



Position Statement on behalf of Mr and Mrs Webb

In relation to: Matter 3 – Housing and Employment
Objectively Assessed Needs (OAN) and Requirements

Mr & Mrs Webb

Project : 17-204
Hearing : Matter 3 – Housing and
Employment Objectively
Assessed Needs (OAN)
and Requirements
Client : Mr and Mrs Webb
Date : September 2018

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1. Introduction

- 1.1 Emery Planning is instructed by Mr and Mrs Webb to attend the Staffordshire Moorlands Local Plan Examination.
- 1.2 This statement summarises our client's position in response to the Inspector's schedule of Matters and Issues, specifically the questions under Matter 3: Housing and Employment Objectively Assessed Needs (OAN) and Requirements. It should be read in conjunction with our detailed representations to the Submission Version of the plan, and our other Position Statements submitted to this examination.

2. Response to the Matters and Issues

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

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

2.1 Paragraph 14 of the 2012 Framework states that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

2.2 Paragraph 47 states that to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework.

2.3 The Submission Version proposes a housing requirement of 320 net additional dwellings per annum. This is not consistent with the OAN that has been identified through the Council's evidence base. Our interpretation of the SHMA Update 2017 is that the OAN is 330 net additional dwellings per annum, based upon the 'Combined Job Growth Scenario + PCU'¹ scenario. We also note that this scenario is also the basis for the employment land requirement in the plan of 27ha. Paragraph 8.10 of the SHMA Update 2017 states:

"If the Council were to pursue a figure significantly lower than 330 dpa whilst also planning for a level of annual job growth or even job stabilisation, it would need to justify how it would mitigate or avoid the adverse housing, economic and other outcomes that a lower-growth approach would give rise to. It would also need to evidence how the adverse impacts of meeting housing need would 'significantly and demonstrably outweigh the benefits' [Framework §14] as well as make provision, through the duty-to-cooperate, for those needs to be met in full elsewhere within the wider HMA."

¹ Partial 'catch-up' in headship rates amongst 15-34 year olds

- 2.4 Whilst the difference between the OAN and the housing requirement is only 10 dwellings per annum, this amounts to 190 dwellings over the period 2012 - 2031. Paragraph 47 of the Framework is clear on the need to meet the full objectively assessed needs for housing.
- 2.5 It is also necessary to consider whether there should be an uplift to the housing requirement in order to meet affordable housing need. Paragraph 2a-029 states:

“An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”

- 2.6 The affordable housing need in Staffordshire Moorlands is 224-432 units per annum. The variation is based upon whether the income : rent ratio is based upon previous CLG guidance (432 per annum) or updated to reflect the current national average (224 per annum). The current national average may provide a more realistic ratio, but it also reflects the severe national housing crisis and the fact that many households are forced to spend much more than they can necessarily afford on the cost of housing. Notwithstanding this even on the lower figure of 224 per annum, the affordable housing need is very severe, and represents 70% of the overall housing requirement. There would be a very significant and serious shortfall in affordable housing based upon the plan as currently drafted.
- 2.7 The SHMA Update 2017 suggests that the uplift to the OAN should only apply to the lower end of the 'range' identified (see paragraph 8.8). However, the OAN is not a range. The decision maker must identify the most appropriate figure, and both the authors of the SHMA and the Council appear to accept that the most appropriate figure is the 'Combined Job Growth Scenario + PCU' scenario (330 dwellings per annum). Consideration as to whether the OAN is increased must apply to this figure. The SHMA Update 2017 suggests a 10% uplift. If applied to the identified OAN of 330 dwellings per annum, the total housing requirement would be 363 dwellings per annum.

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

- 2.8 No. Previous delivery rates been significantly constrained by an absence of viable and deliverable land for development. By allocating the right land in the right locations, significantly higher development rates can be achieved.

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

2.9 We recognise that the evidence base for this plan must relate to the plan period in question, and that uplifts have been made to the demographic starting point to take into account market signals and economic needs. However, it should be noted that there is a very high level of previously unmet housing need arising from a failure to meet past requirements. The backlog from 2012 represents only a fraction of previous unmet needs.

2.10 Past completions are set out in the table below:

Year	Core Strategy requirement	Net completions	Shortfall / surplus
2006/07	220	260	+40
2007/08	220	261	+41
2008/09	220	236	+16
2009/10	220	185	-35
2010/11	220	110	-110
2011/12	220	58	-162
2012/13	220	96	-124
2013/14	220	78	-142
2014/15	220	278	+58
2015/16	220	99	-121
2016/17	360	128	-232
Total	2,560	1,789	-771

Table 1 – Past housing delivery

2.11 A significant shortfall of 771 dwellings has accrued, even against a Core Strategy requirement which was significantly stepped to take into account lower delivery in the early years of the plan, as shown in the table below:

Period	Average Annual Development Rate	Net Dwelling Completions
2006 – 2011	220	1100
2011 – 2016	220	1100
2016 – 2021	360	1800
2021 – 2026	400	2000

Table 2 – Adopted Core Strategy housing requirement phasing

2.12 In addition to a significant portion of the shortfall effectively being written off, the table above also demonstrates that the housing requirement in this plan actually represents a significant reduction in comparison to what was required in the adopted Core Strategy post-2016. The approach taken is not consistent with planning positively or boosting significantly the supply of housing land, as required by the Framework.

1.5 Has the need for older persons' accommodation, including that within C2 communal living been taken into account in the OAN?

2.13 No allowance has been made within the housing requirement for C2 uses for older persons accommodation.

2.14 Table 7.8 of the SHMA Review 2017 identifies that the communal population is anticipated to grow significantly during the plan period. However the Submission Version document does not refer to meeting this need and it is not included within the OAN. This is a notable omission in the context of paragraph 50 of the Framework, especially given the blurred lines between C2 and C3 uses and changes in how the needs of the institutional population are met, particularly older persons. The PPG specifically provides at paragraph 3-037:

"Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan."

2.15 Paragraph 2a-021 also provides:

"The future need for specialist accommodation for older people broken down by tenure and type (eg sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2). Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Local authorities should therefore identify particular types of general housing as part of their assessment."

2.16 We were involved in the examination of the recently adopted Cheshire East Local Plan, where the need for C2 accommodation for older persons (i.e. the institutional population) is included within the overall housing requirement, and equates to approximately 6% of the total requirement (2,185 units of a requirement of 36,000 dwellings). We consider that there are no

local reasons for taking a different approach in this plan to that taken in the Cheshire East Local Plan, and the need for C2 accommodation should be added to the identified OAN.

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

2.17 As noted, the 2012 Framework must apply in examining this plan. Furthermore the Government has made clear that the new standard methodology will shortly be reviewed in light of the latest household projections. Notwithstanding this, the new methodology provides the minimum starting point in determining the number of homes needed within an area. Where additional growth above historic trends is likely to or is planned to occur over the plan period, an appropriate uplift may be considered. In the case of Staffordshire Moorlands, the Council has identified a need to provide for increased levels of growth in order to align the housing requirement with projected economic growth. The approach would be supported under the revised Framework and PPG, and accords with the Government's longstanding policy to boost significantly the supply of housing.

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

2.18 Yes.

2.19 The evidence base for the housing requirement is 2014-2031. 2014 is therefore the absolute minimum start date. However the plan includes for housing provision from 2012 (i.e. 2014 with a small allowance for under-delivery in the two previous years), which accords with the advice in the PPG in relation to addressing the historic backlog. This represents only a fraction of the significant backlog accrued over the Core Strategy plan period. The two dates do not need to be aligned provided that sufficient housing provision is made in accordance with the evidence base.

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

2.20 Please see our response to questions 1.1 and 1.2. Paragraph 47 of the Framework is clear on the need to meet the full objectively assessed needs for housing.

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

2.21 No. Neither figure reflects the full objectively assessed needs as set out within the evidence base. Any reduction in the employment land requirement would be entirely arbitrary.