

My Ref

Your Ref

21 August 2018

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

Dear Mr Dakeyne,

Re. Staffordshire Moorlands Local Plan Examination

I refer to your correspondence dated 16 August. The Council's responses to your follow up questions are set out below. The paragraph numbers are as your preliminary questions.

13 – I can confirm that neither Stoke-on-Trent City Council nor Newcastle-under-Lyme Borough Council have asked Staffordshire Moorlands District Council to help meet their combined development needs of 1390 dwellings per annum.

As set out in the Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council Joint Local Plan Preferred Options Consultation document (February 2018)¹, Stoke-on-Trent City Council does not currently expect to have a shortfall of supply against its apportionment of the OAN but will need to understand any updated position from Newcastle-under-Lyme Borough Council on the shortfall of housing against their apportionment of the OAN given they share a Joint Housing Market Area.

Both Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council can confirm that the Joint Local Plan will not be submitted for examination until after 24 January 2019.

An updated version of the Statement of Common Ground between the District Council, Stoke-on-Trent City Council, Newcastle-under-Lyme Borough Council and Stafford Borough Council is submitted along with this letter. This version now includes a signature to confirm the approval of the document by Stafford Borough

¹ https://www.newcastle-staffs.gov.uk/sites/default/files/IMCE/Planning/Planning_Policy/POJLP/JLP_preferred_Options_v20_small.pdf

Council. For the avoidance of doubt, no other changes are made when compared with the statement submitted with the Local Plan in June.

21 – The Council will update the Policies Maps as indicated.

30 – Applying the annual average development requirement as set out in the Local Plan Submission Version (320dpa) over the fifteen year plan period (2016 to 2031) would provide a gross housing requirement of 4800.

If the objectively assessed need for housing was to be calculated for the period 2016 – 2031 only, the bottom of the range would increase to 240dpa. This would be an uplift from the 235dpa identified in the previous SHMA Update which applied a base-date of 2014. This is summarised in the table below:

Table 5.1 Approach to OAN for Staffordshire Moorlands 2016-2031

| | Dwellings per annum (2016-2031) |
|---|------------------------------------|
| Demographic Starting Point | 170 dpa |
| Adjustments to Demographic-led Needs | 199 dpa |
| Uplift for Market Signals | 219 dpa |
| Employment Led Needs | 328 dpa |
| Affordable Housing Needs (@33% delivery) | 679 – 1,309 dpa |
| Uplift to demographic led needs for Affordable Housing (@10%) | 240 dpa |
| Full Objectively Assessed Needs (rounded) | 240 dpa – 330 dpa |

Please note that this update does not this doesn't involve modelling the latest 2016-based Sub-National Population Projections, 2016/2017 Mid-Year Estimates or a review of the latest market signals/affordable housing needs. The change can be attributed to fluctuations in the annual population projections as per Appendix 2 to the 2017 SHMA Update (ED27.6).

40 – It is acknowledged that the introduction of a 10% slippage allowance would necessitate additional allocations (assuming that all other factors remain equal). The Council's previous response to this issue indicated that it could consider a 10% slippage allowance to the net housing requirement (3859) to indicate the potential scale of such an allowance if required. As per your correspondence, this would equate to the need for the Local Plan to identify land for an extra 385 homes. The Council does not expect that this additional provision would be met through windfall.

50 – The Council seeks to apply the optional standards although it intends to enable detailed consideration of their implementation at the planning application stage. The

Simon W. Baker B.Ed MBA MIMSPA
Chief Executive

Policy Topic Paper ED 13.5 (Pages 25-26) sets out the evidence for seeking the optional standards and the Viability Study ED24.1 tested the viability of including optional standards. However, it is considered overly onerous to require the optional standards for all dwellings on all sites or to set a specific percentage that would apply across the board.

The intent of the policy is to allow for consideration of the scope and merit of introducing the standards and the extent to which they are applied as a percentage of the number of compliant units on a site-by-site basis. For example, the Council may look to achieve the optional standards on all dwellings for a development specifically designed for older people. Conversely, the conversion of a historic building to residential use may not be practical for the optional standards to be applied at all. For some applications financial viability may also be an issue. In order to clarify the Council's approach, it is considered that the supporting text should be amended to provide examples such as those cited above where the standards may be applied to a lesser or greater extent.

87 – The Council agrees to amend the policy in line with Inspector's comments.

98 - Qualifying development would be 11 dwellings or more in accordance with the PPG

I trust that you will find the above helpful. Please don't hesitate to contact me if you require any further information.

Yours sincerely,

Mark James
Senior Regeneration Officer – Planning Policy