

## **THE PLAN FOR STAFFORD BOROUGH - EXAMINATION**

### **N2.8 Note on Development Plans & N2.20 What Homes Where? Local Plan Period**

The What Homes Where? figures (in the second column) are household growth projections rather than number of dwellings required figures. When converted from households to houses, these figures will increase. So the Table as written in N2.8 is misleading in attempting to portray the first column of figures as higher than the second column. The commentary in the text referring to higher housing figures than set out in previous plans is irrelevant, these old plans relate to a different plan period than the one currently under scrutiny. The comparison should be between the objective assessment of need as identified in the relevant SHMA against the housing provision proposed in the respective plan. Therefore N2.8 and N2.20 are incomplete pieces of work as the objective assessment of needs set out in the SHMAs is not identified, for example, the LPAs in the South Staffordshire Districts HMA have all opted for the lowest possible housing requirement figure from the range of alternatives illustrated in their SHMA. There remains no strategic overview of the objective assessment of housing needs across the HMA of which Stafford Borough forms a part.

### **N2.15 Full Justification for Moratorium and Future Details on Application**

The principle of the moratorium remains contrary to the requirements of the NPPF to boost significantly the supply of housing. In the past LPAs have imposed moratorium if the housing requirement in a plan has been achieved, for example, Bromsgrove District Council operated a moratorium for a period of time. However the purpose of the moratorium proposed by Stafford Borough Council is to control the distribution of development in favour of the Strategic Development Land. The proposed mechanism is risky and the delivery of the overall housing requirement as set out in the plan may be jeopardised. The Council's latest proposed wording for the policy does not work with reference to the 5 year land supply. If the Council does not have a 5 year land supply, all relevant policies including any policy on a moratorium contained within the plan are null and void under the NPPF.

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