

STAFFORDSHIRE MOORLANDS LOCAL PLAN EXAMINATION

Date: 11 April 2019

To: Dai Larner, Executive Director - Place

Dear Mr Larner,

Staffordshire Moorlands Local Plan Examination – Housing Implementation Strategy

Thank you for (1) the responses to the focused consultation on the Housing Implementation Strategy (HIS) and (2) the reassessment of Local Green Space (LGS) designations. In this response I deal with the HIS and supporting documentation insofar as it affects the Main Modifications (MMs) that would be required to make the Plan sound. References in this letter to the National Planning Policy Framework (the Framework) are to the 2012 version unless specified otherwise.

The HIS is helpful as far as it goes but it should also include a section about measures that will be used to ensure that a five-year supply of housing will be maintained over the Plan period to meet the housing target. This should include cross-references to the monitoring requirements to be built into the Plan, including, where there has been under-delivery, the need for a review or partial review of the Plan. A revised HIS, incorporating such a section and the other recommendations contained below should be published alongside the Schedule of MMs.

The earliest date the Plan will be adopted is likely to be the Autumn of 2019. In order to show evidence of an up-to-date five years' housing land supply (HLS) at adoption, with flexibility to respond to changing circumstances, the five-year supply position and the trajectory should be updated so that it has a base date of 31 March 2019. This will require MMs to Tables 7.2, 7.3 and Policy SS4 and consequential amendments to the supporting text, Appendix 7 and the HIS.

Updating the housing land supply position will also enable:

- The trajectory, including completions since the start of the Plan period, to be rolled forward;
- The assumptions that the Council made about delivery in 2018-19 to be sense checked to allow adjustments to take place to lead-in times, build-out rates and delivery from specific sites going forward;
- The Council to take into account comments about the delivery of specific sites made in the response to the focused consultation on the HIS and supporting documents in adjusting the five-year HLS position and the trajectory. Particular regard should be had to the conclusions of *Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?* (Nathaniel Lichfield & Partners, November 2016) referred to in representations and during the hearings.

In terms of the housing trajectory, its assumptions and the contribution of specific sites, I would comment as follows:

- Large sites with full planning permission – most of these sites were expected to start in 2018-19. Start dates will need to be adjusted to take into account up-to-date

information, including non-commencement. A commencement on site does not necessarily translate to completions in the same year, particularly if the start is later in the particular year;

- Large sites with outline planning permission – start dates will need to be adjusted taking into account up-to-date information such as the submission of reserved matters and developer/house-builder interest. A commencement on site does not necessarily translate to completions in the same year, particularly if the start is later in the reporting year;
- Sites with planning permission (generally) – if permissions have expired, they should be removed from the trajectory, unless they are proposed to be allocated in the Plan. Conversely large sites that have been granted planning permission in 2018/19 should be added to the trajectory;
- Allocations – adjustments to take into account up-to-date information on delivery at Cheadle North and Blythe Vale. Other adjustments made to start dates to reflect progress such as pre-application discussions and other information, or indeed lack of activity.

In taking into account the above factors the Council's five-year supply on adoption would be based on robust, up-to-date evidence.

If the above updating indicates that a five-year supply on adoption and/or that a supply of specific, developable sites or broad locations for growth for years 6-10 will not be achieved, then the Council will need to consider what other additional MMs will be required to make the Plan sound.

With regard to the LGS Designations I will consider the evidence further with the objective of responding to you in early May. In the meantime, the LGS Reassessment Table 2019 should be added to the evidence base and a Latest News item added to the Examination webpage along the following lines:

'....April 2019 – The Council has provided the Inspector with a review of the Local Green Space designations in response to his post hearings advice. You can view this below in EL6.007.'

Conclusions

The above recommendations should be incorporated into the Schedule of MMs. A draft schedule should be drawn up as soon as possible so that it can be finalised before the June 2019 Council meeting. If you require any clarification let me know via the Programme Officer.

Yours sincerely

Mark Dakeyne

INSPECTOR

Inspector: Mark Dakeyne BA (Hons) MRTPI