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Submissions on Behalf on Mr M Neachell

LP063

Relating to Matter 4 Spatial Strategy and Housing Need

4. Spatial strategy and housing need:

4.1 Is the overall spatial strategy of the Plan based on a sound assessment of Tamworth's demographic, economic and social needs, environmental characteristics, physical constraints and relationships with surrounding areas, in accordance with national policy?

Our position is that the overall strategy as expressed in SS1 of the Local Plan is not the correct strategy to accommodate the housing needs of the district. SS1 says that the strategy will meet most of the housing and employment needs but the result is that 2000 homes out of 6,250 have to be exported. This is almost a third of the overall housing requirement so the statement that most of the needs is being met is unjustified. The strategy expressed in SS1 proposes to retain the green belt areas and this is considered to be unnecessary when there are sites in the green belt that can be brought forward to meet the housing needs of the district and avoid the exportation of 2000 homes. It is not considered that the environmental characteristics have been properly assessed and weighed against the export of homes to adjoining areas. A more sustainable and deliverable approach would be to accommodate as

much of the OAN as possible within the Borough boundaries. The strategy relies on three major sites which are urban extensions of various sizes. Sites of this size and nature require significant infrastructure to deliver homes, and the strategy is heavily reliant on the delivery from these sites.

4.2 Is the Plan's assessment of the household needs for Tamworth over the plan period (to 2031), which is explained in paragraphs 3.6-3.16, as equating to 250 dwellings pa, based on the most up-to-date and robust objective assessment of housing need (OAHN) for the Borough?

The most up to date figures for new households were published in 2015 and post date the October 2014 analysis in document B10. There should at least be a summary of how the latest projections sit with the submitted plan.

4.3 Does the figure in paragraph 4.2 above need to be amended in the light of the 2012 based household projections? In particular, are the Plan's demographic and migration change assumptions realistic? Has any allowance for existing unmet housing need been factored in?

4.4 Are the forecast job growth figures for Tamworth realistic? Are they taken account of in the overall assessment of Tamworth's housing needs?

4.5 What other factors should be taken into account in determining the overall housing provision for Tamworth over the plan period? For example, what weight should be given to the national Planning Practice Guidance (PPG) covering aspects such as market signals, and historic suppression of household formation rates?

Document ref B10 the updated housing needs calculation sets out at para 3.17 that in terms of affordability of dwellings there is a problem in Tamworth which has worsened in recent years and it is suggested in para 3.47 that an uplift in supply to improve affordability should be considered. The report concludes that there should be a modest uplift in Tamworth to take account of the market signals. The Plan as submitted fails to do this by proposing to allocate sufficient land for the midpoint of the range at 250 dwellings per annum. A sensible

proposition would be at least to plan for the upper end of the range at 260 dwellings per annum, to deal with the market signals and to boost affordability. This is particularly important in this Council, where many of the extant permissions relied upon are small sites under 10 dwellings where no affordable is likely to be delivered. [see the NPPG para 012 ref ID 23b-012-20150326]

4.6 Should the Plan include a policy which states that, should the Plan's monitoring indicate that an on-going 5 year deliverable and a subsequent 10 year supply of developable housing land can no longer be sustained to meet Tamworth's needs, the Council will review its housing land provision and negotiate with neighbouring authorities if appropriate, to bring on-stream additional housing as required?

It should not be accepted that the Council cannot meet the requirement within its boundaries.

The Plan should include a policy which says that if there is not a five year land supply of deliverable land then a review of sites should take place and this should include a review of the Green Belt to bring forward alternative sites. The Council can have no influence over the planning committees of other authorities to compel them to release land for houses and so a policy that relied solely on this approach would not be workable.

4.7 Is the Council confident that the Plan makes provision for a 5 year housing land supply on identified specific and deliverable sites?

The Housing trajectory on pages 141 and 142 of the submitted plan deals with the requirement to be met within Tamworth Borough that is 4,250 over 25 years this gives an annual rate of 170 dwellings per year.

This is based on the acceptance that 170 dwellings is correct as it assumes that since 2006 it has been acceptable to remove 2,000 dwellings from the calculations. It is not clear why

2006 is the base date of the Plan rather than the end date of the current adopted plan at 2011.[
For information Lichfield base date is 2008 and NWBC is 2011]

The five year period from 2014 to 2019 is the next five year period and the requirement would be $170 \times 5 = 850$ dwellings plus any back log plus 20% or 5% . Notwithstanding any back log or buffer to the housing provision the evidence indicates that at the start of this five year period the Council cannot demonstrate a five year supply of housing. This is based on the figures in the housing trajectory which purport that from 2014 the total dwellings available in the next five years are some 1201 dwellings. This figure relies on the existing commitments, the allocated sites in the urban area and the strategic sites all delivering significant numbers in that period. The assessment is flawed in several ways including the delivery rates and timing assumed for the construction of dwellings on the golf course, [110 in the first delivery year] and Dunstall Lane delivering 70 dwellings per year. Neither of those sites have applications submitted and it is considered that the delivery timescales are over optimistic. There is no allowance for the non implementation of permissions The actual commitments as at April 2013 was only some 410 dwellings or 2.4 years supply.

The supply calculation is far from transparent in the trajectory and it is not clear what detailed assumptions have been made on delivery drop out rates, or any other assumptions.

It is understood that the Council are to re issue the trajectory with the completions from 2014-2105 included and upon which detailed comment will be made. The five year land supply should be calculated as a separate and checkable document including a clear indication of what assumptions are being made. The plan will not be sound if a five year supply cannot be shown to be available.

4.8 In terms of previous rates of housing delivery and the delivery target(s) that have been in place over the last 10 years, should the appropriate 'buffer' to ensure choice and competition (as set out in the Framework, paragraph 47[2]) be 5% or 20%? Should this buffer be factored in over the first 5 year period or for the plan period as a whole?

The rates of housing delivery from 2006 need to be considered against the relevant target in the then prevailing development plan. The WRMS was abolished in 2013.

The Tamworth Local Plan was adopted in July 2006 and proposed 5,000 new homes over the period 1996-2011 or some 333 dwellings per annum. This Policy HSG1 was not saved under the saving direction in 2009 and effectively expired. The Regional Strategy the WMRS was under review in 2009 and the preferred option in the review was 2,900 dwellings in Tamworth 2006 to 2026 or 145 per annum. The Panel report of September 2009 proposed that this should be 4,000 homes 200 per annum. It is therefore not a simple exercise to determine what the under delivery since 2006 has been.

The following is suggested as reasonable

From 2006 to 2009 the rate should have been 333 per annum or 999 over those three years.

From 2009 to 2013 the RS rate must have applied at 200 per annum or 800 dwellings.

These two targets would have required 1,799 dwellings to have been delivered over that period. The completions data shows that the new dwellings delivered over that period was 1,347 which includes the under delivery of some 452 dwellings.

Taking either target into account the 333 or the 200 The Council has only delivered in excess of the relevant target in the year 2006- 2007 and all the years after that have had an under delivery. In the year 2013- 2014 the delivery was only some 48 dwellings.

The figures for 2014 to 2015 are not yet available.

However on any basis the Council have persistently under delivered against their development plan targets and so a 20% buffer should be applied in any land supply calculations.

The question over the period within which this should be made up is referred to as the Sedgefield v Liverpool methodology. In order to boost the housing land supply from the very low levels of recent delivery then the Sedgefield methodology should be applied and the shortfall and the buffer should be made up in the next five years. There is clearly a record of under delivery in Tamworth resulting in various problems identified in the housing needs report including the provision of affordable homes. The Plan should therefore aim to boost the supply in the next five years. [which is in any event years 9-13 of the plan period] and which is clearly the aim of the NPPF.

4.9 Bearing in mind the relatively tight boundaries around Tamworth, what should be the appropriate area in which to consider and plan for the provision of housing and other development to meet the Borough's needs?

Given the boundary constraint there can be no other forum for the Plan other than the administrative boundary of Tamworth, unless there is a boundary review that takes in additional land to Tamworth. A joint plan with either Lichfield or North Warks or both would have been a possibility, but has not been pursued.

4.10 With reference to the concept of a Housing Market Area (HMA) in the Framework, paragraph 47[1], and the work undertaken in the Southern Staffordshire Districts Housing Needs Study, does the appropriate area for the

consideration of Tamworth's housing needs comprise the Borough of Tamworth and the adjoining areas of North Warwickshire Borough and Lichfield District?

The South East Staffordshire Housing needs study of October 2014 includes Cannock Chase, Lichfield and Tamworth as a Housing Market area. It is however difficult to rationalise a relationship between Cannock Chase and Tamworth in terms of the housing market. There is a close relationship between Tamworth and North Warwickshire.

However the North Warks Local Plan did not include Tamworth as part of the HMA despite the close functional relationships and the proposed agreement for the delivery of homes for Tamworth needs within North Warks. In addition to this point the emerging work on the Birmingham Plan includes Tamworth Lichfield and North Warks as within the Strategic HMA [Page 6 of the PBA Report]. The stage 3 report in this series of work is due to be released to demonstrate where the housing required from that HMA is to be distributed, however this document is not yet available. There are clearly implications from the strategic HMA for the Lichfield Tamworth and North Warks regarding the location of new homes. The Birmingham Local Plan Inspector has not yet reported and it is believed that he is awaiting the Stage 3 report before finalising his report into the Birmingham Plan.

This means for Lichfield and North Warks that they will be expected to take development that cannot be accommodated within Birmingham. As things stand the HMA that is contained within the background papers does not cover North Warks which is a failing given the close functional relationships based on employment and housing that exist between the areas.

4.11 What roles should other areas within the West Midlands HMA, such as Cannock Chase and Birmingham, play in relation to either meeting part of Tamworth's housing needs or in Tamworth meeting part of their housing needs?

The main driver within the region is the City of Birmingham. The scale of the housing requirement that is to be located outside the City boundary is in the region of 30,000-60,000 dwellings. There is no prospect of Tamworth meeting some of the Birmingham needs, this is most likely to be displaced to Lichfield and North Warks in this area. However this does mean that Tamworth should meet its own needs as far as possible. Lichfield has removed two significant areas from the green belt at Lichfield to accommodate growth which does not yet account for the Birmingham overspill. Tamworth should look at the green belt sites available within the Borough to meet its needs and avoid spilling them into adjoin areas.

4.12 The Plan states that the Borough relies on neighbouring authorities to provide about 2,000 houses out of the total OAHN of 6,250 dwellings (paragraph 3.10 of the Local Plan). With this in mind:

(i) Is this quantum objectively based in terms of the amount of OAHN that could be developed on available land free of constraints within the Borough?

The Council have failed to maximise the amount of the OAN that they can accommodate within the Borough. We consider that an addition 500 dwellings can be provided at Dosthill on site ref 693. *(ii) Is its delivery within the plan period realistic in terms of the commitments by the relevant adjoining authorities, and the overall viability of sites?*

There is no real commitment by the adjoining authorities to locate the additional 1000 homes. The first 1,000 homes do not have a detailed site location in North Warks and the location in Lichfield Distict known as North of Tamworth is proving to be beleaguered with road infrastructure problems. The delivery therefore of the whole 2000 homes must be in doubt.

(iii) Are the broad locations of the sites for Tamworth-related development outside the Borough sustainable in terms of their relationship to the town of

Tamworth and other considerations such as transport infrastructure and flood risk?

The location north of Tamworth cannot move forward due to highway infrastructure problems. This was the subject of objections to the Lichfield Local Plan by both Staffs County Council and Tamworth Borough Council both of which did not regard the location as deliverable in highway terms. If the road infrastructure cannot be achieved the development will not be sustainable.

4.13 Does the household needs assessment for Tamworth fully take into account the Borough's affordable housing (AH) needs? The AH needs figure in the Plan (paragraph 5.21) of 183 dpa is clearly undeliverable. However, what is the reasoned basis for the significantly lower provision of 40 AH units pa in policy HG4, and what is the Council's view regarding the likely consequences of the remaining 'unmet' AH need of around 143 dpa? Is the Plan figure of 40 dpa deliverable?

See our comments to question 4.5 above.

4.14 Is the provision of specialist housing (housing for the elderly; housing for the disabled; and student housing) a strategic matter for Tamworth?

4.15 Is policy HG3, for regeneration priority areas, justified and realistic in terms of viability and resource considerations?