / Madam,

STAFFORDSHIRE MOORLANDS LOCAL PLAN – CONSULTATION ON THE HOUSING IMPLEMENTATION STRATEGY (HIS) (FEBRUARY 2019)

Thank you for your consultation seeking the views of United Utilities as part of the Development Plan process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

Comments

We note in the Inspector's post hearing advice, the recommendation to delete the BDNEW Site in Biddulph, which formed part of the Wharf Road Allocation. Should the Council be considering alternative sites, we would continue to direct you to our past representations. The position of United Utilities remains the same as set out in our previous representations. Within these we raised a range of issues such as the importance of the site selection process having regard to sites securing foul only connections to the public sewer and the importance of following the surface water hierarchy. We also specifically noted that when considering a range of sites to meet the housing needs of the borough, it would be more appropriate to identify new housing sites, which are sensitive receptors, that are not close to a wastewater treatment works. This reflects guidance in the NPPG at paragraph Paragraph: 005 Reference ID: 34-005-20140306, which states:

'Plan making may need to consider:

- *Considering whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern).'*

United Utilities would welcome the opportunity to discuss the selection of additional sites with the Council, should the Council be considering alternative sites so we can provide our early comment on any issues that may arise.

Summary

Moving forward, we respectfully request that the Council continues to consult with United Utilities for all future planning documents. We are keen to continue working in partnership with Staffordshire Moorlands District Council to ensure that all new growth can be delivered sustainably, and with the necessary infrastructure available, in line with the Council's delivery targets.

In the meantime, if you have any queries or require further clarification on any of the above matters, please do not hesitate to contact me on

Yours faithfully

Andrew Leysens
Developer Services & Metering
United Utilities Water Ltd

07.02.2019

Mark Dakeyne BA(Hons) MRTPI
Planning Inspectorate

Dear Sir

I write to express my concern regarding the future of Staffordshire Moorlands villages arising from their role in the Draft Local Plan.

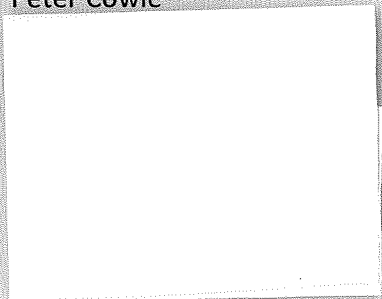
- Figures indicate that plans are to construct 2847 houses in Leek, Cheadle, Biddulph, Blythe Vale and Cresswell. The total number of houses for the Local Plan period is 6080, so in order to meet the target figure 3233 houses are still to be built. Add to this the 588 houses which need to be transferred to alternative sites from the Biddulph Green Belt and the figure becomes 3821. Some of these houses have already been built and Planning Permission is approved for others. I am unable to specifically quantify this total but if it is 1700, this leaves 2121 houses to be built. Should my figure of 1700 be correct (I doubt that the error will be great) – then sites will need to be allocated in the villages and the rural area for 2121 houses. The vital character of the Staffordshire Moorlands countryside is the villages, the countryside between them and the countryside surrounding them and I believe that this special landscape will suffer from the introduction of buildings on this scale.
- This problem is exacerbated by the prospect of dispensing with development boundaries in the 20 designated small villages. Indeed the NPPF proposes that urban sprawl should be avoided and villages should not encroach onto other villages.
- It is my committed opinion that the Green Belt and open countryside should be safeguarded. I believe that the great majority of Staffordshire Moorlands residents would share this view and would express concern regarding the plight of small villages and the rural area. Sadly few residents put their thoughts in writing to you and to the Local Authority and this reluctance is not helped by residents receiving very limited information and opportunity to comment at the various stages of consultation especially if they did not register their concerns at the initial consultation stage. Even Local District and Parish Councillors are unable to advise with confidence and expertise.
- I regret that I am unable to give accurate figures in the early part of this representation but the matter is of a dynamic nature and therefore difficult to underpin with precision. My concern is for the prospect of over development in the villages and the rural area and I would ask that you study this threat with great care. For a village with 80 existing houses to receive an addition of 40 or more houses will generate considerable adverse impact and 40 houses each for the 20 small villages is 800 – still a huge shortfall in the case of a figure exceeding 2000. The local transport infrastructure will need to undergo drastic revision to provide for a consequent population increase.

- Please note that in 2012 The Office for National Statistics published Sub-National Populations Prediction which indicated a significant levelling off of the population in the Staffordshire Moorlands. Additionally the 2015 Department for Communities and Local Government household requirements prediction calculated that population trend would reduce housing requirement to 2573 in the Staffordshire Moorlands for the given period. If greater than 1000 unoccupied properties in the Staffordshire Moorlands can be brought into use any new housing need will surely reduce.

Please consider our unique landscape and do what you can to avoid damage to the character of the beautiful countryside.

Yours faithfully

Peter Cowie



From:
To: Programme Officer
Subject: Focussed Consultation
Date: 08 February 2019 10:53:35

Dear Mr Dakeyne

Please find below my concerns relating to the consultation documents listed under EL7.001-9 and the correspondence between yourself and Mr Dai Lerner in January 2019. Looking at the Housing Implementation Strategy (HIS) document final draft of January we find:

2. Spatial Strategy

The Staffordshire Moorlands Local Plan in Policy SS2 establishes the following tiers in the settlement hierarchy;

Towns. Leek, Biddulph and Cheadle are identified as the three towns in the District where growth will be focused.

Rural Area Larger Villages, Policy SS8 (Larger Villages Area Strategy) identifies 12 larger villages which shall retain and enhance their role as rural service centres, providing for the bulk of the housing requirement of the rural areas and also for employment needs of a scale and type appropriate to each settlement having regard to infrastructure capacity and character.

Rural Area Smaller Villages, Policy SS9 (Smaller Villages Area Strategy) identifies 29 smaller villages where appropriate development which enhances community vitality or meets a social or economic need of the settlement or hinterland is encouraged

Other Rural Areas comprise the countryside and the green belt outside of the development boundaries of the towns and larger villages and the open countryside surrounding the smaller villages. These areas will provide only for development which has an essential need to be located in the countryside, supports the rural diversification and sustainability of the rural areas, promotes sustainable tourism or enhances the countryside.

Yet with changes you, quite rightly, suggest in Biddulph it would appear that the rural areas would be obliged to accommodate as high as 37% of the total allocation. SMDC has already got itself into a pickle over its attempts to implement the concept of sustainability. The latest evidence of which appears in a current Planning Application going before the Committee on the 14th February:

STAFFORDSHIRE MOORLANDS DISTRICT COUNCIL PLANNING APPLICATIONS COMMITTEE

14 February 2019

Agenda Item 10

Application No:

SMD/2018/0733

Location

Former Stable building at Spring Cottage, Greatgate Road, Winnothdale

Proposal

Change of use of former stable building to form 1no. dwelling

Applicant

Mr Tom Whiston

Agent

Rob Duncan Planning Consultancy Ltd

Parish/ward

Checkley

/ Checkley

Date registered 19th Nov 2018

If you have a question about this report please contact: Arne Swithenbank tel: 01538

395578 or e-mail arne.swithenbank@staffs Moorlands.gov.uk

REFERRAL

The application is a Full Minor and is referred to Committee at the request of Cllr Peter Wilkinson in order for committee to determine in particular the sustainability of the location for a new dwelling in the countryside.

8 RECOMMENDATION

A. Refuse for the following reason:

The application site lies outside a defined Settlement boundary and within the open countryside. Policy SS1 (amongst other things) expects new development to provide easy access to jobs, shops and transport services and to contribute towards a reduction in carbon emissions. Policy T1 similarly states that the Council will promote and support development which reduces the reliance on the private car for travel journeys and reduces the need to travel generally expects. The application site is remote from services and facilities. As a result the majority of trips from the development would be car borne. Notwithstanding the limited economic contribution that a single dwelling would make and the fact that it would deliver a dwelling in circumstances of a significant housing undersupply, the environmental harm and conflict with Policies SS1 and T1 of the adopted Core Strategy and the NPPF is considered to be outweighing in this case.

If this is actually their real policy how can they propose such an impact on the rural areas in the Local Plan.

The whole issue of rural development is further compromised by the attempt to remove village boundaries. This will, I believe, result in a planning free for all with developers cherry picking easy, and therefore, most profitable sites regardless of the form, structure and cohesive charm of our rural areas. The Council already lives in an incestuous relationship with developers particularly with regard to obtaining Section 106 agreements where the needs and desires of the population are compromised with the illusion of improved infrastructure which somehow fails to be built. It is essential that the Local Plan is sufficiently prescriptive so that residents of the rural areas, like the three towns, know with a high degree of certainty what can and can't be done .

Turning briefly to the 'numbers game' I remain unable to grasp how job creation is used to justify more housing, drawing again from the HIS:

The SMHA update report provided details of the projected population change, jobs growth and associated annual housing requirement for each of the scenarios tested. An extract from the report with corresponding details is provided below:

*Having reviewed the scenarios, the 2017 SHMA Update recommended a new OAN range of 235 to 330 homes per year to the year 2031. The bottom of the range (235) related to the demographic needs plus a 10% uplift to reflect market signals and a further 10% to respond to the high level of affordable housing need. **The top of the range (330) related to the level of housing growth required to support the projected increase in jobs. Jobs growth is supported by the higher level of housing growth as it enables a higher level of inward migration of working age people from neighbouring areas. Natural population change in the District is largely driven by an increase in the elderly population.***

This looks a bit 'chicken and egg' to me. Are we building houses to facilitate jobs growth or will jobs growth require more housing? This element of the plan has no provable substance and should be discarded.

Finally I am most heartened to see in your letter to SMDC of 29th January the clear statement as regards the necessary longevity of the Green Belt boundaries.

Yours truly

John Steele Cllr. Kingsley Parish.

[Redacted signature area]

Sent from my iPad

From:
To: [Programme Officer](#)
Subject: Local Plan
Date: 08 February 2019 11:25:41

Dear Ms Weate

In response to comments following the Consultation period for the above I have seen the Blythe Vale development plan proposed by Turley on behalf of Modwen Homes.

Turleys have provided their customer with an excellent development plan to cover all Staffs. Moorlands criteria and I foresee the required number of houses in the next emerging Local Plan being met on this one site, which makes it almost a 'Blythe Bridge Two' situated alongside good access but currently VERY busy roads that will undoubtedly bring the usual impact and problems.

My frustration with the above site is its location compared to smaller, micro sites, offering easier WALKABLE access to the local railway station, bus routes, shops which unfortunately the Amec Foster Wheeler Study of 2015 commissioned by Staffs. Moorlands just 'Green Belts' these sites, even though utilities, street lamps exist making them ideal. These small parcels of land offering no more than approx. 30 dwellings would suit first time buyers as well as family homes and they could still have the 'green space' beyond which would not fall into the 'urban sprawl' of Staffs. Moorlands boundary. In excluding smaller sites, (quite literally 400 m (a 5 minute walk)) from the railway station is denying potential purchasers of fantastic, logistical, walkable, 'green environmental' sustainable life styles way beyond the years of the emerging Local Plan. Without doubt Estate Agents use the locality of Blythe Bridge railway station to advertise their properties in the Stoke-on-Trent boundary area, and so will all the other home owners who actually enjoy living in close proximity to this fabulous asset.

According to my information at one of the Hearings the representative from Turleys said that she had recorded in her car that morning the Blythe Vale development was 0.7 km from the railways station. Strange the representative recorded it that same day as the Hearing, – had she tried walking it with say a child/or cycled - by crossing the busy roads to the station before their proposed plan was delivered to Staffs. Moorlands?

I am not sure whether the Inspector will be interested in the above comments but I hope Staffs. Moorlands will be encouraged to revisit some of their 'Green Belt' Policy/Study, and be more flexible with their current restrictions to make use of ideal sites.

Yours faithfully

S J Malpass



Mark Dakeyne BA (Hons) MRTPI
% Angela Weate Programme Officer
STAFFORDSHIRE MOORLANDS LOCAL PLAN EXAMINATION
Moorlands House,
Stockwell Street, Leek,
Staffordshire. ST13 6HQ

Programmeofficer@staffsmoorlands.gov.uk

5th February 2019

Dear Mr Dakeyne

Re: Staffordshire Moorlands Local Plan Examination - Targeted consultation of 16th January 2019

I write in connection with the further targeted consultation of 16th January 2019 with regard to HIS and other housing evidence including post hearing exchanges between yourself and the council.

Yours Sincerely

Gerald Willard
Chartered Town and Country Planner MRTPI

Introduction

I make these comments in the light of the advice in **the framework** to those preparing plans.

You will be very familiar with its contents and especially paragraph 13 which requires a genuinely plan led system. Paragraph 14 requires plans to be prepared positively, in a way that is aspirational but deliverable and contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

I could continue on. But in essence the framework in both in the 2012 and 2018 incarnations say that a plan should be clear, positive and certain. Moreover plans should be engage effectively with those it serves.

It is against this background that I dismayed at the comments made under issue 3 of your post hearing advice letter to the council. At point 9 and in respect of the lack of rural settlement boundaries and inter alia reliance on policy H1 that the effects of the council approach is uncertain. You continue to suggest that the situation should be monitored and reviewed.

With the greatest of respect there are 2 main problems with this wait and see approach.

In the first case it is not what plan making is about surely. The purpose of a plan is too plan and to give those taking part in it and affected by it some certainty as to what development would take place within the plan period. Benjamin Franklin said **"By failing to prepare, you are preparing to fail"** and no lesser figure than Winston Churchill later modified that, rather famously, to **"Failing to plan is planning to fail"**. The abdication of the responsibility to plan properly in respect of housing sites in the rural area is not accordance with the requirements as set out in the framework. In the hearing sessions that I attended I witnessed 3 very senior ex development control planners who are now in private practice describe the failure of the council to allocate any new rural housing sites for the past 20 years. I also heard the same people set out why policy H1 (echo my evidence) would fail to provide any clarity or certainty in the future as to where housing in rural housing might go. This is a disservice to potential developers, those they build houses for and local people all of whom will have no idea throughout this plan period where new housing in the rural areas might go.

I am beyond surprised that this draft plan is still not found to be unsound for this reason alone.

I still hope that despite officers best attempts that you will see that the lack of allocations in the rural areas is wholly politically motivated by councillors unable to resist a small but vocal NIMBY local electorate. You will recall such a policy failing was not the case in the previous

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version of the plan and rural housing allocations were dropped for wholly local political reasons. Failure to plan for sufficient rural housing sites and to rely instead on an ambiguous and wholly subjective policy such as H1 does not serve the people it is meant to be planning for.

My second concern relates to process and cost. The plan making process is already widely misunderstood and many keen otherwise participants fall by the wayside as policy evolves simply because matters become too complex, too much time is required to keep up or professional fees are out of control.

The process and your good self are without doubt very well intentioned. However it cannot be realistic to expect (as paragraph 9 does) landowners and developers will play a never ending role in monitoring the plan and where failing to urge the council to review it if it is failing. The purpose of the plan is to provide a clear and certain plan and not to kick the ball further into the long grass to review again in the future. It becomes a war of attrition with only salaried officers, retired NIMBY's and elected members able and willing to keep actively engaged for what is potentially a perpetual plan. I know for a fact that my clients cannot continue to engage in such a process and they can see no reason; and neither can I, to not prepare a plan that makes provision for the whole of the plan period. The plan making process becomes much weaker if key participants cannot continue to engage within it.

Housing Implementation Strategy -November 2019

Points 3 to 5

On pages 4 and 6 the council indicate that 707 affordable houses will be required over the next 5 years. In accordance with evidence submitted by myself and others the council have no **chance** let alone **hope** of meeting this target. Some of the lowest houses prices in the West Midlands along with comparable construction costs mean that even greenfield sites are not hugely profitable or attractive. A simple drive around the district will show the paucity of housing commencements and emphasise the council's own evidence about insufficient housing supply. The district lags behind every other local council area I visit or work within in terms of the delivery of housing. This problem will of course be significantly worsened by the failure to allocate housing sites for main villages and leaving the provision of new housing on these areas to possible windfall delivery under policy H1. Even if the officers and members of planning committee do support non green belt (only limited infill in villages being allowed by the framework) sites in accordance with draft policy H1 in sustainable locations (few of these within Staffordshire Moorlands) these windfall sites are highly likely to be small sites. As such little if any af-

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fordable housing provision will arise in rural locations if this plan proceeds. Accordingly the plan is unsound in that it will not deliver or plan for sufficient affordable housing.

In addition to this the plan makes no specific reference that I am aware of as to how it can practically and realistically increase the supply of housing suitable for an ageing population or for the community care provision that they will need. This is despite the council asserting at page 5 that *“natural population change in the District is largely driven by an increase in the elderly population”*.

Point 6

The council seem to have a deluded belief that the self build register is a true indication of demand. It is no such thing. Most of those (myself) included are much more focused on searching the market to find suitable sites. The council ought to evidence what engagement they have had with local agents, internet property search providers and specialist custom/self build providers and experts before devising policies to genuinely deliver more custom build/self build homes. It is my belief that should they do so there would be little interest in allocation sites as part of larger housing sites. Self and custom build enthusiasts seek small sites adjacent to towns and villages or suitable conversions or redundant farm buildings.

To an extent revised policy H1 may assist such people but only if the policy is positively applied by both officers and members. Positive supporting text and an inclusion of text within the policy would assist.

Point 7

The council pay lip service to affordable housing despite setting down nice words and positive and encouraging text. This cosiness is however significantly different to devising clear and positive policy to deliver specialist and older persons housing across the district. Further policy work on such a positive approach is required.

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Point 9

In general the council states that projected windfall rates are supported by past windfall rates. This is considered flawed because future windfall sites will and can only be drawn from a depleted stock or urban brownfield sites or suitable greenfield ones. As time passes and more acceptable windfall sites get built out it stands to reason that future windfall supplies will decrease as their supply is not infinite. There should be a reasonable reduction in future windfall projections to account for this attrition.

With regard to the rural areas it simply not acceptable to say that in the future large windfall sites should come forward because they did in the past. Much of the district is covered in Green Belt and much of the land outside villages having high landscape value and local political importance. It is not acceptable to fail to plan for the rural areas without any evidence whatsoever beyond hope that accessible windfall sites would come forward. At the very least the council ought to be able to give a broad indication as to the kind of sites (non Green Belt) that they expect see come forward and get planning permission in the future. This is a planning process all are engaged in here and not simply a wish list.

The problem of planning for housing within the district will of course be amplified if the council fail to find a replacement for BDNEW in Biddulph which it would seem is the intention. The council are in danger of preparing a plan that is unsound from the start.

Delivery mechanisms.

Clearly the council and its partners consider that they achieved some good affordable housing outcomes between 2009 and 2015. This is large part down to the sites being owned by the public sector and social housing partners and being available. This along with the £8,000,000 of Govt funding of course.

As 277 houses were built during this period this equates to a crude cost of £288,808 per dwelling aside from any beneficial land deals. It is doubtful that there will be such treasury generosity in the future (these housing costs are higher than average houses prices) and the new The Accelerated Housing Delivery Programme has much to prove especially as it will look at unimplemented planning permissions (likely to be more costly) and will have significantly less public sector financial support.

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If the council is genuinely serious about addressing affordable housing needs across the district it ought to more fully engage with the private sector to allocate sufficient housing sites especially in Biddulph and the larger villages to provide for and to allocate larger housing sites which can then deliver viable affordable housing in accordance with affordable housing policy requirements via section 106 agreements.

Additional comments on Appendices.

Appendix 1

The council indicates a number of sites for which the agent or landowner states that a site will be ready and available. This is of course what all interested parties say. Such statements need to be treated with a degree of scepticism. In all cases a site will only come forward for development if 2 criteria apply. In the first place the allocated planning use must have a higher value than the existing site use. Secondly the unique business or personal circumstances of the land owner must mean they are ready and prepared for the change that redevelopment would bring. If these 2 conditions are not satisfied then allocations become little more than accounting exercises. It is highly likely therefore that not all allocated sites will be delivered at any stage in the plan process.

Appendix 9

Of course the table is skewed by the projections for Draycott (Blythe Vale) and by 7 large permitted sites at Upper Tean. These 2 villages providing much of future commitments if the sites do get developed. The consents (and others) were only granted because the council have been unable to demonstrate a 5 year supply and adverse planning appeals have affected local decision making in the short term.

There is no likelihood of policy H1 delivering sufficient rural housing sites in the future given the amount of the district which is within the Green Belt, local politics, uncertainty within the policy itself and a newly adopted plan which in the early years will be likely to show it can meet a 5 year housing supply requirement. It will be a short lived plan at the very best.

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Appendix 10

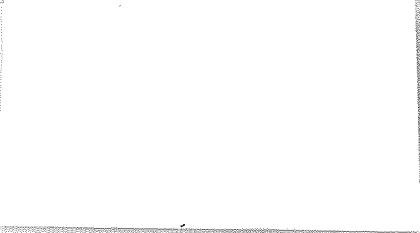
The lack of recent approvals in Biddulph and paucity of approvals in Leek is of concern along with the general lack of application activity across the district.

The dynamism and therefore actual delivery of change on the ground is hard to measure but sometimes plain observation is a useful means of gauging activity. When compared with other adjoining council's there is a clear and palpable lack of development activity as evidenced by development site boards, construction lorries or site clearance/preparation activity. This is no surprise. Property prices in SMDC lag behind many other places but development costs are similar. This is why those developers and agents appearing at hearings have been at pains to promote more allocations especially in the rural areas because they know better than most how difficult it is to bring forward and deliver viable housing and development sites within this district.

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7th February 2019

Dear Mr Daykene,

Having reviewed the current dialogue between yourself and SMDC regarding the housing provision within the proposed Local Plan, I make the following observations:-

1. On the current consultation process itself, the lack of input from local parish councils and the general public at large over this critical issue of housing, seems to emphasise the disparity within the system as highlighted at the examination last autumn where the continuing reiteration of the documentation since 2016 has seen a diminution of response, or active public participation, presumably as respondents fail to continue to comment either through attrition or lack of impetus. This seems then to reflect a system that works well for the few such as those representatives who were fortunate to have the opportunity to attend the initial examination and who now have a chance to remark upon the latest amendments being recommended, but denies that opportunity to the larger population whose future lives will be affected by its final outcome.
2. It maybe that an opportunity will be available later this year for an overall scrutiny of the draft LP but by then issues such as these critical principles over housing policy will have been established by the main parties, yourself and SMDC, and embedded to such a degree that any further public comment will be fruitless.
3. Though you commented that the LP should be regarded as a 'living' document, it does seem unfair to have had a presentation to the public back in 2016 of detailed information upon which to comment that has now been altered, and indeed even within the past year when SMDC approved its draft for submission to the Secretary of State, it has since tinkered with it to such an extent that not all its district members are aware of the current changes afoot, let alone local parish councillors. Since the examination in the autumn, I've continued to struggle to find anyone in my village, one of the designated small villages, who knows what is likely to happen with regard to the village boundary removal proposals and its adherent consequences, which I note you continue to support.
4. The issue of the green belt at Biddulph in the SMDC proposals has proved contentious throughout the consultation process, so it is heartening to see your current recommendation in that regard.

5. However, if upheld, that modification in turn must have a knock-on effect in terms of where and how the absorption of the number of houses that were allocated to that area will now be developed.

6. The probability that it will be added into the overall, rural allocation becomes just as concerning, if not more so, given your recommendation to do away with the small village boundaries.

7. The percentage of houses to be developed in the villages and the rural settings overall will now be exceeding well over 30 percent of the total requirement to be built as estimated by SMDC. Allied to this, your recommendation to support the removal of the small village boundaries will contribute to the mix and assist in increasing it further and therefore presents the numerous problems below, the consequences of which need to be re-considered.

8. The removal of those boundaries will lay open the risk of altering the local landscape characteristics of both the traditional villages themselves and their historic settings for future generations, not just incrementally, but radically and irrevocably.

9. The focussed architectural heritage within the heart of these villages resulting from slow, accumulative growth over life times and centuries, will be lost by the more rapacious, larger scale, monoglot or uniform estate development that will swiftly ensue as the removal of the boundary will transform the ability of planners to control development in areas of sensitive or special landscape value as presently exist around them.

10. The blurring of what is within or beyond the village envelope will mean that, potentially, development within the rural landscape as a whole, will be at a higher risk of happening and the purpose of defining smaller and larger villages will be made obsolete.

11. It may well satisfy the developers to have carte blanche to build where they wish and it may well assist the numbers game in enabling the local authority to satisfy its targets and appease the government, as well as guaranteeing an abundance of revenue as a result, but the prospect of the radical loss of local character and identity and its overall aesthetic impact upon residents, tourists and the undermining of potential support AONB status that SMDC is currently seeking, seems a high and irrational price to pay for such consequences.

12. The most glaring problem that the removal of the boundaries and the impact of the increased development will entail, is that of sustainability and of how such a prospect that is now being envisaged, goes contrary to the current doctrine to which SMDC adheres.

13. It was very evident from representations made at the public examination last autumn that large scale urban development in places like Cheadle will inevitably lead

to a further increase in the abundance of local problems because a lack of infrastructure to accompany the housing projects being mooted.

14. That problem of lack of infrastructure and sustainability will be exacerbated more widely over a greater rural area where in many of the villages, both smaller and larger, additional housing will place demands upon utilities and services.

15. Rural transport is already a problem especially as a result of the lack of public transport ; there are no buses at all in my village now, so we are entirely dependent upon cars for transport to local services in nearby towns or larger village centres.

16. In turn, this emphasis of the dependence upon car usage already impacts upon air quality, via emissions and pollution, and of course, statistically, minor roads and lanes are already more dangerous in terms of accidents and fatalities nationwide, so that as a result of increased volume of vehicles from housing development the risk to the health and welfare of everyone in these rural areas will be greater than ever.

17. There are no longer shops or local schools in many smaller villages, so once again the criteria defining sustainable housing development comes into question.

18. Our nearest mainstream hospitals from maternity and A and E facilities are over 20 miles away at Derby or Stoke Royal.

19. The removal of the smaller village boundaries and its inherent control upon village growth therefore opens up the way to increased pressure through greater housing development, upon many of the aspects of rural sustainability as defined by SMDC, as never before.

20. I do not believe that sufficient attention has been paid to the problems in the rural areas that are likely to arise from the persistent claims for more and more housing; the need for the provision of small scale low cost /affordable rural housing has not been properly addressed in the proposals. Instead, as we have witnessed at the hearing with regard to new urban developments, promises made by developers to provide such in return for permission for large scale estates, are very often not upheld in the long run. That is an area that needs to be policed more stringently by such a policy that eventually emerges that more precise targets are met where there is a specific need, and not just a generality of building what suits the developer's pocket best.

21. Nor do I think that sufficient local discussion has been stimulated during the process of evolving the local housing plan and therefore the people whose lives will be most affected by the introduction of such policies, particularly those in the rural areas, are not aware of the full impact it will have because of the constant amendments and the lack of information being promoted to alert them to the changing nature of the proposals.

22. As I said earlier, by the time this next version of the draft is put out for the general public's attention as the final consultation, it seems unlikely that several of the key and most contentious issues will be altered thereafter, and therefore it is merely the rubber stamping of the final draft that the full membership of SMDC will be required to consider. By then it will be a document that is already altered to such a degree that it bears much less resemblance to that one that was passed for the Secretary of State's approval a year ago, let alone to the earlier one over which far more people had some knowledge and to which they responded in good faith.

23. Finally, if boundaries are to be removed, they must be defined accurately in the first place. I drew your attention to the inaccuracies of the local plan for my village as an example of poor cartography and site allocation in my earlier, written representation.

24. Upon your instigation, after the hearing I wrote to SMDC pointing out the details. To date I have seen no further evidence of any alterations or corrections to that plan, so I should be grateful if you would confirm that they have in fact been made and therefore that from that aspect of legality and soundness, the plans you have before you, are actually now accurate.

Yours sincerely

David Walters

REC'D - 8 FEB 2019

5TH February 2019

Staffordshire Moorlands Local Plan.

Dear Sir/Madam,

Once again I am putting pen to paper so to speak, to express my concerns about the SMDC Local Plan. Reading through the Housing Implementation Strategy on the SMDC website I noticed that the two anonymous developers have already managed to obtain £1.7m and £2.7m each. Is this money going to be used solely by these anonymous developers? And can I ask how the funding was already agreed before any outline planning consent was given. What is the point of a public consultation and planning review when it seems like it's a done deal before we the public have our say. It makes all the letters I have written and sent to SMDC pointless and a waste of my time. Add on to that all the meetings I have attended I might as well have stayed in the comfort of my own home and watched the television.

At the moment we have huge motorway Lorries driving past our front gate to a housing development at the bottom of Riverside. Sometimes they are backwards and forwards all day long. Looking back in the past there has already been subsidence on the river side of the road. The road was closed to residents for months and a huge amount of public money was spent shoring up the road to stop it sliding into the river. When these latest planning applications were put in to build these houses, myself and many more people in Oakamoor were utterly amazed that after all our objections the plans were passed. So, today we have constant heavy vehicles using the road carrying tons of building materials. There have been four gas leaks which has led to holes being dug outside residents properties and the smell of sewerage. And talking about holes, we now have pot holes appearing here and there all the way down the road. I wonder if Laver Leisure who own the river bank know that it is sliding into the river!

The other property development is at the bottom of Farley Lane. After mud slides and the famous 'As seen on TV Sink Hole' they are now fenced off. As of last year these four executive houses have remained empty and unsold. So much for the desperate need for houses. I think not. The desperate need for starter homes is more like it. In my forty five years living in this village not one starter home has been built. Young people have had to move away from the villages where they were born to buy cheaper houses in the towns.

We are now faced with having our village boundaries removed to make way for more development. Which is not being allowed under the current status. To remove the boundaries will create a land grab and a 'Gold Rush' by greedy developers who care not a jot for the environment or the people who live in the lovely Churnet Valley. Our lives will be changed forever.

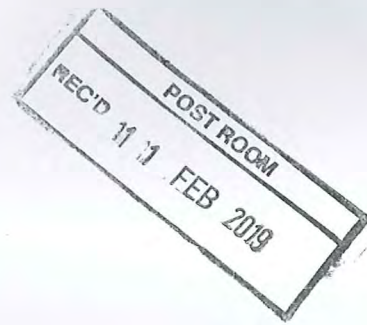
We have a lovely community here in Oakamoor. Even though we have lost two pubs and have no bus service people care for each other and no one is neglected. It's been made obvious by SMDC that little thought has gone into what we the residents want for our village. Where has been the consultations by the council? When did anyone come and visit, walk around, and talk to the people living here. Most of the time people have no idea what is going on. And you can forget about finding everything on computers. There are an awful lot of (elderly) people who never use them.

And so I come to the end of yet another letter to SMDC. Even though I get tired and frustrated, I live in hope that the tide will turn and just maybe if the tide turns we will be able to hold on to what we have, the very special beautiful Churnet Valley.

Yours sincerely,


Dot Merry. ✓

LOGGED



5 February 19

Regeneration Department
Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
Leek
Staffordshire
ST13 6HQ

Dear Sirs

Re:- STAFFORDSHIRE MOORLANDS LOCAL PLAN – CONSULTATION

I am in receipt of your letter of 16 January and comment as follows.

The 16 January 2019 Cheadle Times and Echo article entitled 'More houses planned for Blythe development site', enables readers to physically visualise the detailed Modwen Homes' plan, prepared on their behalf by Turley, and it certainly ticks boxes and meets current required housing numbers for your emerging Local Plan in the Blythe Bridge area.

In considering all the usual objections for the above site's size, location and impact, you do seem 'blinkered' to review 'other' micro sites on the doorstep to the Blythe Bridge railway station, bringing far greater benefits of social and sustainable infrastructure in the locality which would have a lesser detrimental effect on the environment.

Potential land parcels which have been broadly designated 'Green Belt' by your commissioned Amec Foster Wheeler Study of 2015 completely 'dismiss' ideal micro sites, even though their proximity to Blythe Bridge railway station, bus routes, shops, etc is beyond doubt within easier walking distance compared to the Modwen Home Blythe Development.

It is also worth recording you gave permission for land to be developed in the same locality as the railway station adjacent to your designated 'Green Belt' and has been developed since your initial invitation for applications at the Consultation Review. With this in mind I trust you will consider reviewing potential 'Green Belt' parcels for micro development on the same urban fringe which could deliver and maintain the five year land supply as intimated by the Inspector.

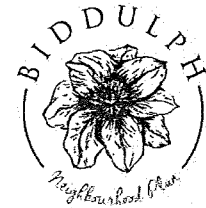
There are questions to be raised at the Planning Department as to how you realistically spread your housing obligations to the common good of future environmental needs, and the broad stroke 'Green Belt' issue needs to be looked at from ground level!

Yours faithfully

J M Belcher



Biddulph Neighbourhood Plan



Friday 8 February 2019

Sent by email

Dear Sirs,

RE: Post Hearing Advice, Consultation

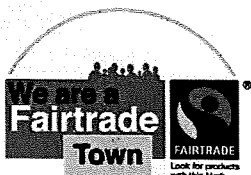
The Biddulph Neighbourhood Plan Working Group requested that I write in relation to Item EL6.005 from the emerging Local Plan evidence base, which is a letter from Staffordshire Moorlands District Council (SMDC) dated 17 January 2019 to Mr M. Dakeyne.

In response to the consultation set out in the first paragraph, Biddulph Neighbourhood Plan Working Group make the following consultation comments.

- Paragraph 8 in the correspondence sets out that:
"The Council will need to closely consider its options to address your concerns regarding site BDNEW over the coming weeks before drawing any conclusions. However, Paragraph 22 of your advice refers to the fact that the Framework does not require the identification of specific sites for the whole of the plan period. The latest housing trajectory indicates that with the removal of site BDNEW from the planned supply, the Local Plan still identifies sufficient land for 13 years. This exceeds the requirement set out in the Framework which only expects the identification of land for the 11-15 year phase of Local Plans "where possible". Whilst the Council's preference has been to identify land for the full plan period with the allocation of site BDNEW, we would like to seek your views on the potential for the site to be removed from the Local Plan without the subsequent deficit in housing supply being made up elsewhere."

We note this course of action and support a considered approach, that includes clarifying that sufficient land is currently available and viable within the existing sites allocated in the emerging Local Plan.

- Density: Biddulph Neighbourhood Plan Working Group note the opportunity of existing sites that remain, and that the density may increase to accommodate some additional numbers, which provides further contribution to the total housing numbers in the district.

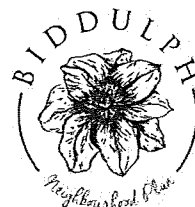


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Biddulph Neighbourhood Plan



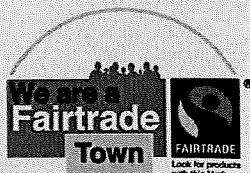
- **Local Plan Review:** The emerging Local Plan (when adopted) will be reviewed within 5 years and this could call for additional sites, if required. It would be more expedient to provide a clear rationale, as alluded to in the letter, and proceed with the document as it stands with the removal of this one site; its cumulative impact on numbers throughout the District is minimal.
- **District Wide Planning Decisions:** Recent planning decisions have granted permission for larger numbers of homes exceeding 50 units on land not allocated for housing or identified through the Local Plan Process or Neighbourhood Plan processes. Therefore, it would be reasonable to assume that speculative development of medium or large-scale development will continue across the District while there is not a robust and up-to-date Local Plan.
- **Emerging Neighbourhood Development Order:** The emerging Local Plan states that the total housing provision for Biddulph Town will be 890 new units; this is the second largest allocation of the towns. The evidence base from the emerging Neighbourhood Development Order is identifying where existing buildings within the Town Centre can be better utilised to include first floor residential accommodation, which will create new residential dwellings and help to revive the Town Centre.
- **Emerging Neighbourhood Development Plan:** The emerging Neighbourhood Development Plan will be submitted for screening in Spring 2019 and undertaking Regulation-14 later this year. The draft policies within the plan support sustainable development and growth with supported infrastructure. This evidence base could be used to further support the case of continuing with the emerging Local Plan, removing this one site and through a range of Local and Neighbourhood Plan policies and the Neighbourhood Development Order, encourage development on existing sites identified, increasing the densities to provide accommodation to meet Biddulph's housing need and create new accommodation in the Town Centre in existing buildings.

If you require further input or clarification from the Group, please do not hesitate to contact me.

Yours sincerely,



Sarah Haydon
Chief Officer, Biddulph Town Council



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