

COUNCIL RESPONSE TO NOTE MF2: SDL IMPLEMENTATION UPDATE (P2- O2)

1. Stafford West SDL Trajectory

With reference to paragraph 2 (bullet point 1) in Note MF2 (P2-O2), the Council would like to clarify the figures. The 380 figure referred to in the Council's response to Note MF1 (paragraph 3.17) does not include sites with planning permission on the Stafford West Strategic Development Location (SDL). When these planning consents are added in, the figure for housing delivery between 2016/17 and 2020/21 on the Stafford West SDL in Note MF2 totals 630 dwellings:

- Remaining Stafford West SDL allocation contributing to 5 year supply without planning permission – 380 dwellings
 - Former Castleworks (15/22595/REM) – 80 dwellings
 - Land South of Doxey Road (14/20425/FUL) – 170 dwellings
- Total = 630 dwellings**

In addition, the delivery figure for 2030/31 has been omitted from the table in Note MF2. This should read 143 dwellings.

The Council does not consider that work on Doxey Road bridge will affect housing delivery, as detailed in the Council's response to Note MF1 (P2-O1).

With reference to paragraph 2 (bullet point 2) in Note MF2 the Council's position titled 'SBC revised trajectory figures', in Table 1 below, is that 2,200 dwellings will be delivered in the Plan period on the Stafford West SDL. The Council has updated the delivery rates for the Plan period post 2021 from those set out in the 5 Year Housing Land Supply Statement 2016 (P2-L1).

In conclusion, the 1,667 dwellings referred to in paragraph 2 (bullet point 2) of Note MF2 for the total delivery on the Stafford West SDL is an undercount because it does not factor in the sites with planning permission (an additional 250 dwellings) and it does not factor in a delivery figure for 2030/31 (an additional 143 dwellings). Furthermore an additional 140 units are now included as part of the Council's updated trajectory post 2021 during the Plan period.

- Inspector's LPA update – 1,667 dwellings
 - + 250 dwellings (sites with planning permission)
 - + 143 dwellings (delivery in 2030/31)
 - +140 dwellings (Council's update to the trajectory)
- Total = 2,200 dwellings**

2. Stafford North SDL Trajectory

With reference to paragraph 3 (bullet point 1) in Note MF2 (P2-O2) the dip to 200 dwellings in 2023/24 in the PFSB Part 1 Trajectory is a typographical error and should read 220.

With reference to paragraph 3 (bullet point 2) of Note MF2 the 2,700 housing delivery figure in the adopted Plan for Stafford Borough Part 1 (PSB 1) housing trajectory does not include sites with planning permission on the North Stafford SDL which total 400 units. These sites are included in the 'Total Commitments' line of the PSB 1 housing trajectory table. Therefore, adding in these sites

increases the overall total for the North Stafford SDL to 3,100 dwellings in the PSB Part 1 housing trajectory.

- PSB 1 housing trajectory – 2,700 dwellings
 - + 400 dwellings (sites with planning permission)
- Total = 3,100 dwellings**

With reference to paragraph 3 (bullet point 3) the figure of 2,910 units in the ‘LPA Update’ line referred to in Note MF2 overall is an undercount. The figures between 2018 and 2021 (the sites with planning permission) are double counted whilst the figures 2021 to 2024 (sites with planning permission) are not included and does not account for the Council’s revised trajectory for the Plan period post 2021. The adjustments are set out below:

- LPA Update (Inspector’s note MF2) 2,910 dwellings
 - - 150 dwellings (sites with planning permission double counted for 2018/19, 2019/20 and 2020/21)
 - + 125 dwellings (sites with planning permission not included for 2021/22, 2022/23 and 2023/24)
 - + 215 dwellings (Council’s adjustment to the 5 Year Land Supply Statement 2016 trajectory)
- Total = 3,100 dwellings**

3. Stafford East SDL Trajectory

The Council believe that the Stafford East SDL will deliver in accordance with the trajectory in the 5 Year Land Supply Statement 2016; these figures are included in the table in this note.

4. Stone West SDL

The Council believe that the Stone West SDL trajectory will deliver in accordance with the 5 Year Land Supply Statement 2016; these figures are included in the table in this note.

5. Overall Stafford Picture

Overall, the conclusion of Note MF2 is that there is a shortfall of:

- Around 500 dwellings in the West Stafford SDL
 - Around 200 dwellings in the North Stafford SDL
- Total shortfall of around 700 dwellings**

Factoring in the corrections above reduces the shortfall to zero.

COUNCIL RESPONSE TO THE REQUEST FOR A NEED TO IDENTIFY ADEQUATE SITES IN YEARS 6-11 OF THE PLAN PERIOD

The Council has identified adequate housing supply in years 6-11. The Strategic Development Locations (as shown on the Table 1 below) show a supply of 2,281 dwellings over the 6-11 year period, and new windfalls within the settlement boundaries together with Neighbourhood Plan sites will account for the remainder in order to deliver a total of 2,500 units.

Table 1

| SDL | 11/12 | 12/13 | 13/14 | 14/15 | 15/16 | 16/17 | 17/18 | 18/19 | 19/20 | 20/21 | 21/22 | 22/23 | 23/24 | 24/25 | 25/26 | 26/27 | 27/28 | 28/29 | 29/30 | 30/31 | Traj Total | PSB1 | Change from PSB1 |
|--|----------|----------|----------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|-------------|-------------|------------------|
| West Stafford | | | | 65 | 141 | 145 | 150 | 150 | 150 | 150 | 150 | 150 | 150 | 150 | 150 | 150 | 150 | 125 | 75 | | 2201 | 2200 | 1 |
| LPA Update | | | | 0 | 0 | 0 | 50 | 105 | 110 | 115 | 143 | 143 | 143 | 143 | 143 | 143 | 143 | 143 | 143 | | 1667 | | -533 |
| SBC revised trajectory figures | | | | | | 15 | 90 | 165 | 180 | 180 | 157 | 157 | 157 | 157 | 157 | 157 | 157 | 157 | 157 | 157 | 2200 | | 0 |
| North Stafford | | | | | 30 | 40 | 65 | 120 | 160 | 220 | 220 | 220 | 200 | 220 | 220 | 220 | 220 | 220 | 220 | 105 | 2700 | 3100 | -400 |
| LPA Update | | | | 44 | 56 | 50 | 50 | 150 | 235 | 275 | 205 | 205 | 205 | 205 | 205 | 205 | 205 | 205 | 205 | 205 | 2910 | | -190 |
| SBC revised trajectory figures | | | | 44 | 56 | 50 | 50 | 100 | 185 | 225 | 255 | 255 | 235 | 235 | 235 | 235 | 235 | 235 | 235 | 235 | 3100 | | 0 |
| East Stafford | | | | 100 | 100 | 140 | 140 | 120 | | | | | | | | | | | | | 600 | 600 | 0 |
| LPA Update | | | | | 93 | 95 | 95 | 95 | 96 | 97 | 51 | | | | | | | | | | 622 | | 22 |
| SBC revised trajectory figures | | | | | 93 | 80 | 110 | 140 | 88 | 60 | 51 | | | | | | | | | | 622 | | 22 |
| West Stone | | | | | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 60 | 60 | 50 | 50 | | | | | | 500 | 500 | 0 |
| LPA Update | | | | | 0 | 0 | 30 | 80 | 80 | 80 | 80 | 80 | 60 | | | | | | | | 490 | | -10 |
| SBC revised trajectory figures | | | | | | 0 | 30 | 80 | 80 | 80 | 80 | 80 | 70 | | | | | | | | 500 | | 0 |
| PSB1 Total | 0 | 0 | 0 | 165 | 311 | 365 | 395 | 430 | 350 | 410 | 410 | 430 | 410 | 420 | 420 | 370 | 370 | 345 | 295 | 105 | 6001 | 6400 | -399 |
| LPA Update Total - Inspector's interpretation | 0 | 0 | 0 | 44 | 149 | 145 | 225 | 430 | 521 | 567 | 479 | 428 | 408 | 348 | 348 | 348 | 348 | 348 | 348 | 205 | 5689 | | -711 |
| SBC Revised Trajectory Figures | 0 | 0 | 0 | 44 | 149 | 145 | 280 | 485 | 533 | 545 | 543 | 492 | 462 | 392 | 392 | 392 | 392 | 392 | 392 | 392 | 6422 | | 22 |

Key:

Figures in housing trajectory (page 161 of PSB1)

Update based on Council's response to Note MF1 - Inspector's interpretation

SBC revised trajectory figures - August 2016

Figures are an undercount - please see notes in the main text of the document.

Figures are an overcount by 150 (the sites with planning permission have been double counted).

Figures are an undercount by 75 (sites with planning permission have not been included).

In addition, there is an undercount in the figures post 2021 due to the Council's updated trajectory figures.